

**THE SALTERNS ACADEMY TRUST: ADMIRAL LORD NELSON SCHOOL**

**Child Protection and Safeguarding Policy**



Author:	K Holness
Position:	Deputy Headteacher: Student Achievement
Date written:	August 2025
Date agreed and ratified by the Governing Body:	17th September 2025
Date of next review:	July 2026

<b>CONTENTS</b>	<b>PAGE NUMBER</b>
1. Key Staff	4
2. UNCRC	4
3. Definitions	4
4. Aims	5
5. Our Ethos	5
6. Equality Statement	6
7. Procedures	6
8. Roles and Responsibilities	7
8.1 The Designated Safeguarding Lead	8
8.2 The Governing Body	8
8.3 The Headteacher	8
8.4 Alternative Members of Staff	8
9. Confidentiality	8
10. Immediate Action to Ensure Safety	9
11. What to do if a Child Makes a Disclosure	9
12. Communicating a Concern or Disclosure	10
13. Notifying Parents	10
14. Female Genital Mutilation (FGM)	10
15. Early Help	10
16. Referral	11
17. Extremism	12
18. Staff role following a referral	12
19. Concerns about a Member of Staff	12

20. Child on Child Abuse	13
21. Sexting	14
21.1 Your responsibilities when reporting to an incident	14
21.2 Initial review meeting	14
21.3 Further review by the DSL	15
21.4 Informing parents	16
21.5 Referring to the police	16
21.6 Recording incidents	16
21.7 Curriculum coverage	16
22. Online Safety	16
23. Students with special educational needs and disabilities	16
24. Mental Health	17
25. Mobile Phones and Cameras	17
26. Complaints and concerns about school safeguarding policies	17
27. Protected Disclosures (Whistleblowing)	17
28. Record Keeping	18
29. Training	18
29.1 All staff	18
29.2 The DSL and Deputy	19
29.3 Governors	19
30. Recruitment – interview panels	19
31. Monitoring arrangements	19
32. Supporting Practices, Guidance and Advice	20

***Appendices 1-4 are based on the Department for Education’s statutory guidance, Keeping Children Safe in Education***

**Appendices:**

Appendix 1: Types of Abuse	21
Appendix 2: Safer Recruitment and DBS Checks	23
Appendix 3: Allegations of abuse against staff	28
Appendix 4: Specific Safeguarding Issues	36

## 1. Key staff involved

Role	Name(s)
Headteacher:	C Doherty
Designated Safeguarding Lead:	K Holness
Designated teacher for Children who are looked after:	S Fenner
Deputy Headteacher: Student Achievement	K Holness
Trust Network Manager:	James Kirk
Safeguarding Link Governor:	Nathan Waites

## 2. UNCRC

*Article 3: (The best interests of the child) The best interests of the child must be a top priority in all decisions and actions that affect children)*

*Article 19: (Protection from violence, abuse and neglect) Governments must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them.*

*Article 34 (Protection from sexual exploitation) Governments must protect children from all forms of sexual abuse and exploitation)*

Admiral Lord Nelson School is committed to safeguarding and promoting the welfare of children and believes all students, regardless of age, special needs or disability, racial/cultural heritage, religious belief, gender or sexual orientation have the right to be protected from all types of harm and abuse. This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners.

## 3. Definitions

Safeguarding and promoting the welfare of children is defined for the purposes of this policy, and in line with the changes made in Working together to Safeguard Children 2023, 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
- taking action to enable all children to have the best outcomes.

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Children** includes everyone under the age of 18.

NB - Keeping Children Safe in Education (2025) refers to "pupils and students" - we use the term "students" in this policy in keeping with our school languages.

The following three **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs.

In Portsmouth the three partners are:

- The local authority (LA)
- Portsmouth Integrated Care Board
- The Chief Superintendent, Hampshire Constabulary

#### **4. Aims**

The aim of this policy is to ensure every child at Admiral Lord Nelson School is safe and protected. The policy applies to all staff (including supply, agency staff), parents/carers, Governors, volunteers, visitors and students and is compliant with the advice and guidance from the Portsmouth Safeguarding Children's Partnership. It also applies when organisations or individuals are using the school premises for activities involving children as per the guidance "Keeping Children safe during community activities, after school clubs and tuition: non-statutory guidance for providers running out of school settings (April 2022) where incidents referred to the school require us to follow our own policy and procedures, including referral to the LADO if appropriate.

This policy will give clear direction about the expected behaviour and responsibility when managing safeguarding concerns and the need to consider, always, what is in the best interests of the child.

Admiral Lord Nelson School aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly training in recognising and reporting safeguarding issues
- All staff have a responsibility to provide a safe environment in which children can learn

#### **5. Our Ethos**

Admiral Lord Nelson School will establish and maintain a child-centred ethos where students will feel secure, will be encouraged to talk and will be listened to. Students will always be given every opportunity to talk freely to any member of staff if they are worried or concerned about something.

Through induction and ongoing training, all staff and regular visitors will know how to recognise a disclosure from a child and how to manage this. We will not make promises to any child and every child will be told what happens to the information they provide.

The curriculum will endeavour to provide activities and opportunities that will equip our students with the skills they need to stay safe (including online safety). At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies.

## **6. Equality statement**

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalization
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

It is important to note that Keeping Children Safe in Education (2025) clearly states in relation to the Equality Act 2010 "provision within the Equality Act allows schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with certain protected characteristics in order to meet specific need". At Admiral Lord Nelson School we do that for example through the Girls Network and through the additional opportunities offered to our Children from the global majority.

## **7. Procedures**

When staff join Admiral Lord Nelson School, they will be informed of the safeguarding arrangements in place. They will be given a copy of our school's Safeguarding and Child Protection Policy and told whom the Designated Lead / Deputy for Safeguarding Children is and who alternative staff members are in their absence. Staff will be made aware that the Portsmouth Safeguarding Children Partnership (PSCP) has a duty to ensure the effectiveness of practice in each service in the city to safeguard children and promote their welfare, which includes Admiral Lord Nelson School.

The induction programme will include safeguarding information detailing: how to manage a disclosure from a child; signs and symptoms of abuse, neglect and exploitation; the PREVENT duty; when to contact the police and how to record and share information. They will also be informed of how to make a referral to the Multi Agency Safeguarding Hub (MASH) and the role of the Local Authority Designated Officer (LADO) and how and when to contact them. New staff will be given access to online basic safeguarding training and key documents to support their practice.

All regular visitors and volunteers to our school will be told where our policy is kept. They will be issued with a set of safeguarding procedures and our Designated Safeguarding Lead/Deputy, alongside alternative staff members, are clearly identified on notice boards around the school for information.

When new students join our school, parents and carers will be informed that we have a Safeguarding Policy. The policy will be made available to parents / carers and awareness of it will be raised using appropriate methods, for example the school website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries, and what happens should we have cause to make a referral to MASH for consideration: MASH is a Multi-Agency team consisting

of professionals from the Police, education, health and social care.

## 8. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

It is part of the teaching standards Part Two:

A teacher is expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct throughout a teacher's career.

- Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school; by:
  - Treating students with dignity; building relationships rooted on mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position.
  - Having regard for the need to safeguard students' well-being, in accordance with statutory provisions.
  - Showing tolerance of and respect for the rights of others
  - Not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
  - Ensuring that personal beliefs are not expressed in ways which exploit students' vulnerability or might lead them to break the law.

### 8.1 The Designated Safeguarding Lead (DSL)

Our DSL is **Katie Holness, Deputy Headteacher**. The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL is available during school hours for staff to discuss any safeguarding concerns. The DSL can also be contacted out of school hours, if necessary, by email or phone (telephone numbers can be located in the staff handbook).

When the DSL is absent, **the Deputy DSLs – Steve Fenner (Assistant Headteacher), Helen Blakeledge (Lead Teaching Assistant for Attachment needs), Tracey Linn (Inclusion Manager), and Emma Kelleher (Safeguarding and Attendance Manager)** – will act as cover. In the unusual event the DSL and deputy DSLs are not available, **Chris Doherty, Headteacher** will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (eg Local Authority Children's Social Care, LADO, Prevent, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly
- Take the lead role in ensuring the Filtering and Monitoring (IT) systems are appropriate and managed correctly, the filtering and Monitoring Standards are met and that effective monitoring strategies are in place. These systems will be reviewed at least annually.

The DSL will also keep the Headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL and deputy DSLs are set out in their job descriptions, as part of their wider roles.

## 8.2 The Governing Body

The Governing Body will approve this policy at each review, ensure it complies with the law and hold the Headteacher to account for its implementation. The Governing Body have appointed **Nathan Waites** as link governor to monitor the effectiveness of this policy in conjunction with the full governing body.

**Jane Beecher and Nathan Waites**, the Co-Chairs of the Governing Body will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see appendix 3).

All Governors will read Keeping Children Safe in Education 2025 which also makes clear that Governors should have appropriate training to be able to challenge and assure themselves of their strategic responsibility, including ensuring filtering and monitoring systems are effective and regularly monitored and reviewed.

## 8.3 The Headteacher

**Chris Doherty (Headteacher)** is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary or supply staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).

## 8.4 Alternative Members of Staff

Alternative members of staff who undertake regular, specific safeguarding training are members of the Pastoral team – Heads of House, Assistant Heads of House, and Senior Inclusion Officers. These staff, as required, will liaise with Children's Services and other agencies. The Trust Network Manager, **James Kirk**, will work alongside the DSL to ensure the Filtering and Monitoring Standards (DFE, March 2023) are met, reviewing the systems annually with the DSL and the Trust Chief Operating Officer. The IT team will ensure harmful content is blocked and that effective monitoring takes place that meets our safeguarding needs. They will manage the day-to-day running of the filtering and monitoring systems in place, alongside the Heads of House and DSL as appropriate.

## 9. Confidentiality

Confidential information and records are only available to those who have a right or professional need



to see them. When sharing safeguarding information, and information of a confidential nature, with the three safeguarding partners and other agencies as required we know:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, consent need not be given.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record keeping and allegations of abuse against staff in appendix 3.

## 10. Immediate Action to Ensure Safety

Immediate action may be necessary at any stage in involvement with children and families.

If emergency medical attention is required, this can be secured by calling an ambulance (dial 999) or taking a child to the nearest Accident and Emergency Department.

Make a referral to Children's Social Care (via the MASH) and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly

Portsmouth Safeguarding Children Partnership (PSCP) Multi Agency Safeguarding Hub (MASH) can be contacted directly on 0845 671 0271/ 023 9268 8793 or the out-of-hours service on 0300 555 1373. Additionally, more information on how to make contact with Children's Social Care, including Portsmouth's inter-agency contact form which is an online referral form which can be found here: <https://www.portsmouthscp.org.uk/>

Key staff in the school are made aware of specific occasions when to call the police.

## 11. What to do if a Child Makes a Disclosure

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner or make them feel a burden
- Avoid comments such as, 'Are you sure?', 'I find that hard to believe' and 'why haven't you told anyone else?'
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it – remember it could be used in a court of law.
- Complete an incident referral via **Child Protection Online Monitoring and Safeguarding system** CPOMS. Alternatively, if appropriate, make a referral to Children's Social Care and/or the police directly and tell the DSL as soon as possible that you have done so

- Do not ask the child to repeat his or her account of events to anyone

## 12. Communicating a Concern or a Disclosure

If you are concerned about a child, you must share your concerns. Admiral Lord Nelson School uses **Child Protection Online Monitoring and Safeguarding system** (CPOMS) to keep accurate records of concerns and disclosures. You should only discuss concerns in person with one of the people named with a role for safeguarding children and this should be done as soon as possible, if not immediately. Details of concerns, disclosures and any subsequent actions or advice are recorded confidentially.

## 13. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. If we believe that notifying the parents would increase the risk to the child, we will discuss this with Portsmouth MASH team before doing so.

Concerns may not be discussed with parents/carers in the following circumstances:

- Where the alleged perpetrator is a family member (eg in sexual abuse)
- Where fabricated or induced illness (previously known as Munchausen Syndrome by proxy) is suspected
- Where female genital mutilation is suspected
- In cases of suspected forced marriage.
- Where contacting parents/carers would place a child, yourself or others at immediate risk
- Where concerns regarding possible radicalisation or extremist behaviour are associated with family members.

## 14. Female Genital Mutilation (FGM)

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4. Under no circumstances should staff examine students.

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a child under 18 **must immediately report this to the police, personally**. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate. The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a child under 18 must speak to the DSL and follow our local safeguarding procedures.

## 15. Support from Early Help and Prevention Service

Early Help is support for all children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Any family may benefit from Early Help intervention (the step before a family opens up to Children's Social Care and is placed on a more formal plan), but all staff should be particularly alert to the potential need for Early Help for a child who:

- Is disabled and has specific additional needs.
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Has experienced multiple suspensions, are at risk of being permanently excluded from school or are in alternate provision.
- Is a young carer
- Is showing signs of being drawn into anti-social behaviour, including gang involvement and association with organized crime groups.
- Is frequently missing / goes missing from care or from home.
- Is at risk of modern slavery, trafficking, or exploitation.
- Is at risk of being radicalized or exploited
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health, and domestic abuse.
- Is frequently absent from school.

If Early Help is appropriate, the DSL will generally lead on liaising with other agencies although this may be delegated to the staff best placed to support the family. Staff may be required to support other agencies and professionals in producing a Family Support Plan, in some cases acting as the Lead Professional. The DSL will keep the case under constant review and the school will consider an escalation to Children's Social Care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. Further information can be found through Portsmouth Safeguarding Children Partnership

## **16. Referrals to Children's Social Care/Police.**

If it is appropriate to refer the case to Children's Social Care or the police, the DSL will make the referral or support you to do so (via the MASH). If you make a referral directly, you must tell the DSL as soon as possible and place a copy of the referral onto CPOMS

The local authority will decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded on CPOMS.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

### Important Information Required when Making a Referral

Be prepared to give as much of the following information as possible: (in emergencies, not all of this information may be available)

- Your name, telephone number, position and request the same of the person to whom you are speaking should you make contact over the phone.
- Full name and address, telephone number of family, date of birth of child and siblings
- Gender, ethnicity, first language, any special needs
- Names, dates of birth and relationship of household members and any significant others
- The names of professionals known to be involved with the child/family e.g.: GP, Health Visitor, School
- The nature of the concern(s) and foundation for them
- An opinion on whether the child may need urgent action to make them safe
- Your view of what appears to be the needs of the child and family
- Whether the consent of a parent with parental responsibility has been given to the referral being made.
- Unavailability of some information should not stop you making a referral.
- Unwillingness from the family to give consent for the referral should not stop you from

making a referral.

## 17. Extremism

A new definition of extremism was released on 14th March 2024 (see DFE Guidance March 2024). If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

Be on the look out for (but consider context carefully - there must be a link to ideology):

- Isolating themselves from friends and family
- Being unwilling or unable to discuss their views
- Being more angry
- Talking as if from a scripted speech
- Having a sudden disrespectful attitude towards others
- Being more secretive particularly around internet use.
- Those with a mixed, unstable and unclear ideology which may include, but not exclusively, anti-government, Covid denial, anti-vaccine, conspiracy theories, Incel concerns and school massacre fascination.

If in exceptional circumstances the DSL or their deputies, are not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Prevent ([prevent@portsmouthcc.gov.uk](mailto:prevent@portsmouthcc.gov.uk)) or Portsmouth MASH.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to take advice and guidance or they can email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). In addition, Hampshire PREVENT partnership board, ([Hampshirepreventboard.org](http://Hampshirepreventboard.org)) is a useful source of information accessible to anyone with regards to preventing terrorism and radicalisation in our community and beyond. [2]

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist related

## 18. Staff role following a referral

Once a referral has been made to MASH a member of school staff (who may also be the Lead Professional) will be identified to hold the case. In the case of Early Help and Prevention this will usually be the person who best knows the family, which in most cases would be the Head of House. For referred cases that require a Section 17 Assessment and subsequent Plan (Child in Need) or a Section 47 Assessment and subsequent Plan (Child Protection Plan) this will be the DSL or a deputy DSL.

## 19. Concerns about a staff member or volunteer

If you have concerns about a member of staff (including temporary or supply staff) or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to either **Chris Doherty, Headteacher** or **Katie Holness (DSL)** – who will discuss it with the

Headteacher at the first opportunity. If the concerns/allegations are about the Headteacher, speak to the Chair of Governors and make contact with the LADO (information on contact details in this policy, in the safeguarding leaflet available in reception and on the posters in the admin office). The Chair of Governors will then follow the procedures set out in appendix 3, if appropriate. Contact details for the Chair of Governors can be located on the school's website.

You should always share information, which suggests any adult who works with children (in a paid or unpaid capacity) has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

## **20. Allegations of abuse made against other students (Child on Child abuse)**

We recognise that children can abuse their peers. Child on Child abuse can include:

- Bullying (including cyber bullying)
- Physical abuse which can include hitting, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment (Sexual comments, remarks, jokes and online sexual harassment which may be stand alone or a broader pattern of abuse)
- Upskirting: which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain self-gratification, or cause the victim humiliation, distress, or alarm.
- Initiation / hazing type violence and rituals.
- Abuse in an intimate personal relationship between peers - "teenage relationship abuse"
- Sharing nude or semi-nudes. (youth produced sexual imagery. Be aware that this also can be either wholly or in part AI generated.

Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Most cases of students hurting other students will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the school at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)
- Is a form of hate crime

### If a student makes an allegation of abuse from another student:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team, if appropriate, and follow its advice, as well as the police if the allegation involves a potential criminal offence (nb - rape, assault by penetration and sexual assault must be reported to the police)
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected such as witnesses and siblings) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- DSL will contact parents unless it is a risk to do so.

- Wherever possible, try to protect anonymity – only those who need to know will have information shared with them, as per all safeguarding situations.

We will minimise the risk of child on child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including the requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, (typically) sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially
- Regularly consider the school culture and ensure the messages it transmits are positive and reflect a “zero tolerance” approach.
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

## **21. Sexting (also known as youth produced sexual imagery)**

Admiral Lord Nelson School’s response to sexting is in line with guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders.; Advice for Schools and Colleges on Responding to Sexting Incidents

### **21.1 Your responsibilities when responding to an incident**

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSL.

### **21.2 Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or children’s social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents should be involved)
- The DSL will make an immediate referral to police and/or children’s social care if any

of the below are a feature of the incident:-

- a) The incident involves an adult
- b) There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- c) What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- d) The imagery involves sexual acts and any student in the imagery is under 13
- e) The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

### **21.3 Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or Children's Social Care, the DSL will conduct a further review. They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks. If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the police immediately.

### **21.4 Informing parents**

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

### **21.5 Referring to the police**

If it is necessary to refer an incident to the police, this will be done through the school's SPOC (Single Point of Contact) or by dialing 101 or completing an online referral

### **21.6 Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in this policy also apply to recording incidents of sexting.

### **21.7 Curriculum coverage**

Students are taught about the issues surrounding sexting as part of the Personal Development curriculum, *Aspiring Futures* Curriculum and Digital Communication Curriculum. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with students so they are aware of the processes the school will follow in the event of an incident.

## **22. Online Safety**

We know that some men, women and young people will use online technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Of particular concern currently is Financially Motivated Sexual Extortion (where children are contacted by adults, manipulated to send images and then blackmailed) and the police are working with other agencies such as schools to tackle this via education and awareness raising.

Cyber-bullying by children, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and children are not allowed to access these sites while in school. Some children will undoubtedly 'chat' on mobiles or social networking sites at home and we have useful links on the school website offering support and advice to parents as to how they can help keep their child safe. Mobile phones are banned from being used in school to help safeguard students.

The use of filters in school ensure students are only able to access appropriate internet content. Examples of inappropriate or harmful content might be, but is not limited to, that linked to extremism, suicide ideation or pornography. It is an expectation that filtering and monitoring systems are understood by the Senior Leadership Team and school Governors (who must be trained to understand their governance role in this area). Keeping Children Safe in Education 2025 makes it clear that this work must be led by the DSL. The DSL will work in conjunction with the Trust Network Manager and the IT team to ensure that:-

- Filtering and Monitoring Standards (as specified by the DFE in March 2023) are met and reviewed annually.
- Generative AI in Education Guidance (Gov.UK) is complied with fully
- Staff are trained to understand and use the systems in place (in classrooms devices are monitored by the teacher using SENSO software which shares screens and allows the teacher to take control of screen, block content and monitor use).
- Harmful and Inappropriate content is blocked
- Effectively monitor systems to meet safeguarding needs
- Online safety concerns picked up via our filtering and monitoring systems are referred via CPOMS by IT staff.
- When appropriate, referrals will be made to Portsmouth MASH or the police.

Students are clear that their personal network area and any activity on the school network and internet is not private and can be tracked.

Students are taught about staying safe online as part of the Personal Development curriculum, Aspiring Futures Curriculum and Digital Communications Curriculum to give them the skills to stay safe online in school and when at home.

Mobile phone use in school is not permitted so as to reduce access to the internet/apps.

Common apps to be aware of: Tiktok, Snapchat, instagram

## **23. Students with special needs and disabilities**

We recognise that students with special educational needs (SEN) and disabilities can face additional



safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Students being more prone to peer group isolation than other students
- The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers
- We offer extra pastoral support for students with SEN and disabilities. Concerns over safeguarding students with SEN or disabilities should always be discussed with the DSL or

**Steve Fenner, SENCO**

## **24. Children's Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is suffering abuse, neglect or exploitation as well as being a safeguarding concern in its own right. Staff should not attempt to make a diagnosis but should communicate such concerns to the DSL. We work closely with the Mental Health Support Teams to support our students as well as with agencies such as DASS (Drug and Alcohol Support Service) and SDAS (Southern Domestic Abuse Service).

Signs you might see in a child:

- Changes in behaviour, emotions or school performance.
- Physical signs such as losing weight or self harm
- Less interest in the things they usually enjoy.
- Being more socially isolated
- Low mood, tearfulness, low self-esteem.

## **25. Staff use of Mobile Phones and Cameras**

Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when students are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with students. Staff will not take pictures or recordings of students on their personal phones or cameras unless the Headteacher or DSL has approved exceptional circumstances – these will not be stored for longer than is necessary.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

## **26. Complaints and concerns about school safeguarding policies**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

## **27. Protected Disclosures (Whistle Blowing)**

Protected Disclosures encourages and enables employees to raise serious concerns within the organisation rather than overlooking a problem or 'blowing the whistle' outside. Employees are often the first to realise there is something seriously wrong. However, they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or to the organisation. Admiral Lord Nelson School has a Trust Protected Disclosures Policy that can be found on the Salterns Academy Trust website.

The aim of the policy is to:

- encourage all staff to feel confident in raising concerns and to question and act upon concerns about practice
- provide avenues for staff to raise concerns in confidence and receive feedback on any action taken
- ensure that staff receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied
- reassure staff that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made a disclosure in good faith.

## **28. Record Keeping**

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded. Admiral Lord Nelson School uses CPOMS to record any safeguarding concerns. If you are in any doubt about whether to record something, discuss it with the DSL where possible but remember it is better to record it than ignore it.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period after they have left the school (in line with NSPCC guidance – currently until they are 25 years of age). If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely (within 5 days), and separately from the main student file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Safeguarding files and information will be kept in a locked, protected filing cabinet. These files will be the responsibility of the DSL and information will only be shared within school on a need to know basis for the protection of the child. Paper copies of referrals, meeting minutes and reports will be stored here and electronic records are kept securely through CPOMS.

## **29. Training**

### **29.1 All staff**

All staff and Governors will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, neglect or exploitation. This training will be regularly updated and will be in line with advice from the three safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually. All staff will access The Key online safeguarding training every year to refresh their understanding and to have a better understanding of any emerging concerns.

Contractors on site and volunteers will also receive safeguarding training as appropriate. They will all be given a copy of our safeguarding information leaflet on arrival.

## **29.2 The DSL and DDSLs**

The DSL and Deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will participate in the PSCP DSL Masterclass programme and across the team ensure knowledge is kept up to date in all relevant areas.

## **29.3 Governors**

All Governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. They are required to undertake The Key online training on a yearly basis and receive other training from the DSL throughout the year as appropriate. As the Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose. A link Governor will be assigned to lead on governing online safety, particularly our filtering and monitoring systems.

## **30. Recruitment – interview panels**

At least one person conducting any interview for a post at the school will have undertaken Safer Recruitment Training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures. At Admiral Lord Nelson School, we require evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview. Appointment at Admiral Lord Nelson School is always subject to satisfactory references. We conduct online searches in keeping with safer recruitment guidance and always inform candidates we are doing so.

All documents used to verify identity of successful candidates, to establish Right To Work or of qualifications will be kept in personnel files. We will undertake enhanced Disclosure and Barring Service (DBS) checks 3 yearly and use any other means of ensuring we are recruiting and selecting the most suitable people to work with our children.

## **31. Monitoring arrangements**

Katie Holness, Deputy Headteacher/DSL, will review this policy annually. At every review, the full Governing Body will approve it.

This policy is based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions

- can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- New definition of extremism guidance – March 2024 DFE.

### **32. Supporting Practices, Guidance and Advice:**

- 'Keeping children safe in education: information for all school and college staff' September 2025
- Working together to safeguard children, Dec 2023.
- Portsmouth Safeguarding Children Board Thresholds document
- Filtering and Monitoring Standards (DFE, March 2023)
- Generative AI in Education Guidance, August 2025 (Gov.UK)
- Keeping Children Safe during community activities, after school clubs and tuition: non-statutory guidance for providers running out of school settings (Sept 2023)
- Working together to improve school attendance (DFE, August 2024)

## Appendix 1: Types of Abuse

Abuse, including neglect and exploitation, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another (in particular the Domestic Abuse Act 2021 now recognizes children who witness abuse as victims of that abuse due to the impact of it)
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening and whether or not the child themselves considers themselves a victim (they sometimes do not)

The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Teenage relationship abuse** might involve:-

- Insults and name calling
- Controlling where the victim goes and what they wear
- Checking up on the victim all the time
- Isolating the victim from friends and family
- Making the feel responsible for the abuse
- Physically abusing the victim
- Forcing the victim to have sex or take part in sexual activity
- Pressuring the victim not to use contraception.
- Other coercive or controlling behaviour

It is important to be “**professionally curious**” – often a child does not make a disclosure – they may not feel ready to or might not even realise they are being abused. Instead professionals must be alert to signs that raise concern. In addition, be aware that certain groups make struggle more to disclose even if they want to such as those with SEND and those from the LGBTQ+ community for whom disclosing might also force them to have to “come out” before they are ready to.

Signs a child is being abused might include:-

- Injuries
- Truancy and doing less well at school
- Changes in mood, personality and clothing
- Mental health needs
- Becoming isolated from family and friends
- Being on their phone a lot
- Inappropriate sexual behaviour, language or attitudes
- Pregnancy
- Using drugs or alcohol
- Bullying other to being bullied.

## **Appendix 2: Safer Recruitment and DBS checks – policy and procedures**

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2025.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

### **Advertising**

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

### **Application forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

### **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

### **Seeking references and checking employment history**

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

### **Interview and selection**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

### **Pre-appointment vetting checks**

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when



the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

\* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would

have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

### **Governors and members**

All trustees, local governors and members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- o A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- o Identity
- o Right to work in the UK
- o Other checks deemed necessary if they have lived or worked outside the UK

### **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. We will also obtain a copy of their own safeguarding policy.

### **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### **Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## **Appendix 3 – Allegations of abuse made against staff (including low level concerns)**

### **Section 1: allegations that may meet the harms threshold**

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, 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 they 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 includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

### **Suspension of the accused until the case is resolved**

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

## Definitions for outcomes of allegation investigations

- **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 to cause harm to the 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 (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate as advised by EPS. The individual can turn to their trade union representatives, or a colleague for support and advice. The Employee Assistance Programme (EAP) is available for additional support or counselling.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

## **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

## **Specific actions**

### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for

- help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### **References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

### **Learning lessons**

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar



events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

### **Non-recent allegations**

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

### **Section 2: Concerns that do not meet the harm threshold**

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites

- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

### **Responding to low-level concerns**

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

We may seek advice from EPS when responding to low-level concerns and will bear in mind. Keeping Children Safe in Education's report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course

of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## **Appendix 4 – Specific safeguarding issues**

### **Worried about a child**

Admiral Lord Nelson School works in partnership to safeguard its students. **Portsmouth MASH** is multi agency and brings together services from Social Care, Education, Health, and Police. The MASH aims to work together to offer the right help at an early stage to families who need support.

### **Consent to share**

You should seek, in general, to discuss concerns with the family and, where possible seek the family's agreement to making a referral unless this may, either by delay or the behavioural response it prompts or for any other reason, place the child at increased risk of Significant Harm.

- A decision by any professional not to seek parental permission before making a referral to Children's Social Care Services must be approved by their manager, recorded and the reasons given
- Where a parent has agreed to a referral, this must be recorded and confirmed on the referral form (online)
- Where the parent is consulted and refuses to give permission for the referral, further advice and approval should be sought, unless to do so would cause undue delay. The outcome of the consultation and any further advice should be fully recorded

All recording with regards to consent to share information should be included in the inter-agency referral form and kept on CPOMS

### **What to do if you are worried about a child suffering from harm**

If you are concerned that a child or young person has suffered harm, neglect, is being exploited or abused, please contact Portsmouth Multi Agency Safeguarding Hub (MASH) on the phone number below who can discuss this with you:

### **Portsmouth MASH:**

Tel: 0845 671 0271 or 02392 688793  
Out of office hours: 03000 555 1373

**If a child is at immediate risk of harm, call the Police on 999.**

### **Children who are absent from education for prolonged periods and/or repeated occasions**

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveler families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to

requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Note that when a child is removed from roll for Elective Home Education, should they have an EHCP, the Local Authority will need to review the plan whilst working closely with parents. In other cases, the school must ensure this is a positive educational choice, working with parents to explore the options and offering and encouraging a meeting with the Local Authority prior to a final decision being made. This is designed to establish whether this is in the best interests of the child, whilst recognizing it is the parent's prerogative to choose this path should they wish.

### **Child Sexual Exploitation and Child Criminal Exploitation**

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE). Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual (no child can consent to abuse) and it should be noted exploitation as well as being physical can be facilitated and/or take place online. It is important to note that child perpetrators of exploitation are victims themselves – they are children.

**Child sexual exploitation** (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. This so called "boyfriend model" is a popular tool used by groomers.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends

- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

**Child criminal exploitation (CCE)** is increasingly used to describe the type of exploitation where children are involved. Child criminal exploitation is common in County Lines (see below) and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft. All should be aware of indicators that may signal that children are at risk from, or are being exploited. These may include:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education
- Signs of assault or unexplained injuries

Staff are made aware of the associated risks and understand the measures in place to manage these.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, student referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (from both home and school), when the victim may have been trafficked for the purpose of transporting drugs. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

### **Domestic Abuse**

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result. The Domestic Abuse Act 2021 specifically recognizes child witnesses as victims of abuse for these reasons.

The DSL works with Operation Encompass to quickly identify and support children who are potentially affected by domestic abuse.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and Deputy DSLs will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **So-called 'Honour-Based' abuse (including FGM and forced marriage)**

So-called 'Honour-Based' abuse (HBA) encompasses incidents or crimes, which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of these dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL.

### **Female Genital Mutilation (cutting)**

The DSL will ensure staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 14 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations

- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- Having a mother, older sibling or cousin who has undergone FGM
- Having a limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to consider the context of the discussion)
- Being unexpectedly absent from school
- Attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

### **Forced marriage**

Forcing a person into marriage is a crime. In addition, since February 2023, it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18<sup>th</sup> birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial "marriages" as well as legal marriages. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the student to their tutor, Head of House or emotional support link as appropriate

### **Preventing radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and ensure staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.



We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online,
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

### **Child on Child abuse:**

All staff should be aware that children can abuse other children (often referred to as Child on Child abuse) this may include but not limited to:

- Bullying (including cyber bullying)
- Physical abuse which can include hitting, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment (Sexual comments, remarks, jokes and online sexual harassment which may be stand alone or a broader pattern of abuse)
- Upskirting: which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain self-gratification, or cause the victim humiliation, distress, or alarm.

### **Serious Violence**

All staff should be aware of the indicators, which may signal that a child is at risk from, or are involved with serious violent crime. These may include but not limited to :

- Increased absence from school
- A change in friendships or relationships with older individuals or groups

- A decline in performance
- Signs of self-harm
- Significant changes in well-being
- Signs of assault or unexplained injuries.
- Unexplained gifts or new possessions.

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to keep their mobile phone(s) or other devices, out of sight, in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

These visitors who are DBS checked will be identified by a green lanyard and can travel around the building unaccompanied.

All other visitors, including visiting speakers, will be accompanied by a staff member (and wear a red lanyard). We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.

### **Missing students**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Contact parents / or suitable named contact
- Contact MASH for further advice and guidance
- Contact the police.

### **Use of school premises for out of hours activities involving children**

Keeping Children Safe in Education 2025 states that the governing body of a school whose premises are being used for out of hours activities involving children should seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed). This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The governing body should also ensure safeguarding requirements are included in hire agreements, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. We do this via our online booking management system "School Hire" where child protection and safeguarding policies are uploaded and our requirements and procedures are made clear. This is managed on a day to day basis by Steve Johnson, Buildings and Community manager

Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO as required.

