



Safeguarding and Child Protection Policy

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Abbreviations:

CCE: Child criminal exploitation

CERAF: Child Exploitation Risk Assessment Framework

CME: Children missing education

CP: Child Protection

CPD and CPL: Continued professional development, continued professional learning

CPI: Community Partnership information

CPOMS: Child Protection Online Monitoring System

CSC: Children's Social Care
CSE: Child sexual exploitation
DfE: Department for Education
DSL: Designated Safeguarding Lead
DBS: Disclosure and barring service
EH: Early Help
EHA: Early help assessment
FGM: Female genital mutilation
GDPR: General Data Protection Regulations
HBA: Honour based abuse
HIPS: Hampshire, Isle of Wight, Portsmouth & Southampton Partnership
IACF: Inter-agency Contact Form
LA: Local Authority
LADO: Local Authority Designated Officer
LGBT: Lesbian, Gay, Bisexual and Transgender
KCSIE: Keeping Children Safe in Education
MASH: Multi-Agency Safeguarding Hub
MH: Mental health
NPCC: The National Police Chief's Council
NRF: National referral form
PCSP: Portsmouth Safeguarding Children Partnership
PREVENT: **Prevent** is about **safeguarding** individuals from being drawn into terrorism, ensuring those vulnerable to extremist and terrorist narratives are given appropriate advice and support at an early stage
PSHE: Personal, Social, Health and Economic Education
SAT: School Attendance Team
SEMH: Social, emotional and mental health
RSE: Relationships & Sex Education
UKCCIS: UK Council for Child Internet Safety

*Protecting children from maltreatment

*Preventing impairment of children's mental and physical health or development.

*Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care

*Taking action to enable children to have the best outcomes. (Working Together 2018 & Keeping Children Safe in Education 2022)

A copy of this policy is available on The Harbour School Website:

<https://theharbourschoolportsmouth.org/>

All staff must acknowledge they have read and understood this policy.

Parent(s) can be issued with a copy of this policy if requested.

This policy has been developed in accordance with the following statutory guidance and local safeguarding procedures: Working Together to Safeguard Children 2018; Keeping Children Safe in Education Sept 2022.

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Aim of The Harbour School Child Protection and Safeguarding Policy

The Harbour School fully recognises its responsibilities for child protection and safeguarding (child protection is part of safeguarding and promoting welfare and is the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm). Our policy applies to all staff, governors, supply staff and volunteers working at The Harbour School. Therefore, this policy aims to set out for The Harbour School staff how to keep those children we work with safe from harm and neglect. There are 6 main elements to our policy:

- Ensuring we practise safe recruitment in checking the suitability of staff and volunteers to work with children.
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
- Developing and then implementing procedures for preventing, identifying and reporting cases, or suspected cases, of abuse (including exploitation, female genital mutilation, radicalisation, and child on child abuse).
- Supporting pupils who are currently receiving services or support from Social Care and is subject to a multi-agency plan and working in partnership with external agencies regarding any concerns.
- Establishing a safe environment and trusted relationships in which pupils can learn and develop and pupils and staff feel able to raise concerns and those concerns will be taken seriously.
- Taking action to enable all pupils to have the best outcomes.

Our Ethos

Safeguarding and promoting the welfare of children is everyone's responsibility as a parent or family member, a concerned friend or neighbour, an employer, staff member or volunteer. We believe that The Harbour School should provide a caring, positive, safe and stimulating environment that promotes the social, physical, mental and moral development of the individual child; enabling children to thrive. Our approach is child-centred, meaning that we consider, at all times, what is in the best interests of the child. We will work with parent(s)/carer(s) to build a solid understanding of the school's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations. The school will therefore:

- Establish and maintain an environment and ethos where pupils feel secure, supported, valued, are encouraged to talk, and are listened to and know that their wishes and feelings will be taken into account.
- Ensure pupils know that there are adults in the school whom they can approach if they are worried or are in difficulty. Include opportunities and activities in the curriculum for pupils to develop the skills they need to stay safe from abuse and recognise when they

are at risk, and how to get help. Risks may include; abuse, bullying, exploitation (sexual, criminal and trafficking), radicalisation and/or extremist behaviour, teen relationship abuse, the impact of new technologies on sexual behaviour (for example sharing nudes or semi-nudes and accessing pornography), child on child abuse, gender based violence, drug and alcohol misuse and when using the internet and social media (making clear risk assessment and responding consistently to protect pupils while enabling them to take age appropriate and reasonable risks as part of their growth and development). This will be supported through the Relationships, Sex and Health Education curriculum. Teaching about relationships, sex and health - GOV.UK (www.gov.uk) (1 stop shop resource). DfE external document template (publishing.service.gov.uk) *Teaching online safety in schools outlines how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements.*

- Consider whether pupils are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to): exploitation and serious youth violence.
- Develop effective links with relevant agencies providing a coordinated offer of early help when additional needs of pupils are identified and co-operating as required with child protection matters including attendance at case conferences.
- Challenge any discriminatory behaviour, derogatory language or radical and extremist views and provide help and support to pupils about how to treat others with respect.
- Maintain a culture of vigilance and an attitude of: 'it could happen here', where safeguarding is concerned and always act in the interests of the child.

Parents should be encouraged to take an active interest in their child's progress and both children and parents should be informed that they should approach their designated staff member or a senior manager in the first instance if they have any concerns.

The Harbour School is committed to the safe recruitment and supervision of staff. All those who will be working with children will be appointed according to clear standards. All employed, casual and volunteer staff working with children will have used a formal application form, they will have received a clear person specification, will have had formal interviews (containing at least one person who has successfully completed an approved Safer Recruitment training course), two references will have been taken up (and verbally checked with the referrer), identity, right to work in the UK and qualifications will have been checked, there will have been a DBS Disclosure at Enhanced level with barred list and prohibition checks. Upon appointment, there will be a mandatory induction and probation period which includes familiarisation with child protection and safeguarding responsibilities and procedures, followed by regular reviews (part of probation review, line management and annual performance management) of ongoing safeguarding and child protection practice.

Safeguarding Responsibilities

All staff are responsible for ensuring that any concern for the welfare of a child is dealt with promptly, consistently and appropriately to ensure that children receive the right help at the right time to reduce risks and prevent issues escalating, with full consideration to the impact on that individual child's safety, emotional wellbeing and mental health. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child. The Headteacher and the Lead for Safeguarding are the Designated Safeguarding Leads for the school, sharing the whole school operational and strategic responsibilities for safeguarding and child protection. Each campus has a Deputy 'Designated Safeguarding Lead' (DSL) who has day-to-day responsibility for such issues, supported by the respective Assistant Head Teachers / Managers. The Deputy DSLs will be able to offer advice as well as to liaise with statutory agencies where there are concerns about a child's welfare. The campus Deputy DSLs are:

Bridge and Stamshaw: Head of Campus and Pastoral Area Leads

Cosham and Reintegration& Tuition Service: Head of Campus and Pastoral Area Lead

Tipner: Head of Campus and Pastoral Area Leads

Vanguard: Head of Campus and Pastoral Area Lead

Outreach Services: Manager of Outreach

See Appendix I

There is a nominated governor responsible for child protection at The Harbour School

All school staff should be prepared to identify pupils who may benefit from early help. This includes identifying emerging problems, liaising with the Deputy DSL/DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking a Family Support Plan. Such cases should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.

Any pupil that goes missing from The Harbour School will receive a well-coordinated response that decreases the harm or risk of harm to them (absence from school is a known potential indicator of abuse or risk including: neglect, exploitation, mental health problems, substance abuse, travelling to conflict zones, FGM or forced marriage). If a pupil is absent and subject to a child protection plan or the school has safeguarding concerns and they are unable to contact the parent(s)/carer(s), the school will notify Social Care or MASH. If a pupil transfers to another school, their information will be sent to the new school within 15 days (including their child protection file which will be transferred separately from the main file) and the school will notify the pupil's social worker and the

Local Authority. Deputy DSLs should also consider if it would be appropriate to share any information with a new school/college in advance of a pupil leaving, if this would enable them to have appropriate support in place or continue with support (e.g. victims of abuse). All schools now have a legal duty to inform the Local Authority when a pupil is removed from roll. If any pupil is regularly absent or has 10 consecutive days or more without permission, with no contact from parent(s) / carer(s), following reasonable enquiries by the school, a CME referral must be made to the School Attendance Team (SAT).

Induction, Training, and Supervision

Those working with children should periodically undertake recognised training in child protection and safeguarding (updated on a 3 yearly basis). All staff will need to be familiar with the key principles underpinning the legislation and guidance, recognise the signs and indicators of abuse and neglect, know how to respond to any disclosures or concerns, have online safeguarding training, know how to access guidance and supervision within the school and how and when to refer concerns onwards. All staff will complete Educare online training in; ACES, Basic Safeguarding and Child Protection and have access to the following E-Learning packages: Female Genital Mutilation (FGM), Prevent and Cyber Security as part of their induction package. Some staff, including the DSLs and Deputy DSLs, will need more detailed additional training through the Portsmouth Safeguarding Children Partnership (PSCP), Safeguarding Children Training Programme and other specialist trainers / organisations (See Appendix C). In addition, staff will receive updated information on safeguarding and child protection at least annually (for example, via emails, updates or campus CPD sessions).

As part of induction, staff will be issued with/directed to and have their understanding checked of: this policy, the Code of Professional Conduct, Part 1 of 'Keeping Children Safe in Education' statutory guidance and information regarding the role of the Designated Safeguarding Lead and Deputy DSL (see appendix D).

Access to supervision and support is available to all staff at The Harbour School who are working with pupils whose safety and welfare are at risk. Supervision provides time and space for case reflection, particularly where the situation is complex, and management support to use escalation processes when needed.

Confidentiality, Consent and Information Sharing

It is right that pupils and others working within The Harbour School expect that private and sensitive information is kept confidential in line with the General Data Protection Regulations (GDPR), however, schools are legally required to report safeguarding concerns to the Local Authority and this duty has not changed with the introduction of GDPR. Staff should seek, in general, to discuss concerns with the family and, where possible, seek the family's agreement to sharing information or making a referral (informed consent can be either explicit or implied, written consent is always preferable) 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. Complete confidentiality can never be guaranteed. Information that indicates a child may be suffering or at immediate risk of suffering significant harm can be shared without consent and will require a referral to either the MultiAgency Safeguarding Hub or the Police in a timely fashion to reduce the risk of significant harm. The decision to disclose in these circumstances should be properly recorded on CPOMS (Child Protection Online Monitoring System) along with any efforts made to gain consent or reasons why consent was not sought. The most important consideration is whether sharing information is likely to safeguard and protect a child and reduce the risk of harm and is in the best interests of the child – we all have a role to play in identifying concerns, sharing information and taking prompt action and 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. Early information sharing is vital for effective identification, assessment and allocation of appropriate support and services. Interagency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and preventing Exploitation - Child Sexual and Child Criminal (CSE and CCE). We all have to work within the law, but ‘consent’ does not necessarily mean that parents have ‘agreed’ to the sharing of information, but that they know what information we are sharing and why we are sharing it or are concerned.

(See ‘Information Sharing. Advice for practitioners providing safeguarding services to children, young people, parents and carers’ (July 2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf for further guidance appendix F- the ‘7 Golden Rules to Sharing Information’ and ‘sharing information with the MASH’).

Disclosure, Action, Referral and Recording

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Should a pupil choose to disclose details of abuse to a member of staff, it is almost always best practice to listen rather than to ask questions. All staff should reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. During the disclosure staff must not offer alternative explanations for the pupil’s concerns or ask leading questions. All staff are required to record notes as soon as possible, using the child’s words. As these notes may be used as evidence, they should be timed, dated and have a named author. CPOMS (Child Protection Online Monitoring System) is now used by all campus staff in reporting safeguarding concerns, contacts and incidents, and supporting information, documents and support plans can also be stored. A ‘body map’ is available on CPOMS if it has been necessary to record pupil’s injuries. CPOMS reduces our use of paper and the risk of breaching GDPR. However, if it’s not possible to access CPOMS, paper ‘Cause for Concern’ forms are available from campus DSL’s (Appendix G) and any information will need to be uploaded onto CPOMS as soon as possible by staff, attaching a scanned copy of the form.

All concerns, discussions, decisions made, the reasons for those decisions and the actions taken, should be recorded on CPOMS – a chronology can be created through ‘useful reports’, listing all recorded incidents for an identified pupil. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome – if in doubt regarding recording requirements, staff should discuss with the campus DSL.

Pupils may not feel ready or know how to tell someone they are being abused or recognise their experiences as harmful. This should not prevent staff having professional curiosity and speaking to the DSL / Deputy about any concerns they have. All staff should speak to the Deputy DSL if they have any concerns re: FGM. There is a legal duty on teachers to report this to the police. Any concerns regarding radicalisation or extremism must follow the child protection processes outlined in this policy. *Parents, whilst under suspicion, are not entitled to see such information and should have their concerns referred back to social care or the police team who are investigating the matter.*

When pupils leave The Harbour School the Deputy DSL will ensure that their child protection information is transferred to their new school as soon as possible, separately from the main pupil record, ensuring secure transit, and confirmation of receipt should be obtained. In addition, the Deputy DSL should consider if it would be appropriate to share any information with the new school in advance of a pupil leaving. For example, information enabling the school to continue supporting victims of abuse by having that support in place when the pupil arrives.

Confidences including disclosures of possible neglect, physical, sexual, emotional or contextual abuse must always be communicated to the DSL/Deputy DSL and recorded. If a staff member is unsure whether the information warrants sharing or not it is advised that they discuss their concern with their line manager or Deputy DSL/DSL anyway to avoid any possibly important information being lost. It is of the utmost importance that information is shared appropriately and in a timely manner and any referral followed up quickly and appropriate actions taken. In the event that the Deputy DSL/DSL or another senior manager is not available, then the primary responsibility of the person suspecting abuse should be to contact the Multi-Agency Safeguarding Hub (MASH), and then to inform the Deputy DSL/DSL as soon as possible. The Harbour School recognises the emotional impact on staff dealing with child protection issues and will therefore ensure that support, advice and supervision is available to them.

The Multi-Agency Safeguarding Hub (MASH) is the first point of contact for all referrals and contact into Social Care. They will decide if a situation needs a children’s Social Care response or involvement or if it should be responded to by another agency, service or a different action or further assessment needs to be made (you may be asked to complete an Family Support Plan for example), and they will help to initiate that response and follow up any actions. To assist in the early assessment of the situation you should provide as much

information as possible, including factors outside of the home (contextual safeguarding) and appropriate background information about the child. You will be required to follow up a referral made verbally by completing an online Inter-agency Contact Form (IACF), when an IACF is submitted, the form will be sent to MASH@portsmouthcc.gov.uk. This must be sent within 48 hours. The guidance for completing an IACF can be found here: <https://www.portsmouthscp.org.uk/wp-content/uploads/2022/02/IACF-guidance-FINAL-Feb-22.pdf> Before contacting MASH, inform the parents and / or gain their consent unless doing so will put that child at immediate risk.

There may be instances where a pupil is not at risk of abuse but may benefit from services that the local authority can provide, at which point consideration should be given to completing a Family Support Plan or referral to the Early Help and Prevention Team. With the informed consent of parents and the child such instances may alternatively, lead to a referral to Children's Social Care for a child in need assessment.

If a disclosure occurs within a different school setting to a member of The Harbour School staff they will:

1. Inform the Head Teacher of the relevant school and/or DSL of that school immediately (school to inform MASH or Social Care).
2. Record on the child's file any decisions and outcomes, and notify site specific DSL and ensure that any actions are followed up.

Where a member of staff is alleged to be involved in the suspected abuse, staff to follow procedure detailed in the flowchart in Appendix B.

Supporting Information and Guidance for Staff

All staff should have a copy of **this policy**, *'The Harbour School Code of Professional Conduct' (2015)* and *'Whistle Blowing' policy*. To be read in conjunction with all other school policies.

The Harbour School is making use of the **'Portsmouth Safeguarding Audit'** to improve practice which will keep children safe from harm and improve early help practice by ensuring that the 12 required standards are being met.

Further supporting information, guidance and tools:

- **'Thresholds Document'** *Guidance for all practitioners in working together so that families in Portsmouth have access to the right support at the right time. (PSCP, March 2021)* <https://www.portsmouthscp.org.uk/wp-content/uploads/2021/04/PSCP-Threshold-Document-v5-March-2021.pdf> **'Working Together to Safeguard Children'** (HM Government, August 2018). <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- **'Keeping Children Safe in Education'** https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf (HM Government, Sept 2022).

- **What to do if you're worried a child is being abused** – Advice for Practitioners
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
-
- **'Children Missing Education (CME)'** (Portsmouth City Council May 2018).
- <https://www.portsmouthscp.org.uk/> **'Portsmouth Safeguarding Children's Partnership'** Website for information, training, guidance and resources.
- <https://hipsprocedures.org.uk/> **'Hampshire, Isle of Wight, Portsmouth & Southampton Partnership – HIPS'**.
- **'Portsmouth Information Sharing Framework' (2019).**
<https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Portsmouth-InformationSharing-Framework.pdf>
- **'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers'** (HM Government 2018)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf
- **'Child Exploitation Risk Assessment Framework CERAF'** (PSCP 2020).
<https://www.portsmouthscp.org.uk/wp-content/uploads/2020/09/CERAF-Guidance2020-08.pdf>
- **'Neglect Identification and Measurement Tool and Guidance'** (Portsmouth, February 2018).
- **'Inspecting Safeguarding in early years, education and skills settings'** (Ofsted, 2019). <https://www.gov.uk/government/publications/school-inspection-handbook-eif>
- [NSPCC | The UK children's charity | NSPCC](#) – Useful additional information and guidance.
- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance - Sept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf) (Home Office, Sept 2018)
+
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement v3 March2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf) (Home Office)
- **'Mandatory reporting of Female Genital Mutilation'** – procedural information (Home Office 2020) [FGM Mandatory Reporting - procedural information nov16 FINAL.pdf](#) (publishing.service.gov.uk)

- Sexual violence and sexual harassment between children in schools and colleges (publishing.service.gov.uk) (DfE, Sept 21)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk) (DfE guidance, December 2020)
- Searching, Screening and Confiscation (publishing.service.gov.uk) (**non-statutory DfE guidance**)
- Youth Endowment Fund Toolkit – Sets out evidence for what works in preventing young people from becoming involved in violence.
- <https://educateagainsthate.com> – Provides information, tools and resources for schools to help recognise and address extremism and radicalisation of children.
- DfE external document template (publishing.service.gov.uk) **‘Teaching Online Safety in School’** (DfE guidance, June 2019)
- 2491596 C&YP schools guides.indd (npcc.police.uk) – **When to call the police guidance for schools and colleges**
- <https://www.safe4me.co.uk/> - Safe4me – a free resource for schools, colleges and parents providing information & resources to help educate, guide and support children and young people to keep safe.
- Mental health and behaviour in schools (publishing.service.gov.uk) (DfE 2018). <https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview> - Public Health Every Mind Matters Materials & Teaching Resources.
- **SafeLives: young people and domestic abuse**
<https://safelives.org.uk/sites/default/files/resources/Safe%20Young%20Lives%20web.pdf>
- **NSPCC – UK domestic abuse – Signs Symptoms Effects**
<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>
- <https://www.gov.uk/government/publications/equality-act-2010-advice-for-schools>

Appendix A: Child Protection Procedures Flowchart 1

The Harbour School process for formally raising a child protection concern.

Below is a flowchart which indicates the steps to be taken when an initial concern is identified, where the suspected abuse **does not** involve an allegation about a member of staff. If a child is in immediate danger or is at risk of harm a referral should be made to MASH and/or the Police immediately.

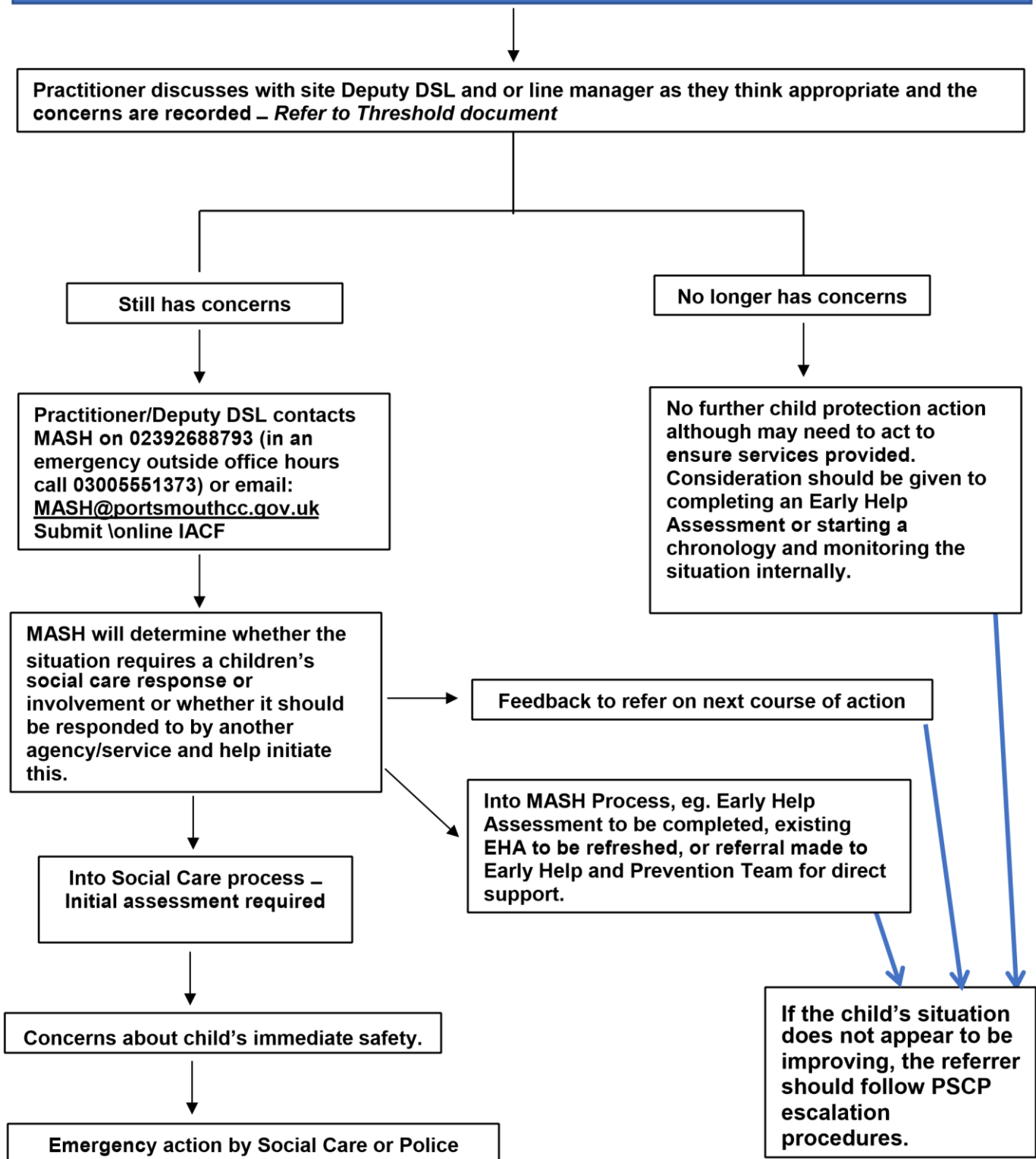
The Multi-Agency Safeguarding Hub (MASH) is a multi-agency team of professionals in Portsmouth – managed within Children’s Social Care – whose role it is to work with services to embed early help processes. MASH is the 1st point of contact for all referrals (including Inter-agency Contact Forms)

and contacts into Children's Social Care. The new online IACF should be used in every scenario when contacting Portsmouth MASH -

[ae8b04bd6ab66/definition.json&redirectlink=%2F&cancelRedirectLink=%2F a](#)

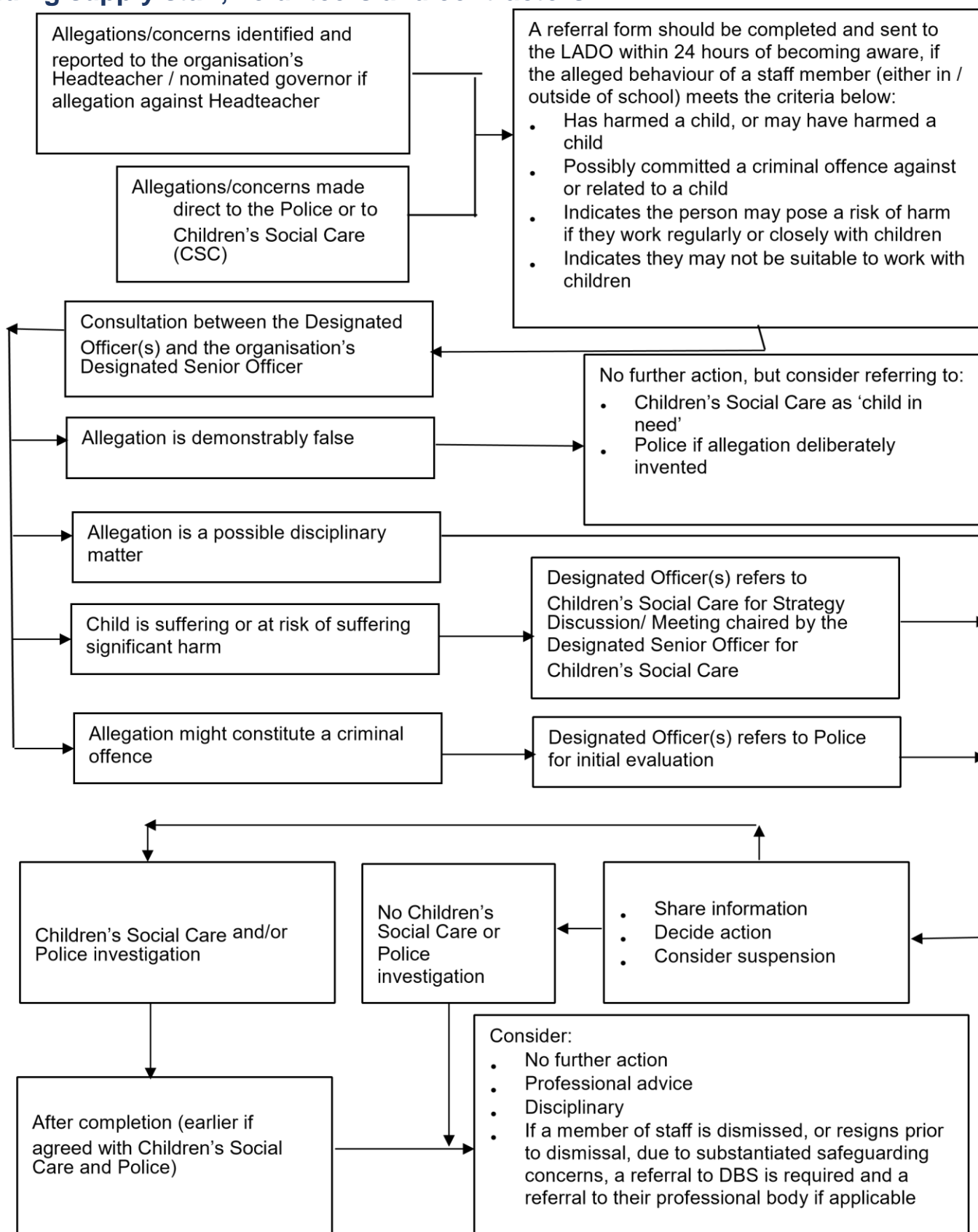
All concerns and actions must also be recorded on CPOMS. The process for raising a child protection concern is shown on the following page.

PRACTITIONER HAS CONCERNS ABOUT CHILD'S WELFARE AND SHOULD ACT ON THEM IMMEDIATELY



Please see 'What to do if you're worried a child is being abused. Advice for practitioners' or *Working Together to Safeguard Children (2018)* for further information and guidance.

Appendix B ALLEGATIONS AGAINST ADULTS WORKING WITH CHILDREN including supply staff, volunteers and contractors.



Portsmouth Designated Officer: (023 92882500) Email: lado@portsmouthcc.gov.uk

For further info: <https://www.portsmouthscp.org.uk/7-information-for-professionals-and-volunteers/7-22-whistle-blowing-and-allegation-management/> & Part 4 of KCSIE

When receiving an allegation: **Treat it seriously and keep an open mind *Do not investigate *Do not make assumptions or offer alternative explanations *Do not promise confidentiality *Record the details using the child/adult's own words *Note time/date/ place of incident(s), persons present and what was said *Sign and date the written record *Do not inform the subject if this might place the child at risk of further harm or jeopardise any future investigation (PCC Lado notification form).*

When dealing with allegations, The Harbour School will:

- Deal with allegations quickly, fairly and consistently
- Provide effective protection for the child and support the person subject to the allegation
- Consider any lessons to be learnt.

Low level concerns – *Concerns that do not meet the harm threshold detailed in the previous flowchart.*

By encouraging the sharing of 'all' concerns, The Harbour School aims to create and embed a culture of openness, trust and transparency in which our values and expected behaviour (outlined in the Code of Professional Conduct) are constantly lived, monitored and reinforced by all staff.

A low level concern does not mean that it's insignificant, but that the behaviour towards a child does not meet the harm threshold detailed in the previous flowchart. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of The Harbour 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 LADO.

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

- being over 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; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one of KCSIE 2022), are shared responsibly and with the right person (Deputy DSL / DSL / Headteacher, depending on who the concern is about), and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

(For more info. KCSIE 2022, Part 4)

Appendix C What is Child Protection/Safeguarding training?

STANDARD 5 of the Portsmouth Safeguarding and Early Help Compact Audit and Compliance with Section 11 of the Children Act (2004), seeks to ensure that an appropriate level of induction, training and appraisal is undertaken by all staff and volunteers that come into contact with children. All staff at The Harbour School will access Basic Awareness Safeguarding Children Training or 1 of the other safeguarding courses on offer, on a 3 yearly basis (DSLs and Deputy DSLs, every 2 years). Basic Awareness Safeguarding Children Training has the following learning outcomes:

- Recognise potential indicators of child maltreatment: physical, emotional, and sexual abuse and neglect.
- Be able to follow local policies and procedures.
- Be able to identify what action to take when you have safeguarding concerns including to whom you should report your concerns to and seek advice and support from.

In addition, staff will receive at least annual updates about specific issues which are linked to priority areas for the school or city and all staff will have access to eLearning for: FGM and PREVENT.

Staff identified as having responsibilities in embedding good 'early help' practice (Family Support Plan completers), Lead Professionals, and participants of a team around the child / family process) will access the Early Help Module, as well as access appropriate and effective supervision through the school.

Safeguarding training undertaken by staff at The Harbour School is accessed through the 'PSCP Safeguarding Children Training Programme' (quality assured by the PSCP) and other specialist trainers and organisations. The Harbour School Safeguarding training is centred on developing the skills, knowledge, and capacity of staff to ensure excellent early help and safeguarding practice to improve outcomes for children and young people. The PSCP Safeguarding Children Training Programme includes:

Basic Awareness Safeguarding Children (3 hour session) - for all The Harbour School staff.

Early Help (1 day) – To support and equip key professionals with knowledge and skill to undertake 'early help' practice (for Lead Practitioners, Deputy DSLs, staff with responsibilities in embedding good 'early help' practice, outreach staff, and mentors).

Child Protection (1 day) - for staff who have responsibilities for completing inter-agency contact form to MASH and attending Child Protection conferences and working with children on Child Protection Plans (for Lead Practitioners, Deputy DSLs, staff with 'child protection' responsibilities, outreach staff, and mentors).

Exploitation (CSE, CCE, Missing and Trafficked) 1 day – raising awareness of these specific issues and related protocols, processes and practice (suitable for all staff). Safeguarding Supervision (1 day) – for managers/supervisors who have a role in providing supervision, support and guidance to other staff (for Deputy DSLs, line managers/supervisors).

DSL Masterclasses (1.5 hrs each): The National and Local Picture; Contacting MASH – getting the right help for children and families; Decision Making – Portsmouth Thresholds; Resources for Effective Safeguarding Conversations; Developing a Safeguarding Culture; Escalation – Having the right conversation with the right person at the right time (for DSLs & Managers).

Understanding Childhood Neglect (1 day) – suitable for all staff.

Harmful cultural practices – An introduction to: Child abuse linked to faith and beliefs; Honour based abuse, forced marriage and dowry; Breast ironing; Female Genital Mutilation (FGM) – suitable for all staff.

ACEs (3 hrs) – Introduction to Adverse Childhood Experiences – suitable for all staff.

Preventing online CSE (Thinkuknow) (1 day) – Suitable for all staff.

If you would like to book on any of the above courses, please discuss your needs with your line manager to gain permission (safeguarding development will also be discussed as part of Performance Management Review). There is a new online booking system which can be accessed via: pscptraining.portsmouthscp.org.uk More information can be found on their website: <https://pscptraining.portsmouthscp.org.uk/event-detail/%3DIJMyC%20Basic-Awareness---Safeguarding-Children>

‘Safer Recruitment’ training is available online via the NSPCC

Domestic Abuse training is provided by the Hidden Violence Service - contact: Sharon Furtado for booking information on 02392841050.

PREVENT training is provided by the Hidden Violence Service, go to: [Prevent Training - Safer Portsmouth](#)

Female Genital Mutilation (FGM) eLearning training, go to: <http://www.fgmelearning.co.uk>

Appendix D The role of the Designated Safeguarding Leads and Deputy Designated Safeguarding Leads:

- **DSLs take lead responsibility for safeguarding and child protection** at The Harbour School and ensure that the school's Child Protection policy is reviewed annually and work with the Governing Body regarding this.
- **Manage referrals:** Liaise with MASH (suspected abuse) and or police (suspected crime or immediate risk), as laid down in this policy including referrals to the Channel programme where there is a radicalisation concern, or the police, where an act of FGM appears to have been carried out on a girl under the age of 18, and support staff who make referrals. Keep records of any cases of suspected abuse reported to MASH and Social Care and follow up any agreed actions, having an overview of information from Social Care on all pupils who are subject to a child protection plan including those who are looked after or on a care order. Maintain detailed, accurate, and secure written records of concerns and referrals on CPOMS.
- **Work with others:** Ensure appropriate staff are aware of pupils who are; subject to a Child Protection Plan, Child in Need Plan, or have an Early Help Assessment and action plan in place, including those who are looked after or on a care order, and that their progress is closely monitored. Act as a source of support, advice and expertise for

staff on matters of safety and safeguarding and when deciding whether to make a referral and share expertise re: good early help practice and multi-agency working, working with children on child in need or child protection plans, and the specific needs of children with SEMH needs and disabilities.

- **Raise Awareness:** Ensure that all teaching, support staff and volunteers, including those newly appointed, are aware of the guidelines for safeguarding and child protection and the school's own policy and procedures are known, understood and used appropriately. Encourage a culture amongst all staff of listening to children and taking account of their wishes and feelings.
- **Be available:** For staff during term time to discuss any safeguarding concerns and arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.
- **Undertake training:** All DSLs and Deputy DSLs should be inducted into the role (including working through all of the PSCP training programme – Basic Awareness, EH, CP) and ensure that they attend regular refresher/update training every 2 years. In addition, DSLs and Deputy DSLs will refresh their knowledge and skills (via e-bulletins, meeting other DSLs or taking time to read and digest safeguarding developments) as required, at least annually, to allow them to understand and keep up with any developments relevant to their role. The DSLs should ensure that all school staff receives update training every three years and link with the PSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding, plus providing annual updates to all staff.
(See also Annex C of KCSIE 2022)

Role of governors and responsibilities of the governing body to support the DSLs' and Deputy DSLs in carrying out their safeguarding role includes ensuring that:

1. The school has an effective child protection policy together with a Code of Professional Conduct and procedures in place and these are in accordance with national and locally agreed guidance and HIPS procedures and that this policy is made available to parents on request.
2. A senior board lead is identified to take leadership responsibility for the school's safeguarding arrangements, ensuring compliance with their duties under legislation.
3. The school operates safe recruitment procedures and makes sure that all appropriate checks are carried out on new staff and volunteers (appropriately supervised) who work with children – including links with extremism.
4. There is a senior member of the school leadership team appointed to the role of Designated Safeguarding Lead, to take lead responsibility for safeguarding and child protection, and that they are given enough time, support and training to carry out these duties.
5. The school has procedures in place for dealing with allegations of abuse against members of staff and volunteers that comply with guidance from the PSCP. A member of the governing body is nominated to be responsible for liaising with the LA and or

partner agencies, as appropriate in the event of allegations of abuse being made against the Headteacher.

6. Pupils are taught about safeguarding, including online (that appropriate filters and monitoring systems are in place), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
7. The school provides appropriate safeguarding responses to pupils who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse and exploitation and to help prevent the risks of their going missing in future.
8. The school provides a co-ordinated offer of early help when additional needs of children are identified and contributes to inter-agency working and information sharing, for pupils subject to child protection or at risk of harm.
9. The school has a designated teacher to promote the educational achievement of pupils who are looked after and ensures that this person has appropriate training.

Appendix E Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues – some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting, sharing nudes and semi-nudes, and criminality put children in danger. All staff should also 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. Although only appropriately trained professionals can diagnose a mental health problem, staff are well placed to observe The Harbour School's pupils and identify behaviours that may suggest they are experiencing a MH problem or may be at risk of developing one. Abuse and neglect, domestic abuse or other potentially traumatic adverse childhood experiences, can have a lasting impact and can affect mental health and behaviour.

Definition of Abuse: '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, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.' (KCSIE, 2022).

Contextual safeguarding: Promotes the idea that young people's behaviours, levels of vulnerability and levels of resilience are all informed by the social/public, as well as private, contexts in which young people spend their time. A Contextual Safeguarding approach is an approach to understanding, and responding to, children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse.

Parents and carers have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships.

Drawing on research into adolescent development, it recognises that as children grow they spend increasing amounts of time socialising with peers, at school and in public environments independently of parent/carer supervision. When spending time in these extra-familial contexts young people may be exposed to healthy norms which promote prosocial relationships, or they may encounter harmful norms that are conducive to abusive or exploitative relationships. As a result, local responses need to prevent, identify, assess, and intervene in all of the social environments/contexts where the abuse and exploitation of young people can occur – in essence to take a 'contextual' approach to safeguarding. Therefore, think about the; child, home, peer group, school and neighbourhood when thinking about the wellbeing and safeguarding of children.

Types of Child Exploitation (CSE, CCE and Radicalisation)

Parallels between and consistent messages across different types of child exploitation:

- Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity – in exchange for something the victim needs or wants, and/or, for the financial or other advantage of the perpetrator and/or through violence or the threat of violence.
- The power imbalance can be due to a range of factors including: age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.
- The abuse can be perpetrated by individuals or groups, males or females, and children and adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.
- Exploitation does not always involve physical contact; it can also occur through the use of technology.
- There is an overlap of vulnerabilities and risk factors and some shared signs and symptoms (e.g. associating with other young people involved in exploitation; suffering from changes in emotional well-being) but the experience and indicators can be different for girls and boys.
- Children being criminally exploited may be at higher risk of sexual exploitation.
- We must be careful not to get blindsided by some of the challenging, offending or risk taking behaviours that victims of exploitation often display – we sometimes see the difficult behaviours and miss the exploitation, seeing them as challenging rather than

‘vulnerable’.

- Links between trafficking and CSE / CCE are becoming increasingly significant.
- Elements of grooming, coercion and control. Gaming is being used as a platform for offenders to make contact, groom and exploit young people and their families – this is becoming more of a feature, particularly whereby young boys are victims of CSE. Young people exploring their sexuality or gender identity online are also particularly vulnerable as perpetrators are using these websites to target and exploit young people.
- Children cannot be prostitutes.
- ‘Consent’ is not informed and cannot be given by children (even where a child may believe they are voluntarily engaging with the person who is exploiting them).
- A significant number of children who are victims of sexual or criminal exploitation go missing from home, care and education at some point.
- Lack of recognition that they are a victim of exploitation.
- Lack of support for parents and families.

Child Sexual Exploitation: ‘Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology’. Legal definition, February 2017. [Department for Education \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/602712/Child_Sexual_Exploitation_-_Definition_and_guide_for_Practitioners.pdf) *Child Sexual Exploitation – Definition and guide for Practitioners*.

Key messages from research on child sexual exploitation: For professionals in school settings by ‘Nicola Sharp-Jeffs, Maddy Coy and Liz Kelly March 2017’

- Some young people may be more vulnerable – those who have experienced prior abuse, are homeless, are misusing alcohol and drugs, have a disability, are in care, are out of education, have run away/ gone missing from home or care, or are gang associated.
- All schools (including alternative educational settings such as Pupil Referral Units and Short Stay Schools, colleges and post-16 training) should assume that CSE is an issue that needs to be addressed.
- An educational environment where there is a ‘whole-school’ approach to addressing gender inequality, sexual consent, and relationships built on respect should be developed.
- All schools are ideally placed to deliver information to students about CSE through preventative education that delivers knowledge and challenges attitudes. Staff within the school community should be trained to spot potential ‘warning signs’ of CSE and to feel confident to begin conversations based on their concerns.

- Multi-agency links mean that schools can be part of developing a protective community network which holds perpetrators to account.

There is no one way that CSE is perpetrated. Grooming is common in some forms of CSE, but it is not always present. Online and offline exploitation can overlap. That children and young people may appear to co-operate cannot be taken as consent: they are legally minors and subject to many forms of coercion and control. These abuses of power are similar to those which are recognised in domestic violence and they may lead to children and young people being unable to recognise what is happening to them as abuse.

Whilst all of the research evidence to date shows that girls and young women are the majority of victims, boys and young men are also exploited. The average age at which concerns are first identified is at 12 to 15 years, although recent studies show increasing rates of referrals for 8 to 11 year olds, particularly in relation to online exploitation (Department for Education, 2017). Less is known about the exploitation of those from Black and Minority Ethnic (BME) and Lesbian, Gay, Bisexual and Transgender (LGBT) communities.

Preventing CSE through the curriculum

Schools are ideally placed to deliver information to students about CSE and a number of resources exist for them to use in doing so. It is important that this work also challenges attitudes and helps pupils to develop emotional and social skills. Opportunities to learn about sexual exploitation should be available in age appropriate forms in both primary and secondary. Open conversations inside and outside the classroom can help children recognise potentially abusive behaviours, identify trusted adults who they can talk to and offer information about support services.

RSE should cover sexual consent, relationships, gender norms and sexuality, including the sexualisation of young women's bodies and standards of masculinity - what it means to be a boy or young man. Given the widespread prevalence of sharing nudes and semi-nudes and young people's access to online pornography, opportunities need to be provided to discuss representations of sex and how these are gendered.

Pupils are far less likely to retain information from a one-off session, so messages should be reinforced, learning can also be enhanced by integrating CSE within the broader curriculum such as within discussions of digital/technological safety during computing lessons. Addressing virtual forms of abuse and exploitation reflects young people's realities, recognising how they socialise and communicate.

Pupils with learning difficulties and disabilities will benefit from tailored information on risks, safety strategies and skill-building in real-life contexts. This is important since having a physical or learning difficulty and/or disability increases the likelihood of being targeted by exploiters.

A safe and secure learning environment

A prevention curriculum should be combined with a safe and secure school environment which promotes positive and respectful relationships between peers, between pupils and staff, and includes wider parent/carers engagement.

Whilst the school environment can represent a positive space for pupils, it may also be a context within which they experience sexual exploitation. Sexual exploitation can also involve other children in complex ways, as facilitators, abusers or bystanders. Grooming and sexual exploitation may take place during the school day, including by gang-associated children. Some pupils may introduce other young people to exploiters. Social media may facilitate the spreading of gossip and images around peer groups so that the impact of CSE taking place outside of school may 'migrate' back into it.

In addition to educating pupils about CSE, schools need to identify and support pupils who are affected. Young people may not think of themselves as victims and may believe that they are in love (Pearce, 2009). A proactive approach should therefore be taken to identifying victims, distinguishing between disruptive behaviour and early warning signs of exploitation.

School staff may be alerted to CSE through pupils becoming isolated from family and/ or peer networks; being picked up outside schools by cars and taxis and being given presents and mobile phones. Other indicators of exploitation in girls and young women might include a more sexualised presentation of self, such as clothing, hair and makeup.

Offering support

Many sexually exploited young people talk of losing hope for the future, believing they are worthless and unable to imagine a way out (Beckett et al. 2013; Coy, 2008; Gilligan, 2016). Support to engage in education can change this in a number of ways: making new friends who are not involved in exploitative networks; (re)discovering intellectual and creative skills; realising it is possible to have dreams and that a different future is possible. Education can also counter the disruptive impact of involvement in criminal proceedings where young people give evidence against exploiters and abusers.

Given the links between CSE and going missing, schools should have the capacity to provide data to local authorities on children who are missing from education, children absent without authorisation as well as children who regularly register for a day but do not attend lessons. This can be cross referenced with local authority data on children who are reported as missing to the police in order to identify children who may require intervention.

It is clear that schools make an important contribution to protecting children and young people when they are fully engaged with and dedicate resources to tackling CSE.

Child Criminal Exploitation (CCE) and County Lines

For further information see: [Criminal Exploitation of children and vulnerable adults: County Lines guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/744441/Criminal_Exploitation_of_children_and_vulnerable_adults_County_Lines_guidance.pdf) by the Home Office, September 2018 and

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf
(Home Office).

Child Criminal Exploitation often occurs without the child's immediate recognition, with the child believing that they are in control of the situation. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and / or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child's limited availability of choice resulting from their social/economic and/or emotional vulnerability. It does not always involve physical contact and can occur through the use of technology.

County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move (and store) drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'.

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations.

County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

How does it affect young people and vulnerable adults?

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim

who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection and perceived friendship and affection). It's important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person or vulnerable adult does not make them any less of a victim.

Who is vulnerable to county lines exploitation? There are recorded cases of:

- Children as young as 12 years old being exploited by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
- Both males and females being exploited.
- White British children being targeted because gangs perceive they are more likely to evade police detection.
- The use of social media to make initial contact with children and young people.
- Class A drug users being targeted so that gangs can takeover their homes (cuckooing).

Some of the factors that heighten a person's vulnerability include:

- Having prior experience of neglect, physical and/or sexual abuse;
- Lack of safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Social isolation or social difficulties;
- Poor education attendance or engagement;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other people involved in gangs;
- Having a physical or learning disability;
- Having mental health or substance misuse issues;
- Being in care (particularly those in residential care and those with interrupted care histories).

Signs to look out for

Any sudden changes in a young person's lifestyle should be discussed with them. Some indicators of county lines involvement and exploitation generally are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out of area; or regularly coming home late;
- Unexplained acquisition of gifts or new possessions (e.g. money, clothes, or mobile phones);
- Excessive receipt of texts / phone calls;
- Relationship with controlling / older individuals or groups;
- Leaving home / care without explanation;
- Suspicion of physical assault / unexplained injuries;
- Parental concerns;

- Carrying weapons;
- Significant decline in school attendance / results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being
- Drug and alcohol misuse.

What to do if you are concerned

Follow the school's safeguarding processes if you think a pupil may be at risk of county lines exploitation. If you believe a pupil is in immediate risk of harm, you should contact the police.

Radicalisation, Extremism and Terrorism

It is possible to intervene to protect vulnerable people from extremist ideology and to prevent those at risk, of being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is the vocal or active opposition to our fundamental values including, democracy, the rule of law, individual liberty and the mutual respect and tolerance of 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 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.

There is no single way of identifying an individual who is likely to be susceptible to extremist ideology and it can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with other safeguarding risks, staff should be alert to changes in pupil's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying pupils who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme. Potential indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

[Radicalisation and Extremism - Examples and Behavioural Traits \(educateagainsthate.com\)](https://educateagainsthate.com)

All schools are subject to the Prevent duty, to have “due regard to the need to prevent people from being drawn into terrorism”. This requires The Harbour School to:

- Assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of a terrorist ideology;
- Have a general understanding of the risks affecting children and young people;
- A specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them;
- Follow the school’s safeguarding procedures to protect children at risk of radicalisation;
- Ensure that pupils are safe from terrorist and extremist material when accessing the internet in school;
- Provide a safe environment for debating sensitive and controversial issues and helping pupils to understand how they can influence and participate in decision-making, to build pupils’ resilience to radicalisation;
- To promote the spiritual, moral, social and cultural development of pupils and, within this, fundamental British values;
- Teach the pupils to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. They can also develop effective ways of resisting pressures, including knowing when, where and how to get help.

Update on Prevent referrals (January 2021):

- Concerns about radicalisation and extremism are treated in the same way as all other safeguarding issues, including physical, emotional and sexual abuse. In Portsmouth, the first step has always been to contact the MASH directly.
- **Now the first step is to complete and submit Prevent National Referral Form (NRF)** to preventreferralsportsmouth@hampshire.pnn.police.uk. The form will be forwarded to the local authority safeguarding team and the Prevent policing team for a joint assessment. At this point, The MASH may determine that a referral for intervention under early help, S.17 or S.47 of the 1989 Children Act OR S.42 of the Care Act 2014 is necessary whilst the police are gathering further information.
- **The level of support has not changed just the initial destination of the referral.** However, as outlined above this is instantly shared with our local MASH. A link to the NRF can be found here: <https://www.saferportsmouth.org.uk/radicalisation/> If there are any concerns about how this process works or difficulty in accessing or completing the form, please contact the Prevent team (Charlie Pericleous/John Webster) or the MASH directly.
- **Concerns that do not meet the Prevent threshold:** Whilst not all information will be suitable for assessment through the Channel Process, if you notice suspicious activity then it can be reported to the police using a Community Partnership Information (CPI) form. Non-urgent but useful community intelligence can be submitted to Hampshire police. This can include information on organised crime, drugs, modern slavery, community tensions, political unrest, missing, exploited and trafficked individuals. A link to the form and guidance to complete it can be found here:

<https://www.saferportsmouth.org.uk/radicalisation/>

John Webster, Hidden Harm Education Officer, can offer support, advice and training about radicalisation and extremism – john.webster@portsmouthcc.gov.uk

The DfE has dedicated a telephone helpline (02073407264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to: counter.extremism@education.gsi.gov.uk. *Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case normal emergency procedures should be followed.*

Guidance on the Channel support programme is available at: [Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612212/Channel-Duty-Guidance-Protecting-people-vulnerable-to-being-drawn-into-terrorism.pdf)

Sharing nudes and semi-nudes (See overview or full guidance for education settings working with children and young people, 2020).

The latest guidance replaces 'sexting in schools...' and uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This can be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents.

The types of incidents which this advice covers are:

- A person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- A person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- A person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18

This advice does not cover:

- The sharing of nudes and semi-nudes of people under 18 by adults as this constitutes child sexual abuse and schools should always inform the police as a matter of urgency.
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts, which don't contain imagery.

Sharing photos and videos online is part of daily life for many young people, enabling them to share their experiences, connect with friends and record their lives. Photos and videos can be shared via messaging apps or posted on social media and image sharing platforms. Although most young people aren't creating or sharing nudes and semi-nudes, the potential risks are significant. If the imagery is shared further, it may lead to embarrassment, bullying and increased vulnerability to blackmail and exploitation.

Although the production of such images will likely take place outside of school, sharing can take place and issues are often identified and reported here. Schools, colleges and other organisations need to be able to respond swiftly and confidently to ensure that children are safeguarded, supported and educated. All incidents should be dealt with as safeguarding concerns. The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of the children and young people involved.

A 2016 NSPCC/Office of the Children's Commissioner England study found that just over one in ten boys and girls (13%) had taken topless pictures of themselves (around one in four of those were girls) and 3% had taken fully naked pictures. Of those who had taken sexual images, 55% had shared them with others. 31% of this group had also shared the image with someone that they did not know.

The law

Much of the complexity in responding to youth produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18.

The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales).

Specifically:

- It is an offence to possess, distribute, show and make indecent images of children.
- The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal. The relevant legislation is contained in section 33 of the Criminal Justice and Courts Act 2015.

The law criminalising indecent images of children was created long before mass adoption of the internet, mobiles and digital photography. It was also created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children.

Despite this, young people who share nudes and semi-nudes of themselves, or peers, are breaking the law.

We should not, however, unnecessarily criminalise children. Children with a criminal record face stigma and discrimination in accessing education, training, employment, travel and housing and these obstacles can follow a child into adulthood.

Whilst children and young people creating and sharing images can be risky, it is often the result of their natural curiosity about sex and their exploration of relationships. Therefore,

engaging in the taking or sharing of nudes and semi-nudes may not always be 'harmful' to all children and young people. Situations should be considered on a case by case context, considering what is known about the children and young people involved and if there is an immediate risk of harm. Often, children and young people need education and support for example, on identifying healthy and unhealthy behaviours within relationships and understanding consent and how to give it. Safeguarding action will also be required in cases where there is risk of harm. Therefore, it is essential that The Harbour School provides a preventative education programme and age appropriate learning opportunities.

Initial response

When an incident involving nudes and semi-nudes comes to the attention of any member of The Harbour School's staff:

- The incident should be referred to the DSL/Deputy DSL as soon as possible. The DSL should hold an initial review meeting with appropriate school staff. DSLs can use Finkelhor & Wolak's typology and harmful sexual behaviour tools to help categorise the incident and assess the behaviours of pupils involved to identify any immediate risk.
- There should be subsequent interviews with the pupils involved (if appropriate)
- Parents and carers should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the pupil at risk of harm
- At any point in the process if there is a concern a pupil has been harmed or is at risk of harm a referral should be made to MASH and/or the police immediately.

When assessing the risks the following should be considered:

- Has the nude/semi-nude been shared beyond its intended recipient? Was it shared without the consent of the pupil who produced the image?
- Has the nude/semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
- How old are any of the pupils involved?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the pupils involved?
- Do you have any concerns about the pupils vulnerabilities?
- Are there additional concerns if the parents or carers are informed?
- Did the pupil send the nude/semi-nude to more than one person?

DSLs/Deputy DSLs should always use their professional judgement in conjunction with their colleagues to assess incidents, alongside relevant tools and guidance.

Adults should **not** view or forward youth produced sexual imagery unless it's unavoidable. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery.

For additional information, learning resources / links for children, parents and staff

see – Sharing nudes and semi-nudes: advice for education settings working with children

and young people - GOV.UK (www.gov.uk) **23/12/20 Guidance, to be read alongside;**
KCSIE, Sexual violence and sexual harassment between children in schools and colleges
(publishing.service.gov.uk) Dfe, Sept 21, **and**
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091133/Searching screening and confiscation advice 2014 updated 2018 .pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091133/Searching_screening_and_confiscation_advice_2014_updated_2018.pdf) (non-statutory DfE guidance)

Child on Child Abuse

In order to prevent and minimise the risk of child on child abuse, The Harbour School encourages an open environment where pupils feel safe to share information about anything that is upsetting or worrying them. Staff tackle such issues as 'prejudiced inappropriate behaviour' and give pupils an open forum to talk things through rather than seek one on one opportunities to be harmful to one another. The school teaches a culture of respect and kindness amongst pupils linked to British values, acceptance and a celebration of difference. All staff should be aware that safeguarding issues can manifest themselves via child on child abuse and it can happen inside and outside of school and online. This is most likely to include, but not limited to: bullying (including online), gender-based violence/sexual assaults and sexual violence and harassment. Abuse is abuse and will never be tolerated or passed off as "banter" or "part of growing up" or "just having a laugh" at The Harbour School. Some groups are potentially more at risk of sexual violence and harassment. Evidence shows that girls, children with SEND and LGBT children are at greater risk and staff will challenge physical behaviours such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting skirts – dismissing or tolerating such behaviours risks normalising them. It is important to consider the forms abuse may take and the subsequent actions required.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. The law on child on child abuse is there to protect children rather than criminalise them.

There are many forms of abuse that may occur between children and this list is not exhaustive:

- **Physical abuse** may include hitting, kicking, nipping, shaking, biting or otherwise causing physical harm to another person. There may be many reasons why a pupil harms another and it is important to understand why a pupil has engaged in such

behaviour, including accidentally, before considering the action or consequences to be undertaken.

- **Sexual violence and sexual harassment** may include sexual violence (such as rape, assault by penetration and sexual assault – may have an online element which facilitates, threatens and or encourages sexual violence); sexual harassment (sexual comments, remarks, jokes or online sexual harassment, which may be standalone or part of a broader pattern of abuse).
- **Sexually harmful behaviour or sexual abuse e.g.** 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 sharing of nudes and semi nudes (also known as sexting and youth produced sexual imagery); upskirting (someone takes a picture under a person's clothing without their permission or knowledge, with the intention of viewing their genitals or buttocks – with or without underwear – to gain sexual gratification, or cause the victim humiliation, distress or alarm).
- **Bullying e.g. physical, name calling, homophobic etc.** Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both children who are bullied and who bully others may have serious, lasting problems. Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason and excluding someone from a group on purpose.
- **Cyber bullying** is the use of phones, instant messaging, e-mail, chat rooms or social media sites to harass threaten or intimidate someone for the same reasons as stated above. Cyber bullying can easily fall into criminal behaviour under the Malicious Communications Act 1988 and the Communications Act 2003, which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another, could also be deemed to be criminal behaviour.
- **Initiating/hazing** is a form of initiation ceremony that is used to induct newcomers into a group or gang. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. Many rituals involve humiliation, embarrassment, abuse and harassment.
- **Prejudice based and discriminatory bullying** refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, and sexual identity.
- **Abuse in intimate personal relationships between children** is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between ages of 13 and 18) against a current or former partner. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

Expected action taken from staff

The Harbour School will take a contextual whole-school approach to preventing and responding to child on child abuse, and ensure that it is focused on all forms of child on child abuse, dealing with a situation of child on child abuse promptly and sensitively, gathering and recording the information as soon as possible to get the true facts around what has occurred. Staff will deal with the situation sensitively and think about the language used and the impact of that language on both the pupils and the parents when they become involved. For example; staff will not use the word perpetrator as this can quickly create a 'blame' culture and leave a child labelled. Staff will not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters. If staff have any concerns regarding child on child abuse (just because it hasn't been reported, doesn't mean that it isn't happening – be professionally curious), they should speak to the campus Deputy DSL.

Gather the facts: Speak to all pupils involved separately, gain a statement of facts from them using consistent language and open questions for each account. Ask them to tell you what happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?

Consider the intent (begin to risk assess): Has this been a deliberate or contrived situation for a pupil to be able to harm another?

Decide on your next course of action: Is there a risk of significant harm warranting a safeguarding referral to the MASH (where a crime has been committed the police should be involved also). Their response will inform the next steps; if they take it further they may ask to interview the children in school and wish to speak to parents, or it may not meet their thresholds.

Informing parents: In all circumstances where the risk of harm to the pupil is evident then the school should encourage the pupil to share the information with their parent. If a pupil is deemed to be 'Gillick Competent' following the 'Fraser' guidelines and does not wish you to share the information with parents, then the school must consider this. The best way to inform parents is face to face. Although this may be time consuming, the nature of the incident and the type of harm/abuse a pupil may be suffering can cause fear and anxiety to parents whether their child is the child who was harmed or who harmed another.

Points to consider:

- What is the age of the pupils involved? What is the developmental stage of the pupils involved? Is there any power imbalance between the pupils?
- Where did the incident or incidents take place? In an open, visible place to others? Was it observed? If not, is more supervision required within this particular area?
- What was the explanation by all pupils involved of what occurred? Did they give the same account and what is the effect on those involved? How are the versions different?
- What is each of the pupil's own understanding of what occurred? Do they understand what they are doing and recognise that it is inappropriate? Is the behaviour deliberate or contrived? Is the behaviour or explanation prompted by something they've heard or

been learning about? Do they understand the impact of their behaviour on the other person?

- Has the behaviour been repeated to an individual on more than one occasion? Has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?
- Are there any on going risks to the victim, alleged harmer, other pupils or school staff?

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved. What support both the harmed and the person who has displayed harmful behaviour has, will depend on the individual pupil. It is important that the individual's views regarding support are sought and that they continue to be monitored and offered support should they require it in the future. Interventions and support may include; individual support for the harmed and harmer, whole class or year group for example a speaker on cyber bullying, or continued curriculum focus on certain issues in PSHE to be discussed and debated more frequently.

For additional information: KCSIE 2022, Part 5 (Child on child sexual violence and sexual harassment) and Annex B

[Preventing harmful sexual behaviour in children - Stop It Now](#)

Neglect

Neglect is the ongoing failure to meet a child's basic needs. Some of the signs of neglect include:

- Poor physical appearance – a child who is dirty, hungry, has a lack of appropriate clothing, bad hygiene, not having access to medical care and treatment (*medical and / or nutritional neglect*)
- Absence of supervision/boundaries – a child who is put in danger or not protected from physical or emotional harm, use of inadequate care givers, chaotic family environment with no boundaries or routines (*physical neglect*)
- A child not getting the love, care and attention they need from their parents or carers (*emotional neglect*)

A child who's neglected will often suffer from other forms of abuse as well. Neglect can cause serious, long-term damage to the child's emotional, social and physical development having a profound impact on their future outcomes and in some cases can result in death. It happens when parents or carers can't or won't meet a child's needs. Sometimes this is because they don't have the skills or support needed, and sometimes it's due to other problems such as mental health issues, drug and alcohol problems or poverty.

Why is this important in Portsmouth?

Additional **practice guidance** has been developed in recognition that neglect is complex and can be hard for professionals to define clearly. It differs by type, severity, frequency and impact. It often coexists with other forms of child abuse making it difficult to identify and address in a timely way. Failure to identify and act on the early signs of neglect may

have severe and damaging long term and enduring consequences for the child. This guidance and the accompanying **Neglect Identification and Measurement Tool** are aimed at supporting good practice in assessment.

Neglect is the most common reason for a child to be the subject of a child protection plan in the UK. In Portsmouth, approximately 70% of children subject to a plan are suffering from neglect.

What do professionals need to do?

Although you may be worried about a child, it's not always easy for professionals to identify neglect. There's often no single sign or incident that a child or family need help. It is more likely that there will be a series of concerns over a period of time that, taken together, demonstrate the child is at risk. If you think a child may be experiencing neglect, don't wait:

- Complete an **Early Help Assessment** and gather all relevant information about the child, including the parenting capacity and family and environmental factors in order to form a professional judgment on strengths, risks and harmful factors
- Use the **Neglect Identification and Measurement Tool**
<https://www.portsmouthscp.org.uk/wp-content/uploads/Neglect-Identification-and-Measurement-tool-updated-Jan-2018.doc> to guide your questions, observations and areas for further consideration
- There is also a **tool for gaining young person's views**
- Regularly review progress using these tools and update the multi-agency plan accordingly
- *Remember: risks of harm around a child can accumulate and combine. Using the Neglect Identification and Measurement Tool will help you identify points when you need to involve other agencies and / or escalate your concerns.*

Online Safety

At The Harbour School appropriate filters and monitoring systems are in place to protect pupils from potentially harmful online material including terrorist and extremist material when accessing the internet in school. The internet is a great way for children and young people to connect with others and learn new things. As interactions between people are increasingly taking place on-line it is essential that we safeguard children as robustly in the virtual world as we do in the real one. We can do this through:

- Promoting safe on-line behaviour to pupils and their families
- Taking pupils and their families' on-line actions and networks into account when providing support

There are lots of benefits in going on-line, and also some risks which can be categorised into four areas;

1. content: being exposed to illegal, inappropriate or harmful material (e.g. pornography, fake news, self-harm, suicide, racist or extremist views);

2. contact: being subjected to harmful online interaction with other users (e.g. peer to peer pressure, adults posing as children/young adults to groom or exploit);
3. conduct: personal online behaviour that increases the likelihood of, or causes harm (e.g. making, sending & receiving nudes and semi-nudes or pornography, or online bullying).
4. Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Technology has become a significant component of many safeguarding issues including:

- Exposure to and sharing of explicit material (including nudes and semi-nudes)
- Grooming
- Radicalisation
- Exploitation
- Identity theft
- Cyber-bullying
- Cyber-hacking

It's important that we are confident in talking with pupils and their families about their online choices and interactions. For example:

- Personal information shared on-line: checking privacy settings, sharing contact details, geotagging
- Images shared and online communication: on-line support networks, inappropriate images (e.g. nudes and semi-nudes), online bullying and harassment
- On-line relationships: safe online friendships, meeting up with on-line friends or potential partners

Key messages:

- Crimes with an online element have increased by 44% from 2015/16
- 13 was the most common age of the targeted child (where recorded). Nearly 100 offences were committed against children aged 10 or under. The youngest child recorded was 3 years old.
- Sexting – 35% of young people said the biggest issue is peer pressure: 18% of young people said that sending sexual imagery it's an expectation.
- Supportive and enabling parenting has a more positive impact on resilience than parental strategies that restrict or monitor internet use. "Resilience: the ability to understand when you are at risk online, know what to do to seek help and learn from experience so you can continue to use the digital world safely and confidently."

For additional information and support:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf KCSIE 2022, Annex B for links to resources regarding online safety and support for children, parents and school staff.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896323/UKCIS Education for a Connected World .pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896323/UKCIS_Education_for_a_Connected_World_.pdf) A framework to equip pupils for digital life.

[DfE external document template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) Teaching online safety in schools – Dfe guidance (2019) outlines how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements.

www.thinkuknow.co.uk

manage.com/track/click?u=2ae276529dabe14cecc1d261e&id=b8cb368843&e=b8b74de96a *Thinkuknow Education Programme Resources 2021*

<https://saferinternet.org.uk/guide-and-resource/parents-and-carers> Statutory guidance: relationships education, relationships and sex education (RSE) and health education.

UKCCIS – Supports the development of the curriculum, Early Years to 18.

www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

Be internet legends – Free internet safety curriculum with PSHE accredited lesson plans and teaching resources for KS2

<https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes>

‘Honour Based’ abuse including ‘Female Genital Mutilation’ (FGM) and Forced Marriage

So-called ‘honour based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community and do not always involve violence, including FGM, forced marriage, and practises such as breast ironing, and often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of so called HBA are abuse, regardless of the motivation, and should be handled and escalated accordingly. If in any doubt staff should talk to the Deputy DSL. All staff need to be alert to the possibility of a pupil being at risk of HBA, or already having suffered HBA.

Risk factors:

- A girl confides to a professional that she is to have a ‘special procedure’ or to attend a special occasion to ‘become a woman’;
- A girl talks about a long holiday to her country of origin or another country where the practice (FGM) is prevalent;
- Parents state that they or a relative will take the girl out of the country for a prolonged period;
- A parent or family member expresses concern that FGM may be carried out on the girl;
- A girl is unexpectedly absent from school;
- A girl has difficulty walking, sitting or standing or looks uncomfortable;
- A girl has frequent urinary, menstrual or stomach problems;

- Increase emotional and psychological needs, for example withdrawal or depression, or significant change in behaviour.

If staff have a concern regarding a pupil that might be at risk of HBA they should follow the school's child protection procedures. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs and is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Teachers have a mandatory statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out).

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. School staff can contact the Forced Marriage Unit if they need advice and information. Contact: 02070080151 or email: fm@fco.gov.uk

High risk groups

- Looked after children and children with special educational needs and disabilities can face additional safeguarding challenges. Additional barriers can exist to recognising abuse and neglect in this group of children including:
 - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - Children with SEN and disabilities can be disproportionately impacted by things like bullying – without outwardly showing any signs; and
 - Communication barriers and difficulties in overcoming these barriers.
- Children who need a social worker due to safeguarding or welfare needs: A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- Poor and irregular attenders, persistent lateness, or children missing from education are also at additional risk.

Appendix F: 7 Golden rules of information sharing

1. Remember that the General Data Protection Regulations (GDPR) 2018, Data Protection Act 1998 and human rights law are not barriers to justified information

sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and, where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose

Please see 'Information Sharing. Advice for practitioners providing safeguarding services to children, young people, parents and carers' (HM Government July 2018) for further information and guidance & KCSIE 2022.

Sharing Information with MASH

- If you have concerns about a family and want to share that information with MASH, you need 'consent' to do this.

- 'Consent' means you have informed the family that you need to share the information with MASH.
- If you do not have 'consent' to share, MASH cannot accept details of a family and record anything on their system.
- You can share information without consent if the matter is an immediate child protection concern under Section 47 of the Children Act (however in most situations, we would need to tell the parents that we need to share information with MASH).
- You can share information without consent if you think that talking to the parents would place the child at risk of significant harm.
- If you are unsure, please contact MASH for guidance - 02392688793.

Reasons for making contact with MASH

- When a child has suffered from or is at risk of significant harm (related to abuse categories)
- When a child is in need or vulnerable (Section 17)
- When professionals need support to access early help services for this child from MASH.

The Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing 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. KCSIE 2022.

Appendix G: Safeguarding Form / Cause for Concern

Pupil Initials and Class Number	
Safeguarding Category	Domestic violence / Emotional related / Neglect related / Physical Related / Sexual Related / Risk of Exploitation / Peer on Peer Abuse

<p>Current concern for the pupil's safety and / or well-being:</p> <p>Include date (and time if appropriate)</p> <p>Be specific and accurate</p> <p>Use pupil initials only</p> <p>Think about....</p> <p>What is the concern?</p> <p>Who has it affected?</p> <p>How do you know?</p> <p>What else do you know?</p> <p>Use body map overleaf if needed</p> <p>What is the response from parent / carer?</p> <p>What actions have you taken?</p>	
<p>Your Full Name:</p> <p>Your email address:</p>	
<p>Date this was recorded:</p>	
<p>Please share this with site DSL</p>	

Appendix H: Poor practice includes (KCSIE 2022):

- Failing to act on and refer the early signs of abuse and neglect, including parental factors
- Poor record keeping / chronologies and monitoring

- Failing to listen to the views of the child
- Failing to re-assess concerns when situations do not improve
- Not sharing information, or sharing information too slowly and not with the right people
- Lack of challenge to those who appear not to be taking action.

Appendix I: Staff Responsibilities and Key Contacts

All staff are responsible for ensuring that any concern for the welfare of a child is dealt with promptly, consistently and appropriately to ensure that children receive the right help at the right time to reduce risks and prevent issues escalating, with full consideration to the impact on that individual child's emotional, mental health and wellbeing. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child, using a child centred approach to safeguarding by keeping the child in focus when making decisions about their lives and working in partnership with them and their families. (*Working Together, July 2018*).

Key Contacts:

Role	Name	Contact details
DSL (Strategic and Operational)	Matthew McLoughlin-Parker	Matthew.mcloughlinparker@thsportsmouth.org
DSL (Strategic)	Harriet Clarke	harreit.clarke@thsportsmouth.org
Deputy DSLs – Tipner Campus	David O'Neill	David.oneill@thsportsmouth.org
Deputy DSLs – Vanguard Campus	Heidi Gibbs Damon Beasley	Heidi.gibbs@thsportsmouth.org Damon.beasley@thsportsmouth.org
Deputy DSLs – Cosham Campus	Anne Ormston Karen Lemieux	Anne.ormston@thsportsmouth.org Karen.lemieux@thsportsmouth.org
Deputy DSLs – Stamshaw & Bridge Campus	(Stamshaw) Samantha Reid (The Bridge) Rosie Parker-Robson (lead of Campus) (The Bridge and Stamshaw)	Sam.reid@thsportsmouth.org Rosie.parker-robson@thsportsmouth.org
Deputy DSL	Lisa Caine (Outreach)	L.caine@thsportsmouth.org
Designated teacher for LAC pupils	Simone Elliott	simone.elliott@thsportsmouth.org
Nominated governor for child protection at The Harbour School	Donna Barrett	donn.barrett@thsportsmouth.org
MASH		Phone: 023 92688793 / Emergency outside office hours: 03005551373 MASH@portsmouthcc.gov.uk

Local Authority Designated Officer (LADO)	Hayley Cowmeadow	Phone: (023 92882500) Email: lado@portsmouthcc.gov.uk
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