



**Prime8 Education**

**Safeguarding and Child Protection Policy**

**September 2026**

# Contacts

| Role                                                       | Name                         | Contact Details                                                                                                          | Notes                                                                        |
|------------------------------------------------------------|------------------------------|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
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| Nottinghamshire Safeguarding Children in Education Officer | Zain Iqbal                   | 0115 804 1047                                                                                                            |                                                                              |
| Nottinghamshire LADO                                       | Eva Callaghan                | 0115 804 1272                                                                                                            | Or Duty LADO<br>Referral must be made online unless an emergency.            |
| MASH                                                       |                              | 0300 500 8090                                                                                                            | Referrals must be made using this number only and not using the online form. |
| MASH Consultation Line                                     |                              | 0115 977 4247                                                                                                            | Office hours                                                                 |
| Emergency Duty Team (Children's Social Care)               |                              | 0300 456 4546                                                                                                            | Outside of office hours                                                      |
| Early Help Unit                                            |                              | 0115 804 1248                                                                                                            |                                                                              |
| Police                                                     |                              | 101<br>999 in an emergency                                                                                               | To report a crime or immediate risk of harm to a child                       |
| NSPCC Help/ Whistleblowing Line                            |                              | 0800 028 0285<br>help@nspcc.org.uk                                                                                       | 8am to 8pm<br>Monday to Friday                                               |
| OFSTED                                                     |                              | 0300 123 1231                                                                                                            |                                                                              |
| PREVENT                                                    | Claire Clayton<br>Louise Cox | 0115 8445973<br><a href="mailto:Prevent@notts.police.uk">Prevent@notts.police.uk</a><br>Louise.cox@nottinghamcity.gov.uk | To report incidents under the Prevent programme.                             |

|        |           |                         |                                                                   |
|--------|-----------|-------------------------|-------------------------------------------------------------------|
| ESHAWH | Sarah Lee | Sarah.lee@nottsc.gov.uk | To discuss emerging threats before it becomes a PREVENT incident. |
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# **Section A - Policy Introduction & Ethos**

## **Prime8 Education's Policy Introduction**

The purpose of this policy is to detail how Prime8 Education ensures that all children and young people enrolled at Prime8 Education are protected and safeguarded from harm, reflecting current legislation, known best practices, and compliance with relevant government guidance.

This policy applies to all staff, volunteers, and visitors, and outlines Prime8 Education's commitment to safeguarding and promoting the welfare of children as a core part of its ethos and values. Safeguarding is everyone's responsibility, and this policy sets out the expectations for a whole-school approach to child protection.

This policy is informed by the statutory guidance *Keeping Children Safe in Education (KCSIE) 2026* and *Working Together to Safeguard Children 2023*, which together set out the responsibilities of Prime8 Education and other agencies in identifying, responding to, and preventing harm to children.

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.

## **Prime8 Education's Ethos**

Prime8 Education will endeavour to provide a safe and welcoming environment where children are respected and valued, can learn and develop, are encouraged to talk, and are listened to and heard. Through Prime8 Education's key worker system, students will know there are trusted adults who they can approach if they are worried or encounter problems. Students 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.

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. Prime8 Education staff will maintain an attitude of **'it could happen here'** where safeguarding is concerned. This ensures no concern, however small, is overlooked. Prime8 Education will ensure that every effort is made to establish and maintain effective working relationships with parents, carers, and colleagues from other agencies.

## **Whole School Approach**

Safeguarding and child protection are embedded across Prime8 Education's policies, procedures, and practices. All staff receive regular training and updates to ensure they understand their roles and responsibilities. Prime8 Education works in partnership with children, parents/carers, and external agencies to promote a culture of vigilance and proactive safeguarding. Throughout this policy, the term 'whole-school approach' is used to refer to a unified safeguarding strategy across the entire education setting, including colleges.

The following policies contribute to Prime8 Education's whole-school approach to safeguarding:

- Staff Behaviour Policy/Code of Conduct
- Child Behaviour Policy
- Anti-Bullying Policy
- Online Safety Policy
- Safer Recruitment Policy
- Whistleblowing Policy

- Attendance and Absence Policy
- RSHE (Relationships, Sex and Health Education) Policy
- SEND Policy
- Early Help and Pastoral Support Policy
- Data Protection and Information Sharing Policy
- Educational Visits and Homestay Policy

Each of these policies is informed by relevant sections of *Keeping Children Safe in Education 2026* and reflects statutory guidance, best practice and Prime8's Education safeguarding ethos.

## **Safeguarding in Alternative Provisions**

As detailed in KCSIE (2026) 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.

## **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

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
- 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

## Annual Review and Public Availability

This policy is reviewed annually, or sooner if required due to changes in legislation or guidance. The review is led by Claire Flear (DSL) and approved by Julie Townsend (Director). The policy is made publicly available via Prime8 Education's website and can be requested in alternative formats if needed.

## Section B - Contextual Safeguarding at Prime8 Education

Contextual safeguarding recognises that the risks children face are often beyond the control of their families and can occur in a variety of settings such as peer groups, schools, colleges and neighbourhoods. Prime8 Education is dedicated to understanding and addressing these wider environmental factors that may pose a threat to the safety and well-being of our students.

At Prime8 Education, we are aware of our main contextual safeguarding issues and use our curriculum to ensure all children are educated about them. These may include, but are not limited to, ***child criminal exploitation (CCE), child sexual exploitation (CSE), online harm, child-on-child abuse (including harassment and violence), radicalisation, and local patterns of domestic abuse or substance misuse***. We work closely with our local safeguarding partners to monitor emerging risks and adapt our provision accordingly.

### Our Commitment

At Prime8 Education, we are committed to proactively identifying and responding to the contextual safeguarding risks that affect our pupils both within and beyond Prime8 Education's environment. We recognise that safeguarding does not stop at Prime8 Education's gates and that children may be exposed to harm in their peer groups, online spaces, neighbourhoods, and wider communities.

To uphold this commitment, we will:

- **Collaborate with students, families, and the wider community** to understand the lived experiences of our pupils and to co-develop effective safeguarding responses.
- **Provide ongoing training for all staff** to recognise the signs of contextual harm, including exploitation, child-on-child abuse, and online risks, and to respond confidently and appropriately.
- **Embed contextual safeguarding into our curriculum**, ensuring pupils are equipped with the knowledge and skills to recognise risk, seek help, and make safe choices.
- **Implement robust policies and procedures** that reflect the unique safeguarding needs of Prime8 Education's community and are informed by local intelligence and national guidance.
- **Engage with external agencies and safeguarding partners**, including police, health, and social care, to share information, coordinate support, and contribute to multi-agency safeguarding efforts.
- **Monitor and review safeguarding data and trends** to ensure our approach remains responsive, evidence-informed, and tailored to emerging risks.

This commitment underpins our whole-school approach to safeguarding and reflects our belief that every child deserves to feel safe, supported, and empowered—wherever they are.

We encourage all members of Prime8 Education's community to contribute to our safeguarding efforts by staying informed, being vigilant, and working together to create a safe environment for everyone. If there are any concerns or suggestions, please do not hesitate to contact our safeguarding team

## **Section C - Statutory Duties and Legal Framework**

Our safeguarding arrangements are shaped by both national legislation and statutory guidance, as well as local safeguarding expectations in Nottinghamshire. Together, these establish the legal duties and operational standards Prime8 Education must meet to keep children safe.

### **1. National Legislative Duties**

We carry out all functions with a view to safeguarding and promoting the welfare of children in line with:

- **Education Act 2002**
  - *Section 175* - duty on local authorities, governing bodies of maintained schools, and FE colleges.
  - *Section 157* - equivalent duty on proprietors of independent schools, academies, and free schools.
- **Education (Independent School Standards) Regulations 2014**
- **Non-Maintained Special Schools (England) Regulations 2015**
- **Children Act 1989 & Children Act 2004** - duties to safeguard and promote welfare, including participation in local multi-agency safeguarding arrangements.
- **Children and Social Work Act 2017 (Section 16H)** - duty to provide information to safeguarding partners when requested.
- **Education and Training (Welfare of Children) Act 2021**
- **Counter-Terrorism and Security Act 2015 (Section 26)** - *Prevent Duty*.
- **Teachers' Standards (2021)** - professional responsibility to safeguard pupils.
- **Childcare Act 2006 & Childcare (Disqualification) Regulations 2018**
- **Serious Crime Act 2015** - mandatory duty for staff to report **known cases** of Female Genital Mutilation (FGM) in under-18s disclosed to them during their work.

### **2. Statutory Guidance**

We have regard to:

- **Keeping Children Safe in Education (KCSIE) 2026**
- **Working Together to Safeguard Children (2023)**
- **Working Together to improve school attendance (2024)**
- **Information Sharing Advice for Practitioners (DfE)**
- Relevant national guidance on **safer recruitment**, **online safety**, and **specific safeguarding issues**.

These documents set out requirements including:

- A whole-school approach to safeguarding.
- Clear referral and reporting procedures.

- The appointment of a suitably trained **Designated Safeguarding Lead (DSL)** with appropriate resources and time.
- Safer recruitment practices and maintenance of a **Single Central Record**.
- Ongoing staff training and annual safeguarding updates.
- Systems for children to express concerns and be listened to.
- Procedures for managing allegations and low-level concerns.
- Online safety measures, including filtering and monitoring in line with the **DfE Filtering and Monitoring Standards (2023)**.
- Compliance with legal notification duties (e.g. private fostering, pupil deletions from roll).

### 3. Local Safeguarding Expectations (Nottinghamshire)

At Prime8 Education, we are committed to meeting the expectations set out by the **Nottinghamshire Safeguarding Children Partnership (NSCP)**. These include:

- **Following NSCP multi-agency procedures** and ensuring they are reflected in Prime8 Education's policies.
- **Engaging fully in local safeguarding arrangements**, including early help pathways, child protection conferences, and multi-agency risk assessments.
- **Completing the annual Section 175/157 safeguarding audit** and acting on any identified areas for improvement.
- **Participating in serious case reviews, child safeguarding practice reviews, and learning reviews** where appropriate.
- **Liaising with the Local Authority Designated Officer (LADO)** within one working day of any allegation against a person working with children, including volunteers and third-party providers.
- **Maintaining comprehensive safeguarding records** to inform review of concerns and ensure effective information sharing with safeguarding partners.
- **Ensuring all staff are aware of local referral routes**, including to the Multi-Agency Safeguarding Hub (MASH).
- **Promoting a culture of listening to children**, with clear systems for pupils to raise concerns and be taken seriously.

### 4. Core Duties in Practice

To fulfil our statutory and local safeguarding obligations, we will:

1. **Engage with local safeguarding partners** and act on requests for information.
2. **Appoint and support a Designated Safeguarding Lead** (and deputies, where applicable) with the authority, training, and time to carry out the role.
3. **Maintain accountability** for safeguarding across leadership and governance.
4. **Operate safer recruitment**, including DBS/barred list checks, prohibition checks, right-to-work checks, and online searches for shortlisted candidates.
5. **Keep an up-to-date Single Central Record** covering all required staff, volunteers, and governance.
6. **Check suitability for early/late years provision** in line with the Childcare Disqualification Regulations.

7. **Refer to the DBS** where an individual is removed from regulated activity due to safeguarding concerns.
8. **Consider referral to the Teaching Regulation Agency** in cases of serious misconduct.
9. **Meet the Prevent Duty**, including risk assessment, training, and referrals.
10. **Report known cases of FGM** in under-18s directly to the police (teachers only).
11. **Notify the local authority** about private fostering arrangements and deletions from roll.
12. **Provide induction and annual safeguarding updates** to all staff, ensuring familiarity with Part 1 of KCSIE and relevant annexes.
13. **Implement and review online safety measures** including filtering, monitoring, and cyber security standards.

## **Section D - Aims and Responsibilities**

At Prime8 Education, safeguarding is a shared responsibility that demands clear leadership, accountability, and a whole-school commitment to protecting children. We strive to create a safe, inclusive, and nurturing environment where pupils feel secure, valued, and heard. All staff are expected to understand their safeguarding responsibilities and respond promptly to any concerns. Safeguarding is embedded throughout Prime8 Education life—from the curriculum and pastoral care to staff conduct—ensuring it remains a central focus. We work in close partnership with families and external agencies to safeguard children from harm, and our approach is firmly rooted in the principles outlined in *Working Together to Safeguard Children 2023* and *Keeping Children Safe in Education 2025*.

### **1. Whole-School Safeguarding Culture**

We are committed to maintaining a whole-school approach to safeguarding that reflects vigilance, openness, and accountability. This commitment is reflected in the systems we have in place to ensure pupils can express concerns and be taken seriously, and in the safe culture we foster for whistleblowing and raising low-level concerns in line with statutory guidance. Staff are supported to feel confident in reporting concerns and challenging unsafe practices. Safeguarding is fully integrated into our policies, curriculum, and daily routines, ensuring it is part of the fabric of Prime8 Education life. Our approach is inclusive, addressing the needs of all pupils, including those with SEND and additional vulnerabilities. We also recognise that safeguarding extends beyond Prime8 Education's gates, encompassing online safety, peer relationships, and wider community contexts.

### **2. Roles and Responsibilities**

#### **Director**

The director provides operational leadership of safeguarding by:

- Ensuring all staff, volunteers, and contractors receive safeguarding induction before commencing work.
- Allocating sufficient time, training, and resources to enable the DSL to fulfil their role.
- Promoting a culture where staff feel confident to raise concerns about pupils or practice.
- Liaising with the **Local Authority Designated Officer (LADO)** in cases of allegations against staff, including supply staff and volunteers, trainee teachers and contractors
- Ensuring safeguarding concerns such as poor attendance, children missing education, forced marriage, or domestic abuse are identified and acted upon.
- Ensure attendance concerns are treated as safeguarding issues, particularly where persistent absence may indicate welfare concerns. Implement the statutory expectations of *Working Together to Improve School Attendance (2024)*, including early intervention and multi-agency collaboration.

## Designated Safeguarding Lead (DSL)

The DSL is the lead professional for safeguarding and child protection and will:

- Have a clearly defined role and be provided with sufficient time, supervision, and support to carry it out.
- Overseeing regular review of the child protection policy to ensure compliance with KCSIE, *Working Together*, and local procedures and ensure that staff are up to date with any changes.
- Ensure that all relevant policies are updated on an annual basis in accordance with KCSIE
- Complete the annual Nottinghamshire Safeguarding Audits to ensure that all relevant procedures and practices are up to date and are being followed by all staff.
- Complete updated safeguarding training at least **every two years**.
- Promote a culture of listening to children and taking account of their wishes and feelings.
- 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.
- Make referrals to children's social care, police, or the Channel programme where required.
- Liaise with safeguarding partners and attend multi-agency meetings and case conferences.
- Maintain secure, accurate, and confidential safeguarding records.
- Ensure all staff know how to report concerns and are familiar with safeguarding procedures.
- Ensuring staff are aware of **Operation Encompass** and domestic abuse notifications.
- Ensuring **online safety education** is embedded across the curriculum in line with statutory guidance.
- Lead on online safety, including Prime 8 Education's filtering and monitoring systems.
- Ensure safeguarding records are transferred securely when pupils move schools and that support is continuous during transitions.
- Liaise with external support agencies as appropriate.
- Share and discuss concerns 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 will be done in a timely fashion with the commissioner routinely updated
- Be available during Prime8 Education's hours and ensure Deputy DSLs can provide cover if absent.
- Meet regularly with Deputy DSLs to review caseloads and procedures.

## Deputy Designated Safeguarding Lead (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.

## All Staff

All staff, including volunteers and visiting professionals, must:

- Read and understand **Part 1 of KCSIE 2026** and Prime8 Education's **safeguarding and child protection policy** as well as Prime8 Education's other key policies located on Sharepoint.
- Recognise signs of abuse, neglect, exploitation, and contextual harm.

- Will ensure their approach is child-centred and that the students who attend Prime8 Education are particularly vulnerable.
- Report concerns immediately using Prime8 Education's safeguarding procedures.
- Record concerns accurately and provide any additional relevant information.
- Share information with the DSL and, if necessary, make direct referrals to children's social care.
- Follow Prime8 Education's **low-level concerns** procedures if worried about an adult's behaviour.
- Undertake safeguarding training at induction and at regular intervals thereafter.
- Maintain an attitude of "it could happen here" in relation to safeguarding.
- Supervise pupils appropriately when using online platforms and report any breaches in filtering or monitoring.
- Monitor attendance patterns and report persistent absence or children missing education and 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, in accordance with the Working Together to Improve School Attendance.
- Be aware of specific safeguarding risks including FGM (known cases), forced marriage, honour-based abuse, exploitation, extremism, and serious violence.
- Support statutory assessments and work with social workers when required.
- Raise concerns about safeguarding practice (whistleblowing) when needed.

### 3. Multi-Agency Working

We actively participate in Nottinghamshire's multi-agency safeguarding arrangements by:

- Sharing information lawfully and effectively with safeguarding partners, in line with the **Information Sharing Advice for Practitioners (DfE)**.
- Participating in early help assessments, child protection plans, and strategy meetings.
- Understanding and applying local thresholds and protocols for assessment and referral.
- Responding promptly to requests for information from safeguarding partners.
- Allowing access to children's social care for assessments under **Section 17** (child in need) or **Section 47** (child protection) of the Children Act 1989.
- Following the NSCP **escalation procedures** if disagreements arise about safeguarding decisions.
- Engaging in child safeguarding practice reviews, serious case reviews, and local learning events.
- Contributing to local safeguarding developments, including through the Nottinghamshire Education Subgroup.

### Virtual School Head

A Virtual School Head (VSH) is a leader within the local authority who supports the education of looked after children and previously looked after children. Their role is to:

- support the education of children with a social worker and those in a kinship care agreement.
- lead a team of people and work with Local Authorities and schools to improve the education outcomes of LAC, PLAC and those with social workers and in kinship care arrangements.

- include identifying children who may need further support or funding and then providing the appropriate resources to advocate this.
- oversee of the educational attendance, attainment, and progress of children with a social worker. Recognising attendance as a key factor in safeguarding, Virtual School Heads should work with local authorities to set and report on ambitious targets to improve their attendance. This is a non-statutory responsibility.

#### 4. Staff Induction and Training

All staff and volunteers **must** receive safeguarding induction appropriate to their role before commencing work. This includes:

- Copies of key policies.
- Identification of the DSL, deputies.
- Familiarisation with reporting procedures and safeguarding systems.
- Confirmation of having read Part 1 of KCSIE 2026.

Safeguarding training is refreshed regularly and includes updates on emerging risks, online safety, and local procedures. DSLs receive enhanced training including data protection and cyber security.

## Section E – Reporting concerns

At Prime8 Education, safeguarding is everyone's responsibility. All staff, volunteers, and visitors must report any concerns about a child's welfare, safety, or behaviour **immediately**. Staff at Prime8 Education follow clear procedures for reporting, recording, and escalating concerns in line with statutory guidance and local protocols.

### 1. Immediate Response to a Disclosure

If a child, parent, or carer shares a concern or discloses abuse:

- **Listen calmly and attentively**, allowing them to speak freely.
- **Use open-ended questions** (e.g., "Can you tell me what happened?").
- **Avoid leading or investigative questions.**
- **Reassure them** that they are being taken seriously and will be supported.
- **Do not promise confidentiality** — explain that you must share the information to keep them safe.
- **Avoid physical comfort gestures** unless clearly appropriate.
- **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.
- **Do not ask the child to write a statement or sign your notes.**
- **Record the child's exact words** and any wishes or feelings expressed.
- **Report verbally to the DSL and write up the conversation as soon as possible.**
- **Where possible**, manage disclosures with **two staff present**, ideally including the DSL or Deputy DSL.

### 2. Reporting Procedures

Staff must:

- **Report concerns to the DSL or Deputy DSL as soon as possible, and by the end of the day at the latest.**
- If the DSL is unavailable, **report to the most senior person on site** and ensure the DSL is informed later.
- In emergencies, **call 999 or make a direct referral to Nottinghamshire MASH — anyone can make a referral.**
- **Do not delay reporting due to uncertainty** — if unsure, speak to the DSL.
- **Do not view, copy, or share images** in cases involving nudes/semi-nudes.
- **Share information only on a need-to-know basis.**
- **Report concerns about staff** (including supply staff and volunteers) to the **Director**, or to **LADO** if the concern is about the Director.

#### **Examples of concerns include:**

- Signs of abuse, neglect, exploitation, or radicalisation
- Physical and emotional abuse
- Bullying
- Child-on-child abuse, sexual violence, or harassment
- Domestic abuse including teenage relationship abuse, forced marriage, FGM, or honour-based abuse
- Gender based violence
- Extra familial abuse
- Racist, disability-based, homophobic, bi-phobic, or transphobic abuse
- Online abuse or inappropriate adult communication
- Internet use including AI
- Private fostering arrangements, children returning to the family home from care
- A family member who in prison or is affected by parental offending
- Changes in behaviour, attendance, or presentation
- County lines
- CSE
- CCE
- A person who may pose a risk to children living in the same household

### **3. Recording and Escalation Protocols**

All concerns, decisions, and actions must be recorded:

- **Record immediately, and by the end of the same working day on the student's individual Safeguarding Log.**
- **Safeguarding logs will be recorded in chronological order so that patterns can be identified.**
- Use Prime8 Education's **secure safeguarding flowchart** to help support decisions.
- Include **date, time, context, and direct quotes or observations.**

- Record **facts, not assumptions**, and include your **full name and role**.
- Note **non-verbal behaviour** and **physical indicators** (e.g., “bruise on right arm above elbow”).
- 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. Members of staff should not take photographic evidence of any injuries or marks to a child's person but should use the body map.
- **Tag child protection files separately** from the main pupil file. (Safeguarding logs located in Safeguarding folder in Sharepoint)
- **Transfer safeguarding records securely** when a pupil moves *school/college* (within 5 working days) and **obtain confirmation of receipt**.
- **Retain safeguarding records securely until the pupil reaches age 25**.

The DSL:

- **Monitors records for patterns** and ensures appropriate escalation.
- **Presses for reconsideration or escalates** using NSCP procedures if concerns persist or outcomes are unclear.

#### 4. Confidentiality and Consent

- **Prime8 staff must never guarantee confidentiality to students.** Students will not be given promises that any information about an allegation will not be shared.
- Information is shared in line with the **Information Sharing Advice for Practitioners (DfE)**, the **Data Protection Act 2018**, and **UK GDPR**.
- **Consent is not required** to share information if a child or adult is at risk of significant or serious harm.
- **Parents/carers are usually informed**, unless doing so would increase risk.
- All **non-routine information sharing is logged** appropriately.
- If in doubt, **staff should consult the DSL or Deputy DSL**.

#### 5. DSL Actions Following a Concern

The DSL or Deputy DSL will:

- **Assess urgency and immediate safety needs.**
- Will sign and date the safeguarding log 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.
- **Review the child's presentation and known history.**
- **Inform relevant staff on a need-to-know basis.**
- Use **appropriate assessment tools** (e.g., body maps, contextual safeguarding tools).
- **(Unless it is an emergency) Discuss concerns with the commissioning school's designated safeguarding lead and/or the local authority's commissioning lead.** If it is agreed that Prime8 Education 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.
- A live link of the safeguarding log is 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.

- **Refer to MASH, Prevent, or Police** where necessary.
- **Consider early help or internal pastoral support.**
- **Notify the local authority of private fostering arrangements.**
- **Follow up referrals within 48 hours** and maintain contact with social workers.
- **Attend and contribute to strategy meetings**, child protection conferences, and core groups.
- **Share reports with parents/carers**, and where appropriate, the child.
- **Document all actions, decisions, and rationales** in the safeguarding record.
- **Use escalation procedures** if concerns are not addressed or outcomes are unclear.

#### **FGM Mandatory Reporting:**

In known cases of Female Genital Mutilation (FGM), **teachers must report directly to the police via 101 by the end of the next working day**, in addition to informing the DSL.

### **6. Support for Staff and Pupils**

We recognise that reporting safeguarding concerns can be distressing. Support is available through:

#### **Support for Staff:**

- **Named link staff** for safeguarding cases who act as a point of contact and support.
- **Access to helplines**, counselling, and peer support, including referral to external services where appropriate.
- **Time-out or supervision** opportunities for staff affected by disclosures or safeguarding processes.
- **Confidentiality and respectful handling** of sensitive information to protect staff wellbeing.
- **Whistleblowing and complaints procedures** to raise concerns about unsafe practice or safeguarding failures.
- **Staff wellbeing and supervision sessions**, where available, to reflect on safeguarding practice and emotional impact.

#### **Support for Pupils:**

- **Pastoral support** from trusted adults, including form tutors, learning mentors, or designated pastoral staff.
- **Safe spaces within Prime8 Education** where pupils can go if they feel overwhelmed or need time out.
- **Regular check-ins** for pupils involved in safeguarding concerns, including those subject to child protection or early help plans.
- **Empowerment through education**, including RSHE and PSHE lessons that build resilience, self-esteem, and understanding of safeguarding risks.

Staff should speak to the DSL or Director if they feel a pupil requires additional support following a safeguarding concern.

## **Section F – Supporting Pupils**

At Prime8 Education, we are committed to ensuring that all pupils feel safe, supported, and able to thrive. Safeguarding is not only about protecting children from deliberate harm but also about creating a nurturing environment in which they are valued, respected, and encouraged to achieve their full potential.

We recognise that some children may require additional support to stay safe, and we are dedicated to identifying and addressing these needs at the earliest opportunity. Our approach is informed by *Keeping Children Safe in Education (KCSIE) 2025*, *Working Together to Safeguard Children 2023*, and the *Nottinghamshire Safeguarding Children Partnership (NSCP)* procedures.

### 1. Whole-School Commitment to Support

- We aim to create a caring, positive, safe, and stimulating environment which promotes the social, physical, emotional, and moral development of all pupils.
- We ensure pupils know they can talk to trusted adults and that their voices will be heard and acted upon.
- Safeguarding and pupil wellbeing are embedded throughout our curriculum, pastoral support, and wider Prime8 Education activities.

### 2. Early Help and Pastoral Support

- We are committed to the principles of **early identification and intervention**, in line with the *Nottinghamshire Pathway to Provision*.
- Staff are trained to recognise when children may benefit from early help and to raise these concerns with the DSL.
- The DSL will consider early help assessments and referrals to external services, working closely with families to provide coordinated support.
- Prior to an early help assessment, Prime8 Education may decide that the children involved do not require referral to statutory services but may benefit from other support. Universal services and community based Early Help play a crucial role in identifying emerging problems and providing support at an early stage. They are not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area.
- We make use of local initiatives such as **Operation Encompass**, ensuring staff are informed of incidents of domestic abuse and can provide timely support at Prime8 Education.

### 3. Supporting Vulnerable Groups

We recognise that some pupils are more vulnerable to safeguarding concerns. This includes, but is not limited to:

- Children with special educational needs and disabilities (SEND)
- Children with social, emotional, or mental health needs
- Children in care and previously in care
- Young carers
- Children missing education or persistently absent
- Children affected by domestic abuse, substance misuse, or parental mental health difficulties
- Children at risk of criminal or sexual exploitation (CCE/CSE), radicalisation, or serious youth violence
- Children from minoritised groups who may face additional barriers or discrimination

We will make reasonable adjustments and provide targeted interventions to meet these pupils' needs. Support may include in base provision, referrals to early help, or multi-agency working through the NSCP framework.

### 4. Mental Health and Wellbeing

- All staff are trained to be alert to the links between safeguarding and mental health.
- Where a child is experiencing mental health difficulties, we will work with parents, health professionals, and external services such as CAMHS or MHST.
- We promote mental health through a whole-school approach, including wellbeing initiatives, safe spaces at base, and embedding resilience and coping strategies within the curriculum.

## 5. Use of Restrictive Practices

Restrictive practices are only used in exceptional circumstances to prevent harm and must be:

- **Proportionate, reasonable, and necessary**
- In line with the Prime8's **Behaviour Policy**
- Carried out by staff trained in approved techniques – from Safer Handling
- Documented thoroughly, including the rationale, actions taken, and outcomes
- Reported to parents/carers and, where appropriate, safeguarding partners

Restrictive practices must never be used as punishment or to enforce compliance. We prioritise de-escalation, pupil dignity, and emotional regulation. Any use of physical intervention is reviewed by the DSL and senior leadership to ensure safeguarding standards are upheld.

## 6. Trauma-Informed and Inclusive Practice

- We adopt a trauma-informed approach, recognising the impact of adverse childhood experiences (ACEs) on behaviour, relationships, and learning.
- Staff are supported to respond with sensitivity and consistency, fostering trusting relationships and safe routines.
- We are committed to equality and inclusion, actively challenging discrimination and ensuring equity of access to support for all pupils.

## 7. Ongoing Monitoring and Transitions

- Safeguarding records are monitored to identify emerging patterns of concern.
- Individual support plans are regularly reviewed with pupils, parents/carers, and professionals.
- When pupils move, safeguarding records are transferred securely and within five working days, in line with NSCP expectations.

## 8. Empowering Pupils

We are committed to equipping pupils with the knowledge and confidence to safeguard themselves by:

- Delivering **RSHE/PSD** programmes that cover online safety, healthy relationships, exploitation, and resilience.
- Ensuring pupils know about support services such as **Childline**, **NSPCC**, and local safeguarding agencies.
- Embedding opportunities for pupil voice to shape our safeguarding culture.

# Section G – Safeguarding in the Curriculum

At Prime8 Education, we believe safeguarding is most effective when it is **embedded across the whole curriculum** and provision life. Our aim is to equip pupils with the knowledge, skills, and confidence to recognise risk, seek help, and make safe, informed choices in all aspects of their lives.

## 1. Whole-School Approach to Preventative Education

- Safeguarding education is delivered through a **planned, progressive, and age-appropriate programme** that reflects Prime8 Education's values and ethos.
- Learning is timetabled and reinforced across the wider curriculum and through the wider Prime8 Education culture.
- Delivery includes:
  - **RSHE (Relationships, Sex and Health Education)**
  - **PSD (Personal, Social, Development)**
  - **Online Safety**
  - **British Values**
  - **Use of evidence-based resources and input from external agencies (e.g. NSPCC, Police, Prevent Team)**
  - **Cross-curricular links**
- Our curriculum promotes a culture of **zero tolerance** towards abuse, discrimination, harassment, and violence of any kind.

## 2. Key Topics Covered

We ensure pupils are educated on a broad range of safeguarding issues, using **evidence-based resources** and adapting content to reflect **local safeguarding priorities**.

Topics include (but are not limited to):

- Bullying (including cyberbullying and prejudice-based bullying)
- Online safety, digital resilience, and responsible use of technology
- Child-on-child abuse, sexual harassment, and harmful sexual behaviour
- Domestic abuse and healthy relationships
- Consent, bodily autonomy, and respect for boundaries
- Exploitation (Child Sexual Exploitation, Child Criminal Exploitation, county lines)
- Radicalisation and extremism
- Honour-based abuse, including FGM and forced marriage
- Mental health, resilience, and emotional wellbeing
- Substance misuse and risky behaviours
- Road, fire, and water safety
- Knife crime and serious youth violence
- Resist peer pressure and make informed decisions

- Know how and where to report concerns
- Understand the law around sharing nudes/semi-nudes and youth-produced sexual imagery

### 3. Empowering Pupils

We aim to create an environment where pupils:

- Feel safe to ask questions, challenge unsafe behaviours, and express concerns without fear of stigma.
- Understand their rights, responsibilities, and the importance of respecting others.
- Know how to access help, both at Prime8 Education and externally (e.g., Childline, NSPCC, Kooth).
- Recognise signs of abuse, exploitation, and coercion.
- Develop resilience, empathy, critical thinking, and self-esteem.

Pupil voice is central to our approach. We actively involve pupils in **shaping, evaluating, and improving** our safeguarding curriculum through various feedback mechanisms.

### 4. Staff Responsibilities

All staff are expected to:

- Reinforce safeguarding messages consistently across subjects and interactions.
- Be alert to safeguarding concerns or disclosures arising during lessons.
- Use age-appropriate, inclusive, and accessible language and resources.
- Adapt delivery to meet the needs of pupils with **SEND and additional vulnerabilities**.
- Share any concerns promptly with the **Designated Safeguarding Lead (DSL)**.

Staff receive regular training and updates to ensure they are confident in delivering sensitive content and responding appropriately.

### 4. Curriculum Adaptation and Inclusion

We ensure that safeguarding education is:

- **Differentiated** to meet the needs of pupils with SEND and other vulnerabilities
- **Responsive** to local safeguarding concerns and emerging risks
- **Inclusive** of pupils with protected characteristics, with reasonable adjustments made where needed
- **Reviewed annually** to ensure relevance, impact, and alignment with statutory guidance

### 5. Curriculum Review and Evaluation

Our safeguarding curriculum is reviewed annually and informed by:

- Pupil feedback and engagement.
- Local and national safeguarding trends and emerging risks.
- Updates to statutory guidance (e.g., *Keeping Children Safe in Education 2025, Relationships, Sex and Health Education statutory guidance*).
- Input from the NSCP, MASH, Operation Encompass, and other safeguarding partners.

We are committed to **continuous improvement**, ensuring our safeguarding curriculum remains relevant, inclusive, and impactful, preparing pupils for life in modern Britain.

## **Section H – Online Safety**

At Prime8 Education, we recognise that safeguarding children includes protecting them from risks associated with digital technologies. Online safety is a core part of our safeguarding strategy and is embedded across our curriculum, policies, and school culture.

We are committed to ensuring that pupils, staff, and visitors use technology safely and responsibly, and that our systems are robust enough to prevent access to harmful content while enabling effective learning.

Prime8 Education is a mobile phone – free environment. Students are unable to have their mobile phone during their time at Prime8 Education. If a mobile or device that can be linked to a phone is brought onto site it will need to be handed in and will be placed in a locked cabinet.

### **1. Whole-School Approach to Online Safety**

Online safety is addressed through:

- A dedicated **Online Safety Policy** aligned with DfE guidance and the **Filtering and Monitoring Standards (2023)**
- Integration into **RSHE** and **PSD**
- Regular **staff training** and updates on emerging risks
- Engagement with **parents/carers** to promote safe use of technology at home
- Clear procedures for reporting online concerns, including cyberbullying, grooming, and harmful content
- An understanding of the Acceptable Use Policy which is to be signed by student and parent/carer at the start of the academic year.

### **2. Filtering and Monitoring Systems**

We use appropriate filtering and monitoring systems to:

- Block access to harmful or inappropriate content
- Monitor user activity for signs of risk or misuse
- Alert designated staff to potential safeguarding concerns

These systems are reviewed **at least annually** and are proportionate to the age, needs, and vulnerabilities of our pupils. We follow the DfE's **Digital and Technology Standards** and ensure:

- Roles and responsibilities for managing filtering and monitoring are clearly defined
- Systems do not unreasonably impact teaching and learning
- Staff are trained to understand and respond to alerts appropriately

### **3. Risks Addressed**

We educate and safeguard pupils against a range of online risks, including:

- **Cyberbullying** and online harassment
- **Online grooming**, exploitation, and radicalisation

- **Exposure to pornography**, violent content, or hate speech
- **Sharing of nudes/semi-nudes** and youth-produced sexual imagery
- **Online challenges, hoaxes**, and misinformation
- **Use of generative AI**, deepfakes, and manipulated media
- **Access via mobile networks** (e.g., 4G/5G) bypassing filters

Staff are trained to recognise signs of online harm and respond in line with safeguarding procedures.

#### **4. Curriculum Integration**

Pupils are taught to:

- Recognise online risks and unsafe behaviours
- Understand privacy, consent, and digital footprints
- Report concerns and seek help
- Use technology responsibly and respectfully
- Navigate misinformation, disinformation, and conspiracy theories
- Understand the risks and dangers associated with generative AI, including blackmail, coercion or reputational harm and that creating or sharing such content – including altered images of themselves or others – may be a criminal offence.

We use age-appropriate resources and adapt content to reflect local safeguarding concerns and pupil needs.

#### **5. Staff Responsibilities**

All staff must:

- Supervise pupil use of technology appropriately
- Report breaches in filtering or monitoring systems
- Reinforce online safety messages across the curriculum
- Be aware of Prime8 Education's mobile phone and smart technology policy
- Understand their role in safeguarding pupils online, including during remote learning

#### **6. Remote Learning and Home Use**

Where pupils access learning remotely, we ensure:

- Platforms used are secure and age-appropriate
- Pupils and parents receive guidance on safe use
- Staff maintain safeguarding oversight and report concerns

We work with families to promote safe online habits and provide support where risks are identified

## **Section I – Working with Parents/Carers**

At Prime8 Education, we recognise that safeguarding is most effective when we work in partnership with parents and carers. By following the guidelines laid down by the NCSB with regards to parents/carers, Prime8 Education are

committed to building strong, transparent relationships with families, based on mutual trust, respect, and shared responsibility for keeping children safe.

## **1. Communication and Transparency**

We ensure that parents/carers:

- Are informed about Prime8 Education's safeguarding responsibilities and procedures
- Understand how concerns are managed and when referrals may be made
- Know who to contact if they have safeguarding concerns
- Can access Prime8 Education's Child Protection Policy and related safeguarding documents via our website or on request
- We aim to communicate in a way that is clear, accessible, and sensitive to individual needs, including providing information in alternative formats or languages where required.
- 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

## **2. Consent and Information Sharing**

We follow the principles of the **Data Protection Act 2018, UK GDPR, and Information Sharing Advice for Practitioners (DfE)**. While we seek parental consent for information sharing where appropriate, we will share information without consent if:

- A child is at risk of significant harm
- Seeking consent may increase the risk to the child
- There is a statutory duty to share information

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.

Staff are trained to understand the boundaries of confidentiality and the importance of timely, lawful information sharing.

## **3. Supporting Families**

We recognise that families may face challenges that impact their ability to safeguard their children. We offer support through:

- Early Help referrals and signposting to local services

- Pastoral support and family liaison staff
- Access to parenting programmes and workshops
- Referrals to external agencies (e.g., mental health, housing, domestic abuse support)

We work collaboratively with families to identify needs, agree support plans, and monitor progress.

#### **4. Involving Parents in Safeguarding Education**

We encourage parents/carers to engage with safeguarding education by:

- Sharing online safety guidance and resources
- Promoting awareness of risks such as exploitation, radicalisation, and harmful online content
- Encouraging open conversations at home about safety and wellbeing

We aim to empower families to reinforce safeguarding messages and support their children's development.

#### **5. Respecting the Child's Voice**

Where appropriate, we consider the child's views when deciding whether to inform parents/carers about a safeguarding concern. This is particularly relevant where:

- The child is mature enough to make informed decisions
- Informing parents may increase risk or distress
- The child has expressed a clear preference

Decisions are made in consultation with the DSL and, where necessary, safeguarding partners.

## **Section J – Children in Care and Previously in Care**

At Prime8 Education, we recognise that Children in Care (CiC) and those previously in care may face additional barriers to learning, wellbeing, and safety. We are committed to promoting their educational achievement, safeguarding their welfare, and ensuring they feel valued and supported throughout their time at Prime8 Education.

### **1. Designated Teacher Responsibilities**

We appoint a **Designated Teacher for Children in Care (currently taken on by the Director/DSL)** who is responsible for:

- Acting as a key point of contact for the Virtual School
- Attending and contributing to **Personal Education Plan (PEP)** reviews
- Ensuring that CiC pupils receive appropriate support, interventions, and access to enrichment opportunities
- Monitoring progress, attendance, and wellbeing
- Liaising with carers, social workers, and other professionals

The Designated Teacher works closely with the **Designated Safeguarding Lead (DSL)** to ensure a coordinated approach to safeguarding and education.

### **2. Children Previously in Care**

We recognise that children who were previously looked after may continue to experience vulnerability. These pupils are supported through:

- Pastoral care and targeted interventions
- Access to mental health and wellbeing support
- Inclusion in safeguarding monitoring and review processes
- Continued liaison with the Virtual School where appropriate

Staff are made aware of the potential challenges faced by previously looked-after children and are trained to respond with sensitivity and understanding.

### 3. Private Fostering Arrangements

A **private fostering arrangement** occurs when a child under 16 (or under 18 if disabled) is cared for by someone who is not a parent or close relative for 28 days or more. We have a statutory duty to report any known or suspected private fostering arrangements to the local authority.

Staff must:

- Notify the DSL if they become aware of a private fostering arrangement
- Support the DSL in liaising with the family and confirming whether the local authority has been informed
- Ensure that safeguarding procedures are followed and that the child's welfare is prioritised

We take steps during admission to verify the relationship between the child and the adults registering them.

### 4. Kinship Care Arrangements

**Kinship care** refers to children being raised by relatives or close family friends. These arrangements may be informal or formalised through legal orders. Schools must:

- Identify and support children in kinship care, including those not known to the local authority.
- Be aware of the local authority's published *Kinship Care offer* and signpost carers to relevant support.
- Liaise with the Virtual School Head to promote educational outcomes for children in kinship care.
- Ensure staff understand the potential vulnerabilities and safeguarding needs of children in kinship arrangements.

### 4. Multi-Agency Working

We work closely with **Virtual Schools, Children's Social Care, Health and mental health services, Carers and families** to ensure that CiC and previously looked-after children receive the support they need to thrive. We contribute to multi-agency plans and ensure that safeguarding concerns are addressed promptly and effectively.

## Section K – Particularly Vulnerable Groups

At Prime8 Education, we recognise that some children and young people may be particularly vulnerable to abuse, neglect, exploitation, or harm due to their individual circumstances, characteristics, or lived experiences. We are committed to identifying these pupils early, providing tailored support, and ensuring that safeguarding arrangements reflect their specific needs.

### 1. Identification and Monitoring

We actively monitor and support pupils who may be vulnerable due to factors including (but not limited to):

- Special Educational Needs and Disabilities (SEND)

- Mental health needs
- Young carers
- Children in care or previously in care
- Children with a social worker or history of social care involvement
- Children affected by domestic abuse, parental substance misuse, or mental health
- Children at risk of exploitation (CSE, CCE, county lines)
- Children at risk of radicalisation or extremism
- Children from minority ethnic backgrounds or with protected characteristics
- Children who are LGBTQ+ or exploring their identity
- Children who are privately fostered
- Children missing education or frequently absent
- Children at risk of serious violence or involved in gang activity

Staff are trained to recognise signs of vulnerability and report concerns promptly to the DSL. We use safeguarding records, attendance data, behaviour logs, and pupil voice to identify patterns and respond proactively.

## **2. Reasonable Adjustments and Positive Action**

We make reasonable adjustments to ensure that pupils with protected characteristics or additional needs are safeguarded effectively. This includes:

- Differentiated safeguarding education
- Accessible reporting systems
- Tailored pastoral support
- Positive action to address disadvantage or discrimination
- Inclusive curriculum content and representation

We promote a culture of respect, equity, and inclusion, and challenge all forms of prejudice-based bullying or harassment.

## **3. SEND and Communication Needs**

Children with SEND may face barriers to recognising or reporting abuse. These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- that 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
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care

- that these children may have issues over 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.

At Prime8 Education we ensure:

- Staff are trained to understand SEND-specific safeguarding risks
- Communication methods are adapted to meet individual needs
- Additional pastoral support is available
- External agencies (e.g. Learning Support, EHCP teams) are involved where appropriate

We recognise that challenging behaviour may be a sign of distress or unmet need and respond accordingly.

#### 4. Young Carers

Prime8 Education staff members are alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. By placing the question as to whether a child is a young carer on our induction paperwork, early identification ensures young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

#### 4. Specific Safeguarding Risks

We are alert to specific safeguarding risks that may disproportionately affect vulnerable groups, including:

- **Female Genital Mutilation (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.
- **Forced Marriage and Honour-Based Abuse:** We educate pupils and staff on recognising coercion and cultural pressures.
- **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE):** We work with external agencies to identify and support children at risk. Staff are aware of the indicators for CCE and CSE and the risks of criminal and sexual exploitation are included in our RHSE 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.
- **Human Trafficking and Modern Slavery** - Staff at Prime8 are aware of these indicators. All staff will then follow procedure via the safeguarding flowchart and report any concerns to the DSL, who will refer to the Local Authority as they are the primary service provider for safeguarding and responding to the needs of a child victim of modern slavery. The concern will also be recorded on the student's individual safeguarding log.
- **Radicalisation and 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. 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. Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required.

- **Serious Youth Violence and Knife Crime:** We engage with community partners and police to address local concerns.
- **Sexual Abuse and Grooming:** Staff are trained to identify signs of manipulation, distress, and inappropriate relationships, and respond swiftly and sensitively.

## 5 Children who are LGBTQIA+

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.

Parents and carers have the leading role in the lives of their children, and this area should be no exception. Therefore, where a child who is questioning their gender asks for support from a school or college, schools and colleges should engage parents/carers as a matter of priority. It is important that the views of the child's parents or carers should carry great weight and be properly considered. However, in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the school or college should involve their designated safeguarding lead to determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

Prime8 Education 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.

## 6 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. Guidance stresses that only appropriately trained professionals should attempt to diagnose mental health problems, but that education staff play an important role in recognising the warning signs and identifying children who may be struggling with their mental health. Prime8 education will ensure that any mental health support or interventions offered are evidenced as safe, effective and appropriate for the need and phase of education.

## 7 Domestic Abuse

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.

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 by the police. The Police will also inform Prime8 Education if there has been a safeguarding referral made alongside the Operation Encompass. 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.

## **8 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.

## **9 Human Trafficking and Modern Slavery**

**Human trafficking** is that the victim is coerced or deceived into a situation where they are exploited. The trafficking process has several distinct phases. This includes the following aspects:

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

**Modern slavery encompasses:**

- Human trafficking
- Slavery
- Servitude
- forced or compulsory labour.

Some people may not be victims of human trafficking but still victims of modern slavery if they have been subject to slavery, servitude and forced or compulsory labour. For an individual to be a victim of slavery, servitude and forced or

compulsory labour where the victims have not been trafficked, they must have been subject to a means, or threat of penalty through which that service was derived.

**Potential victims of modern slavery may:**

- be reluctant to come forward with information
- not recognise themselves as having been trafficked or enslaved
- tell their stories with obvious errors and/or omissions

The **indicators of Modern Slavery** can include:

- Have no access to their parents or guardians (although children may be living with their parents or guardians and still be exploited)
- Look intimidated
- Behave in a way that does not correspond with behaviour typical of children their age
- Have no friends of their own age
- Have no access to education
- Have no time for playing
- Live apart from other children and in substandard accommodation
- Eat apart from other members of the "family"
- Be given only leftovers to eat
- Be engaged in work that is not suitable for children
- Travel unaccompanied by adults
- Travel in groups with persons who are not relatives

## **10 Bullying**

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

## **5. Multi-Agency Collaboration**

We work closely with safeguarding partners to support vulnerable pupils, including:

- Children's Social Care
- Health and mental health services
- Youth justice and early help teams
- Domestic abuse and exploitation services
- Prevent and Channel teams

We contribute to multi-agency plans and ensure that pupils receive coordinated, timely support.

# Section L - Child-on-Child Abuse and Harmful Sexual Behaviour

At Prime8 Education, we recognise that children can be both victims and perpetrators of abuse. We are committed to preventing, identifying, and responding to all forms of **child-on-child abuse**, including **harmful sexual behaviour (HSB)**, in line with statutory guidance and local safeguarding procedures. These forms of abuse can occur both online and face-to face.

We adopt a zero-tolerance approach to abuse and harassment between children and ensure that all incidents are taken seriously, investigated appropriately, and responded to with care and professionalism.

## 1. Definitions and Scope

Child-on-child abuse may include:

- **Physical abuse** (e.g. hitting, kicking, biting)
- **Bullying** (including cyberbullying and prejudice-based bullying)
- **Sexual violence** (e.g. rape, assault by penetration)
- **Sexual harassment** (e.g. sexual comments, jokes, online harassment)
- **Sharing of nudes/semi-nudes** (youth-produced sexual imagery)
- **Upskirting** (a criminal offence under the Voyeurism Act 2019)
- **Initiation/hazing-type violence and rituals**
- **Controlling or coercive behaviour** in peer relationships
- **Emotional and psychological abuse** (e.g. manipulation, intimidation, gaslighting)

**Harmful sexual behaviour** may be developmentally inappropriate, be coercive, abusive, or exploitative. It can occur online or offline and may be perpetrated by individuals or groups, directed at peers, younger children or even adults.

Prime8 staff have an understanding that child on child abuse may still occur but not be reported and will always ensure the 'it could happen here approach' Prime8 staff will also 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" as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children.

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

The different forms of child-on-child abuse can take, such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.
- consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI43.

- 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.
- upskirting (which is a criminal offence<sup>44</sup>), 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.
- initiation/hazing type violence and rituals.

## **2. Prevention and Education**

We take a proactive approach to preventing child-on-child abuse through:

- A robust RSHE and PSD curriculum that teaches consent, boundaries, respect, and healthy relationships
- Online safety education, including risks from mobile networks and AI-generated content
- Staff training on recognising and responding to HSB and child-on-child abuse
- Clear behaviour policies and safeguarding procedures

We promote a culture where pupils feel safe to report concerns and understand that abuse is never acceptable.

## **3. Reporting and Responding to Incidents**

All staff must report concerns about child-on-child abuse to the DSL immediately. The DSL will:

- Assess the nature and severity of the incident
- Consider the wishes and needs of the victim
- Take appropriate safeguarding action, including referral to MASH or the police if necessary
- Inform and involve parents/carers unless doing so would increase risk
- Record all actions, decisions, and outcomes in the safeguarding system

Victims are supported to feel safe, heard, and respected. Perpetrators are also supported, with consideration given to underlying needs or trauma.

It is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Even when there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

Prime8 Education implement a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

## **4. Supporting Pupils**

Support for victims may include:

- Pastoral care and safe spaces
- Access to counselling or therapeutic services
- Regular check-ins and trusted adult relationships
- Safety planning and adjustments to routines

Support for perpetrators may include:

- Behaviour interventions and restorative approaches
- Referral to external services (e.g. CAMHS, youth offending)
- Education around consent, boundaries, and respectful behaviour

We recognise that both victims and perpetrators may require safeguarding support and that early intervention is key to preventing escalation.

## 5. Multi-Agency Working and Resources

We work closely with safeguarding partners to address child-on-child abuse, including:

- Nottinghamshire MASH
- Police and youth justice services
- NSPCC and Stop It Now
- Lucy Faithfull Foundation
- Nottinghamshire Local Authority and other relevant safeguarding partners

We use tools such as the **HSB Toolkit**, **Neglect Toolkit**, and **Contextual Safeguarding Self-Assessment** to inform our practice.

# Section M - Allegation Against Staff

At Prime8 Education we take all allegations and concerns about staff conduct seriously. We are committed to maintaining a safeguarding culture where concerns are identified early, reported appropriately, and managed in line with statutory guidance and local procedures.

This section applies to all staff, including supply staff, trainee teachers, volunteers, contractors, and visitors working with children.

## 1. Managing Allegations

We follow the procedures outlined in **Part Four of Keeping Children Safe in Education (KCSIE) 2026** and the **Nottinghamshire Safeguarding Children Partnership (NSCP)** protocols.

An allegation may relate to a person who works with children and 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 in a way that indicates they may pose a risk of harm
- Behaved in a way that indicates they may not be suitable to work with children

All allegations must be reported immediately to the **Director**.

If the **allegation concerns the Director**, it must be reported to **Local Authority Designated Officer (LADO)** and follow all statutory procedures to safeguard pupils and ensure a fair, impartial investigation.

## 2. Role of the Case Manager and LADO

The **Case Manager** (usually the Director) is responsible for:

- Liaising with the LADO
- Ensuring the allegation is investigated promptly and fairly
- Coordinating with police and children's social care where necessary
- Ensuring the safety and welfare of the child
- Supporting the member of staff subject to the allegation

The procedure if an allegation is made would be as follows:

- 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 2026.
- 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.

The **LADO** provides oversight, advice, and guidance throughout the process and ensures consistency and timeliness.

### 3. Low-Level Concerns

A **low-level concern** is any concern that does not meet the harm threshold but may indicate that an adult is acting in a way that is inconsistent with the setting's Code of Conduct.

Examples include:

- Being overly familiar with pupils
- Using inappropriate language
- Failing to maintain professional boundaries

All low-level concerns must be reported to the Director and recorded securely. Patterns of behaviour are monitored, and concerns are escalated if necessary.

We promote a culture where staff feel confident to report concerns without fear of reprisal.

#### **4. Whistleblowing**

We encourage staff to raise concerns about poor or unsafe practice through our **Whistleblowing Policy**. This includes concerns about:

- Safeguarding failures
- Unsafe behaviour by colleagues
- Inadequate safeguarding procedures

Staff can report concerns internally or contact the **NSPCC Whistleblowing Helpline**:

Tel: 0800 028 0285 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Whistleblowers are protected under the Public Interest Disclosure Act and will not suffer detriment for raising genuine concerns.

#### **5. Safeguarding Culture**

We are committed to fostering a safeguarding culture that includes:

- Clear expectations for staff behaviour (Code of Conduct)
- Regular safeguarding training and updates
- Open dialogue and reflective practice
- Support for staff involved in safeguarding processes
- Transparent and fair management of allegations

Safeguarding is everyone's responsibility, and we expect all staff to uphold the highest standards of professional conduct.

## **Section N – Professional Development and Training**

At Prime8 Education, we recognise that safeguarding is most effective when all staff are confident, knowledgeable, and up to date with current guidance and best practice. We are committed to ensuring that all staff, governors, and volunteers receive appropriate safeguarding training and ongoing professional development.

#### **1. Induction Training**

All new staff, supply staff, volunteers, and governors receive safeguarding induction before commencing work. This includes:

- The setting's **Child Protection Policy**
- The **Staff Behaviour Policy / Code of Conduct**

- The **Behaviour Policy**
- Identification of the **Designated Safeguarding Lead (DSL)** and deputies
- Procedures for reporting concerns and disclosures
- Confirmation of having read **Part 1** of *Keeping Children Safe in Education (KCSIE) 2025*

Induction is tailored to the individual's role and responsibilities.

## 2. Ongoing Safeguarding Training

All staff receive safeguarding and child protection training that is:

- **Refreshed at least annually**
- **Updated in response to emerging risks**, changes in legislation, or local procedures
- Delivered through a combination of **whole setting INSET, online modules, staff briefings, and external courses**

Training includes topics such as:

- Online safety and filtering/monitoring standards
- Child-on-child abuse and harmful sexual behaviour
- Exploitation (CSE, CCE, county lines)
- Mental health and trauma-informed practice
- Prevent and radicalisation
- FGM and honour-based abuse

## 3. DSL Training

The **Designated Safeguarding Lead (DSL)** and deputies:

- Complete enhanced safeguarding training **every two years**
- Attend **termly DSL network meetings** and **local safeguarding briefings**
- Receive training on **data protection, online safety, and multi-agency working**
- Are supported to maintain oversight of safeguarding trends and case management

## 4. Training Register and Evaluation

We maintain a **training register** that records:

- Dates and types of training completed
- Staff attendance and completion status

This register helps identify gaps or future training needs.

## 5. Culture of Learning and Reflection

We promote a safeguarding culture that encourages:

- Continuous professional development
- Reflective practice and peer learning

- Openness to new guidance and local learning reviews
- Engagement with safeguarding partners and external expertise

Staff are encouraged to contribute to the development of safeguarding practice and share insights from training.

## Section O - Identification for Visitors

At Prime8 Education, we are committed to ensuring that all visitors to our site are appropriately identified, vetted, and supervised in line with safeguarding expectations. We recognise that visiting professionals, contractors, and volunteers may have access to children and must therefore meet the same safeguarding standards as staff.

### 1. Expectations for Visitors

All visitors must:

- Report to the main reception on arrival
- Present **official photographic ID** and, where applicable, evidence of **DBS clearance**
- Sign in using the setting's visitor management system
- Wear a **setting-issued visitor badge** at all times while on site
- Be accompanied or supervised unless prior safeguarding clearance has been confirmed

Visitors without appropriate ID or clearance may be refused entry or restricted to non-child-facing areas.

### 2. DBS Verification and Nottinghamshire DBS Letter Process

Where visitors are from external organisations (e.g. NHS, social care, educational services), we follow the **Nottinghamshire DBS Letter Process**, which provides written confirmation from the employing organisation that:

- The visitor has undergone appropriate **DBS checks**
- Safeguarding procedures have been followed
- The visitor is suitable to work with children

This letter is updated annually and retained by Prime8 Education for reference. Visitors from Nottinghamshire County Council or other approved agencies are expected to carry their organisation ID and be listed on the DBS verification letter.

### 3. Visiting Professionals and Contractors

Professionals working directly with pupils (e.g. therapists, social workers, peripatetic teachers) must:

- Be expected and pre-booked by the setting
- Have safeguarding clearance confirmed prior to arrival
- Be briefed on Prime8 Education's safeguarding procedures, including how to report concerns

Contractors working during Prime8 Education's hours must:

- Be risk-assessed for safeguarding impact
- Be supervised if not DBS-cleared
- Avoid unsupervised contact with pupils

#### 4. Volunteers and Regular Visitors

Volunteers who work regularly with children are subject to:

- **Enhanced DBS checks**
- Safeguarding induction and training
- Ongoing supervision and review

Occasional volunteers may be supervised and risk-assessed depending on the nature of their role.

#### 5. Safeguarding Responsibilities

All visitors are expected to:

- Follow Prime8 Education's safeguarding procedures
- Report any concerns immediately to the **Designated Safeguarding Lead (DSL)**
- Maintain professional boundaries and confidentiality

Safeguarding information is displayed prominently in reception and staff areas, including contact details for the DSL and deputies.

## Section P - 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.

Most staff in a school and those in colleges working with children will be engaging in regulated activity relating to children, in which case an enhanced DBS check which includes children's barred list information, will be required.

For all other staff (e.g. contractors) who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.

Barred list information must not be requested on any person who is not engaging in or seeking to engage in regulated activity.

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

## Section Q – Lone Worker

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 2026 Changes

Updated terminology to include "universal services and community-based early help" and "the targeted early help level of Family Help."

Replaced “indecent”, “nude, semi-nude” and “also known as sexting or youth produced sexual imagery” with “making or sharing of nudes or semi-nudes”.

Updated the definition of “assault by penetration.”

Updated the definition of “sexual assault.”

Added further references to “misogyny.”

Retitled “Child-on-child abuse” to “Child-on-child abuse (including harassment and violence).”

Summary: Part one – Safeguarding information for all staff

Paragraph 13: Updated to distinguish between community-based early help and targeted early help delivered through Family Help.

Paragraph 17: Expanded examples of issues staff should remain alert to.

Paragraph 18: Added “modern slavery.”

Paragraph 20: Added “including physical, sexual, and emotional abuse, stalking” and “financial exploitation.”

Paragraph 24: Added additional sentence about child to parent or care giver abuse.

Paragraph 26: Clarified that emotional abuse may include verbal abuse (e.g., criticism, belittling, name-calling).

Paragraph 27: Expanded section on sexual abuse to provide clear examples of physical contact

Paragraph 29: Clarified that safeguarding issues often overlap. Expanded child-on-child abuse content to emphasise that: it is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Expanded Child Criminal Exploitation and Child Sexual Exploitation content: “This can be committed or facilitated by an organised network or gang, and victims may identify as part of this group.”, “This may constitute modern slavery...” and a reference to Modern Slavery statutory guidance, including referral expectations. Added a new footnote defining county lines and linking to Home Office guidance.

Paragraph 42: Added “This can be committed by an individual or an organised network...” and “Most sexual abuse is committed by individuals known to the victim.” Added clarification that victims may be criminalised for actions taken under coercion. Added a footnote defining “organised network” (from the Independent Inquiry into Child Sexual Abuse).

Mental Health section: substantially updated.

Serious Violence section: substantially updated.

Paragraph 58: Added additional info to bullet about managing any support for the child internally.

Paragraph 62: Updated header and clarified when non-social-worker practitioners may lead assessments.

Paragraph 66: Added expectations regarding local assessment protocols.

Paragraphs 75-77: Added references to “trainee teachers”.

Paragraph 76: Added requirement to consider referral to the LADO.

Summary: Part two – The management of safeguarding

Data Protection: Updated to reflect the Data (Use and Access) Act 2025, effective from January 2026.

Paragraphs 95-98: Added new section on “Sport”.

**Paragraphs 105-116: Added new section on “Regulations and safeguarding requirements relating to school premises”.**

**Paragraph 127: Added expectations for robust DSL cover arrangements (e.g., confidential shared mailbox).**

**Paragraphs 138-150: Added more detailed information about sharing information.**

**Paragraphs 138-150: Expanded guidance on information sharing, including risk assessment.**

**Paragraph 158: Added “racism” and “derogatory behaviour or other forms of physical violence and conflict.”**

**Paragraph 160: Added details on PSHE Association approved resources.**

**Paragraph 163: Updated definitions of online risk categories.**

**Paragraphs 165-166: Added guidance and resources on safe and effective use of Generative AI in education.**

**Paragraph 168: Added new section on “Mobile phone policy”.**

**Paragraph 171: Updated wording “...ensure that a review of their effectiveness is carried out at least once every academic year. Reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of the school’s DSL and IT support. They should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks...”**

**Paragraphs 176-178: Redrafted to improve clarity on information security.**

**Paragraphs 186-189: Added references to “trainee teachers”.**

**Paragraph 191: Updated the list of factors that a school’s child protection policy should include.**

**Paragraph 191: Added reference to “misandry”.**

**Paragraphs 197-202: Added new section on “Boarding and residential accommodation”.**

**Paragraphs 203-205: Updated section on reasonable force to reflect new restrictive intervention guidance.**

**Paragraphs 208-213: Updated content relating to alternative provision.**

**Paragraphs 224-232: Updated section on “Children requiring mental health support”.**

**Paragraph 242: Highlighted the role of Virtual School Heads in improving attendance.**

**Paragraph 246: Added new section on “Young carers” and their specific needs.**

**Paragraphs 247-249: Added further additional barriers that children with SEND may face.**

**Paragraph 250: Added new section on safeguarding children with medical conditions.**

**Paragraphs 252-282: Updated content on children who are LGB or gender-questioning.**

**Summary: Part three – Safer recruitment**

**Paragraph 315: Regulated activity section rewritten for clarity and to include volunteers. Regulated activity table updated to remove the ‘supervision exemption’ from regulated activity. This change has been made by the Crime and Policing Act 2026. Removed “DBS check types” section to avoid duplication.**

**Paragraph 325: Added new bullet on DBS checks for volunteers in regulated activity Updated references from TRA Employer Access Service to DfE’s Check a teacher’s record.**

**Paragraph 326: Added “or within 30 calendar days of the issue date on the certificate.”**

Removed the DBS Criminal Record Checks and Barred List Checks flowchart as it was no longer factually accurate following the removal of 'supervision exemption' from regulated activity under 192 the Crime and Policing Act 2026.

Paragraph 370: Clarifies the type of DBS check a self-employed person is now eligible for.

Paragraph 375: Clarified categories of visitors to schools.

Paragraphs 381-387: Volunteer Section rewritten to remove the 'supervision exemption' from regulated activity. This change has been made by the Crime and Policing Act 2026.

Paragraphs 403-407: Work experience supervision section rewritten for clarity and in response to the Crime and Policing Act 2026 change to the definition of regulated activity.

Paragraphs 408-410: Moved former Annex D (homestay) into main body.

Paragraph 422: Existing staff paragraph updated to include volunteers.

Paragraphs 424-428: Duty to refer section rewritten to include referrals about volunteers.

Paragraph 429: Added reference to schools' duties under the PSED.

Summary: Part four – Safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers, and contractors

Reference to "Trainee teachers" added throughout.

Paragraphs 452-456: Updated supply teachers, trainee teachers and all contracted staff section to make it clearer that schools and colleges share safeguarding responsibilities with third party organisations.

Paragraphs 452-456: New content setting expectations for handling concerns about trainee teachers.

Summary: Part five – Child-on-child sexual harassment and sexual violence

Part five substantially rewritten to highlight the progressive continuum from harmful sexual behaviour through to sexual violence.

Paragraph 527: Updated to clarify that all incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether they are consensual or non-consensual.

Paragraph 531: Additional paragraph added on HSB (previously part of para 525)

Paragraph 532: Added link to NSPCC resource providing advice on stages of typical 193 sexual development and behaviour for different age groups.

Paragraph 533: Added link to resource for advice on responding to children who display sexualized behaviour.

Paragraph 540: Added further information on consent

Paragraph 575-581: Updated header and expanded description of universal services and community-based early help.

Paragraphs 582-592: Added new section on "Referrals to Family Help".

Summary: Annex A – Further information (previously Annex B in KCSIE 2025) Annex A (condensed Part one) removed, and replaced with previous Annex B.

Cybercrime section expanded with detail on CMA offences and national risks.

Domestic Violence content updated.

**Operation Encompass content updated.**

**Online safety (parental support) now includes link to screentime guidance.**

**Additional section added on “Temporary accommodation notification duty.” Additional info added to paragraph on Channel to include clarification that information should be shared with the police.**

**Serious violence content update**

**Links added to examples of support for DSLs.**

**Summary: Annex B – Role of the Designated Safeguarding Lead (previously Annex C in KCSIE 2025)**

**Added expectations around DSL cover arrangements when the DSL is unavailable.**

**Added further information to information sharing guidance.**

**Updates on CCE/CSE indicators and Operation Encompass duties. 194**

**Summary: Annex C – Regulated activity (children) – Supervision of activity which is regulated activity when unsupervised (previously Annex E in KCSIE 2025)**

**Removed, Crime and Policing Bill Act 2026 made changes to regulated activity to remove the ‘supervision exemption’. This means that any person volunteering in a school or college in a role that involves teaching, training, instructing or supervising children on more than 3 days in a month or overnight is now in regulated activity**

## **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

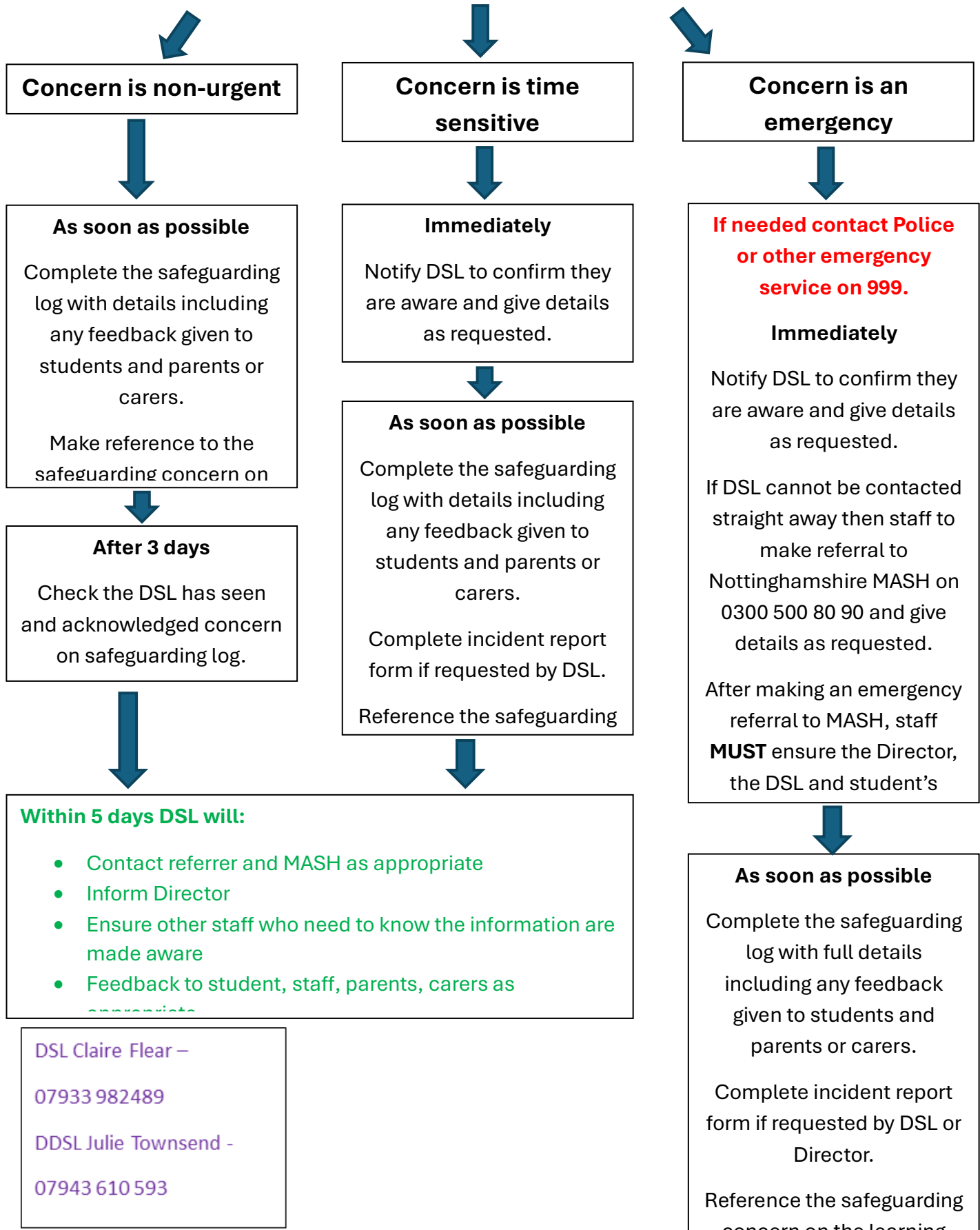
PSD – Personal and Social Development

RSHE – Relationship, Sex and Health Education



## Safeguarding Procedure - Information for staff

**Staff member has a concern  
about a student**



**Concerned for a child's welfare in and outside of school?**

Be alert to signs of abuse, low attendance, unusual behaviour and/or changes to



**A child makes a disclosure**

### Guidance for Using Body Maps to Record Observations of Physical Injury

Where appropriate, **medical assistance should be sought without delay.**

**Body maps** are a tool to help staff accurately document and illustrate visible signs of harm or physical injury. They should be used in conjunction with the school's safeguarding recording procedures.

- Always use a **black ink pen** (not pencil), and **do not use correction fluid or erasers.**
- **Do not remove clothing** to examine injuries unless the area is already exposed due to treatment or the child's clothing naturally allows visibility.
- **Staff must not take photographs** of any injuries or marks on a child's body under any circumstances. Doing so may result in the staff member being subject to **managing allegations procedures.** Use the body map provided to record observations in line with this guidance.
- **All concerns must be reported and recorded immediately** to the appropriate safeguarding services, such as the **Multi-Agency Safeguarding Hub (MASH)** or the child's allocated **social worker** if the case is already open to children's social care.

When recording an injury, aim to include the following details for each mark observed (e.g. bruises, cuts, swelling, burns, scalds, lacerations):

- **Exact location** on the body (e.g. upper outer arm, left cheek)
- **Size** of the injury (in centimetres or inches)
- **Shape** of the injury (e.g. round, linear, irregular)
- **Colour** of the injury (note if multiple colours are present)
- Whether the **skin is broken**
- Presence of **swelling**, either at the site or elsewhere
- Any **scabbing, blistering, or bleeding**
- Whether the injury appears **clean or contaminated** (e.g. grit, fluff)
- Any **restriction in mobility** due to the injury
- Whether the site feels **warm to the touch**
- Whether the child appears **feverish or in pain**
- Any changes in the child's **posture or body movement**

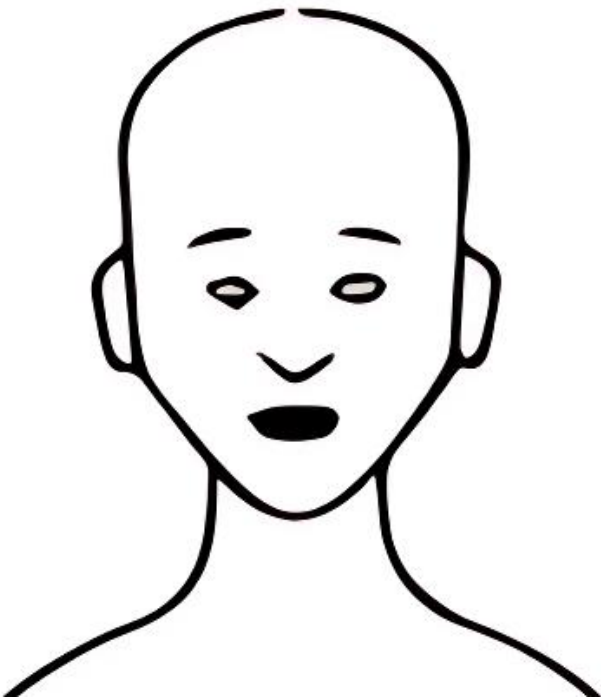
The **date and time** of the observation must be clearly recorded, along with the **name and role** of the person completing the record. Additional comments may be added where relevant.

If **First Aid** is administered, this should be recorded appropriately.

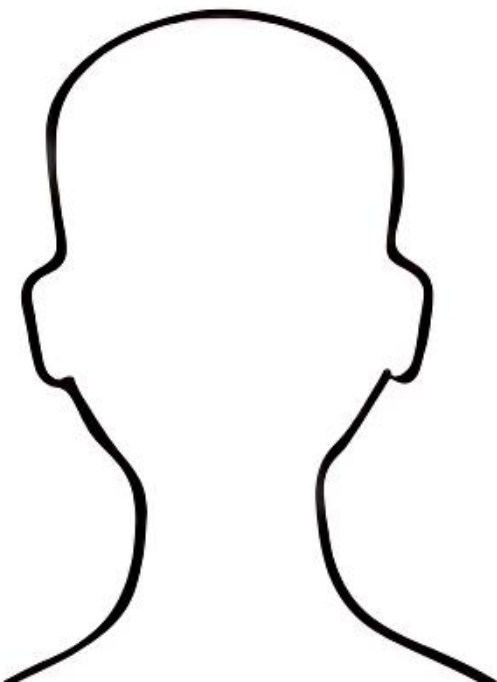
A completed body map should be stored securely within the child's **child protection file.**

|                               |  |                             |
|-------------------------------|--|-----------------------------|
| Names for child:              |  | Details of physical injury: |
| Date of Birth:                |  |                             |
| Name of worker:               |  |                             |
| Signature of worker:          |  |                             |
| Name of school/college:       |  |                             |
| Date and time of observation: |  |                             |

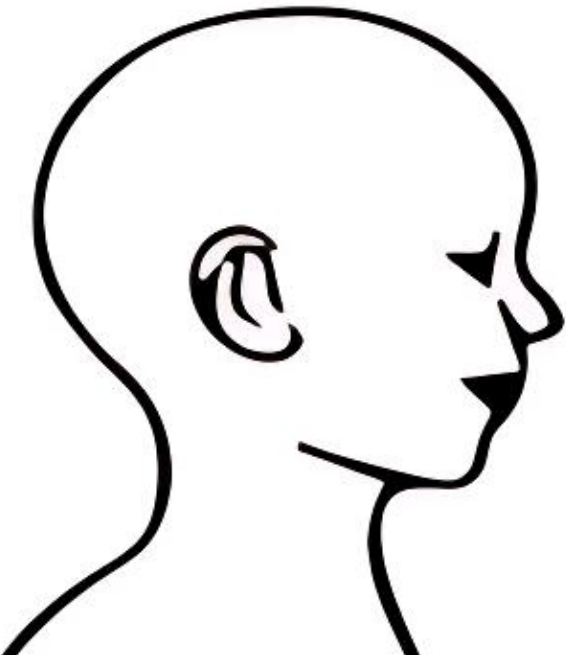
FRONT



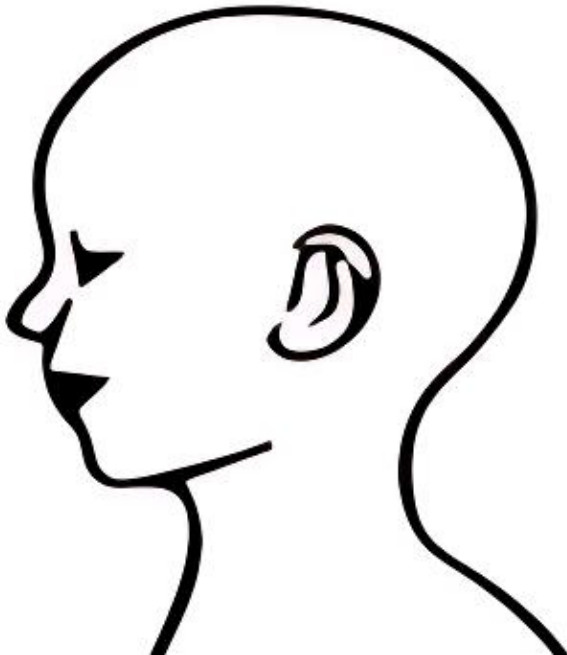
BACK



RIGHT

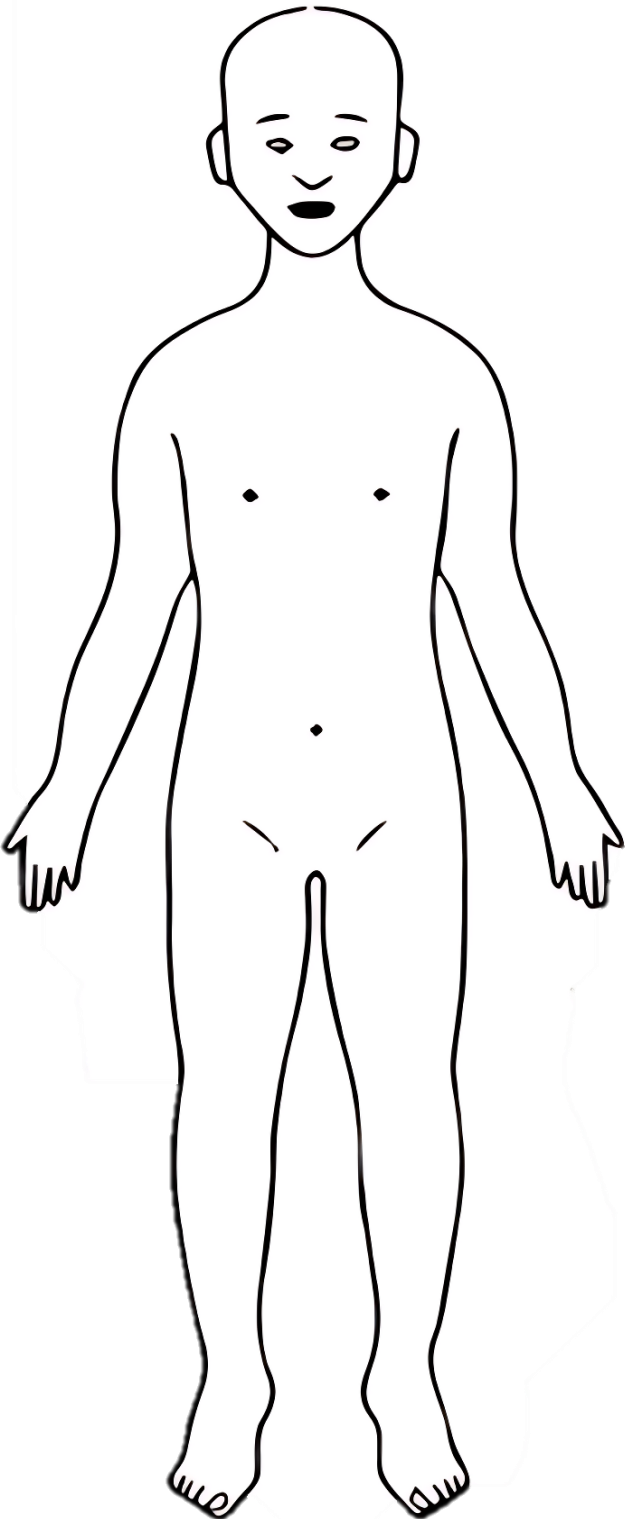


LEFT

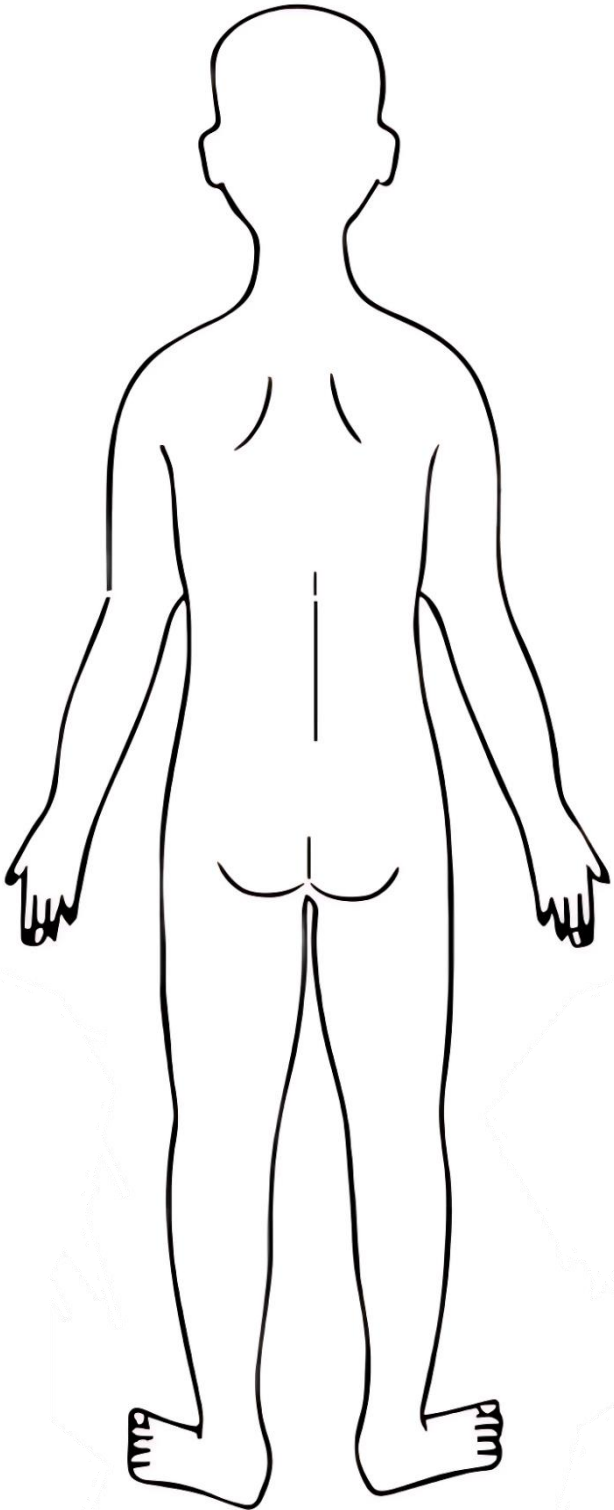


|                               |  |                             |
|-------------------------------|--|-----------------------------|
| Names for child:              |  | Details of physical injury: |
| Date of Birth:                |  |                             |
| Name of worker:               |  |                             |
| Signature of worker:          |  |                             |
| Name of school/college:       |  |                             |
| Date and time of observation: |  |                             |

FRONT

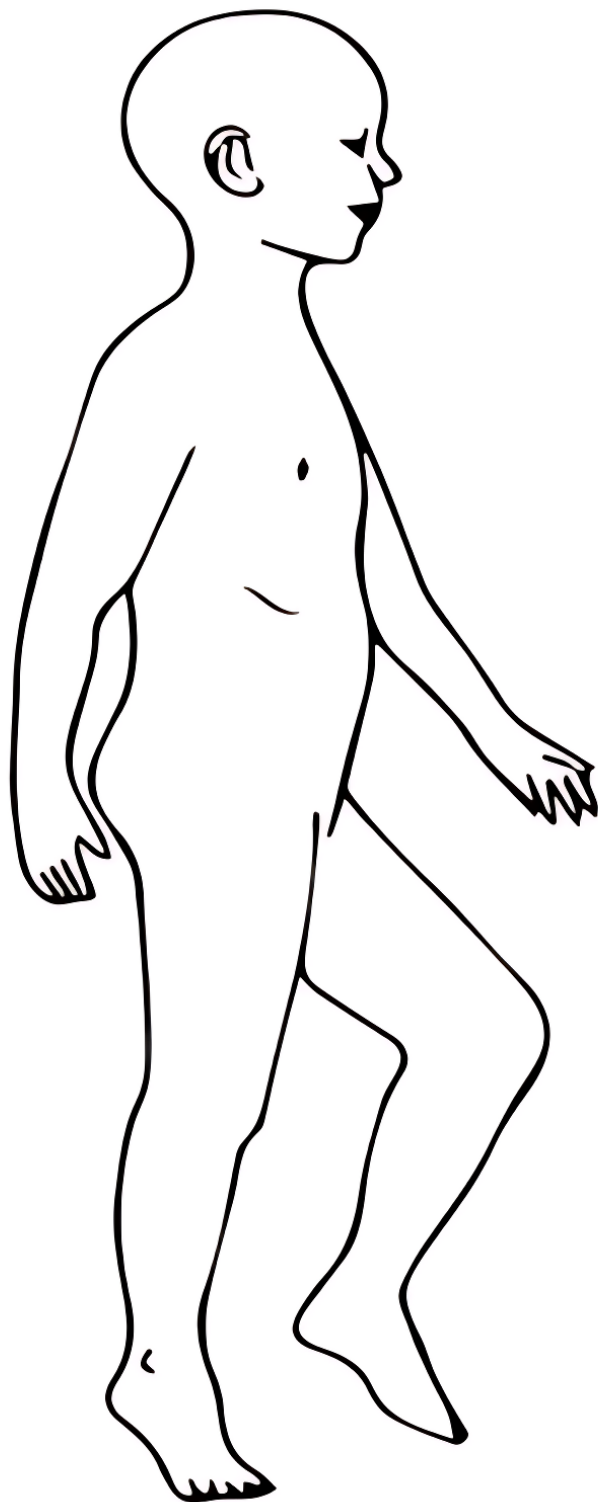


BACK

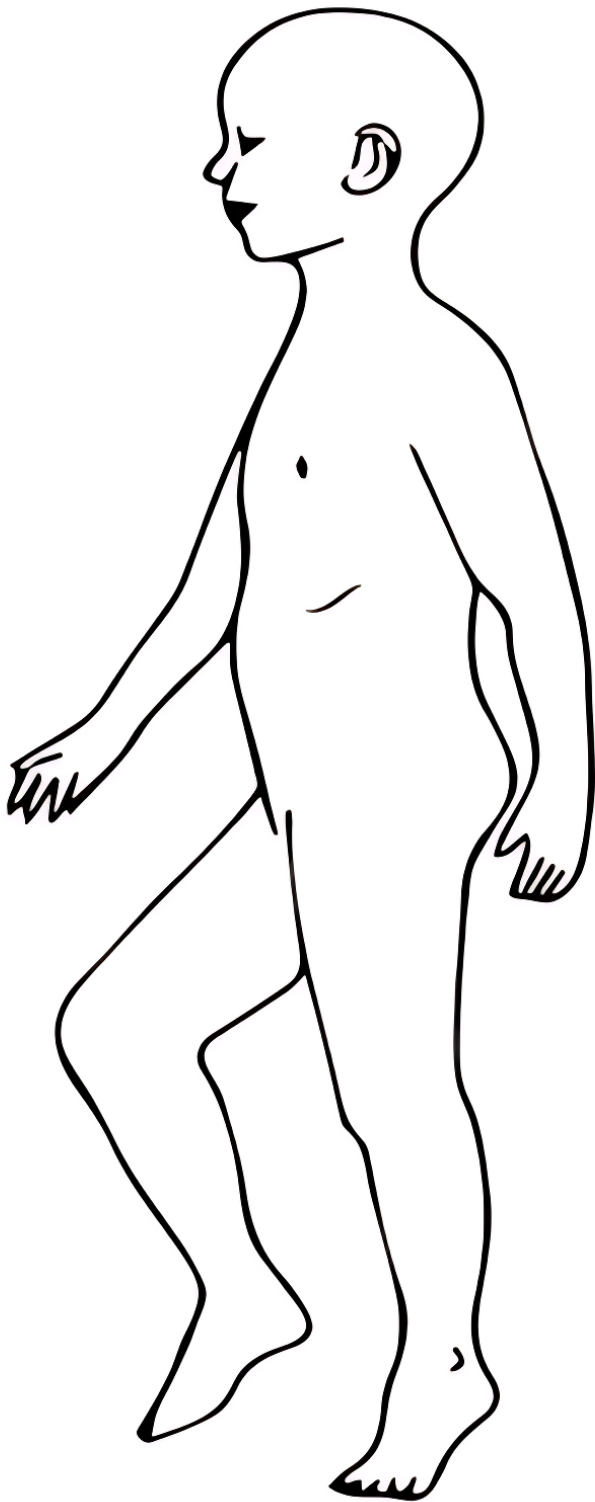


|                               |  |                             |
|-------------------------------|--|-----------------------------|
| Names for child:              |  | Details of physical injury: |
| Date of Birth:                |  |                             |
| Name of worker:               |  |                             |
| Signature of worker:          |  |                             |
| Name of school/college:       |  |                             |
| Date and time of observation: |  |                             |

RIGHT

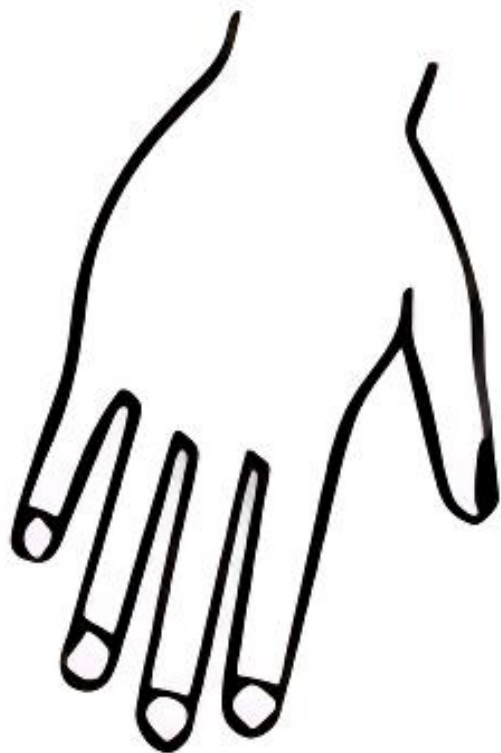


LEFT



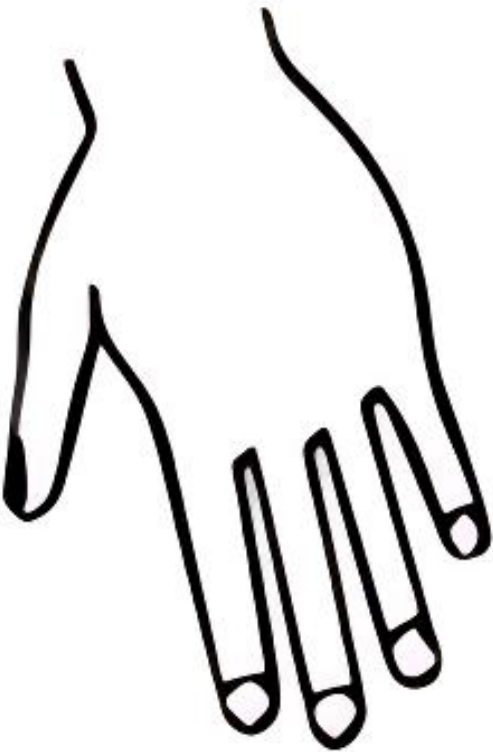
|                               |  |                             |
|-------------------------------|--|-----------------------------|
| Names for child:              |  | Details of physical injury: |
| Date of Birth:                |  |                             |
| Name of worker:               |  |                             |
| Signature of worker:          |  |                             |
| Name of school/college:       |  |                             |
| Date and time of observation: |  |                             |

RIGHT



BACK OF  
HANDS

LEFT



RIGHT



PALMS

LEFT



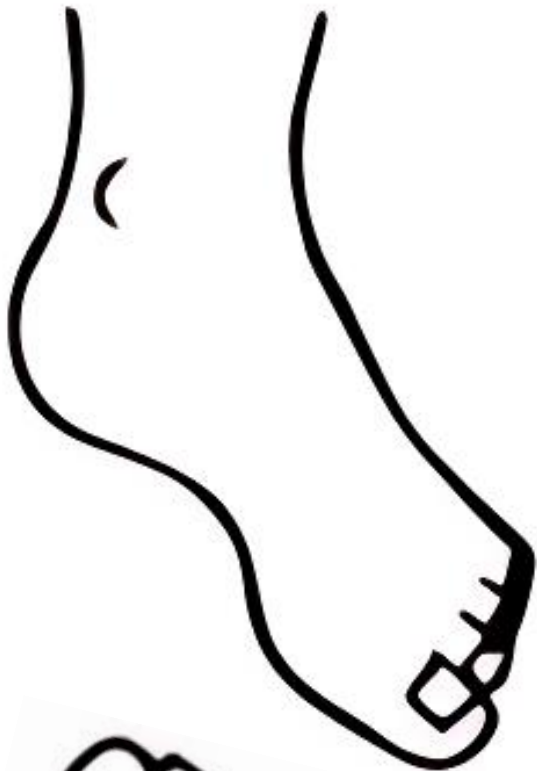
|                               |  |                             |
|-------------------------------|--|-----------------------------|
| Names for child:              |  | Details of physical injury: |
| Date of Birth:                |  |                             |
| Name of worker:               |  |                             |
| Signature of worker:          |  |                             |
| Name of school/college:       |  |                             |
| Date and time of observation: |  |                             |

RIGHT



TOP OF  
FEET

LEFT



BOTTOM  
OF FEET



RIGHT



LEFT

|                      |             |                                                                                                                         |
|----------------------|-------------|-------------------------------------------------------------------------------------------------------------------------|
| Date of Completion   | 1.9.25      | Signed: <br>Claire Flear (DSL/Teacher) |
| Date of Ratification | 1.9.2025    | Signed: <br>Julie Townsend (Director) |
| Date of Review       | July 2026   |                                                                                                                         |
| Next Review Date     | August 2027 |                                                                                                                         |