



Safeguarding and Child Protection Policy

2025-2026

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Review:	The document should be reviewed by the Designated Safeguarding Lead and updated annually if required; after ratification or earlier if there is any new local or national guidance, changes in process, or legislation.
Purpose of Document:	To give guidance on Safeguarding and Child Protection processes and procedures to ensure that students are provided with the highest levels of support and care whilst students at THS.
Implementation:	The procedures will be accessed via the THS Policies team
Dissemination:	The procedures will be available to all staff, teaching and nonteaching

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1.0 Key contacts:

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The Delta Director of Education	Fritz Penn-Barwell	F.Penn-Barwell@deltaeducationtrust.com

2.0 Introduction and Context

2.1. Our responsibilities

The Harbour School is committed to safeguarding children and expects everyone who works for the school to share this commitment.

This policy sets out how The Harbour School will deliver these responsibilities.

- 2.1.1. This policy **must** be read in conjunction with the latest versions of the statutory guidance documents 'Keeping Children Safe in Education (KCSIE)' and 'Working together to safeguard children, a guide to multi- inter-agency working to help, protect and promote the welfare of children (WTTSC)' and does not supersede those statutory documents.

- 2.1.2. All references to KCSIE and WTTSC are from the latest iterations of those documents which can be found on the GOV.UK website.
- 2.1.3. The school will at all times adhere fully to the statutory guidance in place from the Department of Education issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Education (Non-Maintained Special Academies) (England) Regulations 2011, Keeping children safe in education: Statutory guidance for academies and colleges (September 2024) and 'Working together to safeguard children, a guide to multi- inter-agency working to help, protect and promote the welfare of children Nothing written in this policy overrides the school's duties under such legislation.
- 2.1.4. The governing body will oversee the policy, ensure its implementation and review its content and effectiveness on an annual basis.
- 2.1.5. The headteacher will report termly to the governing body on the school's safeguarding culture, implementation of this policy and the efficacy of the arrangements in place to keep children safe and promote their welfare.
- 2.1.6. Furthermore, we will follow the procedures set out by the Portsmouth Safeguarding Children Partnership (PSCP).

2.2. Our Principles

- The health, safety and well-being of ALL our children are of paramount importance to all the adults who work in our school. Our children have the right to protection, regardless of age, gender, race, culture or disability.
- Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that we consider, at all times, what is in the best interests of the child.(Keeping Children Safe in Education, September 2025)
- Safeguarding and promoting the welfare of children is defined for the purposes of KCSIE and 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 the impairment of children's mental and physical health or development
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - Taking action to enable all children to have the best outcomes.

The school

- 2.2.1. Provides a child-centred, caring, positive, safe and stimulating environment that promotes the emotional, social, physical and moral development of the individual child.
- 2.2.2. Provides an environment which helps children feel safe and respected.
- 2.2.3. Enables children to talk openly about anything that worries them and to feel confident that they will be listened to, kept safe and never be made to feel that they are creating a problem for reporting abuse, particularly sexual violence or sexual harassment.
- 2.2.4. Recognises that children may not feel ready or know how to tell someone they are being abused, exploited or neglected and may not recognise their experiences as harmful.
- 2.2.5. Recognises that children with additional needs or vulnerabilities including disability and/or sexual orientation or language barriers may require additional support to enable them to tell someone they are being abused.
- 2.2.6. Ensures that children are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum in line with the DfE's 'Teaching online safety in school' (June 2019) and UKCIS 'Education for a connected world' (June 2020).
- 2.2.7. Works with parents to build an understanding of the school's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations, is understood.
- 2.2.8. Works constructively with safeguarding partners and agencies to ensure children receive the support they need, professionally challenging decisions where required and appropriate.

2.3. Scope

- 2.3.1. In line with the law, this policy defines a child as anyone under the age of 18 years or any child on roll at this school.
- 2.3.2. This policy applies to all members of staff in our school, including all permanent, temporary and support staff, supply staff, governors, volunteers, contractors and external service or activity providers.

3.0 Safeguarding Roles and Responsibilities

3.1. All staff, volunteers and governors have responsibility for the following:

- 3.1.1. To provide a safe environment in which children can learn.

- 3.1.2. To identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm.
- 3.1.3. To take appropriate action, working with other services as needed.
- 3.1.4. To keep themselves updated with the systems within the school which support safeguarding that were explained to them as part of their induction (including the staff Code of Conduct). This includes knowing the role, and working with, the school's designated safeguarding lead.
- 3.1.5. To ensure they receive appropriate safeguarding and child protection training (including digital safeguarding/online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated.
- 3.1.6. To support social workers to take decisions about individual children when required

3.2. All school staff are responsible for:

- 3.2.1. Knowing who the school's designated safeguarding lead (DSL) and deputies are.
- 3.2.2. Raising any concerns with the designated safeguarding lead and deputies immediately.
- 3.2.3. Ensuring that safeguarding concerns are reported immediately, and always on the same day and making comprehensive, clear, accurate and professionally written accounts that will stand up to scrutiny via CPOMS.
- 3.2.4. Being alert to the signs of abuse, including child on child abuse and their need to refer any concerns to the designated staff member.
- 3.2.5. Maintaining an attitude of '**it could happen here**' and always act in the best interests of the child.
- 3.2.6. Listening to, and seeking out, the views, wishes and feelings of children.
- 3.2.7. Sharing information and working together to provide children with the help they need.
- 3.2.8. Referring to the headteacher any concerns about another member of staff immediately, or if the concerns are about the headteacher, referring them to the school's education director and/ or the chair of governors where appropriate.
- 3.2.9. Raising concerns about poor or unsafe practice and potential failures in the school's safeguarding regime through the school's Whistleblowing Policy.
- 3.2.10. Being aware of Portsmouth safeguarding procedures, <https://www.portsmouthscp.org.uk> and ensuring these procedures are followed.

- 3.2.11. Seeking early help where a child and family would benefit from coordinated support from more than one agency via Portsmouth Multi Agency Safeguarding Hub (MASH).
- 3.2.12. Knowing the school's procedures for dealing with child-on-child abuse, including sexual harassment and sexual violence between children.
- 3.2.13. Knowing the school's procedures for dealing with children who go missing from education, particularly on repeat occasions, and reporting any such concerns to the designated lead.
- 3.2.14. Reading KCSIE part one.

3.3. Governors and school leadership are responsible for:

- 3.3.1. Reading, understanding and applying KCSIE and WTTSC statutory guidance.
- 3.3.2. Ensuring that there is an effective Safeguarding and Child Protection Policy in place together with a Staff Code of Conduct, which are provided to all staff.
- 3.3.3. Ensuring all staff are given a mandatory induction, which includes clear guidance on their safeguarding and child protection responsibilities, including online safety, and procedures to follow if anyone has any concerns about a child's safety or welfare.
- 3.3.4. Ensuring that policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.
- 3.3.5. Ensuring that the school has an appropriate senior member of staff from the school leadership team, with appropriate status and authority, funding, resources and support to take the lead in responsibility for safeguarding and child protection- the Designated Safeguarding Lead (including online safety and understanding the filtering and monitoring systems and processes in place); and that they receive DSL /level 3 training which is updated every two years.
- 3.3.6. Ensuring that they are aware of and follow local procedures related to safeguarding.
- 3.3.7. Ensuring that they are doing all they reasonably can to limit children's exposure to online harms from the school's IT system, but that 'over-blocking does not lead to unreasonable restrictions
- 3.3.8. Ensuring that the school has in place filtering and monitoring, the efficacy of which is regularly monitored and reported on, and which complies with current filtering and monitoring standards.
- 3.3.9. Ensuring that all staff and volunteers undergo safeguarding and child protection training (including online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring).

- 3.3.10. Ensuring governors receive appropriate safeguarding and child protection (including online safety which includes an understanding of filtering, monitoring systems and cyber security) training at induction which is updated regularly and at least annually to keep pace with KCSIE updates. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole school approach to safeguarding and child protection.
- 3.3.11. Ensuring that they are aware of their obligations under the Human Rights Act 1998, The Equality Act 2010 including The Public Sector Equality Duty, and their local multi-agency safeguarding arrangements.
- 3.3.12. Ensuring they have appropriate level of security protection procedures in place in order to safeguard children, staff and systems and which meet the standards in 'Cyber security standards for schools and colleges' guidance.
- 3.3.13. Reading and referring to all of KCSIE.

3.4. The Designated Safeguarding Lead is responsible for:

- 3.4.1. Taking lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- 3.4.2. Managing referrals from school staff or any others from outside the school.
- 3.4.3. Working with external agencies and professionals on matters of safety and safeguarding.
- 3.4.4. Undertaking relevant training and attending update sessions.
- 3.4.5. Liaising with the headteacher to inform them of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations This should include being aware of the requirement for children to have an Appropriate Adult (PACE code C 2019).
- 3.4.6. Raising awareness of safeguarding and child protection amongst the staff and parents; and ensuring that child protection information is transferred to the child's new school/college.
- 3.4.7. Ensuring that the school have a nominated governor to liaise with the Education Director in the event of allegations of abuse made against the headteacher.
- 3.4.8. Ensuring all staff receive the appropriate training, which is kept up to date.
- 3.4.9. Notifying the Children's Social Care department if there are concerns over unexplained absences of a child.
- 3.4.10. Informing the local authority when a private fostering arrangement is in place.

- 3.4.11 Managing security within the school and reviewing it annually.
- 3.4.12 Ensuring that important policies, such as those for behaviour and anti-bullying, are kept up to date.
- 3.4.13 Keeping all child protection records up to date on CPOMS; including a clear summary of the concern, decisions reached and the rationale behind the decision, details of how the concern was resolved/outcomes.
- 3.4.14 Having an overview of the numbers of safeguarding and child protection referrals made, and provide an anonymised report to the headteacher, and governing body half termly.
- 3.4.15 Having in place effective ways to identify emerging problems and potential unmet needs for individual children and families.
- 3.4.16 Ensuring in conjunction with the relevant subject leader that there is a planned programme of evidence based, inclusive, age and stage appropriate, RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.
- 3.4.17 Ensuring through the safeguarding curriculum that children know the process of raising a concern (about themselves or a friend/other), that they know the school's Designated Safeguarding Lead (and deputies), and are aware of other support mechanisms such as ChildLine etc.
- 3.4.18 Ensuring at least one person on any appointment panel has undertaken safer recruitment training which is renewed every two years.
- 3.4.19 Ensuring the adherence to statutory responsibilities to check staff working with children, taking proportionate decisions on whether to ask for checks beyond what is required; and ensuring volunteers are appropriately supervised.
- 3.4.20 Ensuring procedures are in place to handle allegations against members of staff and volunteers.
- 3.4.21 Ensuring there are procedures in place to handle allegations against other children.
- 3.4.22 Ensuring that there is support available for staff involved in difficult child protection cases/incidents both at the school and externally through counselling and/or other services.
- 3.4.23 Creating a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and in the school's development.
- 3.4.24 Taking lead responsibility for promoting the educational outcomes for children who have or have had a Social Worker.
- 3.4.25 Making this policy available to parents and carers as appropriate.

- 3.4.26 Ensuring that our staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.
- 3.4.27 Ensuring all staff have regular reviews of their own practice to ensure they improve over time.
- 3.4.28 Ensuring any paper records are secure and kept separately from the child's main file in a locked location.
- 3.4.29 Fulfilling their duties in line with KCSIE Annex C.
- 3.4.30 Reading and referring to all of KCSIE, WTTSC parts 2.4 and 5 and the Local Authority threshold information.

4. Safeguarding Processes and Procedures

The school will deliver its responsibilities for identifying and acting on early help needs, safeguarding and child protection in line with the policies and procedures identified in the Portsmouth safeguarding partners policies and procedure guidance, available at <https://www.portsmouthscp.org.uk>

4.1. How to report any concerns

- 4.1.1. Clear procedures on the reporting of any concerns are given to all staff/volunteers in the school. This is done as part of the staff induction training and staff are given a reminder of this annually in refresher training. These procedures can be found in the THS Teams Channel in the Safeguarding folder.
- 4.1.2. All concerns should be reported in writing, using CPOMS. If CPOMS is temporarily unavailable the school 'back up' paper procedures should be used. These forms can be found in each campus reception area. Concerns should always be completed as soon as possible, on the same day. Staff should never wait until the next day to complete a safeguarding concern report. Concerns about a member of staff should be reported immediately using a 'Low Level Concern form (Pink)' to the headteacher.
- 4.1.3. All child protection and/or safeguarding concerns should be reported to Andrea Nesbit (Designated Safeguarding Lead). See Appendix 1 for a flow diagram which explains how all disclosures are dealt with at the school.
- 4.1.4. Failure to follow these reporting procedures may result in disciplinary action.

4.2. Taking Action

- 4.2.1. If at any time it is considered that a child has suffered significant harm or is likely to do so, a referral should be made to Portsmouth Emergency Duty Team on 023 9268 8793 or 'out of hours' on 0300 555 1373 or call 999 if you are concerned a child needs immediate protection.

- 4.2.2. If the child has an injury that requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.
- 4.2.3. The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

4.3. Children's disclosure of abuse

- 4.3.1. At The Harbour School we have a clear procedure for reporting concerns. If a child talks to a member of staff about any risks to their safety or wellbeing, the staff member will let the child know that the staff member must pass the information on to the safeguarding team (DSL) to offer the proper support that the child requires. Staff members will allow them to speak freely and will not ask investigative questions.
- 4.3.2. Staff will be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, and /or they may not recognise their experiences as harmful. Staff will be aware this could be due to their vulnerability, disability and or sexual orientation or language barriers.
- 4.3.3. The staff member will tell the child what will happen next. It is the duty of the member of staff to inform the Designated Safeguarding Lead (or DDSL) of what has been discussed.
- 4.3.4. Information will be shared on a need-to-know basis only. Issues or concerns will not be discussed with colleagues, friends or family unless necessary for the welfare of the child.

4.4. Suspecting that a child is at risk of harm

- 4.4.1. There will be occasions when staff may suspect that a child may be at risk but have no 'real' evidence. In these circumstances, staff will try to give the child the opportunity to talk. All staff should be aware that children can abuse other children (child on child abuse) and that it can happen both inside and outside of school and online.
- 4.4.2. Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with the Designated Safeguarding Lead Andrea Nesbit.
- 4.4.3. Staff will be aware of the harm caused by child-on-child abuse including sexual violence or harassment and recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

- 4.4.4. Staff will use the school's Anti-Bullying Policy and/or Behaviour Policy where necessary, located in the THS Teams Channel. However, there will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying/behaviour procedures.
- 4.4.5. For all children displaying challenging behaviour and bullying, the DSL must be included in decisions about consequences to determine any safeguarding risks
- 4.4.6. The school acknowledges that some children can be particularly vulnerable or may have an increased risk of abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our children receive equal protection, we will give special consideration to children that are considered to be vulnerable.

4.5. Notifying parents

- 4.5.1. The school will normally seek to discuss any concerns about a child with their parents. The Designated Safeguarding Lead Andrea Nesbit, or a member of the safeguarding team, will make contact with the parent in the event of a concern, suspicion or disclosure. All contacts to the Portsmouth MASH will be made with the knowledge and agreement of the family.

Exceptions to this are;

- When seeking consent to share would put a child, young person or other at risk of significant harm.
- If it would undermine the prevention, detection or prosecution of a serious crime OR • The professional has either tried to seek consent or consent was refused and they feel not sharing information would potentially have a significant impact on the child's safety and wellbeing.

In these circumstances, the Portsmouth MASH and/or Children's Social Care teams may seek and share necessary information about a child, young person or family without initial consent being given.

- 4.5.2. If the school believes that notifying parents could increase the risk to the child, exacerbate the problem or compromise the safety of a staff member, advice will first be sought from Children's Social Care and/ or key multi agency partners.

4.6. Referral to Children's Social Care

- 4.6.1. The Designated Safeguarding Lead, Andrea Nesbit or deputy safeguarding leads will make a referral to Children's Social Care if it is believed that a child is suffering or is at risk of suffering significant harm.
- 4.6.2. Contacts at Portsmouth **MASH via 023 9268 8793 during office hours** (08:30 – 17:00 Monday – Thursday and 08:20 – 16:30 Friday), OR use the out of hours number **0300 555 1373 at all other times** (17:00 – 08:30 Monday – Thursday, 16:30 – 08:30 Friday and 24 hours weekends and bank holidays)

- 4.6.3. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.
- 4.6.4. Portsmouth LADO details are as follows: LADO@portsmouthcc.gov.uk or 02392882500

4.7. Private Fostering

- 4.7.1. The school will notify the local authority where we are aware or suspect that a child is subject to a private fostering arrangement.
- 4.7.2. We have a mandatory duty to notify the local authority if we are involved directly or indirectly in arranging for a child to be fostered privately. Notifications must contain the information specified in Schedule 1 of The Children' Act 1989 (private Arrangements for Fostering Regulations 2005 and must be made in writing.
- 4.7.3. School staff should notify the Designated Safeguarding Lead or relevant deputy when they become aware of private fostering arrangements.
- 4.7.4. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

4.8. Reporting directly to child protection agencies

- 4.8.1. Staff will follow the reporting procedures outlined in this policy. However, they may also share information directly with Children's Social Care, police, or the NSPCC if:
- The situation is an emergency and the Designated Safeguarding Lead Andrea Nesbit their deputy, the Deputy Headteacher or Headteacher are all unavailable.
 - They are convinced that a direct report is the only way to ensure the child's safety.

4.9. Early help

- 4.9.1. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area. Some early help is provided through "universal services" such as education and health services. They are universal services because they are available to all families, regardless of their needs. Other early help services are coordinated by a local authority and/or their partners to address specific concerns within a family and can be described as targeted early help. Examples of these include parenting support, mental health support, youth services, youth offending teams and housing and employment services. Early help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family's

consent to receive support and services offered. These may be provided before and/or after statutory intervention.

- 4.9.2. Staff and volunteers working within the school should be alert to the potential need for early help for children. Staff and volunteers should be alert to children with additional vulnerabilities who may benefit from Early Help.

5. Types of Safeguarding Concerns

5.1. Types of abuse and neglect

This section must be read in conjunction with KCSIE Annex A and B

- 5.1.1. 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. They may be abused by an adult or adults, or another child or children.
- 5.1.2. All staff must know what the different signs of abuse are and be alert to those signs
- 5.1.3. All staff must maintain an attitude of 'it could happen here' and ensure any concern, no matter how small is reported. It could be the vital missing piece of the jigsaw that indicates a child is at risk of harm
- 5.1.4. All staff will receive ongoing training regarding types of abuse including local and national context.
- 5.1.5. The DSL and/or deputy will respond to all concerns, following local authority procedures and where there is an immediate risk of serious harm to a child will inform the police.
- 5.1.6. Further information and resources can be found in annexes A, B and part 5 of KCSIE and in the THS Teams Channel- Safeguarding folder.

5.2. Specific safeguarding Issues

- 5.2.1. All staff must have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.
- 5.2.2. Staff must be aware of the signs of a variety of specific safeguarding issues as outlined in KCSIE, e.g. CCE (including County Lines), CSE, serious violence, so called 'Honour' Based Abuse (HBA), FGM, Forced Marriage, Breast Ironing and know what to do if they have a concern.

5.3. Preventing Radicalisation

- 5.3.1. The Counter-Terrorism and Security Act, 2015, places a duty on and childcare, education and other children's services providers, to have due regard to the need to prevent people from being drawn into terrorism "the Prevent duty".
- 5.3.2. The school has a prevent risk assessment in place, updated annually which has been ratified by the LGB.
- 5.3.3. Where staff are concerned that children are developing extremist views or show signs of becoming radicalised they should discuss this with the Designated Safeguarding Lead and be recorded on CPOMS.
- 5.3.4. The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

5.4. Channel

- 5.4.1. When it is appropriate the DSL will make a referral to the Channel programme.
- 5.4.2. We use the curriculum to ensure that children understand how people with extreme views share these with others to radicalise others, especially using the internet.
- 5.4.3. We are committed to ensuring that our children are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

5.5. Child on Child Abuse

- 5.5.1. All staff should be aware that children can abuse other children at any age and that it can happen both inside and outside of school and online.
- 5.5.2. All staff must know the indicators and signs of child-on-child abuse, know how to identify it and respond to reports of it. This includes sexual violence and sexual harassment.
- 5.5.3. All staff must be aware that even if there are no reports it does not mean child on child abuse is not happening. It may be the case that it is just not being reported.
- 5.5.4. Staff must be vigilant and if they have any concerns they should speak to the DSL or deputy.
- 5.5.5. We will minimise the risk of all types of child-on-child abuse by:
 - Create a whole school protective ethos in which child-on-child abuse, including sexual violence and sexual harassment will not be tolerated.

- Provide training for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators.
- Ensure that staff do not dismiss instances of child-on-child abuse, including sexual violence and sexual harassment as an inevitable part of growing up or 'banter'.
- Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- Provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes including teaching about consent.
- Ensure that staff members follow the procedures outlined in this policy when they become aware of child-on-child abuse, referring any concerns of child-on-child abuse to the Designated Safeguarding Lead (or deputy) in line with safeguarding procedures.
- Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk. School will ensure that these children have a trusted adult in school to talk to.
- Recognise the risk of intra familial harms and provide support to siblings following incidents when necessary.
- The Designated Safeguarding Lead will use harmful sexual behaviours resources such as the Brook Traffic Light Tool, if there is a concern that a young person may be displaying sexually harmful behaviours to support assessment and intervention.

5.5.6. All staff must challenge inappropriate behaviours between children including, but not limited to:

- Bullying (including online bullying, prejudiced based and discriminatory bullying, inappropriate touching).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault which may also include an online element.

- Sexual harassment such as sexual comments, remarks, jokes and online harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery).
- Up skirting – 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.

5.5.7. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

5.6. Harmful Sexual Behaviour

5.6.1. This section of the policy **must** be read in conjunction with KCSIE Part 5 and the guidance in that section followed when responding to harmful sexual behaviour incidents.

5.6.2. We recognise that harmful sexual behaviour (HSB) exists on a continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. It can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

5.6.3. We also recognise that HSB can occur online and face to face (both physically and verbally) and is never acceptable.

5.6.4. We will ensure that all children are taught, in an age-appropriate way, about sex, relationships and consent and understand that the law is in place to protect children rather than criminalise them.

5.7. Sexual violence and sexual harassment

5.7.1. The school has a zero-tolerance approach to sexual violence and sexual assault. It is never acceptable, will not be tolerated and will never be passed off as ‘banter’ ‘just having a laugh’ ‘part of growing up’ or ‘boys being boys’.

5.7.2. The school will maintain an approach of it **is** happening here and may be well hidden from adults.

5.8. Responding to reports of sexual violence and sexual harassment

5.8.1. Our approach will be to support and reassure the victims that they are being taken seriously and that they will be supported and kept safe. We will ensure that victims

are never given the impression that they are creating a problem or made to feel ashamed by reporting sexual violence or sexual harassment.

- 5.8.2. We will ensure that we are aware of intra familial harms and support is provided for siblings following incidents.
- 5.8.3. Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously.
- 5.8.4. All staff will be trained in how to manage a report.
- 5.8.5. The school recognises that certain children may face additional barriers to disclosure because of their vulnerability, disability, sex, ethnicity and/or sexual orientation and that procedures will ensure that all children are able to report easily.

5.9. Risk Assessment

- 5.9.1. Where there has been a report of sexual violence the DSL or campus deputy will make an immediate written risk and needs assessment which will be kept under review and will work to engage with children's social care and specialist services as required.
- 5.9.2. Action will be taken immediately to protect the victim, alleged perpetrator(s) and other children in the school. The school will not wait for the outcome or even the start of any police investigation before taking action to protect the children involved.
- 5.9.3. Any relevant action under the school behaviour policy will be considered.
- 5.9.4. Where there has been a report of sexual harassment the need for a risk assessment will be considered on a case-by-case basis.
- 5.9.5. The risk and needs assessment will consider:-
 - The victim, especially their protection and support.
 - Whether there may have been other victims.
 - The alleged perpetrator(s).
 - All the other children (and, if appropriate adults and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harms.

5.10. Action following a report of sexual violence and/or sexual harassment

- 5.10.1 When a report has been received the DSL or deputy will consider the following:
 - The wishes of the victim.
 - The nature of the alleged incident (s) including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed.
 - The ages of the children involved.

- The developmental stages of the children involved.
- Any power imbalance between the children.
- If the alleged incident is a one off or a sustained pattern of abuse.
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers.
- If there are any ongoing risks to the victim, other children, or staff.
- Intra familial harms.
- Support for siblings.
- Other related issues and the wider context including links to CSE and CCE.

5.10.2 Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) and any other children involved or impacted.

5.10.3 The DSL will consider 4 options when managing a report.

- Manage the report internally.
- Provide support through the local Early Help process.
- Make a referral to Children's Social Care.
- Report to the police.

5.10.4 All concerns, discussions, decisions and reasons for decisions will be recorded on CPOMS.

5.10.5 The school will ensure that if a child is convicted or receives a caution for a sexual offence the risk assessment will be updated to ensure relevant protections are in place and needs are being met.

5.10.6 If a report is assessed as being unsubstantiated, unfounded, false or malicious the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been by someone else and that this is a cry for help. In such circumstances the DSL may make a referral to Children's Social Care. An Early Help process may be initiated.

5.10.7 If a report is deliberately invented or malicious, the school will consider what disciplinary action is appropriate as outlined in the behaviour policy.

5.11. Ongoing response – safeguarding and supporting the victim

5.11.1 The following principles will help shape and decisions regarding safeguarding and supporting the victim:

- The needs and wishes of the victim will be paramount.
- Consideration of the age and development stage of the victim, nature of the allegations and the potential risk of further abuse.
- The victim will never be made to feel they are the problem or made to feel ashamed.

- Proportionality of response. Support will be tailored on a case-by-case basis.
- A holistic approach with an awareness of health needs associated with sexual assault including physical, mental and sexual health problems and unwanted pregnancy.

5.12. School procedures

- Timely action will be taken following any disclosure / incident to ensure all information and evidence is accurately recorded and shared with the safeguarding team.
- Witness statements will be taken and a review of CCTV (if available) will support an accurate understanding of the incident.
- The Designated Safeguarding lead (or a deputy) will lead the school response and will follow the Portsmouth Safeguarding Children's Partnership process and guidance to support decisions on a case-by case basis.
- If it is suspected that the child or young person is being, or is at risk of being significantly harmed as a result of the incident, staff will report **immediately** to the DSL.
- If the child has suffered significant harm AND/OR the child incurred a non-accidental injury the Portsmouth MASH or the Local Authority where the child resides will be contacted immediately by the DSL. If a child is at immediate risk of harm, the Police will be contacted.
- When a referral is made to MASH any information school hold; on the child's developmental needs, the capacity of the child's parents, carers, or family network to meet those needs and any external factors that may be undermining their capacity to parent will be shared.
- If a child or young person is not at risk of being significantly harmed the Designated Safeguarding lead (or a deputy) will consider an Early Help response.
- A range of interventions and assessment tools will be used following an incident to support both the victim and perpetrator as appropriate
- All information will be securely recorded on the school safeguarding platform (CPOMS)

5.13. Domestic Abuse and Children

- 5.13.1 This form of abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely

affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

- 5.13.2 Children can be victims of domestic abuse and as victims have protection and rights under the law. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
- 5.13.3 We encourage children to come forward by raising awareness of the issue and teaching the children about health relationships through PSHCE, the wider curriculum and modelling behaviour in the school.

5.14. Adolescent to Parent Violent Abuse

- 5.14.1 APVA is a hidden form of domestic violence and abuse that is often not spoken about. By raising awareness around this issue, we can provide better protection to victims and apply an appropriate safeguarding approach.

5.15. Digital Safeguarding (also known as online safety/E-safety)

- 5.15.1 We will ensure digital safeguarding is a running and interrelated theme when devising and implementing policies and procedures. This will include considering how digital safeguarding is reflected, as required, in all relevant policies. In addition, we will consider digital safeguarding whilst planning the curriculum, staff training, the role of the DSL and parental engagement. KCSIE 2025 signposts new online risks including misinformation/disinformation, and adds links/resources around AI and digital resilience for pupils and staff. "The school will teach, assess and respond to online risks including misinformation and disinformation, and will set expectations for safe and responsible use of generative AI by staff and pupils. The DSL will keep the curriculum and staff training under review to reflect emerging online harms and DfE guidance."
- 5.15.2 Whilst the DSL has lead responsibility for digital safeguarding, we will ensure there is support, if required, for operational digital safeguarding and the appropriate technical and safeguarding knowledge, skills and understanding to be able to quality assure systems, policies and processes, train staff and contribute to the safeguarding curriculum is available.
- 5.15.3 We will keep our digital safeguarding processes and procedures under review through our digital safeguarding group using an independent tool such as the SWgFL 360 safe process.
- 5.15.4 Our Code of Conduct signed up to by all staff annually.
- 5.15.5 If a child, parent/carer or member of staff has a concern relating to online safety children are encouraged to report it. They can report it directly to Andrea Nesbit or their relevant campus DDSL.
- 5.15.6 Through our regular communication with parents, we will reinforce the importance of children being safe online, explain what systems we use to filter and monitor

online use, explain what children are being asked to do online including sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online.

5.16. Photography and images

5.16.1 To protect children, we will:

- Seek their consent for photographs to be taken or published (for example, on our social media channels or in newspapers or publications).
- Seek parental consent.
- Use only the child's first name with an image.
- Ensure children are appropriately dressed.
- Encourage children to tell us if they are worried about any photographs that are taken of them.
- Remove photographs where requested.
- Only use school equipment when taking photographs of children.
- Comply with GDPR.

5.16.2 Parents, carers or relatives may only take still or video photographic images of children in the school or on school-organised activities with the prior consent of the school and then only in designated areas. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected. All requests should be directed to the headteacher.

5.17. Filtering and monitoring

5.17.1. The school will limit children's exposure to risks from the school's IT system. We meet the DfE filtering and monitoring standards. Leaders (including the DSL and IT lead) complete and record annual risk assessment of filtering /monitoring effectiveness, termly checks are reported to governors. We ensure prompt updates to illegal-content blocklists and maintain processes to identify and respond to indicators of harm surfaced by monitoring.

5.17.2. The school has in place appropriate filtering and monitoring systems that are in line with the recommendations in the UK Internet Centre document Appropriate Filtering for Education Settings.

5.17.3. The school will ensure that 'over blocking' does not lead to unreasonable restriction as to what children can be taught with regard to online teaching and safeguarding.

5.17.4. The school will conduct regular, at least termly, tests of the filtering and monitoring provision in the school and report on findings to the governing body.

5.17.5. All staff will be trained in digital safeguarding and will have a role in educating and protecting children about online harms.

5.17.6. We will seek to prevent children from online harms through educating them about the laws and potential consequences of activity online.

5.17.7. Digital safeguarding may be addressed through: lessons, specialised digital safeguarding sessions, PSHCE, flexi-learning weeks and extended tutor times.

5.18. Sharing of nudes and semi-nudes (also known as youth produced sexual imagery/sexting/non-consensual sharing of images)

5.18.1. Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

5.18.2. In dealing with cases of sending of nudes, semi-nudes etc the response to these incidents will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of any children involved.

5.18.3. To reduce the likelihood of the sharing of nudes/semi nudes we will:

- Outline our expectations and explain the rules of having a mobile, tablet or smartphone.
- Expect all staff and children to sign an acceptable use policy.
- Educate, in an age and stage appropriate way, about how to stay safe and the law in relation to sending and receiving of nudes/semi-nudes.
- Encourage children to report concerns to an adult.
- Ensure adults share concerns with the DSL.

5.18.4. When a child has been affected by the sending of an explicit image staff will:

- Recognise that if the child has been sending explicit images or videos of themselves, the child may feel anxious talking about this.
- Recognise that they themselves may feel shocked, upset, angry, confused or disappointed while listening to the child.
- Give themselves time to process the information, remembering that the child will be watching their reactions.
- Reassure the child that they are not alone.
- Listen and offer support – they're probably upset and need help and advice, not criticism;
- Not shout or make them feel like it's their fault;
- Will not ask questions like "why have you done it?" as this may stop them from opening up.
- Discuss the problem and the wider pressures that they may face, to help them to understand what's happened and understand any wider safeguarding concerns;

- Assure the child that they will do all they can to help and explain that they will seek the support of the DSL.
- Remind them that they can always talk to Childline or another trusted adult if they are not comfortable talking directly to the staff member.

5.18.5. If a child has shared an explicit image, the DSL or deputy will:

- Ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else.
- Support the victim to get the images removed by contacting the Internet Watch Foundation.
- Assess the situation for wider safeguarding concerns and agree who will be contacted and when then contact parents/police/CEOP/ as appropriate to the case.
- Contact the Child Exploitation and Online Protection Centre (CEOP) if the image was requested by an adult, as this is grooming which is illegal.
- Contact the DSL at the relevant school if the image was requested by a school aged child not from this school, to raise awareness of potential wider safeguarding issues or circulation of the image in their school.
- All actions and information to be logged on CPOMS.
- Parents to be contacted as appropriate.

5.18.6. If a child has been sent a sexually explicit image:

- The DSL or deputy should ask them if they know the person who sent it and their age.
- If the image was sent by another child, staff may want to help the child to speak to the sender in order to stop future messages. If the child agrees, staff can also help them to block the sender on social media.
- The DSL will consult the UKIS sharing nudes and semi nudes advice Sharing nudes and semi-nudes: how to respond to an incident (publishing.service.gov.uk).
- If the image was sent by an adult, staff should contact CEOP, the Child Exploitation and Online Protection Centre, as this may be part of the grooming process.
- All actions and information to be logged on CPOMS.
- Parents to be contacted as appropriate.

5.18.7. Staff **must not**:

- View, copy, print, share, store or save images.
- Ask a child to share or download images (if you have already viewed the images by accident, you must report this to the DSL).

- Delete the images or ask the child to delete it.
- Ask the child/children who are involved in the incident to disclose information regarding the image (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the child it involves or their, or other, parents and/or carers.

5.19. Upskirting

- 5.19.1. Under the Voyeurism (Offences) Act 2019, upskirting is a criminal offence punishable by up to two years in prison. Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.
- 5.19.2. Any concerns related to upskirting must be reported to the DSL in line with the reporting process outlines within this policy and where appropriate staff will also consult the behaviour policy.

5.20. Homelessness

- 5.20.1. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
The Designated Safeguarding Lead is aware of routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.
- 5.20.2. It is recognised in some cases 16 and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.
- 5.20.3. Children's services will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

5.21. Children with Special Educational Needs (SEN) and disabilities

- 5.21.1. All staff must therefore be aware of and extra vigilant to the possible indicators of abuse and/or neglect for disabled children. The designated safeguarding lead should liaise regularly with the special educational needs co-ordinator, the behaviour lead and the attendance lead, maintaining a culture of vigilance and being alert to any relevant new information or concerns.
- 5.21.2. If staff have a concern for a disabled child they must consider:
- The child's communication needs and how they can communicate effectively with them.

- What information in relation to the child disability and special needs staff need to be aware of in order to assess risk of abuse.
- What resources staff require in order to undertake an informed assessment of safeguarding risk.
- Where child protection issues are considered regarding a child with disabilities, there must be involvement by key professionals who know the child well, including those who have a comprehensive understanding of the child's disability, method of communication, and any associated medical condition.

5.21.3. Schools should consider what specialist advice, guidance and training may be required in order for staff to understand why children with SEND can be more vulnerable to abuse and how to recognise signs of abuse and/or neglect of disabled children

5.22. Mental Health

5.22.1. All staff should be aware that 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.

5.22.2. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

5.22.3. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. We will ensure that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

5.22.4. We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. For students where there are low level concerns, they will be sign posted using the student worry card which holds information for Childline; Online Chat with Kooth and Text Help (SHOUT). Students across the school can also be referred to specific in school interventions to support wellbeing and mental health.

There is a direct referrals process through the Local Authority for students who require bereavement or domestic abuse support and or counselling. The safeguarding team meet half termly with a CAMHS liaison lead for each campus to discuss any specific concerns for students. For students where there are more significant concerns, referrals can be made directly to CAMHS. If there is an immediate mental health crisis, staff will work with parents to refer to Solent NHS emergency services.

The Harbour School Senior Mental Health lead is Andrea Nesbit who will support the DDSLs as required.

- 5.22.5. We seek to embed positive mental health and mental health awareness through our school to create a culture where children can self-identify, signpost peers and seek support themselves. We undertake staff training and promote mental health awareness through the PSHCE schemes.
- 5.22.6. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the referral mechanisms listed within this policy and speaking to the designated safeguarding lead or a deputy.

5.23. Children who are LGBTQ+

- 5.23.1. Children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.
- 5.23.2. Staff will endeavour to reduce the additional barriers LGBTQ+ children face and provide a safe space for them to speak out or share their concern with members of staff.
- 5.23.3. The school will actively encourage LGBTQ+ children to share their lived experience and views in order to inform practice.

6. Attendance

This section must be read in conjunction with the school attendance policy

- 6.1. Lack of, or erratic attendance, persistent or severe absence is a safeguarding issue and must act as a warning sign to a range of concerns including neglect, sexual abuse, child sexual and child criminal exploitation particularly county lines. It may also be an indication of child-on-child abuse including bullying and sexual harassment or significant mental ill health concerns. It must not be seen as an isolated concern.
- 6.2. Absence from education may increase known safeguarding risks.
- 6.3. We have a separate attendance policy (which includes protocols for children missing education and elective home education) in place which references both Working together to improve school attendance and Children Missing Education.
- 6.4. Further information and support for school's can also be found in the Government's 'Missing Children and Adults - A cross government strategy' (publishing.service.gov.uk), Full time enrolment of 14-16 year old's in Furth Education and Sixth Form Colleges
- 6.5. We have a named senior leader with strategic responsibility for attendance- Andrea Nesbit.

- 6.6. School attendance operational leads, in addition to the general safeguarding training that all staff receive are given access to role specific safeguarding training and ensure they understand the safeguarding implications behind poor or non-attendance.
- 6.7. School leaders and governors ensure that attendance data, particularly for identified vulnerable groups is closely and regularly monitored identifying trends or patterns which may indicate safeguarding concerns.
- 6.8. Where appropriate, Social Workers will be involved, informed and updated about attendance issues.
- 6.9. Safe and well checks are carried out on children who are absent, based on a vulnerability risk assessment.
- 6.10. The school remains responsible for the safeguarding of children placed at any alternative provision

6.1 Children Missing Education (CME)

- 6.1.1 Children who go missing from education are at significant risk. Children who are already known to children's social care, who are on a child in need or child protection plan or in the care of the local authority (looked after children) are additionally vulnerable and in need of additional protection.
- 6.1.2 We will follow the protocols laid out in our attendance policy.
- 6.1.3 The DSL will ensure the school response to identifying children missing from education supports identifying potential abuse or exploitation and prevents them going missing in the future.
- 6.1.4 The school will ensure compliance with the guidance and regulations contained in the appropriate sections KCSIE and Working Together to Improve School Attendance (19th Aug 2024).

6.2 Elective Home Education (EHE)

- 6.2.1 We will follow the protocols laid out our attendance policy.

6.3 Children with medical conditions who cannot attend school

- 6.3.1 We will follow the protocols laid out our attendance policy.

7 Recruitment of staff and volunteers

- 7.1 The school will ensure that safer recruitment practices always follow KCSIE and will be adhered to by staff.
- 7.2 Every interview panel will have at least one member who has a current certificate in safer recruitment. These certificates will be updated every two years. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. We will record the answers to

safeguarding questions asked during the interview process on staff personnel files. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process including carrying out an online search as part of due diligence on shortlisted candidates.

- 7.3 As part of our due diligence, we will carry out an online search on shortlisted candidates to help identify, through publicly available information, any incidents or issues which can be explored at interview.
- 7.4 We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our school.
- 7.5 We will ensure that any alternative provision facility, contractor or agency working with the school provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in their provision.
- 7.6 Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.
- 7.7 We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.
- 7.8 The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. The school will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.
- 7.9 The types of checks undertaken will be in accordance with the guidance given KCSIE.
- 7.10 Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary preemployment checks as required in the guidance given in KCSIE.
- 7.11 Where an enhanced DBS Certificate is required, it will be obtained from the candidate before or as soon as is practicable after the person is appointed.
- 7.12 The school will always ask for written information about previous employment history and check that information is not contradictory or incomplete. References will be sought on all shortlisted candidates, including internal ones, before interview (unless the candidate has expressly denied permission for the employer to approach their referees). Where references have been sought, any issues or concerns they raise can be explored further with the referee and taken up with the candidate at interview.
- 7.13 The school will keep a single central record in accordance with the regulations given KCSIE.

- 7.14 Recruitment and/or deployment checks will be undertaken as stated in KCSIE.
- 7.15 The school will carry out all relevant checks if there are concerns about an existing member of staff and refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

8 Dealing with allegations against staff and volunteers which meet the harms threshold

- 8.1.1 We will prevent people who pose risks to children from working in our school by ensuring that all individuals working in any capacity at our school have been subjected to safeguarding checks in line with KCSIE. The school will maintain ongoing vigilance of all adults working in or visiting the school.
- 8.1.2 The school holds a comprehensive 'Code of Conduct' and 'Staff Disciplinary' policy which outline in detail expected standards of adult behaviour and procedures to take where there are concerns.
- 8.1.3 Where a child makes an allegation against a staff member, supply teacher or volunteer, the allegation will be taken seriously and acted upon immediately.
- 8.1.4 Parents will be contacted as soon as reasonably possible. The child will be offered support and their wishes will be carefully considered before any actions are carried out.
- 8.1.5 Where any member of the school staff, volunteer, governor or visitor has concerns that the conduct of an adult has met the harm threshold, they must report those concerns immediately.
- 8.1.6 Any concerns about the headteacher should go to the Trust Director of Education- Fritz Penn-Barwell who can be contacted by F.Penn-Barwell@deltaeducationtrust.com. The Director of Education will ensure that both the Trust CEO and the chair of governors is informed.
- 8.1.7 If for any reason you cannot make a referral through these routes the school has a duty to refer directly to the Local Authority Designated Officer (LADO) whom you can contact here: LADO@portsmouthcc.gov.uk
- 8.1.8 Under its duty of care for its employees, the school will ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. The school will ensure its obligations for confidentiality when an allegation has been made.

8.2 Concerns or allegations that do not meet the harm threshold/low level concerns

- 8.2.1 All staff, governors, volunteers and visitors will be made aware what constitutes a low-level concern and to ensure that all low-level concerns are shared responsibly with the Headteacher or DSL, recorded and dealt with appropriately.

9 Safeguarding training for all staff and children

- 9.1 Every year all staff (including non-teaching and volunteers) must undertake a variety of Child Protection and Safeguarding training including on KCSIE. This training will be informed by national and local context as well as identified gaps in knowledge and understanding.
- 9.2 Training is recorded and logged. All staff are informed clearly as to how to report anything of concern to Andrea Nesbit immediately. See Appendix 1 for a flow diagram of how concerns are dealt with at The Harbour school.
- 9.3 All new members of staff, including newly-qualified teachers and pastoral support workers, will be given induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, online safety, including filtering and monitoring and familiarisation with the safeguarding and child protection policy, KCSIE , WTTSC, whistleblowing policy, behaviour policy, anti-bullying policy staff code of conduct, systems and processes for CME and other related policies.
- 9.4 The Designated Safeguarding Lead will undergo updated level 3/DSL level child protection training every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.
- 9.5 All staff members of the school will undergo safeguarding and child protection training (whole school training) which is regularly updated.
- 9.6 All governors must undergo governor specific online awareness training at least every two years.
- 9.7 Staff members **who miss** the whole-school training should notify the DSL and will be required to undertake other relevant training to make up for. It is the responsibility of each member of staff to ensure they have completed all mandatory safeguarding training.
- 9.8 We will ensure that staff members provided by other agencies and third parties, e.g., supply teachers and contractors, have received appropriate child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole school training if it takes place during their period of work for the school.

The Designated Safeguarding Lead will provide an annual briefing to the school on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews. In addition, all school staff

will complete over the course of the year 7 minute, safeguarding briefings and associated quizzes alongside signposted courses via the National College.

The DSL will ensure the school maintains accurate records of staff induction and training.

10 Establishing a safe environment in which children can learn and develop

10.1 Anti-bullying

10.1.1 All staff must follow the anti-bullying policy.

10.1.2 At this school we do the following to raise awareness of bullying and what to do about it

- Undertaking questionnaires to monitor the extent of bullying in the school and the effectiveness of the anti-bullying policy.
- Making national anti-bullying week a high-profile event each year.
- Prominently displaying anti-bullying posters produced by the students.
- Using praise and rewards to reinforce good behaviour.
- The Harbour School operates a zero-tolerance policy towards bullying.
- When bullying is reported it will be taken seriously. Staff will work with the student who is being bullied to help them feel safe and to find responses to bullying that work. Staff will also work with the student or other students who are bullying to change the bullying behaviour
- Where appropriate, the school will try to involve colleagues from outside agencies (e.g. VS, Social Workers, YOT workers, Police etc.) in supporting students who are experience ring bullying or who are bullying.

10.1.3 If any child / member of staff / parent / carer has a concern about bullying, they should report it to: The relevant Head of Campus, Phase Leader, Safeguarding and Attendance lead or any member of staff.

11 Confidentiality and sharing information

11.1.1 Staff should only discuss concerns with the designated safeguarding lead, headteacher or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.

- 11.1.2 The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
- 11.1.3 The School will use the DfE Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers May 2024 to inform and support their approach to information sharing.
- 11.1.4 All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that anything being released into the public domain does not compromise evidence.
- 11.1.5 Child protection files must be transferred to a new school within 5 days for in year transfers or within the first 5 days of the start of a new term.

11.2 Storage and handling of records

- 11.2.1 Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 1998 and the UKGDPR (2018) and the school's Data Protection Policy.
- 11.1.2 The School will use the DfE 'Data Protection in Schools' April 2024 to inform and support their approach to information sharing.
- 11.1.3 Any paper record of concern forms and other written information will be stored in a locked facility accessed only by the headteacher and designated safeguarding lead. Any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen.
- 11.1.4 Child protection information will be stored separately from the child's school file and the school file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or school they will be sent separately from the child's file and under a confidential cover or in an encrypted electronic file.
- 11.1.5 Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they will refer the request to the Headteacher or Designated Safeguarding Lead. The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.
- 11.1.6 We will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UKGDPR.

11.1.7 When unsure, we will contact the Trust Data Protection Officer.

12 Use of school premises for non-school activities

- 12.1 Where the school premises are hired or rented out the school leadership will ensure that appropriate arrangements are in place to keep children safe.
- 12.2 The school policies will apply where the services or activities are provided by the school and are under the direct supervision or management of school staff.
- 12.3 Where services or activities are provided separately by another body, the governors and school leadership will seek written assurance that the body concerned has appropriate child protection and safeguarding policies in place (including inspecting these as needed) and ensure that there are arrangements in place to liaise with the school on these matters where appropriate.
- 12.4 This applies whether or not the children who attend any of these services or activities are children on the school roll.
- 12.5 The school leadership and governors should also ensure safeguarding arrangements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
- 12.6 The guidance found in 'Keeping children safe in out-of-school settings' details the safeguarding arrangements that the school should expect these providers to have in place.

13 Working with dual registered schools

Some students accessing The Harbour School, will be coded as Dual registered as they are still on the roll of a mainstream school. To ensure that schools are supported in their safeguarding duties, THS will send a safeguarding assurance letter at the start of each academic year. Within this letter the following information is shared:

Within this letter the following information is shared that all colleagues engaged in regulated activity with children at The Harbour School, including the Outreach Team are DBS checked to an enhanced level. This includes a check of the list of those barred from working with children. The Harbour School also carry out the following checks and retain the following information for all staff;

- ID Evidenced
- DFE Number (where relevant)
- Qualifications Evidenced
- Medical Check (e.g. as required under Teachers Standards)

- Childcare disqualification declaration completed and date
- Barred List Checked and expiry date
- Enhanced DBS Clearance Received and Date of Clearance
- Disclosure Number
- Further Disclosure Information (if relevant)
- Prohibition Order checked and date
- Overseas Police Check (if relevant)
- Right to Work Evidenced
- 2 References in line with the safer recruitment guidelines
- CV History Checked
- Section 128 check where applicable

As part of this process, we strongly encourage our educational partners to come and visit the school, in particular, regular check-ins for those students that they have dual registered with us. Our school DSL or Campus lead will be available to meet throughout the school year.

Appendix 1 - Raising Safeguarding Concerns about a Child

This outline cannot cover every eventuality – all cases will keep the best interests of the child at the heart of any decision

