



Safeguarding Vulnerable Adults Policy
2023-2024



Name of School: Priory School**Tel: 020 8653 8222****Headteacher:**

Name: Julie Evans

Contact details: headteacher@priorycroydon.org.uk**Designated safeguarding lead:**

Name: Tyler Mitchell

Contact details: tmitchell@priorycroydon.org.uk**Deputy designated safeguarding lead:**

Name: Sarah Gough

Contact details: flo@priorycroydon.org.uk**Designated LAC teacher:**

Name: Jonathan Wiltshire

Contact details: jwiltshire1.306@lgflmail.org**Chair of Governors:**

Name: Susan Powell

Contact details: spowell77.306@lgflmail.org**Nominated governor for safeguarding:**

Name: Dominic Riddex

Contact details: driddex.306@lgflmail.org**London Borough of Croydon****Local Authority Designated Officer (LADO):**lado@croydon.gov.uk

LADO: Steve Hall

Email: steve.hall@croydon.gov.uk

Tel: 0208 255 2889

Mob: 07825 830328

Assistant LADO: Jane Parr

Email: jane.parr@croydon.gov.uk

Tel: 0208 726 6000 (Ext. 84343) Mob: 07985 590505

Croydon Transitions TeamDuty: TransitionDutyInbox@croydon.gov.uk

Tel: 0208 604 7577

Adult Safeguarding ReferralsEmail: Referral.team2@croydon.gov.ukWebsite: croydon.gov.uk/healthsocial/sva/reporting-abuse

Tel: 0208 726 6500

Croydon Safeguarding Adult Board (CSCB)Website: croydonsab.co.uk/Email: csab@croydon.gov.uk

Tel: 0208 726 6500



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1. Introduction

Priory School is a maintained Community Special School for students aged 11-19 with moderate-severe learning disabilities as well as students with Autistic Spectrum Disorder. All students have Education, Health and Care plans (EHCPs).

This policy states the ways in which Priory School ensures that students over the age of 18 are safeguarded and their best interests are considered in order to maximise their opportunities, realise their aspirations and keep safe both in and out of school.

The Priory school Safeguarding and Child Protection Policy 2023-2024 outlines details of how all Priory students are safeguarded. This policy is designed to be read alongside the Safeguarding and Child Protection Policy, both of which are updated annually.

This policy is written in accordance with the following legislation and guidance;

- Care Act 2014
- Mental Capacity Act 2005
- Croydon Safeguarding Adults Board
- [London Multi-agency adult safeguarding policy and procedures April 2019](#)

This policy is to be read alongside other Priory school policies

- Priory School Child Protection and Safeguarding Policy 2023-2024
- Priory School Personal Care Policy 2023
- Priory School Behaviour Policy
- Priory School Anti-Bullying policy
- Priory School First aid and Medication Administration policy
- Staff code of conduct
- Safer Internet Use policy
- Risk profiles and risk assessments

1.1 Purpose

This Policy will enable Priory School to demonstrate its commitment to keeping safe all Priory students that are considered to be Adults at Risk. Priory School acknowledges its duty to respond appropriately to any allegations, reports or suspicions of abuse.

This Policy will inform staff best practice and ongoing professional development and training so that all staff, volunteers, students, parents and carers and the governing body can work proactively to prevent abuse and to know what to do in the event of abuse taking place.

The Policy has been drawn up in order to enable Priory School to:



- promote best practice and work proactively across all areas of the school and the curriculum in order to prevent harm, abuse and coercion occurring and to empower and support adults at risk in taking an active role in maintaining their own safety and wellbeing
- ensure that any allegations of abuse or suspicions are dealt with appropriately
- stop abuse occurring and, in the event of abuse occurring, to provide support for the person experiencing that abuse.

The Policy applies to all staff including senior managers and leaders, school governors, permanent staff, agency staff, volunteers, sessional workers, work experience students and anyone else who is working on behalf of Priory School.

- The Governors and staff of Priory School believe in equality of opportunity for all of its students and will ensure that all the School's policies, planning, actions and ethos will proactively support this.
- The Governors and staff of Priory School believe in equality of opportunity for all people with a learning difficulty or disability throughout their lives and will ensure that it utilises its resources to create opportunities for personal development in all possible situations and circumstances, using risk-assessment procedures to create reasonably safe opportunities for progress, achievement and challenge that maximize rather than limit individual potential.
- The Governors and staff of Priory School will promote the rights of all people to live free from abuse and coercion and will work to ensure the safety and wellbeing of people who do not have the capacity to decide how they want to respond to the abuse, maltreatment or discrimination that they are experiencing.
- The Governors and senior leaders of Priory School will manage services in a way that promotes safety and prevents abuse

1.2 Definitions and Context

This Policy refers to harm in terms of 'abuse.' This might be physical, sexual, emotional, financial or material, neglect or acts of omission, discriminatory or institutional. See appendix 1 for definitions of abuse.

"Safeguarding means protecting someone's right to live in safety, free from abuse and neglect."
(Department of Health and Social Care, 2023)

This Policy relates to the safeguarding of adults at risk. An adult refers to a person aged 18 or older. This policy follows the policy and procedures compiled by the London Safeguarding Adult Board.

"Adult at risk is a person aged 18 or over who is in need of care and support (whether or not those needs are being met), who is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves against the abuse or neglect or the risk of it."

(LONDON MULTIAGENCY ADULT SAFEGUARDING POLICY & PROCEDURES Final version (as agreed by the London Safeguarding Adult Board), 2019)



1. Prevention - Safeguarding at Priory School

1.1. Young people with Special Education Needs and Disabilities (SEND)

Priory School is a secondary special school for students who have moderate - severe learning difficulties. Many students have associated complex behaviours and many students have a diagnosis of Autism Spectrum Disorder. All students have an EHCP.

"The available UK evidence on the extent of abuse amongst disabled children suggests that disabled children are at increased risk of abuse and that the presence of multiple disabilities appears to increase the risk of both abuse and neglect." Working together to Safeguard Children 2010

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

"These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being unable to understand the difference between facts and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so." (Keeping Children Safe in Education 2023 p.49.)

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

- Staff training emphasising specific needs of Priory students and the requirement for staff vigilance and close liaison with the Designated Safeguarding Lead or any deputies.
- All staff are encouraged to exercise professional curiosity and discuss all concerns with the Designated Safeguarding Lead or any deputies.



- All staff working with students are familiar with individual communication needs and how to identify if something is wrong.
- Priory staff are skilled at developing close professional relationships with students and become adept at identifying subtle changes in presentation to enable recognition of issues that may indicate abuse.

1.2. Training for all school staff

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

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

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

In addition to safeguarding training, staff at Priory receive a range of training to develop expertise in working with children and young people with disabilities all of which contributes to a whole school safeguarding culture including MAYBO **Positive Approaches to Behaviour (Learning Disabilities)** training in conflict management and key staff are identified for training in safe use of restrictive physical skills in behaviour management.

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

- Priory School Safeguarding and Child Protection Policy 2023-2024
- Safeguarding Vulnerable Adults Policy 2023-2024
- Staff code of conduct
- Positive Behaviour support policy
- Personal Care Policy
- Anti-Bullying Policy
- First Aid and administering medication policy
- Safer Internet Use policy
- Risk profiles and risk assessments



1.3. Training for governors

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

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

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

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

At Priory, the Designated Safeguarding Lead and any deputies will keep a close dialogue with teaching staff about any safeguarding issues that could impact on learning and students fluctuating social care needs. Sensitive information will always be shared in-line with GDPR and on a need-to-know basis.

Teachers are asked to contribute to provide updates for the following meetings; Child Looked After reviews, Child Protection Reviews and Core Group meetings, Child in Need meetings, Team Around the Child (or Family) meetings. Social workers are asked to attend and contribute to EHCP meetings.

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

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

1.5. Safeguarding in the curriculum

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



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

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

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

1.6. Personal Care

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

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

- Personal care requirements will be highlighted on each student's Ready to Learn document and for those requiring additional support, will be detailed in a student's



Personal Care Plan and a written record of each time the personal care is provided to the student.

- Only staff that are well known to the student should be supporting with personal care.
- Staff should always communicate with the student about how they are going to support them, request consent from the student and be gentle and respectful, maintaining dignity for the student at all times.
- Staff should always support students to be as independent as possible and enable the development of independence skills wherever possible.
- Typically, Personal Care Plans are reviewed annually and shared with class teams, parents/carers and where appropriate, the student. If it is felt a more frequent period of review is needed, the Personal Care Plan will reflect this.

1.7. Behaviour that challenges

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

1.8. Use of reasonable force

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

As detailed in section 1.2, Priory School follows the structure of MAYBO, which is in line with the Restraint Reduction Network's training standards. The school has qualified MAYBO trainers in post who are able to train staff on induction or as part of an ongoing training cycle.

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

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



- The physical restraint should employ the minimum reasonable amount of force and be used for the shortest possible time
- It can be used as part of a planned response and should be stated in the RED section of a student's Behaviour Support Plan: when the intervention can be used and what hold is to be used. If any other holds are used during the incident, then this needs to be reported to the Senior Leadership Team as soon as possible and a written record uploaded on CPOMS.
- Parents should be immediately informed if their child/young person has been involved in an incident that resulted in physical restraint and the hold used and for how long should be reported.
- Where a student has been physically restrained, they will reviewed by a First Aider to assess their physical welfare. The outcome of the review will be logged and parents informed via Medical Tracker. There may be occasions when a student refuses First Aider review following restraint. Where this is the case, parents will be notified of the refusal as part of the initial report of physical intervention.
- As an unplanned response or an emergency intervention, this will be followed by consultation with the Behaviour Team in order to clarify the need for a full behavioural risk assessment and development of an appropriate support plan. Following this, updated Risk Profiles and Behaviour Support Plans should be in place as soon as possible and staff trained accordingly

1.9. Use of physical contact

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

Keeping Children safe in Education 2023 p.42

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

Physical contact may be open to misinterpretation and so staff should think clearly and carefully before making contact with a student and be certain that they are informed enough to make a decision in their best interests. Inappropriate physical contact is likely to be viewed as a



safeguarding concern and it is likely to trigger processes described in the section 'allegations against staff'.

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

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

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

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

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



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

1.10. Mental Health

“Mental Health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation” (Keeping children Safe in Education 2023, p.46)

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

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

1.11. Working with parents and carers

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

The School will:



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

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

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

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

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

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

1.12. Early help and social care support

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

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

The eligibility criteria for the transitions team in Croydon Adults Social Care indicates that most Priory students meet the threshold for support because of their learning disability. As such, where there is a need for further support, most Priory students would be referred directly to the transitions team for an adult assessment when they reach the age of 18.

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



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

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

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

2. Prevention of Abuse

a. The six underlying principles

Priory school is committed to the prevention of abuse and the development of a culture and ethos which safeguards adults at risk all underpinned by 6 principles outlined in the Care Act 2014



		A Priory Student Perspective
Empowerment	Adults are encouraged to make their own decisions and are provided with support and information	In line with assessment of my mental capacity, I am consulted about the outcomes I want from learning, future destinations and from safeguarding process. Staff will attempt to understand my wishes using my preferred communication strategies.
Protection	Strategies are developed to prevent abuse and neglect that promotes resilience and self-determination	I am taught about what abuse is, in a way that is adapted to my level of learning. I am taught how to ask for help from the people that I trust. I am taught how to use my 'voice' to say 'No!' when I don't like something. Staff working with me are taught to recognise abuse and report it following school and statutory procedures.
Prevention	A proportionate and least intrusive response is made balanced with the level of risk	I am confident that professionals around me have undergone all necessary employment checks and that all staff will be trained to support me to keep me safe from harm and enable my best possible outcomes to be achieved.
Proportionality	Adults are offered ways to protect themselves, and there is a co-ordinated response to adult safeguarding	I am provided with help and support to report abuse using preferred communication strategies. I am taught about how to keep myself safe. I am supported to take part in the safeguarding process to the extent to which I am able
Partnership	Local solutions through services working together within their communities	I am confident that information will be appropriately shared in a way that takes into account its personal and sensitive nature. I am confident that agencies will work together to find the most effective responses for my own situation
Accountability	Accountability and transparency in delivering a safeguarding response	I am as clear as I can be about the roles and responsibilities of all those involved in the solution to the problem. I am able to trust that professionals around me will act in a responsible way in response to safeguarding and will be accountable for the safeguarding actions taken.

(London Multi-agency adult safeguarding Policy and Procedures 2019)



b. Safer Recruitment

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

The School will carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles and governors, salaried trainee teachers and those involved in the management of an independent school, in accordance with statutory requirements. These checks will include verification of identity, right to work in the UK, Enhanced DBS check, 2 references, one of which must be from a current/most recent employer.

c. Staff training

All staff working at Priory school will have had at least annual Safeguarding training to impart details of the safeguarding policy, the safeguarding adults at risk policy and Keeping Children Safe in Education. All staff working directly with students will have bite-size termly safeguarding awareness refreshers.

Through induction, safeguarding training, wider training and appraisal processes, staff should have an awareness of how concerns may manifest in students with learning difficulties and respond to any concerns by seeking advice with the designated lead or deputy.

All Priory staff will:

- Be aware of indicators of abuse and neglect
- Be able to identify cases of adults at risk who may be in need of help or protection.
- Feel confident in responding to a disclosure of abuse. Will understand the importance of listening without judgement, providing reassurance and informing the student of the safeguarding processes and who will be informed.
- Follow safeguarding procedures should any signs or symptoms of abuse be identified. This includes immediate verbal report to a designated safeguarding lead or deputy and written report via CPOMS.

Abuse includes; physical abuse, sexual abuse, emotional abuse, financial abuse and neglect (Signs and symptoms are detailed in the Priory child protection and Safeguarding policy).

The Care and support statutory guidance outlines 10 types of abuse that Adults at risk may be at risk from. See <http://londonadass.org.uk/wp-content/uploads/2019/05/2019.04.23-Review-of-the-Multi-Agency-Adult-Safeguarding-policy-and-procedures-final-.pdf> Pg. 26

d. Behaviour and Safety



Priory School recognises that some of its students present behaviours which may challenge others. It is acknowledged that abuse of children and adults at risk may occur in the management of challenging behaviour, particularly where physical interventions are used and Priory School is committed to the least restrictive best practice in positive behaviour support in line with MAYBO training and the Priory Behaviour Policy.

Staff at Priory School recognise behaviours which challenge as a form of communication and will always use their skills and knowledge of students to accurately interpret that communication and support with strategies to offer alternative forms of communication.

Staff always review possible triggers for challenging behaviour, including their own actions, to ensure further challenges are minimised.

All staff are trained in level 1 MAYBO approaches to de-escalate challenging situations and minimise risk to students, staff and others.

The School operates a robust system of risk assessment in terms of individual students, activities, places and equipment.

All staff, including agency staff, are expected to be familiar with behaviour support plans relevant to the students they are working with, activities they are supporting students in and the places they are working, either with students or independently.

The overriding responsibility of every staff member at Priory School is the Safeguarding of all students.

e. Bullying and Peer on Peer Abuse

E19. Behaviour that occurs between peers

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

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

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



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

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

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

E19.1 Bullying and Peer on Peer Abuse

Bullying: Definition

"Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many formsand is often motivated by prejudice against particular groups..... It might be motivated by actual differences between children, or perceived differences." "Many experts say that bullying involves an imbalance of power between the perpetrator and the victim"

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

Peer on Peer Abuse: Definition

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

Bullying and Peer-on-peer abuse at Priory

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



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

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

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

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

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

Responding to incidents of bullying/abusive behaviour between peers

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



6. The most appropriate support is identified for the 'victim'; this may be in the form of therapeutic support in school or additional support identified with services outside of school (see below).

Supporting students to reduce incidents of challenging behaviour

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

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

- During incidents of physical challenge, staff will always engage in dynamic risk assessments to ensure that students in the vicinity are kept safe. This may require unplanned use of physical intervention. This will always be recorded in the incident report and overseen by the behaviour team and DSL.
- Risk Profiles and risk assessments will be reviewed to ensure that there are identified strategies that sufficiently reduce the risk present to students impacted by others behaviour. This may require assessment for use of a physical intervention when there is risk of harm to others and/or moving students to ensure their safety.
- Behaviour Support Plans will be reviewed to ensure that strategies are addressing changing behaviours to reduce prevalence of behaviour that can harm others.
- Where appropriate, for those who are able to, students will be offered a de-brief session to talk through the incident later in the day or at a later date to provide problem solving and reparation opportunities. This should only be done when the student is calm and able to reflect on the incident. Where appropriate visual tools used to support e.g. comic strip conversations.

Supporting Students Impacted by challenging behaviour

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

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

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



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

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

E19.2. Harmful sexual behaviour, sexual violence and harassment

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

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

The School will promote an environment where all students are encouraged and feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the School and appropriate referrals made to the police and children's social care.

Sexual abuse and Sexual harassment

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

Sexual abuse includes abuse of children through sexual exploitation.



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

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature either explicitly or implicitly. (United Nations, no date)

Sexual violence

It is important that schools and colleges are aware of sexual violence and the fact young people can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. The government guidance refers to sexual violence under the Sexual Offences Act 2003¹⁴ and describes sexual violence as: Rape, Assault by penetration, Sexual assault or causing someone to engage in sexual activity without consent.

What is consent?

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

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

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

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

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

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

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

Sexual Violence and Sexual Harassment at Priory School



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

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

Despite this, it is important to be vigilant to the risk of students being abused by their peers and be familiar with the processes to support students should this occur.

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

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

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

Reporting and management of Sexual Abuse and Sexual Harassment

- Any incident of sexual violence, sexual harassment or harmful sexual behaviour that is observed or reported to any staff member should be verbally reported immediately to the Designated Safeguarding Lead or a deputy.
- Verbal reports are essential to ensure that quick action takes place to keep the young person safe.
- The staff member will then be asked to record the incident through the safeguarding tab on CPOMS
- The DSL will assess the concern raised and will respond on a case-by-case basis. Possible actions may include:
 - Police involvement
 - Social Care referral – See Safeguarding Policy Section
 - Information gathering within school to assess risk to students
 - Consideration of how to keep all students safe within school;



- If there is an on-going perceived risk, it may be necessary to consider internal or external exclusion until students can be supported to reduce risk to peers onsite.
 - Implementation of appropriate support for both students with consideration of their individual learning needs.
- The DSL will inform the parents of the student/s who has made the disclosure or seen to be impacted by the behaviour of another and will discuss support plans.
- The DSL will inform the parents of the student/s who the allegation has been made about with suggested decisions/support identified.
- The DSL will identify the most appropriate way to support the student who has been impacted by another's behaviour. This may include:
 - Opportunities to speak with favoured staff members
 - Internal therapeutic support offered via allied therapists or support strategies offered by members of the therapy team.
 - Referral to external support services
 - Consideration of the need to move students where there are risks identified to specific individuals. This will always be done sensitively, ensuring that actions are not taken to 'punish' but to ensure safety.
 - Increased support in RSE, safe relationships and 'speaking out' advocacy with the support of SALT as required.

Incidents of Inappropriate sexualised behaviour

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



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

Searching, Screening and Confiscation Guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf

f. Principles for Teaching and Learning

- Priory School provides its students with a broad and balanced curriculum that reflects their individual abilities, preferred learning styles and aspirations.
- The Priory Curriculum is used to provide opportunities to actively engage in learning that will support safeguarding and senior and middle leaders, teachers and support staff will strive to deliver this learning in ways that meet individual needs and the broader needs of an SLD/MLD/ASD cohort.
- Across all Key Stages, the appropriate curriculum areas are used to deliver personalized learning that promotes British Values and aims to prevent radicalisation in line with the WRAP agenda.
- The PSHE curriculum includes differentiated learning around keeping safe with the aim to raise awareness of and prevent instances of FGM, running away, gangs and DASV in a way that is accessible to Priory Students.
- Through the ICT curriculum, Priory Students who are able to access the internet are taught about online risks and how to keep safe when using the internet.
- Priory School recognizes the importance of providing safe space for students to communicate with staff who understand their responsibilities in case of disclosure.
- Learning opportunities to support personal development and wellbeing are embedded across the curriculum and the work of the multi-disciplinary team.
- All lessons are planned and delivered to ensure appropriate differentiation.
- All students have an appropriate level of challenge within lessons to maximise their individual progress.
- Staffing levels for each class reflect the individual needs of every student in that class.
- All lessons will use a range of appropriate teaching materials and resources, including computers, interactive whiteboards and iPads, to engage students, develop independence and make learning more accessible.

3. Reporting and responding to concerns

a. Reporting

Where there are concerns about a student's welfare, staff will act immediately by verbally reporting to the designated safeguarding lead (DSL) or their deputy. **The same staff member**



should then complete a written safeguarding report on CPOMS. The school designated leads are most likely to have a complete safeguarding picture and therefore are the most appropriate people to decide on the next course of action.

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

Due to the communication difficulties experienced by most Priory students, it may be difficult for them to raise a concern, explain how they are feeling or ask for help. This requires staff to be especially vigilant and have an increased dialogue with caregivers.

If a student arrives at school with any injury, staff should report this using a body map on CPOMS as soon as possible. If there has been no explanation given for the injury from a family member or if the explanation does not fit with the injury seen, this must be reported to the designated lead immediately

b. Response to a concern

The DSL should respond to the report by considering information available to identify most appropriate next course of action.

The DSL will consider the students mental capacity to give consent to share information prior to making contact with family or wider agencies.

Where a student is not deemed to have mental capacity to give or refuse consent for information sharing, a best interests decision will be made to ensure the safety of the young person and protect against risk of harm. The DSL will ensure that the student is told about the sharing of information using a student's preferred communication strategy.

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

Information may be shared with caregivers, allocated social worker, social care team and/or a safeguarding adults referral may be made.



Where it is deemed appropriate or necessary, the school may consider referral to advocacy services to enable independent assessment of best interests.

3.3 Referral to social care

The decision to complete an adult safeguarding referral should be made by the Designated Safeguarding Lead. In the event that the DSL is not available, this should not delay any referral and any member of staff may make a referral if this is necessary. Staff should discuss the matter with a member of the senior leadership team. The Designated Safeguarding Lead should be informed as soon as possible.

If the student lives outside Croydon, a referral should be made to their home local authority.

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

The school will participate in best interests processes that may result from a safeguarding referral or involvement from a social care team.

3.4 Allegations against staff members

Reporting a concern

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

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

The DSL/Headteacher will:

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



Before contacting the LADO the DSL/Headteacher will:

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

Allegations that may meet the harms threshold

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

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

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

Where the harms threshold is met, this should be reported immediately to the Headteacher who, with the DSL will report the matter to the LADO.

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

lado@croydon.gov.uk

Location: 4th Floor, Zone F, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA



Senior LADO: Steve Hall
Email: steve.hall@croydon.gov.uk
Tel: 020 8726 6000 Ext 24334 Mob: 07825 830328

LADO: Jane Parr
Email: jane.parr@croydon.gov.uk
Tel: 0208 726 6000 (Ext. 24817) Mob: 07985 590505

If an allegation is made that does not meet this harms threshold. This will be considered a 'low level concern' which will be investigated and responded to following the process outlined in the **low level concerns policy**.

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

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

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

Investigation

In the event that the harms threshold has been met and the LADO advises that an investigation is required, a "case manager" will be identified to complete the investigation. The case manager will ensure that the guidance in Keeping Children Safe in Education 2023 is followed to:

- Ensure the welfare of all children and young people at all times and **this will be the prime concern in terms of investigating an allegation against a person in a position of trust.**
- Inventively seek alternatives to suspension through the process of the investigation unless the LADO objects based on information received from other services.
- Inform the staff member of decisions in writing
- Consider possible professional reputational to the staff member and minimise upheaval unless it is in students best interests
- Keep accurate, thorough and detailed records of all information gathers, decisions made and outcomes. These will be stored electronically on the staff member's HR file until and unless the decision is made that the allegation is malicious or false.



- Ensure that welfare support is offered to the staff member; ensure there is an effort to minimise stress for the alleged at all times; advise them to access a trade union, appoint a named representative to keep the person informed about progress of the case and provide access to counselling or medical advice where appropriate. Ensure the staff member is appropriately supported through the 'return to work' process.
- Inform parents or carers of the young person(s) involved as soon as possible. Consulting the LADO and where involved children's social care and/or the police on what information can be disclosed, only in relation to their child - no information can be shared regarding the staff member. Ensure they are made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.
- Maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered in line with The Education Act 2011 amended the Education Act 2002
- If allegations are found to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead should consider whether the child and/or the person who has made the allegation is in need of help & consider a referral to social care. If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual in reference to the code of conduct.
- Follow guidance in Keeping Children Safe in Education regarding 'settlement arrangements' and resignation (p.98)
- At the conclusion of an investigation, with the LADO, review the circumstances of the case to determine whether there are any improvements to be made to the school's or college's procedures to help prevent similar events in the future

Allegation outcomes

The definitions that should be used when schools and colleges determine the outcome of an allegation are set out below:

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

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

Record keeping and references



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

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and the outcome as categorised above;
- a copy provided to the person concerned, where agreed by children's social care or the police; and,
- a declaration on whether the information will be referred to in any future reference. 398.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

Records will be kept in line with guidance stated in Keeping Children Safe in Education 2023 which references Independent Inquiry into Child Sexual Abuse (IICSA), ICO.

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

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

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

3.5 Written Record keeping

When there has been a concern raised, there will be a written record that is kept in line with GDPR guidance for the purposes of ensuring student's safety in the future.

All safeguarding information is stored securely away from the students' main file.

Safeguarding files are transferred securely to the Designated Safeguarding Lead of the students' next placement in line with information sharing and GDPR guidelines.

4. Role and responsibilities



Governors

- Governors will ensure this policy is reviewed and updated annually
- Governors will engage in safeguarding training that should equip them to test and assure themselves that the safeguarding policies and procedures in place are effective and support a robust, whole school approach to safeguarding. It should be regularly updated.
- Governors will ensure that other School policies and procedures reflect and support the principles embodied in this Policy
- The Governors and SLT constantly scrutinise the financial robustness of the School and ensure systems are in place for Priory to offer value for money.

Leadership and Management

- The Senior Leadership Team (SLT) work with Governors to ensure that the vision, ethos and strategic direction of the School constantly improves outcomes and the learning experience for all students.
- The SLT support all staff, through line management, observations, appraisal and mentoring to deliver the best possible learning experience and outcomes for students.
- The School pro-actively establishes, nurtures and values partnership work with parents, stakeholders, education providers and other agencies to improve outcomes and destinations for students.
- The SLT and Governors monitor the achievement and progress of students to ensure they maximise the impact of their learning.
- The SLT and Governors encourage and facilitate the continuous professional development of staff to improve the learning experience for students and maximise opportunities for staff.
- The SLT will establish with students, staff, Governors and stakeholders core values that create and sustain a positive ethos and teaching and learning, personal and pastoral care and multi-disciplinary team working guided by the six underlying principles outlined in the Care Act 2014.
- The SLT will ensure that all staff, Governors, students and families/carers are familiar with this Policy
- The SLT will endeavour to keep up-to-date with national developments relating to the prevention of abuse to adults at risk and to the promotion of their wellbeing, best interests and individual potential

All Staff are expected to follow this policy and other school policies to ensure that the safety and prevention of harm for all Priory students is maintained as the highest priority.



Taken from **London Multi-agency adult safeguarding policy and procedures April 2019**
<https://londonadass.org.uk/wp-content/uploads/2019/05/2019.04.23-Review-of-the-Multi-Agency-Adult-Safeguarding-policy-and-procedures-2019-final-1-1.pdf>

2.3 Types and indicators of abuse and neglect

There are 10 categories of abuse described within the Care and Support Statutory Guidance. These categories are expansive and cover a range of abusive situations or behaviours. It is important to recognise that exploitation is a common theme in nearly all types of abuse and neglect. The Statutory Guidance (para 14.17) states that:

“Local authorities should not limit their view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should always be considered; although the 3 stage criteria will need to be met before the issue is considered as a safeguarding concern”

Types of Abuse	Description taken from Statutory Guidance and/or other supporting guidance
Physical Abuse	<p>Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions. In extreme circumstances unlawful or inappropriate use of restraint may constitute a criminal offence. Restraint covers a wide range of actions. It includes the use of active or passive means to ensure that the person concerned complies.</p> <p>Restrictive interventions are defined as: 'deliberate acts on the part of other person(s) that restrict an individual's movement, liberty and /or freedom to act independently in order to;</p> <ul style="list-style-type: none"> • Take immediate control of a dangerous situation where there is a real possibility of harm to the person or others if no action is undertaken; and • End or reduce significantly the danger to the person and others; and • Contain or limit the persons freedom for longer than is necessary' <p>If restrictive interventions are carried out for any other purpose than those listed above, concerns should always be escalated through safeguarding procedures (DH 2014).</p> <p>Female Genital Mutilation (FGM) is a very specific form of physical (and psychological) abuse. FGM is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done. FGM is also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal to practice FGM in the UK and is child abuse. It is also illegal to take girls who are British Nationals or who are permanent residents of the UK abroad for FGM. There is a mandatory duty on</p>



	<p>healthcare professionals to report any identified cases of FGM in females under the age of 18 years. FGM is very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sex, childbirth and mental health. Page 27 of 160 Types of Abuse Description from Statutory Guidance and/or other supporting guidance Professionals working with women who have been subject to FGM may want to signpost them to appropriate health services for help and support. Further information, including on safeguarding women and girls at risk of FGM is available here.</p>
<p>Domestic Abuse</p>	<p>The Home Office defines domestic abuse as: any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial, emotional abuse and 'honour' based violence.</p> <p>Honour Based Violence (HBV) is committed when families feel that dishonour has been brought to them. It will usually be a criminal offence and referring to the Police must always be considered. Women are predominantly (but not exclusively) the victims and the violence is often committed with a degree of collusion from family members and/or the community. Some victims of HBV may contact the Police or other organisations for help themselves. But many others are so isolated and controlled that they may be unable to seek help. Adult safeguarding concerns that may indicate HBV include domestic abuse, concerns about forced marriage, enforced 'house-arrest' and missing persons reports.</p> <p>Forced Marriage is a term used to describe a marriage in which one or both parties are married without their freely given consent or against their will. A forced marriage differs from an arranged marriage in which both parties consent to the assistance of a third party in identifying a spouse. In a situation where there is a concern that an adult is being forced into a marriage that they cannot consent to, there will be an overlap between action taken under the forced marriage provisions and adult safeguarding processes.</p> <p>If an adult safeguarding concern is raised about HBV or forced marriage, Police should be contacted as urgent action may need to be taken and they (in co-ordination with other relevant specialised organisations) have the necessary expertise to help manage the risk.</p>
<p>Sexual Abuse</p>	<p>Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subsection to pornography or witnessing sexual acts, indecent exposure, sexual assault and sexual acts to which the adult has not consented or was pressured into consenting. Sexual exploitation involves situations, contexts and relationships where adults at risk receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, gifts, money, affection) as a result of them performing sexual</p>



	acts (and/or another/others performing such acts on them). Sexual exploitation affects men as well as women. People who are being exploited may not always perceive such behaviours as exploitation. In all cases those exploiting the adult at risk have power over them by virtue of their position, gender, age, physical strength, intellect, economic situation or other resources. There is a distinct inequality in the relationship.
Psychological Abuse	Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, unreasonable and unjustified withdrawal of services or supportive networks.
Financial or Material Abuse	<p>Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements including in connection with wills, property, Page 28 of 160 Types of Abuse Description from Statutory Guidance and/or other supporting guidance inheritance or financial transactions and the misuse or misappropriation of property, possessions or benefit. An adult at risk may be persuaded to part with large sums of money/life savings. Such concern should always be reported to the Police and if relevant, local Trading Standards for further investigation. Local Trading Standards should be involved in the work of Safeguarding Adults Boards. Where this abuse is perpetrated by someone with authority to manage the adult at risk's finances, the Office of the Public Guardian should be informed (in relation to Deputies/Attorneys) or the DWP (for Appointees).</p> <p>Such abuse may take the form of a 'Mate Crime'. The Safety Net Project define this as occurring 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual'. Mate Crime is often difficult for the Police to investigate due to its sometimes ambiguous nature but should be reported to the Police who will decide as to if a criminal offence has been committed. Mate Crime is committed by someone the adult knows and often happens in private. In recent years there have been several Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.</p>
Modern Slavery	This type of abuse encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. Serious and organised crime gangs make significant amounts of money from human trafficking. They exploit the social, cultural and financial vulnerabilities of the victim. They control almost all aspects of the victim's life with little regard for their welfare and health. However, adults who are enslaved are not always subject to trafficking. Someone is in slavery if they are forced to work through physical or mental threat, owned or controlled by an 'employer' (usually through abuse or threat of abuse), dehumanised and treated as a commodity (bought & sold as 'property'), physically constrained or has restrictions placed on his/her freedom of



	<p>movement. Since 2015, specific authorities have had a duty to notify the Home Office of any individual suspected as a victim of slavery or human trafficking.</p>
Discriminatory abuse	<p>This includes harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion. Examples of discriminatory abuse may include; denying access to communication aids, not allowing access to an interpreter, signer or lip reader. Harassment or deliberate exclusion on the grounds of a protected characteristic. Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic. Substandard service provision relating to a protected characteristic (SCIE 2015)</p> <p>Some forms of discriminatory abuse may also constitute a Hate Crime – defined by the Crown Prosecution Service as</p> <p>"Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity."</p> <p>There is no legal definition of hostility so the Police and CPS use the everyday understanding of the word which includes ill-will, spite, contempt, prejudice, unfriendliness, antagonism, resentment and dislike.</p>
Organisational Abuse	<p>This includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. See Section 5: 'Working with Care and Support Providers'</p>
Neglect and acts of omission	<p>This includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services and/or the withholding of the necessities of life, such as medication, adequate nutrition and heating. Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly where the adult at risk lacks the mental capacity to assess risk for themselves.</p>
Self-neglect	<p>This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It should be noted that self-neglect may not always prompt a section 42 enquiry. An assessment should be made on a case by case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.</p>

