THE SALTERNS ACADEMY TRUST: TRAFALGAR SCHOOL

CHILD PROTECTION AND SAFEGUARDING POLICY

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UNCRC

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.

Trafalgar 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), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

Definitions

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

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is 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 protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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.

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual. Children includes everyone under the age of 18.

The following 3 **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:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases,

abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Aims

The aim of this policy is to ensure every child at Trafalgar School is safe and protected. The policy applies to all staff (including supply and agency staff), parents/carers, Governors, volunteers, visitors and students and is compliant with the advice and guidance from the Portsmouth Safeguarding Children's Partnership.

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

Trafalgar 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

Our Ethos

Trafalgar 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.

Equality statement

Some children have an increased risk of abuse, both online and offline, 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 or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- 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 female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- 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
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

Procedures

When staff join Trafalgar 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 who the Designated Lead / Deputies for Safeguarding Children are 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 Trafalgar School.

The induction programme will include safeguarding information detailing: how to manage a disclosure from a child; signs and symptoms of abuse; the PREVENT duty; exploitation (CSE and CCE); when to contact the police and how to record and share information. 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 / Deputies, 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.

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 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

All staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) in full, and review this guidance at least annually

- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online safety policy (which includes expectations and applicable roles and responsibilities in relation to filtering and monitoring), and the safeguarding response to children who go missing from education/who are absent from education
- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
    - Drug taking and/or alcohol misuse
    - Unexplainable and/or persistent absences from education
    - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
    - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time

- What to look for to identify children who need help or protection.

The Designated Safeguarding Lead (DSL)

Our DSL is **Chris Furnell, Assistant Headteacher**. The DSL takes lead responsibility for child protection and wider safeguarding. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Out of school hours, if necessary, the DSL can be contacted via email at: cfurnell.trafalgar@salterns.org.

If the DSL and deputies are not available or absent, we have cover arrangements in place. The Deputies – **Peter Dudley, Assistant Headteacher** and **Cathy Seal, Assistant Headteacher** – will act as cover for the DSL.

In the unusual event the DSL and deputies are not available, **Gemma Pearse, Headteacher** and/or **Tracy Crouch, Deputy Head of Student Engagement and Wellbeing** will act as cover (for example, during out-of-hours/out-of-term activities).

The wider safeguarding team are available via a shared mailbox: safeguarding.trafalgar@salterns.org.

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 (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Make sure that staff have appropriate Prevent training and induction

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.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

The full responsibilities of the DSL and Deputies DSL are set out in their job description.

The Governing Body

The governing body will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that all staff who work directly with children read **at least part 1** of Keeping Safe in Education (KCSIE) and those staff who do not work directly with children read **part 1** of KCSIE
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
- Ensure the school has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:
- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Ensuring that reviews should are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors, **Claire Haque,** 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 (KCSIE) in its entirety.

The Headteacher

Gemma Pearse, the 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
- Ensuring that staff understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- 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, including online safety 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)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

Virtual School Headteacher

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

Alternative Members of Staff

Alternative members of staff who undertake regular, specific safeguarding training are **Heads of House, Assistant Heads of House,** the **Student Engagement Team** and the **Inclusion Team.** These staff, as required, will liaise with Children's Services and other agencies.

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 3 safeguarding partners and other agencies as required we know:

- Timely information sharing is essential to effective safeguarding
- Arrangements should be in place setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required
- 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
- 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 a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - The DSL should consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)
        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or Deputies)
- Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving
- Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff in appendix 3.

Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and modern slavery and shall be alert to the potential need for early help for a child who:

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care plan)
- Is a young carer
- Is bereaved

- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing education, from care or home
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.
Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputies DSL)".

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 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**. Additionally, more information on how to make contact with Children's Social Care, including Portsmouth's **inter-agency contact form** can be found here.

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

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
- 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
- Sign and date the write-up and pass it on to the DSL. 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. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- Do not ask the child to repeat his or her account of events to anyone.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

Communicating a Concern or a Disclosure

If you are concerned about a child you must share your concerns. Trafalgar School uses 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.

Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. 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 will not be discussed with parents/carers in the following circumstances:

- Where sexual abuse or sexual exploitation is suspected
- Where organised or multiple abuse is suspected
- 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.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

If you discover FGM has taken place or a pupil is at risk of FGM

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 pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the wider safeguarding team, Senior Leadership Team and/or take advice from Portsmouth's MASH. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority children's social care directly, if appropriate. Share any action taken with the DSL as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. The DSL will keep the case under constant review and the school will consider a referral to local authority 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 Partnership or by emailing EarlySupportReferralPanel@Portsmouthcc.gcsx.gov.uk.

Referral

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. If you make a referral directly you must tell the DSL as soon as possible.

The local authority will make a decision 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.

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: Resolving professional differences - Re-think and escalation - Portsmouth Safeguarding Children Board (portsmouthscp.org.uk).

Important Information Required when Making a Referral

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

- Your name, telephone number, position and request the same of the person to whom you are speaking
- 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.

If you have concerns about extremism

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.

If in exceptional circumstances the DSL is 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 Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or Portsmouth's Children's Social Care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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.

If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in this policy. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

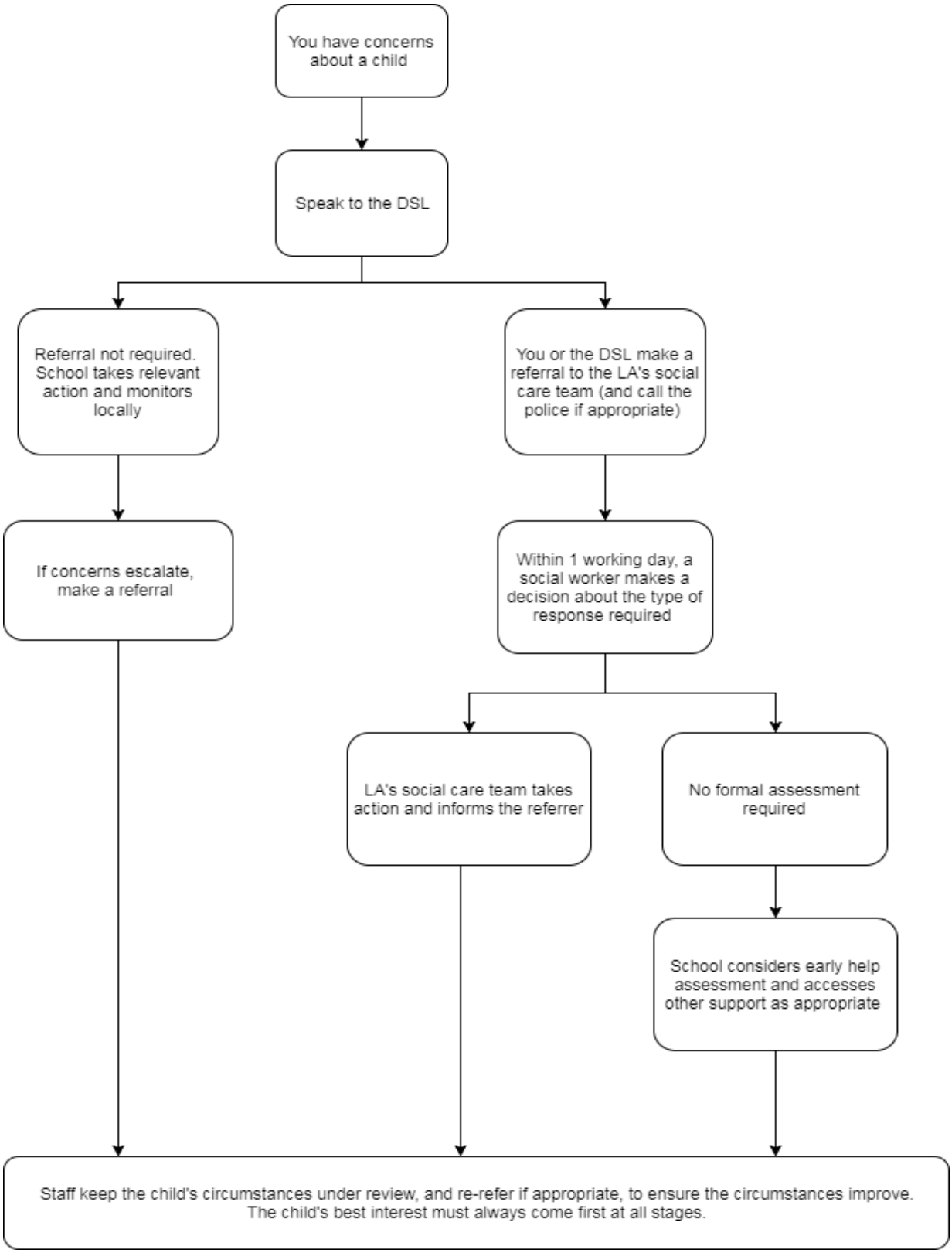
If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note –if the DSL is unavailable, this should not delay action.)



Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to **Gemma Pearse**, **Headteacher**. If the concerns/allegations are about the Headteacher, speak to the chair of governors. The Headteacher /Chair of Governors will then follow the procedures set out in appendix 3, if appropriate.

You should always share information as soon as possible 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.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO), Lydia Bowles.

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Allegations of abuse made against other pupils (child-on-child abuse)

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh", "part of growing up", or "boys being boys", as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.

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

Most cases of pupils hurting other pupils 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 pupils in the school at risk
- Is violent
- Involves pupils 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 the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- 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 and follow its advice, as well as the police if the allegation involves a potential criminal offence
- 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)

with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

- That a pupil 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
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action

Disciplinary action can be taken while other investigations are going on, such as by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

Making or sharing of nudes and semi-nudes

This is a suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

Trafalgar School's response to making or sharing of nudes and semi-nudes) is in line with guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil 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 pupil to delete it
- Ask the pupil(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 pupil(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 pupil(s) that they will receive support and help from the DSL.

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 pupil(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 pupils 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 pupils involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- 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)
- 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
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil 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.

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 pupils involved (if appropriate) to establish the facts and assess the risks. If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers 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 pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the school's police liaison officer or by dialing 101.

Recording incidents

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

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of the PD curriculum and computing programmes.

Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- 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 and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils 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 the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident. Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse to any adult and make pupils aware of the reporting systems and processes, e.g. through discussion in tutor time, through the PD and relationship/sex education curriculum
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

Online Safety and the use of Mobile Technology

KCSIE outlines that your policies on online safety and the use of mobile and smart technology should be reflected in your child protection and safeguarding policy. Among other things, this should include filtering and monitoring on school devices and the school network, and your approach to ensuring your school is a mobile phone-free environment by default.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content –** being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact –** being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct –** online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce –** risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalization and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras unless exceptional circumstances have been approved by the Headteacher.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.

Artificial Intelligence

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as Copilot, ChatGPT and Google Gemini.

Trafalgar School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Trafalgar School will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/behaviour/artificial intelligence policies.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

Students with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN), disabilities and health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect 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
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Communication barriers and difficulties in overcoming these barriers
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so.

We offer extra pastoral support for pupils with SEN and disabilities through the Compass Centre and the ARC. Concerns over safeguarding students with SEN or disabilities should always be discussed with the DSL or **Catherine Seal**, Assistant Headteacher – Inclusion.

Pupils with a medical condition

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

Young carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, **Chris Furnell, Assistant Headteacher**, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

Pupils who are lesbian, gay, bisexual

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our behaviour policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL. Personalised pastoral support is available through our 3 Centres: Lighthouse, ARC and Compass Centre.

Pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.

The DSL will lead in these cases.

Involving parents/carers in cases where pupils are questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes

- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

Rules on single-sex spaces

Pupils are not allowed into toilets, changing rooms or showers designated for the opposite biological sex, with no exceptions.

Rules on single-sex sports

The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

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).

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. Salterns Academy Trust has a Protected Disclosures Policy which can be found on the school 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.

Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily 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 of time after they have left the school.

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 as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

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, invitations to child protection conferences, core groups and reports will be stored here and electronic records are kept securely through CPOMS.

Training

All staff

All staff and Governors will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning. It will be regularly updated and will be in line with advice from the 3 safeguarding partners. Training will include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.

Training will have regard to the Teachers' Standards to support the expectation that all teachers:

- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils

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, including on online safety, as required but at least annually (for example, through emails, the Trafalgar Beacon and staff meetings).

All staff will access online safeguarding training every two years to refresh their understanding and to have a better understanding of any emerging concerns. Anyone can request to complete this training alongside the DSL.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training and volunteers will receive appropriate training, if applicable.

Volunteers will receive appropriate training, if applicable.

The DSL and Deputies

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, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

Governors

All Governors receive training about safeguarding and child protection (including online safety). This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

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.

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 Trafalgar School we require evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview. Appointment at Trafalgar School is always subject to satisfactory references. 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.

See appendix 2 of this policy for more information about our safer recruitment procedures.

Monitoring arrangements

This policy will be reviewed **annually** by **Chris Furnell**, DSL. At every review, it will be approved by the full Governing Body.

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), the Maintained schools governance guide and Academy trust governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

› This policy is also 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 pupils 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 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), 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
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse

› This policy also complies with our funding agreement and articles of association.

Supporting Practices, Guidance and Advice:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
- Portsmouth Local Safeguarding Children Board: https://www.portsmouthscp.org.uk/

https://hipsprocedures.org.uk/

- Portsmouth Safeguarding Children Board Thresholds document.

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

Appendix 1: types of abuse

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.
This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.
Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.
Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or penetration with an object) 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 can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect 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 as a result of maternal substance abuse.
Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (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.

Appendix 2: safer recruitment and DBS checks – policy and procedures

Recruitment and selection process

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 may 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
    - If they are known to the policy and children's local authority social care and
    - If they have been disqualified from providing childcare
- 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 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:
    - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
    - Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school
- 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 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

The above applies to both paid staff and volunteers.

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 or a new volunteer. 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

All governors 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:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- 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.

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.

Appendix 3: allegations of abuse made against staff

Section 1: allegations that may meet the harm 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 within 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 local authority 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 that 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 local authority 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 local authority children's social care services, where necessary). Where the police and/or local authority 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 local authority 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 local authority 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 local authority 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, such as who they can turn to for advice – trade union representatives, a colleague or welfare 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 local authority 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 local authority 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 local authority 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 local authority 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 local authority 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 local authority 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 that 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 LADO 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

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 as per section 7.7 of this policy
- 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

Trafalgar School's Headteacher and DSL operate an open-door policy for staff, to support confidentially in sharing low-level concerns.

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.

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 Data Protection Act 2018 and the 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 harm 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 that would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: Specific safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular Part 1. Part 1 also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime.

Worried about a child

Trafalgar School works in partnership to safeguard its students. **Portsmouth MASH** is multi agency and brings together services from social care, education, health, police and children centres. 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 relevant referral form
- Where the parent is consulted and refuses to give permission for the referral, further advice and approval should be sought from a manager or the Designated Senior Person or Named Professional, 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 individual organisation's record systems.

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 or abuse, 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.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on part 1 of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes

- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions 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 be absent or become missing from education, but some children are particularly at risk of becoming missing from education. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller 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 are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation 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.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

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 absent, 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.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or

pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

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

If a member of staff suspects CCE, 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.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. 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. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also 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. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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.

Child-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI
- Upskirting, which is a criminal offence, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or if a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will

inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL [and deputy/deputies] will be aware of contact details and referral routes in to 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 local authority children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

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

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 pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
- 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 pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised 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
- A girl:
- Having a mother, older sibling or cousin who has undergone FGM
- Having 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/carers 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 take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or 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. A forced marriage is one entered into without the full and free consent of 1 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.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

- Speak to the pupil 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 fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs **Terrorism** is an action that:
- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting 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 pupils 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 radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a pupil 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, including on social media
- 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 pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the curriculum policy, behaviour policy and online safety policy.

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents

- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

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 the visitors' book 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 (unless already verified by Portsmouth City Council) 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 local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. 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 pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will contact parents or carets and/ or any other emergency contacts. In the event we cannot contact someone, we will contact MASH and/or police as appropriate.

Missing pupils

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 carets and/ or any other emergency contacts. In the event we cannot contact someone, we will contact MASH and/or police as appropriate.

Appendix 5: a joint protocol for the safeguarding of students on the Trafalgar School and UTC Portsmouth shared site

It is imperative when dealing with a site of this complexity that all aspects of safeguarding, health and safety and conduct are considered for risk potentials, and that an understanding in resolution of these situations is agreed upon by both facilities.

The main aims of this policy are set out below:

- Ensure communal areas are secure and safe environments are provided for students, staff and visitors
- Ensure boundaries between schools are firmly described
- Ensure there are understood processes in place for situations of high-risk potential
- Ensure communication between schools is regular and accurate
- Ensure policies are synchronised where possible and expectations across all staff are consistent
- Ensure that this policy is agreed upon by all members of both leadership teams and a commitment to manage and review it is maintained.

This protocol is supported by both facilities, and specific personnel will liaise with their counterparts at least once a term to discuss and review procedures.

It is inevitable that situations not covered by this policy could occur, and in these instances, it is important that both schools have the opportunity to discuss and potentially amend the policy outside of the usual review dates. All staff should have the opportunity (if required) to contact staff from the other facility with causes of concern; this responsibility should not just be limited to senior staff and DSLs. Both sites will adhere to guidance on when to call the police, as set out by the NCPCC.

This protocol will be referred to and added as an appendix to each of the following facility policies and procedures:

- Safeguarding and Child protection policy
- Behaviour policy
- Allegations of abuse against staff policy
- Anti-bullying policy
- Complaints procedure
- Emergency Plan
- Fire safety and evacuation policy
- First Aid policy
- Health and safety policy
- Staff induction policy
- Banned and restricted items (within behaviour policy)

Furthermore, each of the aforementioned facilities will have available copies of the policies from the other facility for ready reference.

Staff Induction and Training

It will be part of standard staff induction to receive the following mandatory training:

- Basic safeguarding awareness

- Radicalisation, exploitation (CSE and CCE), FGM, child-on-child abuse
- Prevent and Channel training
- Fire drill/Lockdown procedure
- Sharing information
- Working with disabled children

In addition, staff will be given access to copies of all relevant policies from both facilities, including the provision of this joint site policy.

This induction training will also apply to staff returning from a period of absence longer than six months.

Annual safeguarding updates will be scheduled for both facilities and training will be refreshed every two years in line with local guidance.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL or Deputies DSL".

1. Communal areas - General

1.1 Communal areas within the shared site are defined in this protocol as the following areas:

- **Trafalgar School field** inc Softball area, Cricket pitch, Athletics track, Football pitch, long jump area, MUGA, tennis courts
- **Trafalgar School** and **UTC Portsmouth car parks**
- **Trafalgar School** and **UTC Portsmouth external reception areas**
- **Trafalgar School** and **UTC Portsmouth bike shed area**
- **Trafalgar School Basketball/Table tennis area**
- **Trafalgar School South Drive access route**

1.2 Students from both facilities will have access to designated communal areas at specific times throughout the day. These are described in table 1.1 below:

AREA	TRAFALGAR	TIME	UTC	TIME
Trafalgar field (Ex. tennis courts) MUGA	✓	PE Break Lunch	✓*designated areas, staffed as agreed	PE UTC Break UTC Lunch
Trafalgar/UTC car parks	×	Out of bounds	KS5 students (picnic benches only)	UTC Break UTC Lunch
Trafalgar reception area	✓	Pre-School Post-School	×	Out of bounds
UTC reception area	×	Out of bounds	✓	Pre-College Post-College
UTC bike shed area	×	Out of bounds	✓	Pre-College Post-College

Trafalgar bike shed area	✓	Pre-School Post-School	×	Out of bounds
Trafalgar Basketball/Table tennis area	✓	PE Break Lunch	✓*no ball games permitted	UTC Break UTC Lunch
Trafalgar South Drive access route	×	Out of bounds	×	Out of bounds
Walkway between MUGA & UTC Sports Hall	×	Out of bounds	✓	UTC Break UTC Lunch
Entrance to UTC Sports Hall (Tarmac area)	×	Out of bounds	×	Out of bounds

Table 1.1 access to communal areas

1.3 A diagram of the communal areas and access by each facility is provided in *appendix 1.*

1.4 Staff from both facilities are to be treated as supervising adults by all students, and are therefore expected to be respected and listened to when issuing instructions.

1.5 Supervising Staff are introduced to the opposite facility during designated assembly times. Linked governors and trustees will have their contact details and information signposted in a document shared between the facilities.

1.6 All staff from both facilities are expected to wear their identification lanyards at all times.

1.7 Visitors to both sites must head directly to the relevant reception area to sign in, before being allowed access to any communal areas (see 2.2.3 as an exception to this).

1.8 Students are strictly forbidden to cross into the building of the other facility at any point during supervised time without an accompanying member of staff. If instructed to, they must always make their point of entrance the reception area of the other facility.

1.9 If a student is found to be trespassing in another facility, then a member of senior staff from the student's facility must be contacted via radio and asked to accompany the student back to their own grounds.

1.10 Year 12/13 students from the UTC must always wear their lanyards to identify themselves. These are to only be removed at the request of a teacher for P.E, or for Engineering Health and Safety rules.

1.11 Students from both facilities must never swap uniform, P.E tops, rugby tops, jumpers or blazers. Students from the UTC must never give their lanyard to a student from Trafalgar school.

1.12 Smoking, vaping, alcohol and drugs are strictly prohibited by both facilities and are not permitted onsite. Should a member of staff have suspicion, or has witnessed an incident then that staff member

has the authority to approach the student with the allegations. Where possible a member of the student's facility should be contacted via the radio and asked to attend the incident.

1.13 Chewing gum is banned by both facilities and not permitted onsite.

1.14 Any searches of students should only be conducted by an appropriate member of staff from the student's facility, unless there is an imminent threat to the health and safety of that student or others.

1.15 Any observed dangerous or unacceptable behaviour, bullying, swearing or rudeness should be immediately reported to the student's facility.

1.16 In the event of a situation that could cause harm to a student or property, a member of staff from either facility is permitted to use reasonable force to restrain or remove a student. These instances of restraint should only be used in the most serious of situations and every effort must be made to inform a member of SLT from the other facility as soon as is possible. The procedure for the student's facility should then be followed by all members of staff involved in the incident.

1.17 Litter is the responsibility of the student, and each student is expected to leave the communal areas in a neat and tidy fashion. Should a member of staff witness a student littering, then they will ask the student to tidy their mess up. Failure to do so will ensure the student is reported to their facility.

1.18 Ball games such as football and basketball are permitted on the Trafalgar field/Basketball area only, during supervised break times. Games with hard balls such as golf and cricket are not permitted. All balls must be placed in lockers/bags once unsupervised break time has finished. The tennis courts are reserved for Trafalgar School year 7 students only.

1.19 Students are not permitted to use their phones and digital devices in the communal areas. Students bring and use their phones and digital devices at their own risk; neither facility can be held responsible for damages, loss or theft.

2. Communal areas - Specific safeguarding regulations

2.1 Pre and Post day communal area procedures

2.1.1 All students are permitted access to and from their grounds via the UTC main pedestrian entrance situated Centrally on London Road, via the UTC main exit, and via both Trafalgar's North and South front pedestrian entrances.

2.1.2 Both schools with ensure a designated member of staff is on duty at the appropriate gates to observe these procedures are followed. These members of staff are also responsible for ensuring that facility rules are applied when students are waiting or disembarking from buses and travelling to/from the facilities.

2.1.3 Students are **not** permitted on the Trafalgar field or in communal areas designated as 'out of bounds' in table 1.1, unless directed by an appropriate member of staff.

2.1.4 Both schools will ensure that a designated member of staff is on duty by these other communal areas to ensure these procedures are followed.

2.1.5 In the event that a student from the opposite facility is failing to follow procedure, then the use of radio is permitted to alert the other facility to their student's misdemeanour and it is for the other facility to supervise the sanctioning of the student.

2.1.6 Should students from either facility fail to meet our expectations then the member of staff on duty from the students' facility has the responsibility of applying the appropriate procedure and sanctions as directed by their facility.

2.1.7 Trafalgar School and UTC Portsmouth site staff will ensure that the internal access gates surrounding the site are locked during these periods of time. In particular, to restrict unauthorised access to both bike sheds and the external area of the UTC.

2.1.8 Bike sheds are accessible only by students of the appropriate facility.

2.1.9 Trafalgar bike sheds are to be locked 15 minutes after the close of morning registration. Site staff will be given authority to reopen the sheds for students who are late. UTC Portsmouth bike sheds will be open until 9:20 and will have a combination lock protecting them, therefore any students who are leaving/arriving at various times may access the UTC Portsmouth bike shed only.

2.2 Communal areas - Daily Operation

2.2.1 Students and staff from both facilities are permitted to access the communal areas throughout the day when required and permitted (if applicable).

2.2.2 Only DBS checked staff or supervised staff/visitors are permitted access to the communal areas.

2.2.3 Members of staff wishing to access the buildings or contact staff or students within the opposite facility should always make their point of entrance the reception area of the other facility. Here signing in protocols, and safeguarding procedures can be checked upon entry. Staff are not permitted to use any other entrances to access the opposite school unless authorised/accompanied by a staff member of that facility. This does not apply to SLT of either facility who may make entry to either facility through any entrance/exit if they feel there is need or urgency.

2.2.4 Student's usage of the communal areas must be supervised at all times by a relevant member of staff from each facility. In particular, each facility should ensure it has at least 2 members of staff on duty in the communal areas during break and lunch times.

2.2.5 6th form students from UTC are permitted off-site during the day. In these instances, 6th form students must leave via the UTC pedestrian entrance or main exit. No other year group from either facility is permitted off-site during the day.

2.2.6 PE sessions are to be timetabled at the beginning of each academic year between both facilities to ensure there is adequate supervision and space for the students to access the communal areas.

2.2.7 Members of staff from both facilities will be allocated a radio unit to communicate between both staff and the reception of each institution in the event of any issues. This will require an agreeing of a pre-set radio frequency and protocol of use.

2.2.8 In the event that a student from the opposite facility is failing to follow procedure, then the use of radio contact is permitted to alert the other facility to their students' misdemeanour and it is for the other facility to supervise the sanctioning of the student.

2.2.9 Should students from either facility break protocol then the member of staff on duty has the responsibility of applying the appropriate procedure and sanctions as directed by either facility.

2.2.10 CCTV systems are operated by both facilities for the safety of all students regardless of their originating facility.

2.2.11 CCTV images of students are never to be shown to students, parents or other unsupervised staff from either facility.

2.2.12 CCTV images are only to be used in instances where video evidence is deemed essential, and that in watching the CCTV images further information or evidence could be obtained.

2.2.13 CCTV images are only to be stored for the relevant investigation time since their capture, upon which they must be deleted

2.2.14 There may be rare occasions where CCTV from one facility could help the other facility in an investigation. In these rare instances only designated members of the SLT from either facility can view the images, and only with permission from the Headteacher.

3. The role of the DSL in both Facilities

Within this joint protocol it will be the responsibility of both facilities Designated Safeguarding Lead (DSL) to ensure the document is fit for purpose and is reviewed annually to gauge its effectiveness. The DSL from each facility should endeavour to ensure that the following is considered at every opportunity:

3.1 The DSL from each facility is given access to each facilities safeguarding training register to ensure staff are consistent in their training and safeguarding competence.

3.2 Where a discrepancy or training need is discovered, it is the responsibility of that facilities' DSL to ensure those needs are met by the next protocol review point.

3.3 DSL's from both facilities should meet regularly to discuss any immediate issues that have arisen since the last protocol review point. DSLs should discuss students in their facility that pose a potential high risk to the other facility, and ensure information is transmitted to mitigate any incidents. DSLs will determine which students require discussion and how the information is shared in a sensitive and efficient way.

3.4 DSLs from both facilities should have the opportunity to conduct a review of the other facilities' safeguarding measures at least once per academic year. This review should be announced a week in advance, and a suitable date should be found for both facilities. The review is a good practice procedure to ensure consistency throughout the year and not just at protocol review points.

3.5 DSLs from both facilities should be given access to all previous fire drill and lockdown practice reviews.

3.6 Both facilities' share a safeguarding visitor leaflet to ensure coverage across the whole of the communal areas.

4. Aligning of safeguarding measures and policies

4.1 Single Central Record (SCR)

4.1.1 The designated person with responsibility for the SCR from each facility should be allowed access to the other facilities SCR to carry out the necessary safeguarding checks.

4.1.2 Should a discrepancy or area of concern be found within the SCR, then the DSL of that facility should ensure the relevant staff are directed to make the necessary changes required to bring the SCR back into order. This should happen immediately.

4.1.3 Any member of staff working (however briefly) within the other facility must be included on the SCR of that facility.

4.2 Easy identification of students

4.2.1 Students at UTC Portsmouth will be identifiable by their 'teal' polo shirt or blue sweater in year 10/11.

4.2.2 6th form engineering students at UTC Portsmouth will be identifiable by their 'teal' or 'grey' polo shirt or blue sweater. 6th form A-level students are not required to wear uniform but will be issued with an identification lanyard which must be worn at all times.

4.2.3 All Year 12/13 students at UTC Portsmouth must abide by the lanyard rules as stated in 1.10/1.11. Should any student contravene this rule than a member of staff from UTC Portsmouth must be informed as soon as is possible. *See appendix 1.2 for a list of appropriate lanyards and their designation.*

4.2.4 Students at Trafalgar School will be identifiable by their white shirt, striped tie, and their branded black blazer and/or jumper.

4.2.5 Students from Trafalgar School must also follow the rules in 1.11. Should any student contravene this rule then a member of staff from Trafalgar School must be informed as soon as is possible.

4.2.6 Students from both facilities must follow point 1.8

4.3 Emergency Procedures

4.3.1 In the event of an emergency at either facility (e.g. fire or lockdown), a designated member of staff will contact the reception of the other facility to inform them of the incident.

4.3.2 In the event of a fire/lockdown, the relevant member of each site team must ensure the internal safety fences are locked/unlocked as appropriate.

4.3.3 In the event of a fire alarm activation at UTC Portsmouth, students will assemble away from the building at the back of the Trafalgar field by the rear fence.

4.3.4 In the event of a fire alarm activation at Trafalgar, students will assemble away from the building alongside the tennis courts and at the side of the field.

4.3.5 In the event of fires at both facilities all students will still assemble at these designated points. The field has capacity for both facilities, and this positioning will ensure students are safely contained and supervised between both teams of staff without the risk for misidentification.

4.3.6 Should a fire occur at either facility, any PE lessons on the field or in other communal areas should be cancelled and students returned to the most suitable facility under the supervision of their member of staff where they will follow that facilities procedure if required.

4.3.7 In the event of a trespasser in any of the communal areas, then students from both facilities should be directed towards the nearest facilities entrance by their member of staff if there is a perceived

risk of danger. In this instance, points 1.8/1.9 are to be ignored. All effort should be made to contact the reception of both facilities and initiate their own emergency lockdown procedure.

4.3.8 Each facility must inform the other when they are practicing either a lockdown or fire drill. This should be done at least a week in advance to ensure there are no clashes of communal space and that curriculum can be adjusted if necessary.

4.4 Parking Procedures

4.4.1 There is an agreement between both facilities that the UTC and Trafalgar car parks are separate and will be used by staff, parents and visitors of the appropriate facility. Permits, issued by each facility, will be displayed.

4.4.2 Staff from both facilities must display their own organisations parking permit. The permit must be visible and valid should any dates/timings apply.

4.4.3 Both facilities must offer a parking permit to any external visitors when they have signed in to reception and all safeguarding checks have been completed. The visitor parking permit must be visible and valid.

4.4.4 In the event that visitor or staff vehicles have been parked in a way that causes concern, it is the responsibility of the facility that is closest to the vehicle to identify the owner and rectify the cause for concern. Should the owner be absent, then it is the responsibility of the closest facility to contact the other facility and inform them of the concern.

4.4.5 Neither facility accepts any responsibility for any damages that occur in either of the designated car park areas.

4.4.6 UTC Portsmouth 6th form students will be prohibited from parking on the facility grounds.

4.5 College and School events

4.5.1 When either facility hosts an event (during the day or after) that has the potential for safeguarding issues (e.g. Parents' day), then the other facility must be informed at least a week in advance to ensure safeguarding procedures can be observed.

4.5.2 Car parking considerations must be given to the other facility at least a week in advance to ensure adequate provision for its staff is provided. Each facility will exchange their calendar at the beginning of their academic year to allow for effective planning of events.

4.5.3 The DSL of both facilities should be involved in any events that use the shared communal areas, and an agreement must be concluded upon to ensure both facilities are safeguarded against any potential issues.

4.6 Management of Deliveries

4.6.1 Both facilities must observe their own safeguarding policy for receiving deliveries. As most of these will occur within the car park or designated communal areas, then the safeguarding points mentioned previously will apply.

4.6.2 Where there is the potential for deliveries to both facilities from the same vendor, then the vendor must be signed in and processed by each separate facility before completing their delivery.

4.6.3 The entry point for all deliveries must be via the reception area of each facility initially.

4.7 Management of Contractors

4.7.1 Both facilities must observe their own safeguarding policy for management of contractors on their site.

4.7.2 Where there is the potential for contractual work to both facilities from the same vendor, then the vendor must be signed in and processed by each separate facility before completing their work.

4.7.3 The entry point for all contractual work must be via the reception area of each facility initially.

4.8 Sanctions

It should not matter what facility a child attends on a shared site whenever there are instances that require urgent or sensitive attention. In order that no student is forgotten, and no incident is left unresolved, the following will apply:

4.8.1 Each facility will apply their own sanctions to their own students regardless of where the misdemeanour took place and no matter who witnessed it.

4.8.2 As stated in section 1 and section 2, it is best practice to inform as immediately as possible a member of duty staff from the student's facility to their misdemeanour.

4.8.3 Restorative approaches are practiced in both facilities, therefore where appropriate the offending student should be given the chance to apologise either in person or in writing to the other facilities staff member.

4.8.4 It is not appropriate for facility staff to give detentions or withhold privileges of students from the other facility. In these instance point 4.8.2 should be applied.

4.8.5 This does not prohibit the use of verbal or physical intervention from facility staff if deemed necessary. See 1.16.

4.8.6 Students must treat staff from both facilities equally, as stated in point 1.4.

4.8.7 If parental engagement is required (e.g. a meeting) then the member of staff from the other facility should be invited to the meeting to explore opportunities to repair the relationship and ensure systems are in place for the future.

5.0 Allegations against staff or volunteers

Both facilities will have an existing protocol should any allegations of misconduct be made against staff (including temporary and supply staff) or volunteers. However, within a shared site there is the potential for allegations to be made against staff from another facility. In these rare instances it is important that we follow a strict protocol to ensure responsibilities are clearly defined and there is no miscommunication or delay in the processing of the allegation.

5.1 Should an allegation be made against another facilities' member of staff or volunteer, then the member of staff receiving the allegation must follow their facilities procedure initially. This will involve recording of the allegation and passing the allegation on to the relevant member of staff (usually the Headteacher).

5.2 The Headteacher must then immediately inform the Headteacher of the other facility (or Trustee/Governor if the Headteacher is the subject of enquiry). This is to ensure the students of the facility are safeguarded against immediate danger and to further progress the allegation.

5.3 Both Headteachers must meet that day (ideally within an hour) to analyse the notes and decide on an appropriate course of action as dictated by their safeguarding policy. The LADO/Police/MASH must be contacted if deemed necessary by both Headteachers and a joint meeting arranged between both facilities.

5.4 The facility with whom the member of staff is employed should now take the lead on the investigation, but all meetings, correspondence and outcomes must be copied to the Head of the other facility.

5.5 Any further representation from the accuser/accused has the right to request a chosen member of staff from their own facility at any meetings or proceedings.

5.6 In the event that the allegation is quashed, but the accuser would still have contact with the other facilities member of staff, it is reasonable to assume that the students' facility will make provision for that student to alter curriculum or have alternative provision for those periods of time.

5.7 After each allegation is concluded, it is good practice for both Head's to meet and look at the procedure to ensure it was followed and effective. At this stage if it is deemed necessary, an adjustment can be made outside of the usual protocol review process.

6. Managing concerns or disclosures by students

It should not matter what facility a student attends on a shared site whenever there are instances that require urgent or sensitive attention. In particular, if a student wishes to disclose information to a member of staff, then the origin of that staff member should not be a barrier in any instance. The following procedure must be observed:

6.1 Should a student from either facility wish to disclose information to a member of staff, then that staff member must accommodate the request in an immediate capacity.

6.2 The staff member should follow their own facilities' policy. This will usually involve asking open-ended questions, listening and reassuring the student. If possible, this should take place in the presence of another member of staff from either facility, but understandably this will not be the situation in all cases.

6.3 The student is to be kept in the facility where the disclosure took place (or in the facility of the member of staff if the disclosure took place in one of the communal areas) whilst that facilities' DSL is approached with any notes from the meeting. A shared safeguarding record will be held in both facilities for use where appropriate.

6.4 That facilities' DSL will contact the other facilities' DSL and request a meeting (within an hour if deemed serious enough). In the event that the DSL feels that the child is capable of returning to the other facility, then the DSL or another member of staff must accompany that student back to the other facility where they will be met by the DSL and relevant paperwork and notes can be exchanged.

6.5 The DSL from both facilities must treat this as a normal disclosure and it must be recorded as per that facilities' policy.

6.6 The students' facility will now take the lead on any necessary intervention and will inform the other facilities' DSL of any resolution so that it can be recorded and marked as finalised on their record system.

6.7 After each disclosure is concluded, it is good practice for both DSLs to meet and ensure the procedure was followed and effective. At this stage if it is deemed necessary, an adjustment can be made outside of the usual protocol review process.

6.8 Staff may report any safeguarding observations using the designated reporting system (Cura) but also through the use of the safeguarding record form which is held in both facilities.

7. Review of the process

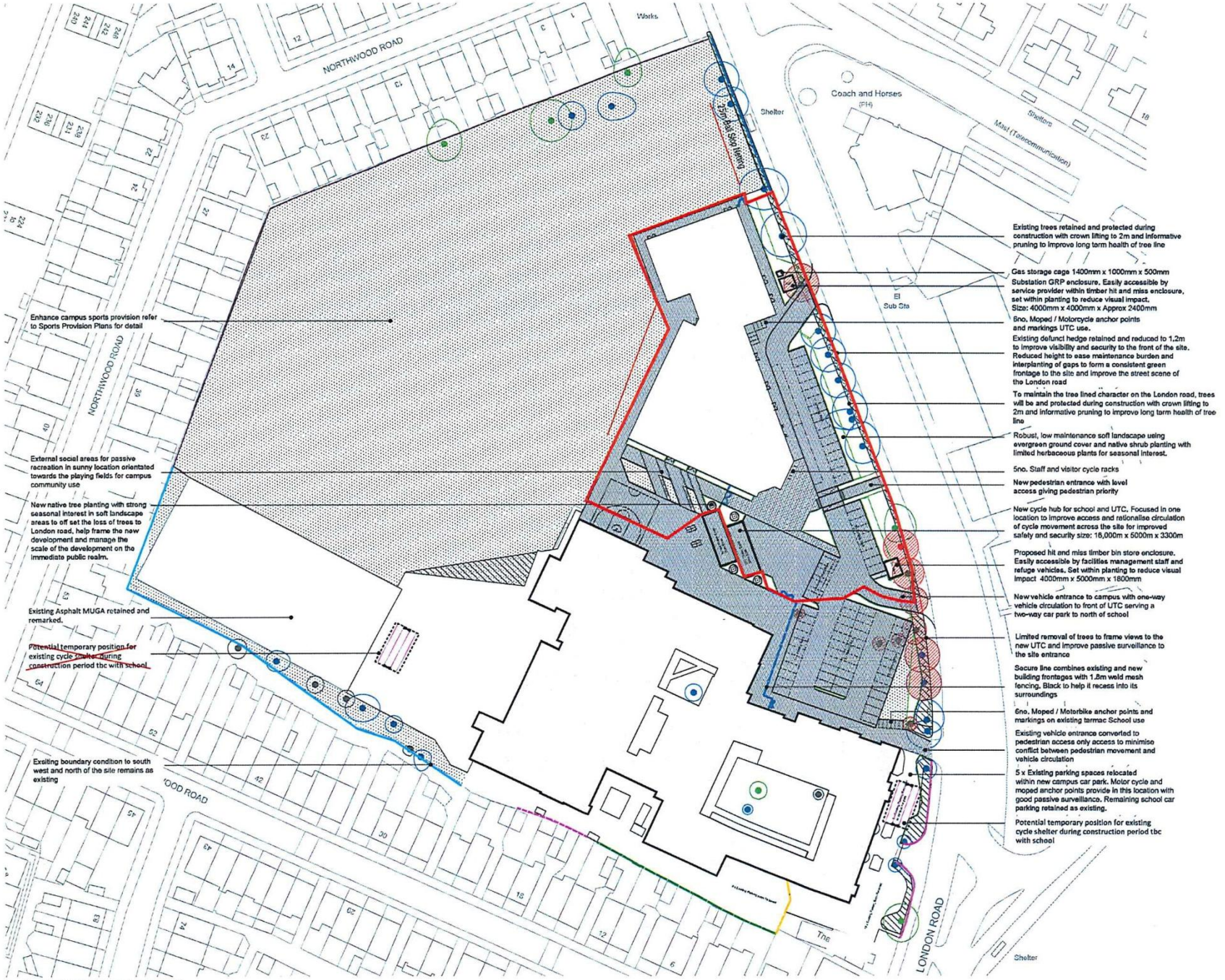
In addition to the termly safeguarding updates between DSL's the following review process should be observed by both facilities:

7.1 This protocol will be reviewed once a year by both SLT teams in a designated meeting.

7.2 Any agreed changes to the protocol following the meeting must be implemented within a timescale agreed in that meeting.

7.3 DSLs will have responsibility for the coordination of these changes, and must prompt individuals within both teams to ensure the deadlines are met.

7.4 Whilst the activities of the Designated Safeguarding Lead referred to in this document can be delegated to appropriately trained deputies, the ultimate responsibility for the regular review of these procedures remains with the Designated Safeguarding Lead, this lead responsibility will not be delegated.



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A1

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Approximate extent of canopy
Tree Root Protection Area (RPA)
Tree to be removed

Individual Trees
- Ungraded
- Grade A Trees
- Grade B Trees
- Grade C Trees
- Grade U Trees to be removed for reasons of sound arboricultural management

Proposed Secure Boundary Fence with lockable gates
Existing Wire Mesh Fence
Existing Chain link Fence
Existing Iron Railing Fence
Existing Palisade Fence
Existing Chain link Security Fence

Proposed Asphalt
Proposed Paving
Existing Tarmac replaced with amenity grass
Amenity Grass
Ornamental Ground Cover Shrubs
Existing Defunct Hedgerow
Proposed Hedgerow to be removed
Car parking Space
+00.000 Proposed Level
EX 00.000 Existing Level

Date	Rev	Name	Chk	Description
28.01.16	P01	JH	MRJ	INFORMATION
16.12.15	PL01	JH	MRJ	PL - PLANNING ISSUE

Stride Treglown
Architecture Town Planning Interior Design Building Surveying Landscape Architecture Graphic Design
Promenade House, The Promenade, Clifton Down, Bristol BS8 3NE
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PROJECT
UTC Portsmouth
London Road
Portsmouth
Hampshire

RED-LINE BOUNDARY DRAWING
V 1.1

STATUS
INFORMATION

DATE	SCALE	DRAWN BY	CHECKED BY
Dec 2015	1:500scale@A1	JH	MRJ

DRAWING NUMBER
40285-STL-00-XX-DR-L-XX-01001

REVISION NO.
P01

Appendix 6: staff code of conduct

The code of conduct applies to all staff groups, including those staff who are seconded, supply agency staff, governors, volunteers and students when working on the school premises, on trips/visits, including residential trips with students.

At Trafalgar School, we believe expectation shapes performance. As staff, our high expectations are shown in a number of ways and all members of staff share the responsibility for ensuring excellent standards are maintained at all times. Standards of behaviour, work and respect depend upon the example we set as staff, both in the classroom and around the school: students flourish in an atmosphere that is safe, supportive, calm, positive and well prepared.

Always insist on high standards of behaviour, work and respect from students, yourself and colleagues: stimulating lessons generate outstanding behaviour and earn respect from all. Please refrain from criticising another member of staff (or school policy) either when talking with students or in the staff room. Any concerns should be discussed with the appropriate line manager.

It is the expectation in your daily work you will:

- Be firm, fair and consistent
- Be positive and friendly
- Treat everyone as an individual and with dignity
- Have very high expectations of students and set high standards (students will rise or fall to your level of expectation)
- Ensure you are always out in the corridor by your classroom or work area for the start and end of lessons; it is everyone's responsibility to ensure students get into lessons on time
- Take responsibility for dealing with behaviour concerns – to ignore it is to condone it
- Keep an attractive, clean and tidy area with displays that enhance learning
- Never give up on a student
- Prioritise safeguarding students.

Staff Dress and Appearance

As role models, it is essential all school staff convey the right messages to students, parents and colleagues. Staff must also take responsibility for their own and others' safety. Dressing appropriately is integral to this and adults working with children must not dress in a manner that could be viewed as offensive or inappropriate, as this can make them vulnerable to criticism or allegation. For this reason, it is important we maintain the same high standards of dress we expect from the students.

Examples of acceptable clothing include a combination of: • appropriate length skirts • blouses • smart jumpers • jackets • dresses • business suits • tailored trousers • school branded polo shirts • shirt and tie.

Inappropriate clothing for a school environment refers to anything that is likely to be viewed as offensive, revealing, or sexually provocative. Professional dress does not distract, cause embarrassment or give rise to misunderstanding. Alternations to appearance e.g. piercings, extreme hairstyles and tattoos remain at the discretion of the Headteacher. Staff should avoid wearing things containing any political or otherwise contentious slogans and must be mindful of their own health and safety when dressing for work.

Examples of unacceptable clothing include: • denim • cord • miniskirts • leggings • low cut / revealing tops • trainers • flip flops.

Informal wear is acceptable on non-uniform days or training days however, staff should still ensure they are dressed appropriately for a school environment.

Language

At Trafalgar, excellent relationships exist between staff and students and this must not be taken for granted. It is essential all staff seek to praise students whenever the opportunity arises; at least four times more than issuing negative comments. Students will test the boundaries of acceptable behaviour and we are most successful in these instances when we deal with problems fairly and effectively (see behaviour policy).

The language we use (verbal and non-verbal) with students in lessons and around school is crucial as it sends out such strong messages. Often what we say to a student can be interpreted differently e.g. "You may do that at home, but you will not do it in my lesson" and could unwittingly cause offence. Therefore, staff should consider carefully the language they choose to use. Think about: • where you stand and how you command a given space • body language: height and posture • gestures: hands and arms • facial expressions and eye contact • pitch and tone of voice • internal state of mind: breathing, pauses • external states: what you say, how you say it, what you are doing when you speak and what you look like when you are speaking.

Communication Etiquette

We encourage all staff to maintain a positive work / life balance and therefore do not expect emails to be sent or work-related calls to be made outside of the hours of 7am-6pm, on weekends or during school holidays.

Social Media

At Trafalgar School we appreciate staff have social media accounts but it we encourage staff to follow union guidance regarding its safe use. The DfES 'Guidelines for Safer Working Practice for Adults who work with children and young people in Educational Settings' states that "all staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children" therefore staff need to be careful about any information shared in the public domain. Under no circumstances should staff share pictures of, or reference students on their personal social media accounts. Nothing posted or 'liked' in the public domain should bring your professional status into question. All privacy settings should be 'private' (the IT team can help with this). Profile pictures should be professional e.g. no alcohol, no nudity, no offensive language. Comments should not mention the school by name or refer to Trafalgar School or the workplace in a derogatory way.

It is an expectation no staff have 'friends' on social media who are ex-students, under the age of 18 (any exceptions to this e.g. family members should be brought to the attention of the Headteacher). Some staff prefer to disguise their name in order to limit the number of students able to easily find them on social media platforms.

Safeguarding

Every member of staff will be issued with an ID badge on a Trafalgar School lanyard. All staff are required to wear their ID badge and lanyard at all times – this is an essential part of our safeguarding processes and enables us to identify those who are DBS checked and members of staff in the school. Anyone without an ID badge must be challenged. ID badges should not be lent to other members of staff or students. All staff are required to use their ID badge to sign in and out daily and any time they leave the school site.

DBS checks are carried out every three years. Nevertheless, all staff are expected to inform the Headteacher without delay (and by whatever means of communication is fastest) should they, or a close relative, be investigated in any other aspect of their lives, or arrested.