



# Prime8 Education Safeguarding and Child Protection Policy 2025

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## **Prime8 Education**

# **Safeguarding and Child Protection Policy**

### **1 Policy Statement**

Prime8 Education fully recognises its moral and statutory responsibilities for safeguarding children and promoting welfare and wellbeing. Prime8 will endeavour to provide a safe and welcoming environment where children are respected and valued. Staff will be alert to the signs of abuse and neglect and follow the relevant procedure to ensure that children receive effective support, protection, and justice. The procedures contained in this policy apply to staff, supply staff and volunteers and are consistent with those of NSCB.

Prime8 Education staff will maintain an attitude of **'it could happen here'** where safeguarding is concerned. This ensures no concern, however small, is overlooked.

This policy applies to all staff, supply staff and volunteers working within the provision. Policies relating to The Safeguarding and Child Protection Policy are mentioned throughout this document and can be found in the policies file on SharePoint.

A designated staff member or members will have responsibility for safeguarding issues.  
The DSLs are Claire Flear and Julie Townsend

Either DSL can be contacted as necessary. In the event of the absence of both DSLs or in a matter concerning the DSLs, the contact is Debbie Crookes.

In the event of a matter concerning the Director, Julie Townsend, or a situation where there is a conflict of interest in reporting the matter to the DSLs and/or Director, this should be reported directly to LADO (contact details below).

This policy will be reviewed on a regular basis to ensure it remains current and incorporates all revisions made to local or national Safeguarding guidance, including, Keeping children safe in education and Working together to safeguard children. This policy will be reviewed once a year (at the beginning of the autumn term) and ratified by the Director.

## **2 Ethos**

Prime8 Education is committed to an environment in which children and young people are safe from abuse and where any concern or suspicion of abuse is promptly and appropriately responded to.

Prime8 will establish and maintain an environment in which children feel secure, valued, can learn and develop, are encouraged to talk, and are listened to and heard. Children will know there are trusted adults who they can approach if they are worried or encounter problems.

Prime8 will ensure that every effort is made to establish and maintain effective working relationships with parents, carers, and colleagues from other agencies.

Children will be given the space to explore key issues in a sensitive way, including opportunities as part of the PSD curriculum, to develop the skills they need to recognise and stay safe from abuse. This will include teaching about online harms, hoaxes, or harassment, including involving incidents of sexual violence and sexual harassment between children.

For further information please see RSHE Policy.

## **3 Guidelines and Procedures**

This policy will be implemented in conjunction with relevant safeguarding children acts, guidance, policies and procedures.

Prime8 work within the guidelines set out by NSCB. Safeguarding and child protection duties and responsibilities are set out within the Education Act 2002 (sections 175 and 157) and HM Working Together to Safeguard Children 2018 (updated 2020) are incorporated into this policy.

All staff, supply staff and volunteers must have a full and active understanding of KCSIE 2025 and all sections of this policy and related policies, as well as the Code of Conduct.

Reference should be made to Pathway to Provision to inform thresholds and any assessment made against the thresholds will be documented.

We acknowledge further guidance can be found by visiting the NCSB Website.

## **4 Roles and Responsibilities**

### **4.1 The Director**

The referrer has overall responsibility for safeguarding and child protection within Prime8. This is supported by the Director ensuring that a strong safeguarding culture is embedded across all aspects of Prime8 and that the designated safeguarding lead (DSL) is supported with the time, training and resources needed to fulfil their role effectively.

### **4.2 The Role of the DSL**

Prime8 Education has two Designated Safeguarding Leads who take lead responsibility for safeguarding children and child protection and who have received appropriate training and support for this role. They will also ensure that Prime8 staff are aware of and understand the child protection policy and that this policy is reviewed annually against the key guidance, including, Keeping children safe in education and Working together to safeguard children.

The DSLs will always act in the best interest of the child. They will remain mindful of the importance of working with parents and carers about safeguarding concerns for children and in particular children's access to online sites when away from Prime8.

The DSLs maintain a key role in raising awareness amongst staff about the needs of children who have, or who have had, a social worker and the barriers that those children might experience in respect of attendance, engagement, and achievement in education.

The DSL will keep detailed, accurate, secure written records of concerns, discussions and decisions made including the rationale for those decisions.

The DSL should then begin by sharing and discussing the concern with the commissioning school's designated safeguarding lead and/or the local authority's commissioning lead. If it is agreed that Prime8 is best placed to take forward the safeguarding referral, for example, because they have built a strong trust with the child, then this should be done in a timely fashion with the commissioner routinely updated.

Although we advocate that any staff member can make a referral to children's social care or MASH, especially where a child is identified as being in immediate danger, they should, however, make sure that a DSL is informed as soon as possible.

The DSL will ensure that safeguarding and child protection is the first item on the agenda at all staff meetings. They will also use e-mail bulletins to ensure staff and parents are aware of key and emerging issues in relation to all concerns including online safeguarding concerns and will provide training and advice as needed.

The DSLs will ensure The Behaviour Policy and Online Safety and Security, include measures to prevent bullying, including cyberbullying, harmful online challenges, hoaxes, prejudice and discriminatory bullying, and use of social media platforms and networks.

### **4.3 The Role of the Deputy DSL**

Deputy DSL's are trained to the same level as the DSL and support the DSL with safeguarding matters on a day-to-day basis.

### **4.4 The Role of Prime8 staff**

Everyone who works at Prime8 Education understands they are an important part of the wider safeguarding system for children and accept safeguarding and promoting the welfare of children is everyone's responsibility and that everyone who comes into contact with children and their families has a role to play. In order to fulfill this responsibility effectively, all our staff, including supply staff and volunteers, will ensure their approach is child-centred and will be supported to consider at all times what is in the best interests of the child.

All staff recognise that some children are particularly vulnerable and therefore more likely to require early help or safeguarding. As an AP, Prime8 considers all students to be vulnerable and therefore will be vigilant in recording and reporting concerns. Staff recognise that children who run away, go missing or are absent from school, are potentially more vulnerable to abuse and exploitation. Prime8 will therefore work actively in partnership with parents, carers, and other agencies to understand and improve poor school attendance and address issues of children running away and/or going missing from home.

Prime8 is committed to offering referral to early help for those children and families who need it. Staff are trained to be vigilant and to record and report all concerns and issues that indicate a child may require help or that there may be a safeguarding issue to a DSL.

Where staff members have concerns about a child (as opposed to the child being in immediate danger) they will decide what action to take in conjunction with the DSLs.

### **4.5 Contacts**

Role	Name	Contact Details	Notes
Director	Julie Townsend	07943 610 593	Can also be contacted in

		01777 811006 jtownsend@prime8education.co.uk	absence of DSL
DSL	Claire Flear	07933 982 489 01777 811006 cflear@prime8education.co.uk	Either DSL can be contacted
DDSL	Julie Townsend	07943 610593 01777 811006 jtownsend@prime8education.co.uk	Either DSL can be contacted
Nottinghamshire Safeguarding Children in Education Officer	Zain Iqbal	0115 804 1047	
Nottinghamshire LADO	Eva Callaghan	0115 804 1272	Or Duty LADO Referral must be made online unless an emergency.
MASH		0115 804 0003 (Line for just Newark and Sherwood and Bassetlaw)	Referral must be made using this number only.
MASH Consultation Line		0115 977 4247	Office hours
Emergency Duty Team (Children's Social Care)		0300 456 4546	Outside of office hours
Police		101 999 in an emergency	To report a crime or immediate risk of harm to a child
NSPCC Help/ Whistleblowing Line		0800 028 0285 help@nspcc.org.uk	8am to 8pm Monday to Friday
OFSTED		0300 123 1231	

## **5 Training**

Staff will be required to undertake safeguarding training during their first week of their employment with Prime8, as part of their induction package. Prime8 systems and processes will be explained as part of induction, which includes this policy, the Code of Conduct, the role of the DSL and KCSIE 2025.

All staff receive safeguarding and child protection training through Educare. Updates are undertaken as and when required on a tri-annual , bi-annual or annual basis depending on the nature of the course.

On induction and then annually thereafter, staff will read all policy and procedural information and sign to show their understanding and agreement to the policies and procedures.

Staff are aware of the process for making referrals to children's social care and for statutory assessments under The Children Act 1989 and understand the role they may have in these assessments.

Staff, supply staff and volunteers will know how to identify children or young people who may be being harmed and how to respond to a pupil who discloses abuse, or where others raise concerns about them.

## **6 Safeguarding in Alternative Provisions**

As detailed in KCSIE (2025) the responsibility for safeguarding a learner placed with Prime8 Education will remain with the referrer, whether that is a school, college, or the local authority. The referrer should be satisfied that Prime8 Education can meet the needs of the child.

Children who attend alternative provisions often have complex needs. It is important that the DSLs and other staff ensure children are fully supported at all times. The alternative setting must be made aware of any additional risks of harm that learners may be vulnerable to by the referrer. Information sharing for learners who attend Prime8 is vital to support the young person, and referrers should ensure all necessary information about the learner is passed on regularly and consistently. The working together principles are key to keeping the learner safe and understanding the vulnerabilities needing to be supported. This should include up-to-date contact details for the professionals working with the child and family being passed on to Prime8.

Prime8 Education will provide a letter of comfort for referrers, on request, to confirm that appropriate safeguarding checks have been conducted on staff and will inform referrers of any changes that may pose risk to the child, so that the referrer can ensure itself that appropriate safeguarding checks have been carried out on newly employed staff.

## **7 Key Principles**

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing 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 the outcomes set out in the Children's Social Care National Framework

All forms of abuse or harassment will be reported in accordance with national safeguarding guidance, and we will take a zero-tolerance approach to abuse. All staff recognise that children may not feel ready or know how to tell someone that they are being used, exploited, or neglected, or they may not recognise their experiences as harmful. Children may also feel embarrassed, humiliated or could be being threatened, so not feel able to share what is happening to them. Alternatively, we recognise children may not want to make a disclosure or talk about what is happening due to their vulnerability, disability, sexual orientation, or language barriers. This should not prevent staff from having a professional curiosity and speaking to a DSL if they have concerns about a child and agree a way forward to support the child and determine how best build trusted relationships with children and young people which facilitate good opportunities for communication.

## **8 What is Safeguarding?**

- Protecting children from maltreatment
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

*NB: Children includes everyone under the age of 18*

Safeguarding is not just about protecting children from deliberate harm. It also relates to the broader aspects of care and education including:

- Pupils' health and safety and emotional wellbeing, and their mental and physical health or development
- Meeting the needs of children with special educational needs and/or disabilities
- Ensuring reasonable adjustments are provided as informed by the Equality Act for disabled children and young people
- Where a child receives elective home education and has an EHCP, the LA should review the plan working with parents and carers
- The use of reasonable force
- Meeting the needs of children with medical conditions
- Providing First Aid
- Educational visits and off-site education
- Intimate care and emotional wellbeing
- Online safety and associated issues including filtering and monitoring in accordance with DfE monitoring standards
- Appropriate arrangements to ensure security, taking into account the local context

- Keeping children safe from risks, harm, exploitation and sexual violence and sexual harassment between children
- Promote children's health and safety

## **9 What does Safeguarding cover?**

Safeguarding can involve a range of potential issues such as:

- Neglect, physical abuse, sexual abuse, and emotional abuse
- Bullying, including online bullying (by text message, on social networking sites, and prejudice-based bullying) and sexually harmful behaviour, sexual violence, and sexual harassment
- Child-on-Child abuse
- The approach to online safety, including appropriate filtering and monitoring on Prime8 devices and networks and being aware of the ease of access to mobile phone networks
- The impact of new technologies, including sexting, accessing pornography and AI
- Going frequently missing and/or being absent from education, going missing from care or home, and the risk this poses, especially when on repeat occasions and/or for prolonged periods
- Persistent absence from Education, including persistent absences for part of the day
- Unexplainable and or/persistent absences from education
- At risk of suspension or permanent exclusion
- Domestic abuse, including teenage relationship abuse
- Gender based violence - violence against women and girls
- Particular issues affecting children including FGM and honour based abuse
- Being subject to any conduct where the purpose is to cause a child to marry before their 18th birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding unofficial 'marriages' as well as legal marriages (Law changed February 2023)
- Racist, disability-based, homophobic, bi-phobic, or transphobic abuse
- Risk of extremist behaviour and/or radicalisation and susceptible to being at risk of being drawn into terrorism
- A young carer
- Has a special educational need, whether or not they have an EHCP
- Has a mental health need that has an effect on attendance and progress
- Privately fostered
- Has returned home to their family from care
- Has a family member in prison or is affected by parental offending
- Is in a family circumstances which present challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse or harm
- Contextualized - also known as extra familial abuse
- Harm outside the home - extra familial harm
- Issues which may be specific to a local area or population is showing signs of being drawn into antisocial criminal behaviours, including gang activity or involvement in associations with organised crime groups or county lines.

- In possession of a knife and or involved in knife crime, youth violence, Criminal Child Exploitation (CCE)
- Is at risk of or from serious violence and violent crime
- Child Sexual Exploitation (CSE), human trafficking, modern slavery
- Upskirting

## **10 What is Abuse, Neglect and Exploitation?**

The four categories of child abuse are as follows:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

### **10.1 Indicators of Abuse, Neglect and Exploitation**

**Abuse:** a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children 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 by another child or children.

**Physical Abuse:** a form of abuse that 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 adverse effects on the child's emotional development. It may involve conveying to a child 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 over protection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children 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, although it may occur alone.

**Sexual Abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is 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 masturbations, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children to look 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. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and of Prime8's policy and procedure for dealing with it.

**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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to; provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Prime8 staff are aware of the indicators of abuse and neglect and know what to look for is vital for the early identification so that support can be put in place. They are also aware of the specific safeguarding issues that indicate or inform of concerns or incidents linked to child criminal or sexual exploitation. Prime8 Staff understand that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition, and that in most cases multiple issues will overlap with each other. Staff are all aware of the DfE guidance, "What to do if you're worried a child is being abused."

## **11 Safeguarding children with SEND**

Prime8 staff understand the fact that additional barriers can exist when recognising abuse, neglect and exploitation in SEND children. These can include:

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

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or a deputy) and the special educational needs coordinator (SENCO)

## **12 Children who are LGBTQIA+**

The revised guidance on gender questioning children is expected to be published soon. Once published, it will be signposted in KCSIE 2025 guidance.

Prime8 Education ensure children who may be LGBTQIA+ have a trusted adult who they can be open with.

A child or young person being LGBTQIA+ is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who are.

However, caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

When supporting a gender questioning child, Prime8 will take a cautious approach and consider the broad range of the child's individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Prime8 will refer to the Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed. Risks can be compounded where children lack trusted adults with whom they can be open.

## **13 FGM**

Prime8 staff have an understanding that if they have concerns of a case of FGM that as well as informing the DSL, they have a legal duty that if they discover a case of FGM has been carried out on a girl under the age of 18, that they must report this to the police.

## **14 Mental Health**

The mental health of our students is very important, and staff undertake training around supporting mental health issues. Our DSLs, Director and other staff will support children with mental health problems and have experience in identifying and supporting mental health concerns. They will also follow safeguarding procedures if the mental health issue is a cause for safeguarding concern.

## **15 Domestic Abuse**

Domestic Abuse is an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. It is very common.

Domestic abuse can include, but is not limited to, the following:

- Coercive control (a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence)
- Psychological and/or emotional abuse
- Physical or sexual abuse
- Financial abuse
- Harassment and stalking
- Online or digital abuse.

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’.

Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16).

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children who have experienced or witnessed Domestic Violence. Through Operation Encompass, if there has been a report to the police of domestic violence, where a child is in the household, the Director and DSL at Prime8 education will be informed. The DSL will then record this on the child’s safeguarding log.

If Prime8 staff members have concerns or are told that a child may or has been witnessed or experienced domestic violence they will report this to the DSL.

## **16 Incels**

Incels are a new emerging form of terrorism in the UK. An incel (an abbreviation of involuntary celibate) is a member of an online subculture of people who define themselves as unable to find a romantic or sexual partner despite desiring one. Discussions in incel forums are often characterised by resentment and hatred, misogyny, misanthropy, self-pity and self-loathing, racism, a sense of entitlement to sex, and the endorsement of violence against women and sexually active people. Staff can help counteract the rise of the incel movement and the dangers of misogyny with lessons on respect for women and healthy relationships. Staff should be alert and able to recognise the signs of young people being radicalised by incel ideas.

## **17 Child criminal exploitation (CCE) Child Sexual Exploitation (CSE) and Trafficking**

Both CCE and CSE are forms of abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child or young person under the age of 18 into sexual or criminal activity in exchange for something the victim wants or needs and/or for the financial advantage or increased status of the perpetrator or facilitator. In the case of CSE, the victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology.

The trafficking process has several distinct phases. This includes the following aspects:

- recruitment or grooming
- travel/transportation
- arrival
- exploitation
- rescue/escape
- return and rehabilitation

Staff are aware of the indicators for CCE and CSE and the risks of criminal and sexual exploitation are included in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim. Staff know to report any concerns to a DSL or Director, ensuring that help is available for children who may be in need of protection.

For further information please see CSE Policy

## **18 Child on Child Abuse**

*Previously known as Peer-on-Peer Abuse*

Prime8 will do our best to ensure children understand the law on child-on-child abuse is there to protect them rather than criminalise them. In doing this we will discuss with relevant statutory safeguarding agencies, any concerns, or incidents to ensure they are addressed fully. We will ensure that where required, different types of assessment and services are put in place in accordance with the Pathway to Provision v9.1.

Prime8 staff will understand that child-on-child abuse is most likely to include, but may not be limited to:

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

sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Prime8 staff will make clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”.

Prime8 staff will ensure all victims are reassured that they are being taken seriously and that they will be supported and kept safe. Any concerns of Child on Child abuse will be reported in accordance with the safeguarding procedures and guidelines, including informing the DSL.

## **19 Preventing Violent Extremism**

PREVENT is one strand of the Government's counter terrorism strategy, CONTEST. Its main aim is to prevent people becoming terrorists or supporting terrorism.

The PREVENT Strategy has 3 clear objectives:

- Terrorist ideas should be identified and challenged
- Vulnerable people should be supported and protected from becoming terrorists or supporting terrorism
- Communities, institutions, and the Government should all work together to tackle the problem of extremism

All staff at Prime8 education are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from becoming terrorists or supporting terrorism”. This duty is known as the Prevent duty.

It is the duty of all Prime8 Education staff to ‘safeguard’ our learners from radicalism and extremism in any form, e.g., right-wing extremism or extremism relating to animal rights, and duly inform the DSO if there are any concerns relating to this issue.

Staff will use their judgement when identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

## **20 Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous

effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people. Bullying someone because of their age, race, gender, sexual orientation, disability and or transgender will not be tolerated as Prime8 operates a zero-tolerance approach.

Bullying can take many forms and includes:

- Emotional - being excluded, tormented (e.g., hiding things, threatening gestures)
- Physical - pushing, kicking, punching, or any use of aggression and intimidation
- Racial - racial taunts, use of racial symbols, graffiti, gestures,
- Sexual - unwanted physical contact, sexually abusive comments including homophobic comments and graffiti,
- Verbal - name calling, spreading rumours, teasing
- Cyber - all areas on internet, such as e-mail and internet, chat room misuse, mobile threats by text message and calls. Misuse of associated technology, i.e., camera and video facilities, sexting

For further information please see The Anti-Bullying Policy.

## **21 Online and Cyber Safety**

The digital world which our young people are exposed to is progressing at a rapid speed and young people are at risk through their actions and behaviour online. Prime8 Education will teach students specific online safety sessions about keeping themselves and others safe online, and keep it prominent through our day-to-day teaching. This will be taught through PSD lesson using the RSHE statutory guidance (revised for introduction in September 2026)

The education we provide for online safety will take into account the need for children to learn using online technologies in a safe environment, whether that be at Prime8, in the home or in a community venue. This will also be taught as part of a wider PSD programme, as well as through other subject areas and ICT.

Prime8 will ensure there is an Online Safety Policy which addresses statutory filtering and monitoring standards, which takes into account remote learning and use of mobile and smart technology as well as preventing access to harmful and inappropriate content accessed through generative AI tools and products. This will be reviewed regularly to take into account any new threats.

The use of explicit images or videos created or manipulated using artificial intelligence is becoming an increasing concern in the modern world and students at Prime8 may be exposed to such images. AI generated child sexual abuse material (AI-CSAM) are illegal and harmful. They can involve blackmail, coercion or reputational harm. Creating or sharing such content – including altered images of themselves or others – may be a criminal offence. However, students may not be aware of this so will be taught about the risks during PSD lessons.

At the start of every year, students and parent/carers sign a phone expectations document which includes expectations on, the use of phones whilst at Prime8, the communication between students with other Prime8 students and non Prime8 students and the prohibition of taking and sharing images/videos and inappropriate content.

Prime8 will support teaching about harmful online challenges and share information with parents and carers, including where they can get help and support.

All staff will be aware of the rules for the use and storage of mobile phones and cameras within the first week of their employment with Prime8. Staff must not be distracted from caring for children by using a mobile phone or other online device. Personal cameras or cameras on personal mobile phones may not be permitted to be used. Staff must only use their work mobile cameras or Prime8 devices and the images must be downloaded and deleted at the end of sessions. Failure by staff to follow procedures will be taken very seriously and deemed as gross misconduct, which could result in disciplinary action.

Prime8 know the areas of risk areas in respect of online safety and will report any concerns to the DSL

For further information please see The Online Safety Policy.

## **22 Disclosures**

If a child chooses to tell a member of staff about alleged abuse, there are a number of actions that staff will undertake to support the child.

Reassurance will be given to the child. Staff will ensure the child understands they were right to inform them, and that staff will work in their best interest to protect them.

The child will be listened to. Staff will stay calm and will actively listen with the utmost care to what the child is saying.

The key facts will be established in language that the child understands, and the child's words will be used in clarifying or expanding what has been said.

The child will not be questioned, except for necessary clarification. Leading questions will be avoided and there will be no repetitive questioning or pressurising young people through questions. If it is necessary to ask any questions, then open questions should be used.

Promises will not be made to the child regarding sharing any of the information given during the disclosure.

Staff will subsequently note the main points, carefully creating a full written record which is duly signed by the staff member and dated, including the time and location of the conversation. This record should outline what has been said in the child's own words and detail any body language that was noted. Staff will not ask children to write statements about abuse that may have happened or get them to sign any staff records.

The DSLs and/or Director will be informed immediately and procedures followed.

Following a disclosure by a child, unless it is an emergency, the DSL should then begin by sharing and discussing the concern with the commissioning school's designated safeguarding lead and/or the local authority's commissioning lead. If it is agreed that Prime8 is best placed to take forward the safeguarding referral, for example, because they have built a strong trust with the child, then this should be done in a timely fashion with the commissioner routinely updated.

If required, a referral to children's services will be made without delay, either to the child's own social worker, to MASH or, in an emergency, the police. If unsure about whether a referral to social care is appropriate, the MASH Consultation Phone line can be used during office hours to speak anonymously to a qualified social worker.

As a provision, should an incident happen, or a disclosure be made by a child, our staff will always reassure the child that they are being taken seriously and that they will be supported and kept safe, but we recognise that not every victim will view themselves such. We will be mindful of the use of other terminology such as 'alleged perpetrator(s)' or 'perpetrator(s)' as in some cases, the abusive behaviour will have been harmful to the perpetrator as well.

## **22.1 Record Keeping**

Records will be kept as appropriate.

When concerns are raised or worrying changes are observed in a child's behaviour, physical condition or appearance, a specific record will be set up. All concerns will remain confidential and shared on a need-to-know basis and the guidance set by the NCSB will be followed. All records will provide a factual and evidence-based account and there will be accurate recording of any actions. Records will be signed, dated, and where appropriate, witnessed. The DSL will also sign and date the report when notified and add any actions taken. Where a professional opinion or judgement is recorded, this should be clearly stated such. Any concerns about a child will be recorded as soon as possible and within 24 hours.

In cases of a disclosure, records will be made to include the child's name, full address and date of birth, the date and time of the disclosure, the exact record of the disclosure in the child's own words, the name of the person to whom the disclosure was made and the name of any third-party present.

Members of staff should not take photographic evidence of any injuries or marks to a child's person but should use the body map. The body maps should be used in accordance with recording guidance and to support clarity, for example of areas of injury, marks and bruising and/or touching.

A chronology will be kept as part of a concern file. Staff will record any minor concerns on the chronology and will take responsibility for alerting a DSL should the number of concerns rise or, in their professional judgment, become significant. A DSL will sign and date to confirm they have seen the record and will add any further actions taken, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

All safeguarding children and welfare concerns will be kept in a separate secure file on SharePoint, away from the main pupil file. Prime8 Education will ensure all our files will be available for external scrutiny, for example by a regulatory agency or because of a serious case review or audit.

A live link of the safeguarding log will be sent to the commissioning school's designated safeguarding lead and/or the local authority's commissioning lead and a safeguarding entry note will be added to the student's learning log so that the referrers are notified of the entry.

## **22.2 Confidentiality**

We recognise that all matters relating to child protection are confidential; however, a member of staff must never guarantee confidentiality to children. Children will not be given promises that any information about an allegation will not be shared. Staff recognise that this is not in the best interest of the child and will communicate this accordingly.

Where there is a child protection concern it will be passed immediately to a DSL, and/or to children's social care. When a child is in immediate danger children's social care/ the police will be contacted. Staff will not discuss this with any other members of staff or other professionals without previous discussion with the DSLs or Director.

The Director or DSLs will disclose personal information about a child to other members of staff, including the level of involvement of other agencies, only on a 'need to know' basis.

### **22.3 Information Sharing**

Effective sharing of information between practitioners and local organisations and agencies is essential for early identification of need, assessment, and service provision to keep children safe. Serious Case Reviews, now known as Rapid Reviews, have highlighted that missed opportunities to record and thereby understand the significance of sharing information in a timely manner can have severe consequences for the safety and welfare and well-being of children.

All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children. They are aware that the Data Protection Act (1998) should not be a barrier to sharing of information, where failure to do so would result in a child being placed at risk of harm.

For further information please see The Information Sharing Policy.

### **22.4 Time Scales**

The young person's referrer (e.g., NCC or the school) should ideally have made the referral. Emergency situations should be referred to MASH immediately. Any other referral should take place on the same day, including to the LADO or PREVENT. All MASH and LADO referrals should be confirmed in writing within 24 hours. If the referrer has not received an acknowledgement within 3 working days, they should contact children's social care again. Prime8 should receive confirmation that the referral has been made on the same day. Should Prime8 feel that the referral has not been made in a timely way, or has not been made at all, then Prime8 will make the referral to ensure that no time is wasted.

### **22.5 Early help**

Any child may benefit from early help, Prime8 staff will be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs

- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- is at risk of being radicalised or exploited.
- has a parent or carer in custody, or is affected by parental offending.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- is misusing alcohol and other drugs themselves.
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child.

In line with managing internally, Prime8 staff may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

Prime8, as a relevant agency, will follow pathway to provision which includes the process for the local early help assessment and the type and level of early help services to be provided.

Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and alleged perpetrator(s).

Whatever the response, it should be under-pinned by the principle that there is zero-tolerance approach to sexual violence and sexual harassment and that both are never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

### **23 Allegations against Staff**

Appropriate behaviour between staff, learners and their families is covered in the Code of Conduct.

An allegation against a member of staff which causes concern may include that they have:

- 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 is unsuitable to work with children

Procedures for dealing with allegations against staff:

- The priority will be given to ensure the immediate safety of the child and any other children affected or in contact with the individual (including their own children)
- Reassurance will be given to the child
- The staff member will not be questioned
- A DSL will be informed immediately, and procedures followed for referral of the child or children to MASH. If the allegation involves a DSL, the other DSL or director will undertake this role. If the allegation involves the director or there is a conflict of interests, this will be reported directly to LADO.
- The appropriate referrers will be informed.
- Where there is an allegation made against a member of Prime8 staff that meets the threshold for referral to the LADO, the Director or a DSL will discuss the allegation immediately (within 24 hours) with the LADO and ensure that cases are managed in line with KCSIE 2025.
- The Director or a DSL are able to contact the Safeguarding team or LADO for advice. Where an adult's behaviour has caused harm or risk to a child, investigations can be undertaken through Prime8's HR Company, or through Nottinghamshire LADO, as deemed appropriate.
- The accused person should be told about the allegation as soon as possible after consulting the LADO and HR if this is appropriate. However, where a strategy discussion is needed, or it is clear that Police or children's services may need to be involved, that should not be done until those agencies have been consulted and have agreed what information can be disclosed to the person. All Prime8 staff will cooperate fully with any inquiry.
- If the person is a member of a union or a professional association, he or she should be advised to seek support from that organisation.
- The director will consider the seriousness and plausibility of the allegation, the risk posed to children and the possibility of tampering with evidence, as well as the interests of the person concerned as to whether suspension would be implemented. Prime8's disciplinary procedure will be followed where necessary.

Detailed records will be made to include:

- The adult's name who the allegation is made against
- The adult's address and their date of birth
- The employer's name and address
- The date of the incident and the date the allegation has been made
- The nature of the allegation
- Details of any third-party present

Records will be kept separately and securely with limited access.

Prime8 will notify the Criminal Records Bureau with regards to DBS, of any circumstances affecting the well-being of a child and an allegation being made against a member of staff. OFSTED will also be contacted if appropriate.

Further information can be also found in Prime8's whistle blowing policy.

## **24 Parents and Carers**

All parents/carers will have access to a copy of this policy and made aware of the fact that Prime8 Education has a legal obligation to safeguard and promote the welfare of the children in their care and that the child's needs will be our first concern.

Supporting Families:

We acknowledge that parents/carers will be the first point of contact and they will be informed of any suspicions unless this is deemed likely to put a child at risk

Prime8 will follow the guidelines laid down by the NCSB with regards to parents/carers

Prime8, through this policy, will inform parents/carers of their role and responsibility regarding safeguarding children

Prime8 will continue to welcome children and work with parents/carers throughout any investigation

Parents/carers will be given support and signposted to resources as needed

Sometimes it can be difficult to make contact with parents/carers. This is sometimes compounded by absence of the child from the setting. Prime8 staff will use a range of strategies to make contact with parents/carers and see children to ensure they are safeguarded.

These may include:

- Making phone calls and leaving positive phone messages at different times of the day
- Texting or emailing daily
- Trying to make contact with the second emergency contact number provided by the family
- Making contact with another known relative or via another service who are involved with the family
- Arrange for the child's keyworker to drop off a resource or reward
- To deliver a free school meal if the child has been absent from Prime8

If a parent/carer cannot be contacted, then this should not delay any referral to MASH or Children's Social Care.

If a child has not been seen for a prolonged period of time, or there are any concerns regarding the wellbeing of the child, a referral to MASH would be appropriate, following discussion with the referrer. It may be appropriate to call the Police.

## **25 Visitors**

Prime8 Education manage visitors in a way that ensures the safety of children and adults whilst on site. All staff have a responsibility to ensure that visitors, including VIPs, are properly welcomed, and managed safely.

There are several different types of legitimate visitors to Prime8:

- Parents and carers
- Referrers
- Representatives of Local Authorities or other professional organisations
- Visitors from other provisions
- Prospective students, parents, carers, or referrers
- Those carrying out maintenance tasks or similar
- VIPs

*NB – A VIP is usually an external visitor of importance or influence who commands special treatment. In general terms a VIP should be treated in a similar way to any other visitor, but a degree of common sense should prevail. All VIPs and any entourage should be accompanied by a member of staff at all times.*

Visits should be planned to ensure they run smoothly, taking into account the need to safeguard both children, the reputation of Prime8 and the visitor. Where required, risk assessments should be undertaken.

- All visits will be made by prior arrangement.
- Visitors must enter via the front door and will be required to sign the visitors' book.
- When greeted by staff, all visitors should explain the purpose of their visit and who has invited them and should be ready to show formal identification.
- All visitors will be requested to wear a red visitor lanyard/sticker.
- All visiting tutors/speakers will be supervised by Prime8 Education staff holding an Enhanced DBS Certificate.
- All visitors should be accompanied by a member of staff. Visitors should not be alone with a child or young person unless this is a legitimate part of their role, e.g., a social worker seeing a child. In this case, Prime8 will have been assured that the visitor has had the appropriate DBS checks.
- Children and young people should also be made aware of the expectations regarding visitors and be aware that they should not be unsupervised with visitors unless agreed by themselves, the visitor and Prime8 staff.
- On leaving the premises, visitors will sign out, return their visitors badge and lanyard and be seen to leave the premises.
- The DSLs and Director will monitor compliance with this policy and any shortfalls will be addressed as a matter of urgency to ensure the safety of all.

Children, staff, and parents should be made aware of who they should report any concerns to or who they should go to for help or advice if they have any concerns about a visitor. Any issues regarding the suitability of visitors to Prime8 should be noted to a DSL and promptly brought to the attention of the

Director. If the behaviour of any visitor causes safeguarding concerns, a DSL should contact the Nottinghamshire safeguarding team.

## **26 Recruitment**

Recruitment procedures will ensure the suitability of staff and volunteers working with children and will follow statutory requirements with regard to Criminal Record Bureau (DBS) checks, Independent Safeguarding Authority (ISA) registration (when required to do so) and references.

More information to be found in Prime8's recruitment policy.

## **27 Lone Workers**

Due to the nature of the organisation, staff will often find themselves as lone workers. Staff should not undertake unscheduled home visits and should not be left in the home with a child at any time.

For further information please see The Lone Worker Policy

## **KCSIE Updates 2025**

All staff have been updated as to the new requirements in KCSIE 2025

The new points from KCSIE 2025 are as follows:

<b>Summary</b>	<b>About the guidance (no changes made)</b>
<b>Part one</b>	<b>Safeguarding information for all staff (no changes made)</b>
<b>Part two</b>	<b>The management of safeguarding</b>
Page 36	Para 129 We have added a note to say that revised guidance on Relationships, Sex, and Health Education was published July 2025 for introduction September 2026
Page 38	Para 135 Updated to clarify misinformation, disinformation and conspiracy theories are safeguarding harms. Para 136 Removed hyphen from antisemitism
Page 40	Para 143 – Link added to the <a href="#">plan technology for your school</a> service, which schools can use to assess themselves against the filtering and monitoring standards and receive personalised recommendations on how to meet them.
Page 41	Para 143 - Link added to DfE guidance on the use of generative AI in education (2025) at end of filtering and monitoring (FM) section to support schools and colleges.

	Para 144 – wording amended in the cybersecurity standards for schools and colleges advice to clarify that it was developed to help schools improve their cyber resilience.
Page 47	Paras 168-170 information added to clarify that it was developed to help schools improve its cyber resilience.
Page 49	Para 177 – updated to clarify 'working together to safeguard attendance' 'is now 'statutory' guidance.
Pages 50 & 51	Paras 184-187- updated to remove references to funding grant support for SMHLs training as this programme has ended
Page 52	Para 190 split into paras 189 and 190 for cosmetic reasons only (to retain paragraph numbering)
Page 54	Para 199 has been amended to clarify that the role of the virtual head has been extended to include responsibility for promoting the educational achievement of children in kinship care.
Page 56	Para 205 removal of 'spectrum' and 'disorder' to align with the SEND code of practice.  Updated note: We expect to publish the revised guidance on gender questioning children soon. Once published we will signpost to this guidance in KCSIE 2025.
<b>Part three</b>	<b>Safer recruitment</b>
Page 73-74	Para 260 reference to TRA's Employer Access Service removed and replaced with new link to GOV.UK page.
Page 75	Para 266 references to TRA's Employer Access Service removed and replaced with new link to GOV.UK page.
Page 85	Para 319 reference to Employer Secure Access removed and replaced with link to GOV.UK for S128 checks.
<b>Part four</b>	<b>Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors</b>
Page 106	Para 422 amended to correct the title of the Information Commissioner's employment practice guidance.
<b>Part five</b>	<b>Child-on-child sexual violence and sexual harassment</b>
Page 140	Para 545 – Link added to the Lucy Faithfull Foundation's <a href="#">'Shore Space'</a> , which offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours.

## **Abbreviations**

AP – Alternative Provision

DfE – Department for Education

DSL – Designated Safeguarding Lead

EHCP – Education, Health and Care Plan

FGM – Female Genital Mutilation

GDPR – General Data Protection Regulations

KCSIE – Keeping Children Safe in Education

LA – Local Authority

LADO – Local Authority Designated Officer



MASH – Multi Agency Safeguarding Hub


NCC – Nottinghamshire County Council

NCSB – Nottinghamshire Children’s Safeguarding Board

PSD – Personal and Social Development

RSHE – Relationship, Sex and Health Education

Date of Completion	8/9/25	Signed:  Claire Flear (DSL)
Date of Check	17/9/25	Signed:  Julie Townsend (DDSL)

Date of Ratification	17/9/25	Signed:  Julie Townsend (Director)
Date for Review	8th September 2026 (In line with KCSIE 2026)	