



Education Skills and Employment Portfolio
Safeguarding Policy and Child Protection Policy

APPROVED POLICY

Version 3

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TEAMS AFFECTED:	<ul style="list-style-type: none"> • Prince Andrew School • Harford School • Pilling Primary School • St Paul’s School • SHRI • Library • SHG Community College • Careers Access Service
THIS POLICY REPLACES WITH IMMEDIATE EFFECT:	SHG Statutory Guidance Keeping Children Safe in Education 2017 Education Schools’ child protection policies 2017

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All staff	Read and Sign Declaration

Key Contacts:	
PAS Designated safeguarding lead (DSL) Deputy Head Student Services	+290 24290
PAS Head teacher	+290 24505

Harford Primary School Head Teacher	+290 24719
Pilling Primary School Head Teacher	+290 22540
St Paul's Primary School Head Teacher	+290 24727
St. Helena Research Institute Manager	+ 290 22507
Inclusion Manager (Olive Cottage)	+ 290 24543
Librarian	+ 290 22540
SHG Community College: Head of Life Long Learning	+290 22507
Careers Access Service Manager	+ 290 25832
Education Skills & Employment Assistant Director	+290 22607
Children's Social Care (CSC) Ebony View Main Office	+290 23312
Royal St. Helena Police (Police)Main Office	+290 22626

This Portfolio Policy supports the St Helena Government Children and Vulnerable Adults Safeguarding Policy, approved 01/09/2024.

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Introduction

1. This safeguarding policy is designed to create a safe, inclusive, and nurturing environment for all children within our Education Skills and Employment Portfolio (Referred from here on as Education Portfolio/ Portfolio). Aligned with the UK's *Keeping Children Safe in Education* (KCSIE) 2024 guidance **Appendix [1]** this policy outlines our commitment to protecting children from harm, promoting their well-being, and ensuring that our staff are equipped with the necessary skills and knowledge to recognise, report, and respond to any safeguarding concerns. We believe that safeguarding is everyone's responsibility, and together we aim to foster a culture where every child feels safe, valued, and supported to reach their full potential.

Background

2. This policy establishes the responsibilities and procedures for safeguarding children within the Education Portfolio, ensuring compliance with the latest *Keeping Children Safe in Education* (KCSIE) guidance. It serves as a foundation for all practices, setting standards to protect children from harm and promoting a safe learning environment.

Legal and Regulatory Framework

3. The policy is based on the UK safeguarding laws and regulations, including the Children Act 1989 and 2004, the Education Act 2002, and the statutory guidance of *Keeping Children Safe in Education* (KCSIE) 2024 and Part B **Appendix [2]** and *Working together to Safeguard Children* 2023.

4. This policy has also been developed with regard to the SHG Child Protection policy 2024.
Further information regarding local approaches can be found via the St Helena Children's and Adult Safeguarding Board.

5. UK legislation is used for guidance, but does not apply to St Helena.

6. The following UK legislation, St Helena Ordinances and St Helena Government (SHG) Policies apply to this Policy.
- Code of Management 2013 (SHG)
 - Criminal Procedure Ordinance 1975 (SHG)
 - Education Ordinance 2008 (SHG)
 - Equality Act 2010 (UK)
 - Sexual Offences (Communication with a child) Ordinance 2022 (SHG)
 - Sexual Offences Act, 2003 (UK)

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- IT and Information Management policies 2024 (SHG)
- Children and Vulnerable adults Safeguarding Policy 2024 (SHG)
- The St. Helena, Ascension, and Tristan da Cunha Constitution Order 2009
- Welfare of Children's Ordinance (WOC0) 2008 (SHG)
- Whistleblowing Policy: Code of Management 2013 (SHG)
- Working Together to Safeguard Children and Vulnerable adults on St Helena 2023 (SHG)

Scope of the Policy

7. This safeguarding policy applies to all staff, volunteers, external partners, and stakeholders involved with children and young people in educational settings under within our Portfolio. It ensures that everyone is aware of their safeguarding roles and responsibilities and adheres to the highest standards of child protection.

Alignment with KCSIE Principle

8. In line with the KCSIE 2024 guidance, this policy emphasises the importance of preventive and proactive measures, early identification, and appropriate intervention in safeguarding children. It recognises that safeguarding goes beyond child protection, incorporating mental health, online safety, and a positive school culture.

Equality statement

9. Some children and young people have an increased risk of abuse, both online and

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

10.We give special consideration to children and young people who: ● Have special educational needs and/or disabilities (SEND) or health conditions (**Paragraph 147, Page 38**)

- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation

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- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

Policy Objectives and Principles

Commitment to Child Protection

11.Our Education Portfolio is committed to prioritising children's safety and welfare. All staff, volunteers, and partners are responsible for understanding and following safeguarding procedures, recognising the signs of abuse, and responding swiftly and effectively to any concerns

We will

- Ensure a Safe Environment: Establish and maintain a safe, supportive environment where all children feel protected and valued.
- Identify and Respond to Risks: Equip staff with the knowledge and tools to identify, assess, and respond to safeguarding risks, including signs of abuse,

neglect, and exploitation.

- Promote Early Intervention: Foster a culture of early identification and response to safeguarding concerns to prevent harm and support children's well-being.
- Ensure Compliance and Accountability: Align practices with *Keeping Children Safe in Education* (KCSIE) guidance and legal obligations, ensuring all staff understand and adhere to their safeguarding responsibilities.
- Provide Training and Support: Commit to ongoing training, supervision, and resources for all staff, empowering them to recognize, report, and respond to safeguarding concerns effectively.

Aims

12.The Portfolio aims to ensure:

- Timely Action to Safeguard Children: Appropriate action is taken swiftly and effectively to protect children and young people from harm and promote their well-being, following recognised safeguarding procedures.

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- Clear Staff Responsibilities: All staff members understand their individual and collective responsibilities concerning safeguarding and are committed to maintaining a safe educational environment.
- Comprehensive Training for Staff: Staff are thoroughly trained in recognizing signs of abuse, neglect, and other safeguarding concerns, as well as in reporting procedures to ensure a timely, coordinated response.

Principles

13.The Education Department is committed to a safeguarding approach that places the safety, rights, and dignity of children and young people at the heart of all decisions and actions. Guided by core principles, we ensure that the welfare of our children remains central to our work, upholding high standards of ethical conduct at every level.

We are committed to:

- A child-centred approach, prioritising the safety and well-being of children, ensuring that all decisions and actions are made with the best interests of the child at the forefront.
- Zero tolerance for abuse, with a firm commitment to identifying, addressing, and preventing abuse and harm in any form within the education setting.
- Transparency and accountability, upholding high standards of transparency,

ethical conduct, and accountability to foster trust and integrity in all safeguarding practices.

- Confidentiality and respect, maintaining appropriate confidentiality in handling safeguarding concerns and sharing information only when it is in the child's best interest, with respect for all individuals involved.
- Partnership and collaboration, working together with external agencies, families, and the wider community to protect children, leveraging shared expertise and resources to strengthen safeguarding efforts.

Definitions

14. Safeguarding and promoting the welfare of children and young people means: ●
- Providing help and support to meet the needs of children and young people as soon as problems emerge
 - Protecting children and young people from maltreatment whether that is within or outside the home, including online
 - Preventing impairment of children and young people's mental and physical health or development

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- Ensuring that children and young people grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children and young people to have the best outcomes

15. Definitions

- **Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm ([Appendix \[3\] explains the different types of abuse](#)).
- **Alleged perpetrator(s) and perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children and young people) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.
- **Child in Need (CIN):** A child identified by a local authority as needing additional support for optimal development and well-being. Children in Need may require extra assistance due to disability, health needs, or other vulnerabilities.
- **Child protection** is part of this definition and refers to activities undertaken to protect specific children and young people who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or

outside the home, including online.

- **Children and young people** includes everyone under the age of 18.
- **Contextual Safeguarding:** Recognises that risks to children and young people may arise outside of the family, such as in peer groups, schools, or communities. It considers the wider context when addressing safeguarding concerns.
- **DBS Check (Disclosure and Barring Service Check):** A background check carried out on individuals working with children and young people to ensure they are suitable for such roles and do not pose a risk.
- **Designated Teacher for Looked-After Children:** A teacher with specific responsibility for supporting the educational achievement and well-being of looked-after children within a school setting.
- **DSL (Designated Safeguarding Lead):** A senior staff member with lead responsibility for safeguarding and child protection. The DSL is tasked with managing and coordinating responses to safeguarding concerns, ensuring that procedures are followed, and providing advice and support to staff.
- **Early Help:** Support provided as soon as problems begin to emerge, intended to address issues before they become more serious. Early help is essential for preventing escalation and providing timely intervention.

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- **FGM (Female Genital Mutilation):** A form of child abuse involving the partial or total removal of female genitalia for non-medical reasons. Staff are required by law to report known cases of FGM on individuals under 18 to the police.
- **LADO Local Authority Designated Officer** is the person who should be notified when it has been alleged that a professional or volunteer who works with children and young people has: behaved in a way that has harmed a child, or may have harmed a child.
- **Looked-After Child (LAC):** A child who is in the care of the local authority, either through a care order or on a voluntary basis. Looked-after children may reside in foster care, residential care, or other local authority arrangements.
- **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. [Appendix \[3\] defines neglect in more detail.](#)
- **Peer-on-Peer Abuse:** Any form of physical, sexual, emotional, or psychological abuse between children. This includes bullying, harassment, and sexual violence, and requires specific response protocols.
- **Prevent Duty:** A statutory requirement for schools and organisations to prevent individuals from being drawn into extremism and terrorism. Staff are trained to recognise early signs of radicalisation and respond accordingly.

- **Radicalisation:** The process by which individuals are influenced to adopt extreme beliefs, potentially leading to terrorism. Safeguarding measures include preventing radicalization through education and early intervention.
- **Safeguarding Partners:** Social Services and police forces work collaboratively as safeguarding partners to coordinate local safeguarding arrangements. ●
- **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children and young people share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video. ●
- **Significant Harm:** Any physical, emotional, or developmental harm that significantly affects a child's well-being or health. This threshold is used to determine when intervention is necessary.
- **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- **Whistleblowing:** A process by which staff can report concerns about the behavior of colleagues or practices within the organization that may put children at risk, without fear of reprisal.

Roles and responsibilities

16. Safeguarding and child protection **is everyone's responsibility**. This policy applies to **all** staff, and volunteers in the Portfolio and is consistent with the procedures of the SHG Safeguarding Policy 2024. Our policy and procedures also apply to extended school and off-site activities.
17. The Portfolio plays a crucial role in preventative education. This is in the context of a whole-Portfolio approach to preparing children and young people and young people for life in modern St Helena, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.
18. This will be underpinned by our:
 - School Behaviour policies
 - School Attendance Policy
 - Our schools' Pastoral support system
 - Planned programme of PSCH and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent

- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

Education Skills and Employment Portfolio

19. The Portfolio will:

- Facilitate a whole-Portfolio approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the head teacher and service leads to account for its implementation

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- Appoint a lead to monitor the effectiveness of this policy in conjunction with ESE. This is always a different person from the DSL. This responsibility sits with the Portfolio Director.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the Portfolio has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Discussing with IT staff and service providers what needs to be done to support the Portfolio in meeting these standards
- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-Portfolio approach to safeguarding and related policies
 - The DSL has lead authority for safeguarding, including online safety and

understanding the filtering and monitoring systems and processes in place •

The Portfolio has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low level concerns) about staff members (including supply staff, volunteers and contractors). **Appendix [4]** of this policy covers this procedure

- That this policy reflects that children and young people with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.

20. A detailed Guidance for Safer Working Practices for staff can be found in **Appendix [5]**

21. Where another body is providing services or activities (regardless of whether or not the children and young people who attend these services/activities are children and young people on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the Portfolio about safeguarding arrangements, where appropriate

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

The Head Teacher / Head of Service

22. The Head Teacher or Head of Service are responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school or accesses the Service and via the Portfolio website and induction process. • Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate ([see Appendix \[3\]](#))

- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this needs coordinators (SENCOs), social workers, mental health leads and others.

The Designated Safeguarding Lead (DSL)

- 23.**The DSL is a member of the senior leadership team in a school or service ([See Appendix \[6\] for a description of the role](#)).
- 24.**The DSL needs to be trained to Level 3 in safeguarding. Specific SHG DSL training is mandatory. The Portfolio also requires on-line training, which is available from the National College. The training needs to be recorded on the Portfolio Single Central Register and certification retained.
- 25.**The DSL takes lead responsibility for child protection and wider safeguarding in the school or setting. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep children and young people safe online.
- 26.**The DSL will be given the time, funding, training, resources and support to: •
Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
 - Contribute to the assessment of children and young people
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- Refer suspected cases, as appropriate, to the relevant body (children's social care, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
 - Have a good understanding of harmful sexual behaviour
 - Have a good understanding of the filtering and monitoring systems and processes in place within their school
- 27.**The DSL will also:
- Keep their line manager informed of any issues
 - Liaise with Children's Services and police for child protection concerns as appropriate
 - Discuss the local response to sexual violence and sexual harassment with police and children's social care colleagues to prepare the Portfolio's policies
 - Be confident that they know what local specialist support is available to support all children and young people involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
 - Be aware that children and young people must have an 'appropriate adult'

to support and help them in the case of a police investigation or search **28**. During term time, the DSL will be available during work time for staff to discuss any safeguarding concerns.

29. If you encounter a safeguarding concern outside of regular working hours, please immediately contact children's safeguarding services **contact details +290 23312** or, in case of an urgent emergency, the police **contact details +290 22626**

All staff

30. [Annually, staff who work directly with children must read at least part 1 of Keeping Children Safe in Education \(KCSIE\) Appendix \[1\]](#).

31. Annually, staff who don't work directly with children and young people read must part 1 of KCSIE or annex A of KCSIE (a condensed version of part 1). **32**. Staff who work directly with children and young people are also expected to read [annex B \(Appendix \[2\]\)](#) of KCSIE (about specific safeguarding issues). [There is a detailed guidance on Appendix \[7\] on specific safeguarding issues](#). but you may expect all of your staff, including those who don't work directly with children and young people, to read it too.

All staff will:

33. Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually

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34. Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance. This needs to be recorded on the Single Central Register and retained, in line with SHG Data Retention Policy.

35. Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children and young people to do online (e.g. sites they need to visit or who they'll be interacting with online)

All staff will be aware of:

36. Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL), the school's behaviour policy and the safeguarding response to children and young people who go missing from education

37. The SHG Early Help Assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

38. The process for making referrals to children's social care and for statutory

assessments that may follow a referral, including the role they might be expected to play

39. What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
40. The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
41. New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
42. The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
43. The fact that children and young people can be at risk of harm inside and outside of their home, at school and online
44. The fact that children and young people who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children and young people
45. That a child and their family may be experiencing multiple needs at the same time

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46. What to look for to identify children and young people who need help or protection
Paragraph [60] Page [22] of this policy outline in more detail how staff are supported to do this.

Confidentiality

47. The Welfare of Children's Ordinance (WOCO) and other SHG policies give permissive gateways for information sharing.
48. Confidentiality, although important, should not hinder information being shared to the relevant people, the following points provide guidance around confidentiality:
 - Timely information sharing is essential to effective safeguarding
 - Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children and young people
 - If school staff need to share 'special category personal data,' the safeguarding

of children, young people, and individuals at risk serves as a valid processing condition. This allows practitioners to share information without consent if obtaining consent is not possible, cannot be reasonably expected, or would place a child at risk.

- Examples of special category personal data in a school safeguarding context include:
 - Health information: A teacher reports concerns to the safeguarding lead about a student's mental health issues that indicate a risk of harm.
 - Biometric data: A school uses fingerprint recognition for lunch payments, ensuring compliance with data protection regulations.
 - Religious beliefs: A school records a child's religious background to ensure appropriate support during religious observances or foster care placement.
- If a victim asks the Portfolio member of staff not to share information about sexual violence or sexual harassment:
 - There is no definitive answer, as staff may still lawfully share the information if there is a legal basis for doing so under data protection laws.
 - The DSL must balance the victim's wishes with their duty to protect the victim and other children and young people.
 - The DSL should consider that:
 - Parents or carers should normally be informed unless this would place the victim at greater risk.

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- The basic safeguarding principle is that if a child is at risk of harm, in immediate danger, or has been harmed, a referral should be made to children's social care.
- Rape, assault by penetration, and sexual assault are crimes. Any report of these offences should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the default position remains that a referral to the police should be considered.

49.Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children and young people involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and

- any support for children and young people involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- If staff are in any doubt about sharing information, they should speak to the DSL

Recognising Abuse and Taking Action

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

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home • Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation • Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

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- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending • Is missing education, or persistently absent from school, or not in receipt of full time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

51.Staff must follow the procedures set out below in the event of a safeguarding issue. **52.**Please note – in this and subsequent sections, you should take any

references to the DSL.

53.If a child is suffering or likely to suffer harm, or in immediate danger **54.**Make a referral to the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.** Then contact children's social care.

55.Tell the DSL as soon as possible if you make a referral directly.

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
 - Stay calm and do not show that you are shocked or upset
 - Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
 - Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
 - Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgment on it
 - Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly
- For detailed guidance on managing these concerns, please refer to: Managing Referrals paragraphs [59- 65] below** and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

57.Staff must bear in mind that some children and young people may: • Not feel ready, or know how to tell someone that they are being abused, exploited or neglected

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- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

Managing Referrals

59.Recognise

All staff and volunteers must remain vigilant and be able to recognise signs of potential abuse, neglect, or harm.

Concerns may arise from:

- A disclosure made by a child or young person.

- Observations of behavior or physical signs.
- Information shared by another party (e.g., parent, peer, or external agency).

60.Respond

- Listen: Provide a safe and supportive space for the child or young person to share. Avoid asking leading questions.
- Reassure: Acknowledge the child's courage in speaking up and reassure them they are being taken seriously.
- Do not promise confidentiality: Explain that the information must be shared with the appropriate people to ensure their safety.

61.Report

Immediately report concerns to the DS)

If the child is at immediate risk of harm, contact emergency services [911]

62.Record

- Complete a written record of the concern as soon as possible (within 24 hours). ● Include factual details: date, time, names, what was said, and any actions taken. ● [Use the Multi Agency Form \(Appendix \[8\]\).](#)
- Ensure the form is signed, dated, and securely stored.

63.Refer

The DSL will assess the concern and decide on the next steps, which may include: ● Referring the case to local child protection services or social care. ● Contacting a safeguarding advisory service for further guidance. ● Consulting with the police in cases of criminal activity.

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- **The referral must be made within 24 hours of identifying the concern.**

64.Follow-Up

The DSL **must**:

- Confirm that the referral has been received and logged by the external agency. ● Monitor the situation and maintain regular contact with external agencies as required.
- Provide feedback to the staff member who reported the concern, where appropriate.

[For detailed guidance, refer to Appendix \[9\]: What to do if you're worried a child is being abused.](#)

This document provides practical steps for identifying and responding to concerns about child abuse, aligning with the Keeping Children Safe in Education guidelines

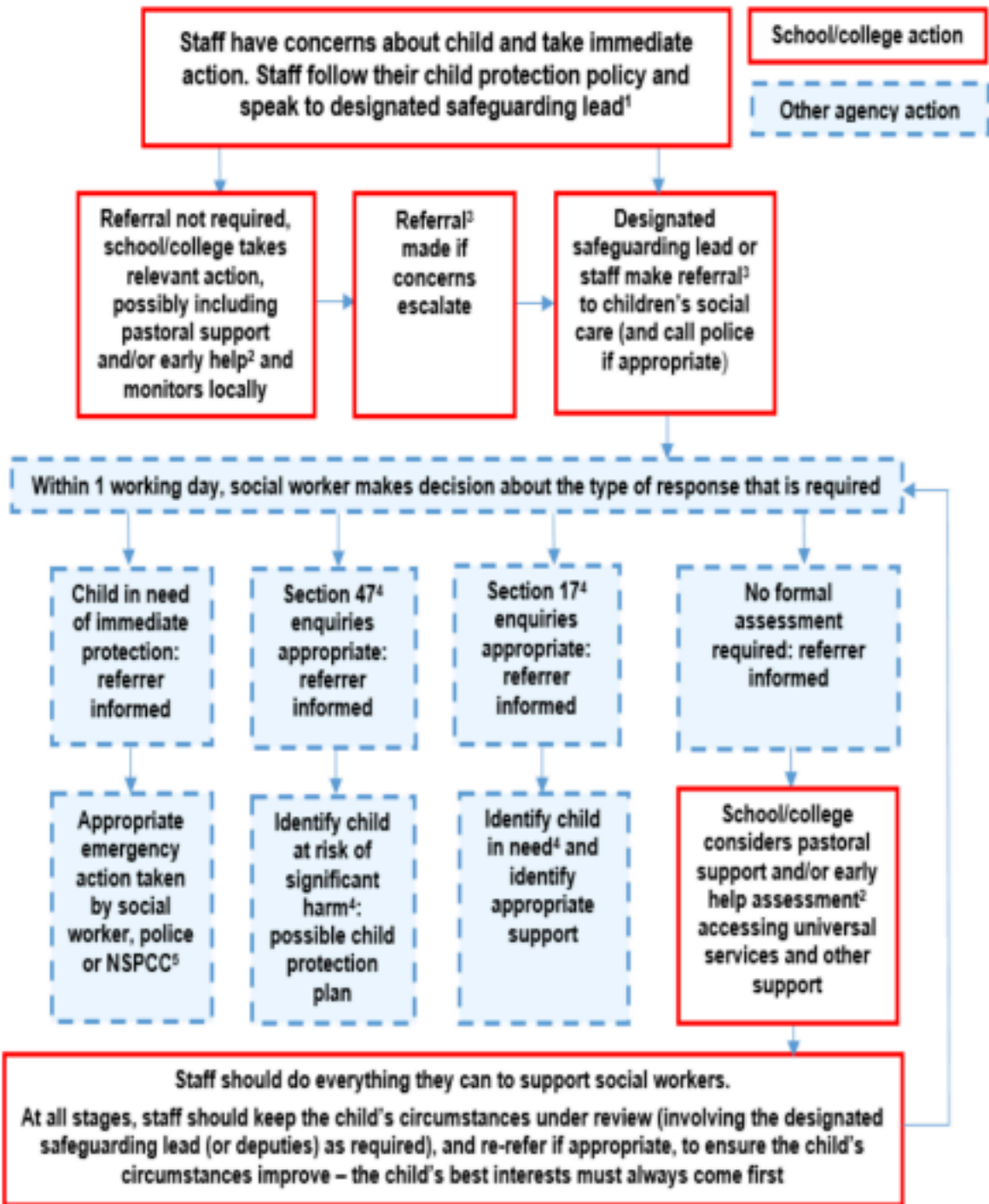
65. Confidentiality and Data Protection

- All safeguarding records must be handled in line with [SHG's] data protection policies and IT Policies
- Information is shared on a need-to-know basis, ensuring the child's privacy and dignity are respected.

66. Whistleblowing

If staff feel their concerns are not being acted upon appropriately, they should escalate their concerns by:

- Following the SHG Whistleblowing policy from SHG Code of Management (2013).
- Contacting external safeguarding authorities directly: Children's Social Care contact **details +290 23312** or Royal St. Helena Police **contact details +290 22626**.



Abuse, neglect and exploitation

69. All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of

children who may be in need of help or protection.

70. All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.
71. All staff, but especially the designated safeguarding lead should consider whether children 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) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
72. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.
73. In all cases, if staff are unsure they should always speak to the designated safeguarding lead or a deputy.

If you have concerns about Female Genital Mutilation (FGM)

74. Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.
75. FGM is illegal in the Saint Helena under Criminal Proceedings Ordinance and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.
76. For teachers, there are no circumstances in which you should be examining a girl. It is possible that a teacher, perhaps assisting a young child in the toilet or changing a nappy, may see something which appears to show that FGM may

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have taken place. In such circumstances, the teacher must make a report under the duty, but should not conduct any further examination of the child. 77. Possible indicators that a child has been subjected to FGM, and factors that suggest a child may be at risk, are set out in **Appendix [7]**

78. If a girl discloses to you that she has had FGM (whether she uses the term ‘female genital mutilation’ or any other term or description, e.g. ‘cut’) then the duty applies. If, in the course of delivering safe and appropriate care to a girl you

would usually ask if she has had FGM, you should continue to do so.

79. Any teacher who either:

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

Must immediately report this to the police, personally. **This is a mandatory statutory duty**, and teachers will face disciplinary sanctions for failing to meet it.

80. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate. **81. Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

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

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

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

85. Figure 1 below, illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action.

86. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from SHG children's social care. Share details of any actions you take with the DSL as soon as practically possible. Make a referral to SHG children's social care directly, if appropriate. **For detailed guidance on managing these concerns, please refer to: Managing Referrals paragraphs [59- 65] above.**

87. Share any action taken with the DSL as soon as possible.

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

88. The DSL will keep the case under constant review and the Portfolio will consider a referral to children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.
89. If it is appropriate to refer the case to SHG children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly, **please refer to: Managing Referrals paragraphs [59- 65] above for detailed guidance on managing these concerns.**
90. You must tell the DSL as soon as possible. Children's Services will make a decision concerning the referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with children's services if this information is not made available, and ensure outcomes are properly recorded. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

If you have concerns about extremism

91. If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from children's social care. Make a referral to children's social care directly, if appropriate. **For detailed guidance on managing these concerns, please refer to: Managing Referrals paragraphs [59- 65] above.**
92. Inform the DSL or deputy as soon as practically possible after the referral. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or the children's social care team.
93. **In an emergency call 911** if you:
- Think someone is in immediate danger
 - Think someone may be planning to travel to join an extremist group
 - See or hear something that may be terrorist-related

If you have a concern about mental health

94. 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. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

95. If you have a mental health concern about a child that is also a safeguarding concern. For detailed guidance on managing these concerns, please refer to: **Managing Referrals paragraphs [58- 65]** above.
96. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.
97. Where possible, speak to the DSL first to agree a course of action. **98.** (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)
99. If the DSL is unavailable, this should not delay action. **For detailed guidance on managing these concerns, please refer to: Managing Referrals paragraphs [59- 65] above.**

Domestic abuse

100. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Serious violence

101. All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

If you have concerns about a staff member, supply teacher, volunteer, or contractor

102. If you have concerns about a staff member, supply teacher, volunteer or contractor posing a risk of harm to children, report this immediately to the Head

Teacher or Head of Service. If the concern involves the Head Teacher or Head of Service, escalate it to the ESE Assistant Director or Head of Lifelong Learning. The SHG Local Authority Designated Officer (LADO) must be consulted, with coordination through Children's Social Care. The LADO oversees allegations

involving adults working or volunteering with children, ensuring a fair and thorough process in collaboration with Children's Services, Police, and Education.

- 103.** Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the head teacher, report it directly to Children's Services or the police).
- 104.** If you receive an allegation relating to an incident where an individual or organisation was using the Portfolio premises for running an activity for children and young people, follow our Portfolio safeguarding policies and procedures, informing Children's Services or the police, as you would with any safeguarding allegation.
- 105.** [For detailed guidance on managing these concerns, please refer to Appendix \[4\]: Allegations of Abuse Made Against Staff.](#)

Allegations of abuse made against other children and young people

- 106.** We recognise that children and young people are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children and young people.
- 107.** We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously. **108.** Most cases of children and young people hurting other children and young people will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
- Is serious, and potentially a criminal offence
 - Could put children and young people in the school at risk
 - Is violent
 - Involves children and young people being forced to use drugs or alcohol
 - Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting (taking a picture under a person's clothing) or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)
- 109.** Child-on-child abuse is most likely to include, but may not be limited to:

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- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence⁶ such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment^{9F7} such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse ● 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 nude and semi-nude images and/or videos⁸ (also known as sexting or youth produced sexual imagery) ● upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and ● initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

110. Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

111. Child criminal exploitation (CCE)

- Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money, working/ dealing in cannabis, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin

to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their

- vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
- It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

112. Child sexual exploitation (CSE)

- CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
- CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.
- CSE can affect any child who been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex.

Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

Procedures for dealing with allegations of child-on-child abuse 113. If a pupil

makes an allegation of abuse against another pupil: • You must record the allegation and tell the DSL, but do not investigate it • The DSL will contact the children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

- The DSL will put a risk assessment and support plan into place for all children and young people involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while

protecting children and young people and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

115. To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female children and young people, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate children and young people about appropriate behaviour and consent
- Ensure children and young people are able to easily and confidently report abuse using our reporting systems as described in **Paragraph [119- 120] below**
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children and young people who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

116. We will ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in Portfolio, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children and young people can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
 - That certain children and young people may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- 117.** The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- 118.** Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our Portfolio from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or children's social care to determine this ●
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

Reporting Systems for Children and Young People

- 119.** Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining the appropriate action to take and the

services to provide. We recognise the critical importance of ensuring that children and young people feel safe and confident to report any concerns and/or allegations.

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120. To achieve this, we will:

- Encourage children and young people to confidently report abuse by displaying posters and ensuring that Designated Safeguarding Lead (DSL) contacts are clearly visible in schools and other premises.
- Ensure that our reporting systems are well-promoted, easily understood, and easily accessible for all children and young people, regardless of age or ability.
- Make it clear to children and young people that their concerns will be taken seriously, that they will be listened to, and that they can safely express their views and provide feedback without fear of retribution or judgment.
- Provide information on how children and young people can report concerns anonymously if preferred.

Online safety and the use of mobile technology

121. We recognise the importance of safeguarding children and young people from potentially harmful and inappropriate online material, and we understand that technology plays a significant role in many safeguarding and wellbeing issues. To address this, our Portfolio aims to:

122. Protect and educate the whole Portfolio community in its safe and responsible use of technology, including mobile and smart technology (referred to as 'mobile phones').

123. Set clear guidelines for the use of mobile phones for the whole Portfolio community, ensuring that their use aligns with safeguarding principles and promotes responsible behavior.

124. Establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns related to online safety, where appropriate, ensuring that all issues are addressed swiftly and effectively. Our approach to online safety is based on addressing the following

Categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for

sexual, criminal, financial or other purposes

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g.

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consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and •

• **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

125. As part of our commitment to safeguarding and online safety, we use Impero and ContentKeeper to monitor and filter internet usage within our network. These systems help to prevent access to inappropriate content, ensure compliance with our Online Safety Policy, and support digital safety for all users.

126. To meet our aims and address the risks above, we will: • Educate children and young people about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring children and young people are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to Portfolio for their own use, but will limit such use to non-contact time when children and young people are not present
 - Staff will not take pictures or recordings of children and young people on their personal phones or cameras
- Make all children and young people, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in Portfolio, use of the Portfolio's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the

acceptable use of the internet and mobile phones

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

Sharing of nudes and semi-nudes ('sexting')

127. Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non consensual sharing of nude or semi-nude images/videos, including pseudo images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

128. You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

129. You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

130. Following a report of an incident, the DSL will hold an initial review meeting with appropriate Portfolio staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is

necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

- What further information is required to decide on the best response

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- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the children and young people involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual • Whether to contact parents or carers of the children and young people involved (in most cases parents/carers should be involved)

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Appendix 5 for more information on assessing adult involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13

132. The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

133. If none of the above apply then the DSL, in consultation with the Head Teacher, should report the incident to Children's Social Care for their advice. The decision will be made and recorded in line with the procedures set out in this policy.

134. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the children and young people involved (if appropriate).

135. If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the

police immediately.

136. Informing parents/carers

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

137. Referring to the police

If it is necessary to refer an incident to the police. All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

138. Children and young people are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships education and ICT lessons. Teaching covers the following in relation to the sharing of nudes and semi nudes:

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

139. Children and young people also learn the strategies and skills needed to manage:

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

140. This policy on the sharing of nudes and semi-nudes is also shared with children and young people so they are aware of the processes the school will follow in the event of an incident.

141. Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people

- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

Artificial intelligence (AI)

142. Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, children and young people and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

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

144. The Portfolio will treat any use of AI to access harmful content or bully children and young people in line with this policy and our behaviour policy. Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the Portfolio. **Notifying parents or carers**

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the children's social care team before doing so. In the case of allegations of abuse made against other children and young people, we will normally notify the parents or carers of all the children and young people involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or children's social care to make sure our approach to information sharing is consistent.

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

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

out of classes with the victim, and the reason(s) behind any decision(s)

Children and Young people in special circumstances

Children and young people with special educational needs, disabilities or health issues

147. We recognise that children and young people with SEND or certain health conditions can face additional safeguarding challenges. Children and young people with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Children and young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children and young people
- The potential for children and young people with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

148. We offer extra pastoral support for these children and young people. This includes:

- Access to Head of Key Stage Prince Andrew School
- ELSA Provision
- Access to CAMHS
- Access to the School Nurse
- Access to Play Therapy

149. Any abuse involving children and young people with SEND will require close liaison with the DSL (or deputy) and the SENCO.

Children and young people with a social worker

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

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

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

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

Children and young people who are lesbian, gay, bisexual or gender questioning

153. We recognise that children and young people who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children and young people.

154. We also recognise that LGBTQ+ children and young people are more likely to experience poor mental health. Any concerns should be reported to the DSL. **155.**

When families/carers are making decisions about support for gender questioning children and young people, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre pubertal children.

156. When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

157. We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

158. Risks can be compounded where children and young people lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where children and young people can speak out or share their concerns with members of staff.

Allegations of Abuse Against Staff

- 159.** If you have concerns about a staff member, supply teacher, volunteer, or contractor posing a risk of harm to children, report this immediately to the Head Teacher or Head of Service.
- 160.** The Education Portfolio is committed to handling all allegations of abuse against staff members with the utmost care, professionalism, and sensitivity. Allegations will be addressed promptly and in accordance with established safeguarding protocols to ensure the safety of children and young people, as well as to uphold the integrity of staff members and our organisation. All allegations will be investigated fairly and impartially, with due respect for the rights and well-being of all parties involved.
- 161.** Any staff member facing an allegation will be informed of the process, and appropriate support will be provided throughout the investigation. The Designated Safeguarding Lead (DSL) or a designated senior leader will coordinate the response, ensuring adherence to confidentiality and legal requirements.
- 162.** If the concern involves the Head Teacher or Head of Service, escalate it to the ESE Assistant Director or Head of Lifelong Learning. The SHG Designated Officer (LADO) must be consulted, with coordination through Children's Social Care. The LADO oversees allegations involving adults working or volunteering with children, ensuring a fair and thorough process in collaboration with Children's Services, Police, and Education.
- 163.** For a detailed outline of the procedures for Managing Allegations of abuse against staff, including reporting, investigation, and resolution steps, please refer to [Appendix \[4\]](#).

Complaints against staff

- 164.** Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our **procedures for Managing Allegations of abuse against staff, including reporting, investigation, and resolution steps, please refer to Appendix [4]**.

Visitor Management and Signage Guidelines

- 165.** To ensure the safety and security of our children and staff, all visitors to the school must comply with the visitor management procedures outlined in **Appendix [10]**.
- 166.** Visitors are required to sign in at reception upon arrival, providing their details and the purpose of their visit. They will be issued an identification badge, which must be worn at all times while on school premises. The school utilises a

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color-coded badge system to easily identify the role of each visitor, such as contractors, parents, or guest speakers.

- 167.** Clear signage is displayed at entry points to direct visitors to reception and to indicate restricted areas.
- 168.** All visitors must adhere to the school's code of conduct, which includes staying within authorised areas and following emergency procedures. Staff members are trained to challenge unidentified visitors and ensure that all safety protocols are followed, while children are educated on the importance of identifying and reporting unauthorised individuals. This approach is designed to maintain a secure environment while fostering a welcoming atmosphere for those visiting the school.

Other complaints / concerns

- 169.** Complaints and concerns about the safeguarding policy or other Portfolio related matters should be directed to the school or service in the first instance. If there isn't a satisfactory outcome then this can be escalated to Education Skill and Employment Assistant Director (schools) or Head of Life Long Learning (as appropriate).

Whistle-blowing

- 170.** See SHG Whistleblowing Policy in SHG Code of Management 2013 for further details.

Record-keeping

- 171.** We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the rationale for those decisions,

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

172. Records will include:

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

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

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

175. Safeguarding records relating to individual children and young people will be retained for a reasonable period of time after they have left the school. **176.** If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. **177.** To allow the new school to have support in place when the child arrives, this should be within:

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

178. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

179. In addition:

- **Appendix 5** sets out our policy on record-keeping with respect to allegations of abuse made against staff
- **Appendix 7** sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

Training

All staff

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

180. This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-Portfolio safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the safeguarding board
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the UK Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment

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- Have a clear understanding of the needs of all children and young people

181. A medium term aim is for all staff to be trained on anti-radicalisation to enable them to identify children and young people at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

182. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

183. Volunteers will receive appropriate training, if applicable.

The DSL

184. The DSL will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

The Portfolio

185. All advisory board members will receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

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

Recruitment – interview panels

186. At least 1 person conducting any interview for any post at the Portfolio will have

undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

187. [For a detailed outline of the procedures for Safer Recruitment please refer to Appendix \[11\].](#)

Supervision for Staff Working with Children, Young People, and Families

188. The Portfolio is committed to ensuring that all staff who have direct contact with children, young people, and families—including Designated Safeguarding Leads (DSLs), Inclusion Managers, and other relevant staff in inclusion, or

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wellbeing roles, ELSAs, pastoral staff, school counselors/ therapists, — all receive regular supervision.

189. Supervision will provide a structured space for staff to receive support, coaching, and training. It will also promote the best interests of children and young people, enable confidential discussions of sensitive issues, and enhance professional practice in safeguarding and emotional wellbeing.

Monitoring arrangements

190. This policy will be reviewed **annually**. At every review, it will be approved by the Portfolio Advisory Board.

Links with other policies

191. This policy links to SHG Policies and the following Portfolio policies and procedures:

- School Behaviour Policies
- Attendance Policy
- Health and safety
- PSCHE
- Curriculum
- Special Educational Needs and Disability (SEND)
- Anti-bullying
- IT Policies
- Whistle-blowing

- Equality & Diversity