THE PORTSMOUTH GRAMMAR SCHOOL

The PGS Safeguarding and Child Protection Policy and Procedure

Contents

KEY SCHOOL CONTACTS 4
KEY EXTERNAL CONTACTS 6
1 Aims 9
2 Scope and application 9
3 Regulatory framework 10
4 Publication and availability 12
5 Definitions 13
6 Responsibility statement and allocation of tasks 13
7 Safeguarding principles 14
8 General reporting obligations of staff in relation to safeguarding 16
9 A safe working environment for staff 16
10 What to do if staff have a concern about a pupil 17
11 Managing support for pupils internally 18
12 Family Help 18
13 Making a referral 22
14 Allegations against pupils - child on child abuse 23
15 What to do if staff have a concern about someone else's welfare 24
16 Allegations against staff 24
17 Informing parents 25
18 Additional reporting 25
19 Safer recruitment and supervision of staff 27
20 Online Safety 28
21 Training 30
22 Risk assessment 33
23 Monitoring and review 33
24 Record keeping 34
25 Information sharing and multi-agency working 34
26 Regulations and safeguarding requirements relating to school premises 36
27 Use of school or college premises for non-school/college activities 37

Appendix 1: Indicators of abuse 38
1. Types of abuse 38
2. Signs of abuse 40
3. Specific safeguarding issues 41
4. Serious violence 45
5. Special educational needs and disabilities 55
6. Children in care (including kinship care) and previously children in care 56
7. Children in Alternative Provision 56
8. Virtual School Heads 57
9. Care leavers 57
10. Young carers 57
11. Children who are questioning their gender 57
12. Safeguarding children with medical conditions 61

Appendix 2 Radicalisation and the Prevent Duty 63

Appendix 3 Concerns about a child - guidance for staff (see also paras 8 and 10 above) . 66
1. Receiving a disclosure 66
2. Recording a concern 66

3 Receiving a report of harmful sexual behaviour 66
4 Use of reasonable force 67
5 Concerns about a child – Flow chart of actions 67

Appendix 4 Dealing with allegations against staff (see also paragraph 16 above) 69
1. The School's procedures 69
2 Reporting an allegation 69
3 Disclosure of information 70
4 Further action to be taken by the School 70
5 Early Years Foundation Stage (EYFS) 70
6 Ceasing to use staff 70
7 Malicious allegations 71
8 Record keeping 71
9 Learning 71

Appendix 5 Responsibilities of the Designated Safeguarding Lead (DSL) 72

Appendix 6 Local arrangements 76

Appendix 7 Flow chart of safeguarding actions 77

Appendix 8 EYFS Framework 2026 78
1. Introduction 78
2. Roles and Responsibilities 78
3. Safer Recruitment and Suitability 78
4. Child Protection 80
5. Supervision and Ratios 80
6. Dogs on the Premises 80
7. Safer Sleep 81
8. Toileting, Intimate Care and Personal Care 81
9. Online Safety and Screen Use 81
10. Attendance 82
11. Behaviour 82
12. Partnership with Parents and Carers 82
13. Training 82
14. Review 83

Appendix 9 Protocol for Staff: Supporting Children Who Are Questioning Their Gender . 84

Appendix 10 Portsmouth Grammar School (PGS) Mental Health Referral Pathway 87

Appendix 11 Allocation of tasks and Version control 89

KEY SCHOOL CONTACTS

Designated Safeguarding Lead (DSL) (including EYFS provision) – **Mrs Laura Ryan**	Email: l.ryan@pgs.org.uk or safeguarding@pgs.org.uk Telephone number (term time only): 02392 681344 Telephone number (during the holidays): 02392 360036 Mobile number: 07561 856237
Deputy Designated Safeguarding Leads (DDSLs)	Telephone number (term time only): 02392 681344 Telephone number (during the holidays): 02392 360036 Email: safeguarding@pgs.org.uk (during the holidays) **Pre-School (EYFS)** Mrs Chloe Eastburn: c.eastburn@pgs.org.uk **Junior School** Mr Jason Ashcroft: j.ashcroft@pgs.org.uk Mrs Helen Millington: h.millington@pgs.org.uk **Senior School** Mrs Rebecca Clay: r.clay@pgs.org.uk Mr Mike Murray: m.murray@pgs.org.uk Miss Rachel Poole: r.poole@pgs.org.uk Mrs Emily Seddon: e.seddon@pgs.org.uk Mrs Elly Tanyanyiwa: e.tanyanyiwa@pgs.org.uk Mrs Sarah Webb: sarah.webb@pgs.org.uk
Head - Mr Andrew Fisher	Email: head@pgs.org.uk Telephone number: 023 9236 4200
Head of the Junior School - Mrs Amy Wilson-Smith	Email: a.wilson-smith@pgs.org.uk Telephone number: 023 9236 4249

Chair of Governors – Mrs Vivienne Chapman	Email: chair@pgs.org.uk or via Mr John Read School Bursar and Clerk to the Governors j.read@pgs.org.uk Telephone number: 023 9236 0036 ext 250
Vice-Chair of Governors – Mr John Murphie and Mr John Millar	Email: via Mr John Read School Bursar and Clerk to the Governors j.read@pgs.org.uk Telephone number: 023 9236 0036 ext 250
Lead Safeguarding Governor - Mrs Sally Gingell Deputy Safeguarding Governor – Mr Nicholas Weaver	Email: via Mr John Read School Bursar and Clerk to the Governors j.read@pgs.org.uk Telephone number: 023 9236 0036 ext 250

KEY EXTERNAL CONTACTS

Designated Officer(s) of the local authority [LADO]	Lydia Bowles Portsmouth Local Authority Designated Officer [LADO] Telephone number: 023 9288 2500 Email: LADO@portsmouthcc.gov.uk
Multi-Agency Safeguarding Hub (MASH)	Portsmouth: Mon-Fri (office hours): 0845 671 0271 / 02392 688793 Out of hours/ Emergency Duty Service: 0300 555 1373 Hampshire: 0300 555 1384 Isle of Wight: 0300 300 0117 Southampton: 02380 83 3004 or 02380 23 3344 West Sussex: 033 022 26664 or 01403 229900
Portsmouth Safeguarding Children Partnership[1](LSCP)	Email: PSCP@portsmouthcc.gov.uk Website: www.portsmouthscp.org.uk Telephone number (concerns about children): ring MASH directly (see above) Training: 02392 834404
Hampshire, Isle of Wight, Portsmouth and Southampton (HIPS) Safeguarding Children Partnership	Websites: http://hipsprocedures.org.uk/ www.portsmouthscp.org.uk

Portsmouth Safeguarding Adults Board	Telephone number: 023 9268 0810
Portsmouth Mental Health Support Team (MHST)	Email: MHSTCamhsPortsmouth@solent.nhs.uk
Portsmouth City Council Housing Department	023 9283 4989 Contact Form
Emergency (e.g. police/ambulance)	999 or 112
FGM reporting - non-emergency police contact number	101
Hampshire Constabulary/ Police liaison officer	PC Clarke: 07795332416 Assly.Clarke@hampshire.police.uk PC Carter: 07970145664 Daniel.Carter@hampshire.police.uk
Prevent partners and advice about extremism	Prevent Officer Name: Charlie Pericleous Email: charlie.pericleous@portsmouthcc.gov.uk **Non-emergency DfE advice** 020 7340 7264 **Non-emergency:** 101 **Emergency:** 999 **Anti-Terror Hotline:** 0800 789 321
Department for Education	**Telephone (general):** 0370 000 2288 **Preventing extremism:** **Telephone helpline:** 020 7340 7264 **Email**: counter-extremism@education.gov.uk

NSPCC (including whistleblowing helpline)	NSPCC Weston House 42 Curtain Road London EC2A 3NH Telephone: 0808 800 5000 Email: help@nspcc.org.uk https://www.nspcc.org.uk/preventing-abuse/
OfSTED Independent Schools Inspectorate (ISI)	0300 123 4666 or at enquiries@ofsted.gov.uk 020 7600 0100 or at safeguarding@isi.net
The Charity Commission Reporting serious wrongdoing to The Charity Commission	Telephone: 0300 066 9197 www.gov.uk/government/organisations/charity-commission For further guidance see: https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer whistleblowing@charitycommission.gsi.gov.uk
UK Safer Internet Centre	0344 381 4772 helpline@saferinternet.org.uk

1 Aims

1.1 This is the safeguarding and child protection policy and procedures of The Portsmouth Grammar School (**School**).

1.2 The aims of this policy are as follows:

1.2.1 to actively promote and safeguard the welfare of children, staff and others who come into contact with the School;

1.2.2 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and/or allegations of abuse;

1.2.3 to raise the awareness of all staff of their safeguarding responsibilities and how to report concerns;

1.2.4 to ensure staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and others and feel supported in this role;

1.2.5 to ensure consistent good safeguarding practice throughout the School;

1.2.6 to ensure pupils' wishes and feelings are taken into account when determining what action to take and what services to provide;

1.2.7 to ensure reporting systems are well promoted, easily understood and easily accessible for pupils confidently to report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

2 Scope and application

2.1 Safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development in school.

2.2 This policy applies to the whole School including the Early Years Foundation Stage (**EYFS**).

2.3 This policy applies at all times including where pupils or staff are away from the School.

2.4 This policy applies to core School activities and to out of hours and commercial activities arranged through the School.

2.5 This policy is designed to address:

2.5.1 the School's charity law safeguarding duty to:

(a) provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers;

(b) set an organisational culture that prioritises safeguarding so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;

(c) have adequate safeguarding policies, procedures and measures to protect people;

(d) provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the Charity Commission; and

(e) the specific obligations on the School to safeguard and promote the welfare of children, as defined below.

2.6 It is not uncommon for the School to have some pupils on roll who reach the age of 18 or 19 in the course of their education. The School's safeguarding responsibilities extend to all members of the School community and its safeguarding policies, procedures, and codes of conduct apply to all pupils, including those aged 18 or over. The School acknowledges its duty of care to these pupils and the need to consider their specific needs and rights, as well as the need to manage any risk they may present to others, with reference to differences in legal status, maturity, or life experience, for example. Where a pupil who is aged 18 or over presents safeguarding concerns, the School will consider whether they are, or may be, an "adult at risk" under the provisions of the Care Act 2014. If so, it will follow appropriate safeguarding procedures, including referrals to the relevant local authority's MASH, where relevant.

3 Regulatory framework

3.1 This policy has been prepared to meet the School's responsibilities under:

3.1.1 Education (Independent School Standards) Regulations 2014;

3.1.2 Statutory framework for the Early Years Foundation Stage (DfE, updated July 2026);

3.1.3 Education and Skills Act 2008;

3.1.4 Children Act 1989 and Children Act 2004;

3.1.5 Childcare Act 2006;

3.1.6 Children and Social Work Act 2017;

3.1.7 Data Protection Act 2018 and General Data Protection Regulation (GDPR);

3.1.8 Data (Use and Access) Act 2025, effective from January 2026;

3.1.9 Equality Act 2010; and

3.1.10 Charities Act 2011.

For links, see: https://www.legislation.gov.uk/

3.2 This policy has regard to the following guidance and advice:

3.2.1 Keeping children safe in education (DfE, September 2026) (or later version, if any) (KCSIE);

3.2.2 Working together to safeguard children (HM Government, statutory guidance, 2026) (WTSC);

3.2.3 Disqualification under the Childcare Act 2006 (DfE, 31 August 2018);

3.2.4 Revised Prevent duty guidance for England and Wales (HM Government, December 2023);

3.2.5 Channel duty guidance: protecting people susceptible to radicalisation (HM Government,

updated October2025);

3.2.6 Educate Against Hate (HM Government 2018);

3.2.7 Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020);

3.2.8 Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage (June 2023);

3.2.9 What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);

3.2.10 Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, March 2015, updated May 2024);

3.2.11 Sharing nudes and semi-nudes: advice for education settings working with children and young people (UK Council for Internet Safety (UKCIS), updated March 2024);

3.2.12 The Protection from Sex-Based Harassment in Public Act 2023, (from 1st April 2026) (legislation.gov.uk);

3.2.13 Criminal Exploitation of children and vulnerable adults: County Lines guidance (Home Office, October 2023);

3.2.14 Children missing education (DfE, September 2025);

3.2.15 Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017);

3.2.16 Searching, screening and confiscation: advice for schools (DfE, July 2022);

3.2.17 Listening to and involving children and young people (DfE, January 2014);

3.2.18 Safeguarding children (links to government guidance and resources);

3.2.19 Strategy for dealing with safeguarding issues in charities (Charity Commission, December 2017);

3.2.20 Regulatory alert to charities - safeguarding (Charity Commission, December 2017);

3.2.21 How to report a serious incident in your charity (Charity Commission, January 2026);

3.2.22 Report serious wrongdoing at a charity as a worker or volunteer (Charity Commission, October 2018, updated June 2019);

3.2.23 Relationships education, relationships and sex education and health education guidance (DfE, September 2025, comes into effect 1st September 2026);

3.2.24 Teachers' Standards (DfE, 2021);

3.2.25 Generative artificial intelligence (AI) in education (August, 2025);

3.2.26 Working together to improve school attendance (August, 2026);

3.2.27 Teacher misconduct: the prohibition of teachers. Advice on factors relating to decisions leading to the prohibition of teachers from the teaching profession (Teaching Regulation

Agency, February 2022); and

3.2.28 Portsmouth Safeguarding Children Partnership referral / threshold procedures and guidance.

3.3 The following School policies and procedures are relevant to this policy:

3.3.1 The PGS Code of Professional Conduct for Staff;

3.3.2 The PGS Low Level Concerns Policy;

3.3.3 The PGS ICT Acceptable Use Policy (employees) (AUP);

3.3.4 The PGS Whistleblowing Policy;

3.3.5 The PGS Recruitment, Selection and Disclosure Policy and Procedure;

3.3.6 The PGS Online Safety Policy;

3.3.7 The PGS Attendance & Registration Policy

3.3.8 The PGS Behaviour and Relationships Policy;

3.3.9 The PGS Exclusion Policy;

3.3.10 The PGS Anti-Bullying Policy;

3.3.11 The PGS ICT Acceptable Use Policy (pupils) (Junior/Senior School) (AUP);

3.3.12 The PGS Missing Child Policy;

3.3.13 The PGS Additional Educational Needs and Disabilities Policy;

3.3.14 The PGS Disability Policy;

3.3.15 The PGS First Aid Policy;

3.3.16 Health and Safety at PGS;

3.3.17 The PGS Staff Social Media & Digital Images Policy;

3.3.18 The PGS Equal Opportunities and Dignity at Work Policy for Staff;

3.3.19 The PGS Storage & Retention of Records & Documents Policy;

3.3.20 The PGS Data Protection Policy and Privacy Notices;

3.3.21 The PGS Parent Photography and Sharing Images Policy;

3.3.22 The PGS Trips Policy;

3.3.23 The PGS EYFS Camera, Mobile Phone and Recording Devices Policy;

3.3.24 The PGS Mobile Devices Policy for pupils;

3.3.25 The PGS Common Room Handbook (virtual);

3.3.26 The PGS Restrictive Interventions Policy (including Use of Reasonable Force)

4 Publication and availability

4.1 This policy is published on the School's website.

4.2 This policy is available in hard copy on request.

4.3 A copy of the policy is available for inspection from the School Office during the School day.

4.4 This policy can be made available in large print or other accessible format (e.g. alternative language) if required.

4.5 This policy and all policies referred to in it are also available to staff on the School's intranet.

5 Definitions

5.1 Where the following words or phrases are used in this policy:

5.1.1 References to 'pupil' or 'pupils' are references to a learner or learners aged 2 to 19 who receive their education at the School; where reference is made or intended to be made to a 'child' or 'children' who receive their education at the School, this will include those aged 2 to 19.

5.1.2 References to the LADO(s) are references to the Designated Officer(s) of the local authority;

5.1.3 References to **working days** mean Monday to Friday, when the School is open during term time. The dates of terms are published on the School's website. If referrals to an external agency are required outside term time, references to **working days** are to the days on which the relevant external agency is working.

5.1.4 **Portsmouth Safeguarding Children Partnership** is the external body with lead responsibility for the safeguarding and protection of children.

5.1.5 **Safeguarding** is promoting well-being and welfare by safeguarding and promoting the welfare of children (as defined below) and protecting the rights of adults to live in safety, free from abuse, neglect and exploitation.

5.1.6 **Safeguarding and promoting the welfare of children** is defined in KCSIE as:

(1) providing help and support to meet the needs of children as soon as problems emerge;

(2) protecting children from maltreatment, whether that is within or outside the home, including online;

(3) preventing impairment of children's mental and physical health or development;

(4) ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

(5) taking action to enable all children to have the best outcomes.

5.1.7 DSL means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.

5.1.8 Reference to **staff** includes all those who work for or on behalf of the School, regardless of their employment status, including contractors, volunteers and Governors, unless otherwise indicated.

6 Responsibility statement and allocation of tasks

6.1 The Governing Body has overall responsibility for all matters which are the subject of this policy and has specific responsibilities as described in Part 2 of KCSIE.

6.2 The Governing Body has nominated one of its senior board level members to take leadership responsibility for the School's safeguarding arrangements. Contact details are set out in the

School contacts list at the front of this policy.

6.3 To ensure the efficient discharge of its responsibilities under this policy, the Governing Body has allocated the tasks according to the table in Appendix 11.

6.4 Designated Safeguarding Lead

6.4.1 The Governing Body has appointed a senior member of staff of the School's leadership team to the role of the DSL. The DSL has the necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety) throughout the School.

6.4.2 The DSL has the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The DSL takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. This includes children in need of a social worker, helping to promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that all children are experiencing with teachers and school and college leadership staff. This includes ensuring that staff know who these children are, understand their academic attainment, and maintain a culture of high aspirations for this cohort. The name and contact details of the DSL are set out in the School contacts list at the front of this policy. The main responsibilities of the DSL are set out in Appendix 5.

6.4.3 If the DSL is unavailable, the activities of the DSL will be carried out by a Deputy DSL. The Deputy DSLs' details are also set out in the School contacts list at the front of this policy.

7 Safeguarding principles

7.1 The School will take reasonable steps to ensure that its pupils and others who come into contact with the School do not, as a result, come to harm or are exposed to abuse.

7.2 Abuse is a form of maltreatment. Somebody may abuse, neglect or exploit a person by inflicting harm, or by failing to act to prevent harm. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

7.3 Any safeguarding concern raised by any person will be taken seriously and action taken in accordance with the relevant School policies and procedures.

7.4 Specific duties in relation to children

7.4.1 Safeguarding and promoting the welfare of children is everyone's responsibility.

7.4.2 Every pupil should feel safe and protected from any form of abuse, neglect and exploitation. The indicators of abuse including neglect and examples of specific safeguarding issues are set out in Appendix 1.

7.4.3 The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.

7.4.4 The School will:

(a) follow the local inter-agency procedures of the Portsmouth Safeguarding Children Partnership;

(b) be alert to signs of abuse and exploitation both in the School and from outside and take steps to protect individuals from any form of abuse, whether from an adult or another child;

(c) deal appropriately with every suspicion or complaint of abuse or exploitation and support children who have been abused (or allege that they have been abused) in accordance with his / her agreed child protection plan;

(d) design and operate procedures which, so far as possible, ensure that staff and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;

(e) prepare staff to identify children who may benefit from Family Help (further detail in paragraph 12 below);

(f) be alert to the needs of pupils with physical or mental health conditions, special educational needs or disabilities, where additional barriers can exist when detecting abuse, neglect, exploitation and modern slavery;

(g) encourage a culture of listening to pupils and taking account of their wishes and feelings in any measure put in place by the School to protect them;

(h) operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

(i) assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

(j) include opportunities within the pastoral curriculum for children to develop the skills they need to recognise, and stay safe from abuse, neglect, exploitation and modern slavery;

(f) educate and prepare pupils for life in modern Britain ensuring a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict;

(g) identify pupils who may be vulnerable to radicalisation, and know what to do when they are identified;

(h) notify the local authority when private fostering is identified (private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.) The school will then notify the local authority to allow them to check the arrangement is suitable and safe for the child; and

(i) consider and develop procedures to deal with any other safeguarding issues which may be specific to groups of pupils or individual pupils in the School or in the local area. These might include, for example, one-to-one lessons and coaching, work experience placements and homestay arrangements, details of

which can be found in the PGS Code of Professional Conduct for Staff, The PGS Common Room Handbook or other relevant policies.

7.4.5 Contextual safeguarding

(1) Safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside the School.

(2) All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life (including the risk of intra-familial harm, as well as those outside the home) that may be a threat to their safety and / or welfare.

(3) Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse / allegations of abuse and/or neglect or exploitation.

7.5 Staff may follow the School's whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details). Staff may also report to the Charity Commission if the School, as a charity, fails to deal with concerns appropriately.

8 General reporting obligations of staff in relation to safeguarding

8.1 Staff members should maintain an attitude of "it could happen here" where safeguarding is concerned. All staff are required to read all of Part One of KCSIE and to sign to say that they have read and understood the guidance. In addition, all school leaders and all those staff who work directly with children are required to sign to say that they have read and understood Annex B. When concerned about the welfare of a pupil, staff members should always act in the best interests of the pupil.

8.2 All staff have a duty to:

8.2.1 report any concerns they may have about the safety and / or wellbeing of pupils;

8.2.2 report any concerns they may have about the safety and / or wellbeing of other persons associated with the School;

8.2.3 report any safeguarding concerns about staff or anyone else associated with the School;

8.2.4 follow up on any such reports to ensure that appropriate action is or has been taken.

8.3 The procedures for doing so are set out below in paragraph 10. If staff are unsure about the process, they should not hesitate to speak to the DSL, senior leadership team or directly to children's social care or police in their absence for guidance.

9 A safe working environment for staff

In respect of staff, the school is wholly committed to the provision of a safe working environment for all staff and one that supports their wellbeing. In addition to 2.5.1 (a), the principles in relation to the

School's commitment to the protection of staff are set out in The PGS Code of Staff Professional Conduct, The PGS Low Level Concerns Policy, The PGS Equal Opportunities and Dignity at Work Policy and Health & Safety Policies.

10 What to do if staff have a concern about a pupil

10.1 If staff have **any concern** about a pupil's welfare, they should report their concern to the DSL (or a DDSL in the DSL's absence) **immediately**.

10.1.1 The contact details of the DSL and DDSLs are set out in the contacts list at the front of this policy.

10.1.2 See Appendix 3 for guidance about what to do when receiving a disclosure and recording a concern.

10.2 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.

10.3 Teachers must report known cases of female genital mutilation (FGM) to the police. See Appendix 1 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

10.4 If the concern involves an allegation against staff, this must be reported in accordance with the procedures set out in Appendix 4.

10.5 **What if the DSL is unavailable?**

10.5.1 The DSL or a DDSL should always be available to discuss safeguarding concerns and may be contacted in relation to any safeguarding concerns out of School hours.

10.5.2 If in exceptional circumstances the DSL and DDSLs are unavailable, which may occur outside term time or school hours, staff must not delay taking action. Staff should speak to their line manager or a member of the Senior Leadership Team and / or advice should be taken from children's social care. The contact details are set out at the front of this policy.

10.5.3 Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and/or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See paragraph 13 below for details on making a referral.

10.5.4 Any action should be shared with the DSL or DDSL, or a member of the senior leadership team, as soon as is practically possible.

10.6 **Action by the DSL**

10.6.1 On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the Portsmouth Safeguarding Children Partnership procedures and referral threshold document. Such action may include:

(1) managing any support for the pupil internally via the School's own pastoral support processes (see paragraph 11 below), seeking advice from children's social care where required;

(2) a community-based early help assessment or a Family Help assessment (see paragraph 12 below); or

(3) a referral for statutory services (see paragraph 13 below).

10.6.2 The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

10.6.3 Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to Adults Social Care rather than, or in addition to, children's social care.

10.6.4 If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

11 Managing support for pupils internally

11.1 The School has a framework for the identification, assessment, management and review of risk to pupil welfare so that appropriate action can be taken to reduce the risks identified. See paragraph 22.

11.2 Support for pupils includes a pastoral team of teaching staff as well as a Health and Wellbeing Centre, staffed by nurses, health care assistants and school counsellors.

11.3 Staff should always reassure victims of abuse, neglect and/or exploitation that they are being taken seriously and will be supported and kept safe. Children and young people should never be made to feel ashamed or that they are creating a problem by reporting abuse, neglect, exploitation, sexual violence or sexual harassment.

12 Family Help

12.1 Family Help means providing support as soon as a problem emerges at any point in a child's life, from before birth, through the foundation years and during the teenage years. The School understands that providing Family Help is an early intervention for promoting the welfare of children and is more effective than reacting later to escalated more significant concerns.

12.2 Under the Families First reforms, there are two levels of Family Help, reflecting different levels of need. This is one of the key changes from the previous Early Help system.

12.2.1 Universal services and community-based early help (lower level of need)

This is for children and families with emerging or additional needs that do not require statutory social care intervention. This level of early help is provided through “universal services” – such as education, health and other community-based services.

Support may include:

(a) Parenting advice.
(b) School attendance support.
(c) Emotional wellbeing support.
(d) Help with housing or financial difficulties.
(e) Signposting to community services.
(f) Short-term coordinated support (Family Support Plan – see below) from a

Lead Practitioner.

(g) Typically, referrals come from schools, health professionals, early years settings, or families themselves. Consent from parents/carers is generally sought unless doing so would place a child at increased risk.

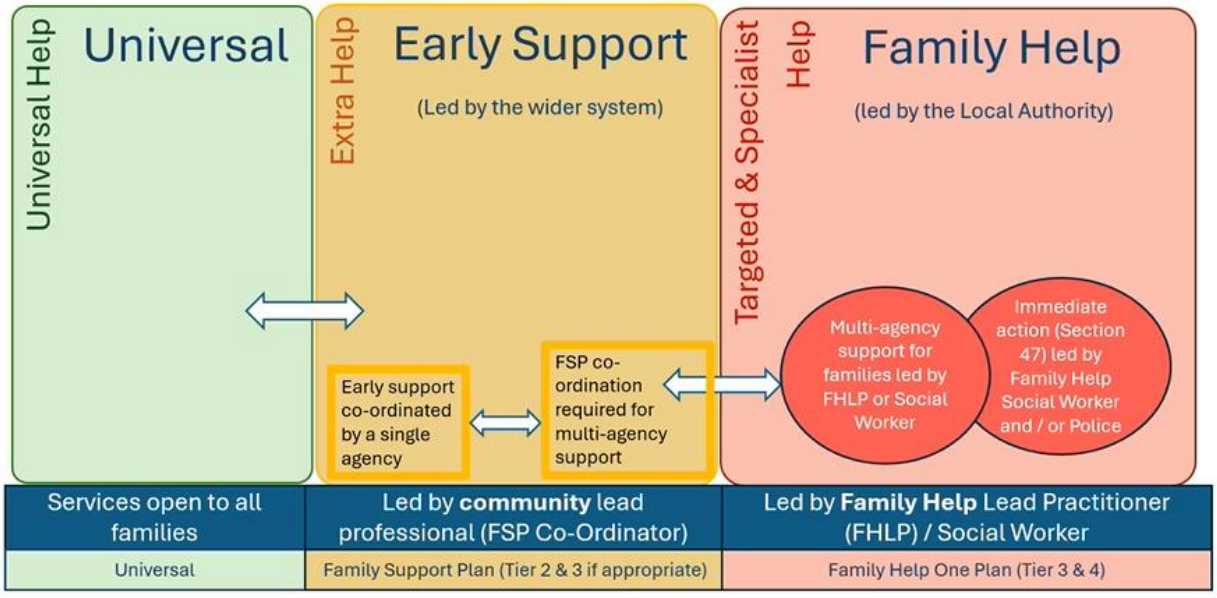
12.2.2. Family Help (targeted/intensive, integrates Section 17, Child in Need)

This is for families with more complex or multiple needs, where there are safeguarding concerns or a higher risk of problems escalating, but where the threshold for child protection (Section 47) may not yet be met. This is targeted early help and Section 17 support in one co-ordinated plan. This model avoids families being transferred between separate Early Help and Children's Social Care teams.

Support is:

(a) Intensive and longer-term.
(b) Delivered by a multi-disciplinary team.
(c) Coordinated through one whole-family assessment and one Family Help plan (FHP).
(d) Closely linked with children's social care.
(e) Able to increase or reduce in intensity as the family's needs change.
(f) Making use of family group decision making, such as family group conferences.
(g) Managing transitions between non-statutory and statutory (delivered under Section 17 of the Children Act 1989) Family Help, maintaining consistent practitioner relationships, and building on the Family Help Plan.

Family Help: Levels of Support



12.3 The model aims to achieve seamless transitions for families as their level of need changes. As a School we have support from our Link Co-ordinator at Portsmouth Children's Safeguarding Partnership (PSCP) when acting as the community lead coordinating a Family Support Plan (FSP).

12.3.1 A Family Support Plan (FSP) is a holistic assessment for educational professionals to complete with families where there is an emerging concern. It is a document utilised to

identify early needs and to initiate support. The template document can be found on the PSCP website here: Family Support Plan. This will always be completed by the DSL or DDSL, however, other members of staff may be asked to contribute.

12.4 The School's safeguarding training includes guidance about the Family Help process and prepares all staff to identify children who may benefit from Family Help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Any child may benefit from Family Help but all staff should be particularly alert to the potential need for Family Help for a child who:

12.4.1 is disabled or has certain health conditions and specific additional needs;

12.4.2 has special educational needs (whether or not they have a statutory education, health and care plan);

12.4.3 has a mental health need;

12.4.4 is a young carer;

12.4.5 is pregnant and/or is a parent themselves;

12.4.6 has exhibited early signs of abusive, violent and/or harmful behaviours;

12.4.7 is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

12.4.8 is frequently missing / goes missing from education, home or care;

12.4.9 has been repeatedly removed from the classroom, experienced a suspension, is on a part-timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;

12.4.10 is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation;

12.4.11 is at risk of being radicalised into terrorism;

12.4.12 has a parent or carer in custody, or is affected by parental offending;

12.4.13 is in a family circumstance presenting challenges for the child, such as drug and alcohol abuse, adult mental health problems and domestic abuse;

12.4.14 is misusing alcohol and/or other drugs themselves;

12.4.15 is at risk of so-called 'honour' or faith-based abuse such as Female Genital Mutilation or Forced Marriage; and,

12.4.16 is a privately fostered child (see paragraph 7.4.4 (h) above for definition).

12.5 A member of staff who considers that a pupil may benefit from Family Help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Portsmouth Safeguarding Children Partnership referral threshold document and will liaise with the Portsmouth Multi-Agency Safeguarding Hub (MASH) and support other staff in liaising with other agencies and setting up an inter-agency assessment as appropriate. In the event that a pupil lives outside Portsmouth, the relevant MASH should be consulted (details can be found in key External Contacts above and / or in Appendix 6 below).

12.6 If Family Help is appropriate, staff may be required to support other agencies and

professionals in a Family Help assessment and will be supported by the DSL and carrying out this role. In some cases, staff may be required to take a lead role.

12.7 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation appears to be getting worse or does not appear to be improving.

13 Making a referral

13.1 **Where a child is suffering, or is likely to suffer from harm, a referral to Children's Social Care (and if appropriate the police) should be made immediately**. The contact details for children's social care are set out at the front of this policy.

13.2 **Statutory assessments**

13.2.1 Children's social care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

13.2.2 **Children in need**: A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.

13.2.3 **Children suffering or likely to suffer significant harm**: Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

13.3 Staff required to make a direct referral may find helpful the flowchart set out on page 27 of KCSIE and Flow chart 1 on page 79 of WTSC for information about the likely actions and decisions required. See Appendix 6 for the local guidance (PSCP) regarding Parental/Guardian consent to sharing information.

13.4 Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

13.4.1 personal details of the child including the child's developmental needs;

13.4.2 detailed information about the concern;

13.4.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent;

13.4.4 the feelings and wishes of the child, though these will not be determinative.

13.5 If the referral is made by telephone, this should be followed up in writing.

13.6 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

13.7 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

13.8 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves. Further detail of local procedures can be found in Appendix 6 below.

14 Allegations against pupils - child on child abuse (including harassment and violence)

14.1 All staff should recognise that children are capable of abusing their peers (including online). The School has a zero tolerance approach to such abuse - staff should understand that downplaying certain behaviours as “just banter” or “boys being boys” can lead to a culture of unacceptable behaviour, an unsafe environment for children and young people and a culture that could be seen to normalise abuse.

14.2 All staff should know that pupils are taught about fostering healthy and respectful relationships with others through the PSHE/Pastoral Curriculum programme, and what they are taught.

14.3 All staff should understand the importance of challenging inappropriate behaviour between children and young people both inside and outside of school, and the mechanisms through which this can be done.

14.4 Allegations against pupils should be reported in accordance with the procedures set out in this policy (see paragraph 8 above). This includes lower level concerns and allegations. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

14.5 All alleged victims will be assured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Pupils will be reminded that the law on child on child abuse is there to protect them rather than criminalise them.

14.6 A pupil against whom an allegation of abuse has been made may be suspended from the School as a neutral measure during the investigation and the School's policy on behaviour, discipline and sanctions will apply. The School will take advice from children's social care and / or the police, as appropriate, on when and how to inform the pupil and his / her parents about the allegations and how investigation of such allegations will be conducted. The School will carry out risk assessments and take all appropriate action to ensure the safety and welfare and continued education of all pupils including the pupil or pupils accused of abuse.

14.7 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of relevant agencies, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's education guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her as a neutral measure during the investigation.

14.8 All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved. This may include such measures as pastoral or medical support or counselling, management or amendment of a pupil’s school routine or commitments and / or support from external services as necessary.

14.9 The timeframe of reporting child on child abuse is critical - see guidance in *When to call the Police – guidance for schools and colleges (NSPCC – Child-centred Policing).*

15 What to do if staff have a concern about someone else's welfare

15.1 Staff who have concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.

15.2 In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.

16 Allegations against staff

16.1 Detailed guidance is provided to staff to ensure that all staff (including supply teachers, trainee teachers, volunteers and contractors) are clear as to the expectations of the School in relation to conduct and contact with pupils, parents, colleagues and any other person who comes into contact with the School. This guidance is contained in The PGS Staff Code of Professional Conduct and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils. The School has procedures for dealing with allegations against staff:

16.1.1 The procedures in this policy apply to staff (including supply teachers, trainee teachers, volunteers and contractors) who pose a risk of harm to children and aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, false, unsubstantiated or unfounded allegations. These procedures are set out in Appendix 4 and follow Part 4 of KCSIE.

16.1.2 The School will follow these appropriate procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.

16.2 The School will also record low level concerns and allegations that do not meet the harms test. All concerns about adults (including allegations that do not meet the harms threshold (see KCSIE Part Four - Section One)) should be shared with the DSL and The Head.

16.2.1 Sharing low level concerns will encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

16.2.2 A low level concern means that the behaviour towards a child does not meet the harms test. 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 school or college may have acted in a way that:

(1) is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;

(2) does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

(3) Examples of such behaviour could include, but are not limited to: being over friendly with children; having favourites; having their personal mobile phone out in view of the pupils on the School site (repeatedly); 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.

16.3 Supply teachers, trainee teachers and all contracted staff

16.3.1 Where concerns or allegations relate to individuals not directly employed by the school, such as supply teachers, trainee teachers or contracted staff provided by an agency or third-party organisation, the school will work in partnership with the relevant employer, agency or training provider to ensure that safeguarding concerns are managed appropriately.

16.3.2 The school retains responsibility for establishing the facts, managing the safeguarding process and liaising with the Local Authority Designated Officer (LADO), while the employer, agency or training provider will normally lead on any employment, disciplinary or suitability considerations. The school will not cease to use a supply teacher or other contracted individual solely because of safeguarding concerns without first establishing the facts and consulting the LADO.

16.3.3 Agencies and training providers will be expected to co-operate fully with enquiries undertaken by the school, LADO, police and/or children's social care, and to share relevant information, including any previous concerns or allegations. Where appropriate, discussions will take place regarding suspension or alternative deployment during investigations.

16.3.4 The school will ensure that agencies and training providers are informed of its allegations management procedures, involved in relevant meetings, and kept updated throughout the process. Individuals who are the subject of an allegation will be advised to seek support from their trade union representative or a colleague where appropriate.

17 Informing parents

17.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the LADO(s), children's social care, the police and / or the pupil before discussing details with parents.

17.2 In all cases, the DSL will be guided by the Portsmouth Safeguarding Children Partnership referral threshold document.

17.3 See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

18 Additional reporting

In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

18.1 Health and Safety Executive

The School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the School's Health and Safety Policy.

18.2 Charity Commission

18.2.1 The School is a registered charity and is required to report all serious incidents to the Charity Commission in accordance with the guidance *'How to report a serious incident in your charity (Charity Commission 2014, updated June 2019)*'.

18.2.2 Serious incidents that will be reported to the Charity Commission include suspicions, allegations or incidents of abuse involving pupils or other beneficiaries. This is likely to involve the following:

(a) pupils or other beneficiaries have been, or are alleged to have been, abused or mistreated while under the care of the School or by someone connected with the School, for example a Governor, staff member or volunteer;

(b) there has been an incident involving the abuse or mistreatment (alleged or actual) of someone who has come into contact with the School through its work, which has resulted in or risks significant harm, and this is connected with the activities of the School';

(c) there has been a breach of the School's procedures or policies which has put pupils or others who come into contact with it at risk of significant harm, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children or otherwise disqualified from holding their position there.

18.2.3 The School will notify the Charity Commission of other agencies to which the incident has been reported in accordance with this policy.

18.2.4 The School will notify the actual or alleged incident to the Charity Commission promptly, as soon as is reasonably possible after it happens, or immediately after the school becomes aware of it. The School will not wait until someone is arrested, charged or convicted before doing this.

18.2.5 The School will always tell the Charity Commission what action it has taken or is planning to take at the time of reporting a serious incident, including the immediate management of the incident and any wider review or lessons learned exercise.

18.3 Insurers

18.3.1 The School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

18.3.2 Care should be taken to ensure this is done before renewal to ensure that the school complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

18.4 Disclosure and Barring Service (DBS)

A referral to the DBS will be made promptly if the criteria are met. See paragraph 19.3, Appendix 4 6.1, Appendix 5 1.1.6 for further details.

18.5 Teaching Regulation Agency (TRA)

Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed, or would have been dismissed if he / she had not resigned. See

Appendix 4, 6.3 for more details

19 Safer recruitment and supervision of staff

19.1 The School is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the School's separate Whole School Recruitment Policy.

19.2 The School maintains a single central register of appointments for all staff.

19.3. The School recognises that many roles within the organisation constitute regulated activity with children. Regulated activity includes work that is carried out frequently, intensively or overnight and involves teaching, training, instructing, caring for, supervising, providing advice or guidance to children, or driving a vehicle solely for the purpose of transporting children. It also includes certain work undertaken in specified establishments, including schools, where there is the opportunity for contact with children. The School will ensure that all individuals appointed to posts involving regulated activity are subject to the appropriate pre-employment checks, including an Enhanced Disclosure and Barring Service (DBS) check with a Children's Barred List check completed and deemed satisfactory before they begin work.

19.4 In accordance with Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), the School is committed to implementing rigorous safer recruitment procedures that deter, identify and reject unsuitable applicants, promote a vigilant safeguarding culture, and help ensure that children/pupils from the age of 2 to 19 years are educated and cared for in a safe environment. The School will assess each role individually to determine whether it meets the legal definition of regulated activity and will apply recruitment and vetting processes that are proportionate to the level of responsibility and contact with children.

19.5 Staff connected to the School's early years and later years' provisions are under an ongoing duty to inform the School if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the PGS Whole School Recruitment Policy for further information about this duty and to their contract of employment in respect of their ongoing duty to update the School.

19.6 The School's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the School's separate Guide for Visitors to The Portsmouth Grammar School and associated PGS External Visiting Speaker Policy.

20 Online Safety

20.1 The School is committed to ensuring that our pupils are safeguarded from potentially harmful and inappropriate online material. We have an effective whole-school approach which is detailed in The PGS Online Safety Policy. The School aims to protect and educate pupils and staff in their use of technology and has effective monitoring and filtering systems to identify, intervene in, and escalate any concerns where appropriate.

20.2 The Four Cs

The breadth of issues classified within online safety is considerable and ever evolving but can be categorised into four areas of risk of which we educate our pupils and parents:

20.2.1 Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

20.2.2 Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: 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.

20.2.3 Conduct: Online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying ; and

20.2.4 Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

20.3 Artificial Intelligence (AI)

The school recognises that artificial intelligence (AI) can support learning but must always be used safely, responsibly, and in line with safeguarding expectations. Staff will promote the safe, ethical, and age-appropriate use of AI while ensuring pupils understand the risks of inaccurate, harmful, or inappropriate content. AI must not be used in any way that compromises the academic integrity, safety, wellbeing, privacy, or dignity of pupils, staff, or the wider school community. Any safeguarding concerns arising from the use or misuse of AI will be managed in accordance with the school's safeguarding and child protection procedures. For further information, please read The PGS AI Policy and The PGS Online Safety Policy.

20.4 Monitoring and Filtering

20.4.1 The School meets the Department for Education's filtering and monitoring standards. The School carries out a bi-annual monitoring and filtering review led by the DSL. As part of this, the School uses 'test-filtering' to ensure we are compliant and the Department for Education's 'Plan technology for your school service' to self-assess against the filtering and monitoring standards. This includes checks that filtering is working appropriately on all inter-connected devices in all relevant locations. A record of all of these checks is kept and are reviewed by the Online Safety Committee bi-annually and shared with Governors termly.

20.4.2 The Department has also published Generative AI: product safety expectations (Jan, 2025) and Generative Artificial Intelligence (AI) in Education (August, 2025) which the School refers to ensure that we use generative artificial intelligence safely and it also explains how filtering and monitoring requirements apply to the use of generative AI in education.

20.4.3 The School takes the online safety of our pupils seriously both during the school day and out of hours. The School promotes to parents of pupils in Years 3 – 11 a digital safeguarding tool called Schoolsmobile which provides enterprise grade threat protection on their children's devices at all times when activated.

20.5 Cyber Security

20.5.1 The School takes appropriate action to meet the Cyber security standards for schools and colleges in order to improve our resilience against cyber-attacks.

20.5.2 Children with particular skills and/or interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead should consider referring them into the Cyber Choices programme. It aims to intervene where young people are at risk of committing or being drawn into, low-level cyberdependent offences and divert them to a more positive use of their skills and interests.

20.6 Use of mobile technology

20.6.1 The School's policy on the use of mobile technology complies with the latest statutory guidance on mobile phones in schools (updated June 2026). Throughout the school day pupils up to and including Year 11 do not have access to their mobile phones (or any other smart technology, e.g. smart glasses or watches, with cellular, messaging, notification or recording capabilities), including during lessons, the time between lessons, breaktimes and lunchtimes. The School has achieved this by adopting Yondr pouches. Sixth Formers have access to their mobile phones but they can only use them in designated Sixth Form areas and must not be seen anywhere else on the School site.

20.6.2 Where there is an identified educational, medical, accessibility or SEND-related purpose, the school will determine the circumstances in which a device may be used. This may include specifying when, where and for what purpose the device may be operated. Any such arrangement should be agreed with a member of the senior leadership team and, where appropriate, recorded as part of the pupil's individual support or reasonable-adjustment arrangements.

20.6.3 The School's approach further includes:

(1) The PGS ICT Acceptable Use Policy for pupils;

(2) The PGS Mobile Devices Policy for pupils; and

(3) The PGS EYFS Camera and Mobile Phone Policy.

These set out the expectations on pupils from Pre-School to Year 13.

20.6.4 all staff (including staff in the EYFS setting) should use mobile devices and cameras in accordance with the guidance set out in the following documents:

(1) The PGS Online Safety Policy;

(2) The PGS Parent Photography and Sharing Images Policy;

(3) The PGS ICT Acceptable Use Policy (employees);

(4) The PGS Mobile Devices Policy;

(5) EYFS Mobile Devices Policy; and

(6) The PGS Staff Social Media and Digital Images Policy.

20.6.5 Parents of all pupils (including parents of pupils in the EYFS setting) should use mobile devices, cameras or electronic devices with imaging and sharing capabilities in accordance with the guidance set out in The PGS Parent Photography and Sharing Images Policy and The PGS Mobile Devices Policy / EYFS Camera and Mobile Phone Policy. Unless stated otherwise, parents may bring mobile or imaging/ sharing devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

20.7 Online Safety Policy

The School's approach to online safety is set out in The PGS Online Safety Policy, including detailing how the school does all that it reasonably can to limit children's exposure to harm through applying effective filtering and monitoring to the School's IT Network.

21 Training

21.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

21.2 The level and frequency of training depends on role of the individual member of staff.

21.3 The School maintains written records of all staff training.

21.4 All training will be carried out in accordance with Portsmouth Safeguarding Children Partnership procedures where possible.

21.5 Induction

21.5.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant includes the provision of copies of):

(1) this policy;

(2) the role, identity and contact details of the DSL and his / her Deputies;

(3) The PGS Code of Professional Conduct for Staff (including a copy of the policy) and including The PGS Whistleblowing Policy, The PGS Social Media Policy and The ICT Acceptable Use Policy;

(4) the safeguarding response to children who go missing from education;

(5) the School's approach to online safety and The PGS Online Safety Policy;

(6) The PGS Behaviour & Relationships Policy;

(7) safeguarding and child protection training in accordance with Portsmouth Safeguarding Children Partnership procedures including guidance on managing a report of child on child harmful sexual behaviour;

(8) Part 1 of KCSIE (plus Annex A as appropriate); and

(9) appropriate Prevent duty training.

21.6 Safeguarding training

21.6.1 All staff including the Head will receive a copy of this policy and Part 1 of KCSIE, and will be required to confirm that they have read and understand these.

21.6.2 The Head and all staff members will undertake appropriate safeguarding training which will be updated every three years and following consultation with the Portsmouth Safeguarding Children Partnership. In addition, all staff members will receive safeguarding and child protection updates via email, online training via the Portsmouth Safeguarding Children Partnership and staff meetings on a regular basis and at least annually.

21.6.3 In the EYFS Safeguarding training will be updated every 2 years, in line with the statutory requirements of the EYFS Framework updated for September 2026 (wording shown in Appendix 8 to this Safeguarding Policy). EYFS staff will receive regular updates in line with the school's safeguarding training programme and engage in termly supervision meetings with the Coordinator of Pre-School and Infants, to ensure they remain confident and competent in safeguarding practice, with a clear understanding of their responsibilities to keep children safe at all times.

21.6.4 Staff development training will also include training on online safety, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, searching pupils for prohibited and banned items and Prevent duty training assessed as appropriate for them by the School.

21.6.5 Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, harmful sexual behaviour, child sexual exploitation, female genital mutilation, cyberbullying, mental health and searching pupils for prohibited and banned items to ensure that staff have the skills, knowledge and understanding to keep children in care safe.

21.6.6 All Governors receive safeguarding training on induction, and then at regular intervals, to help them to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures are effective. The Lead Safeguarding Governor, Deputy Safeguarding Governor and the Chair of Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. This training involves a blended approach delivered both internally and externally in a variety of formats, reflecting developing themes/issues/concerns as well as more established safeguarding practice. A record of this training is retained for reference.

21.6.7 The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including staff meetings, safeguarding cue cards and professional development reviews. This includes information on how staff can report concerns occurring out of hours/out of term time and should, where appropriate, refer to the School's risk assessment for out of hours/out of term safeguarding arrangements.

21.7 Designated Safeguarding Lead (DSL)

21.7.1 The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. Deputy DSLs are trained to the same level as the DSL. This training includes Prevent awareness training and inter-agency working training and will be updated at least every two years.

21.7.2 In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Appendix 5.

21.7.3 Prevent duty training will be consistent with Home Office Workshop to Raise Awareness of Prevent training if available.

21.7.4 The Designated Safeguarding Lead (DSL) holds overall responsibility for safeguarding and child protection, working in close partnership with local Safeguarding Partners. All staff must remain vigilant and responsive to any concerns about a child's welfare, whether arising at home or in other environments. In accordance with the EYFS reforms, the Pre-School Leader serves as a Deputy Designated Safeguarding Lead (DDSL) with specific responsibility for safeguarding within the EYFS, ensuring that age-appropriate safeguarding practices are embedded and consistently applied across the setting. Contact details are clearly stated above.

21.8 Teaching pupils about safeguarding

21.8.1 The School teaches pupils about safeguarding through the curriculum and PSHE. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.

21.8.2 Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through PSHE education appropriate to their age and stage of development.

21.8.3 Pupils are taught that the law on child on child abuse is there to protect them rather than criminalise them.

21.8.4 Pupils are taught about their human rights and the law in relation to The Human Rights Act (1998). Pupils are taught that being subjected to harassment, violence and / or abuse, may breach children's rights.

21.8.5 Pupils are taught about their rights and the law in relation to the Equality Act 2010.

21.8.6 Pupils are taught that the School is a LGBTQ+ friendly environment, and LGBTQ+ pupils are provided with a safe space for them to speak out or share their concerns with staff.

21.8.7 Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. The PGS Parental Complaints Policy and Procedure sets out in writing what pupils or parents should do if they have a concern or complaint.

21.8.8 The safe use of technology is a focus in all areas of the curriculum and key ICT safety

messages are reinforced as part of assemblies and tutorial / pastoral activities. The School has appropriate filters and monitoring systems in place (see the PGS Online Safety Policy) and is mindful that this should not lead to unnecessary restrictions on learning.

20.8.9 The School will use its communications with parents and carers to reinforce the importance of children being kept safe online.

22 Risk assessment

22.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

22.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

22.3 The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

22.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

22.5 The school will seek further expertise and support when necessary but has identified the following as of greater significance to the school community at this time: online-safety, children missing education, preventing radicalisation and children in care..

23 Monitoring and review

23.1 The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Governing Body as necessary and seeking contributions from staff. The DSL will update the Senior Leadership Team regularly on the operation of the School's safeguarding arrangements.

23.2 Any safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Governing Body. Where an incident involves a member of staff, including supply staff, the LADO(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regard to safeguarding arrangements at any time will be remedied without delay.

23.3 The Governing Body will undertake an annual review of this policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working.

23.4 The DSL will work with the Lead Safeguarding Governor, preparing a written report commissioned by the Governing Body. The written report should address how the School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Governing Body should also consider independent corroboration,

such as:

23.4.1 inspection of records or feedback from external agencies including the LADO(s);

23.4.2 reports of ISI inspections;

23.4.3 the outcome of any relevant parental complaints; and

23.4.4 press reports.

23.5 The Governing Body will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the Governing Body will be made.

24 Record keeping

24.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing either in hard copy or on CPOMS.

24.2 The records created in accordance with this policy may contain personal data. The School has a number of privacy notices which explain how the School will use personal data for the benefit of pupils and parents. The privacy notices are published on the School's website. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy. This includes the PGS Data Protection Policy, the PGS Staff Data Protection Policy and information security documentation.

24.3 All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

24.4 Insofar as pupil records are concerned:

The DSL will keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. The record will include:

(1) a clear and comprehensive summary of the concern;

(2) the recording will be factual and where opinion is expressed this will be referenced as such (including a clear record of the wishes of the child);

(3) details of how the concern was followed up and resolved;

(4) a note of any action taken, decisions reached and the outcome. Each entry will be dated and indicate who made the respective decision;

(5) a review date for the plan / concern.

All records will be regularly reviewed (at least termly) so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

25 Information sharing and multi-agency working

25.1 The School recognises that effective information sharing is fundamental to safeguarding and promoting the welfare of children. Sharing information at the earliest opportunity helps professionals identify concerns, assess risk and take appropriate action to protect children from harm, abuse, neglect and exploitation.

25.2 The Governing Body will ensure that clear systems are in place for sharing information within the School and with external agencies, including Children's Social Care, safeguarding partners, the police, health professionals and other relevant organisations. Staff should be proactive in sharing concerns as early as possible, whether difficulties are emerging or a child is already known to external services.

25.3 When sharing information, staff should ensure it is relevant, necessary and proportionate to the safeguarding concern. Consideration should be given to what the receiving professional or agency needs to know, and information should be shared in a clear and appropriately contextualised manner. Professional judgement should be used to determine what information needs to be shared, taking care not to omit details that may be important to understanding or managing risk.

25.4 All staff should understand that data protection legislation does not prevent the sharing of information where this is necessary to safeguard and promote the welfare of children. Information may be shared without consent where there is a lawful basis to do so, including where seeking consent is not possible, is not appropriate, or could increase risk to a child. The safety and welfare of the child will always be the School's priority.

25.5 Any decision to share or withhold information should be recorded appropriately. Safeguarding records will be stored securely and access will be restricted to those who need the information in order to fulfil their safeguarding responsibilities.

25.6 When a pupil leaves the School, the Designated Safeguarding Lead (DSL), or a Deputy DSL, will ensure that any child protection file is transferred securely and separately from the main pupil record to the receiving school or college as soon as possible. This should take place within five days of an in-year transfer, or within the first five days of the start of a new term, to ensure appropriate safeguarding support is in place when the child joins the new setting. Confirmation of receipt will be obtained. Where appropriate, the DSL will also contact the receiving DSL directly to discuss safeguarding concerns, vulnerabilities or risks, including where information may be required to support risk assessment, safety planning or ongoing support.

25.7 The School follows the principles and expectations set out in Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2026), relevant Information Commissioner's Office (ICO) guidance and local safeguarding partnership procedures. The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people.

25.8 The School understands that the GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately as per ICO guidance (https://ico.org.uk/for-organisations/) or https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-sharing/a-10-step-guide-to-sharing-information-to-safeguard-children/.The School will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.

25.9 Fears about sharing information must never be allowed to prevent staff from taking action to safeguard a child. Where there is concern that a child may be suffering, or is at risk of suffering, harm, information will be shared promptly and appropriately with relevant professionals.

25.10 The School will be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.

25.11 Where allegations have been made against staff, including supply staff, trainee teachers,

volunteers and contractors, the School will consult with the LADO(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

25.12 While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example, because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

26 Regulations and safeguarding requirements relating to school premises

26.1 Toilets: The School is committed to ensuring that all toilet facilities are safe, suitable, and provided in a manner that protects the welfare, privacy, dignity, and comfort of all pupils. In accordance with the School Premises (England) Regulations 2012, the Education (Independent School Standards) Regulations 2014, and statutory safeguarding guidance, the School will:

26.1.1 Provide separate toilet facilities for boys and girls aged 8 years and over, except where individual toilets are located in self-contained rooms that can be locked from the inside and are intended for use by one pupil at a time.

26.1.2 Ensure that pupils do not use toilet facilities designated for the opposite biological sex.

26.1.3 Consider appropriate alternative arrangements for a gender-questioning pupil who does not wish to use the toilet facilities designated for their biological sex. Staff should refer to the section of this policy specifically on children questioning their gender for guidance and the 'Supporting Children Who Are Questioning Their Gender' protocol which can be found in Appendix 9.

26.1.4 Undertake appropriate safeguarding risk assessments where mixed-sex toilet facilities are provided in addition to single-sex facilities. Any mixed-sex facilities will, wherever possible, consist of individual lockable rooms opening directly onto a public area such as a corridor.

26.2 Changing rooms and showers: The School recognises that changing rooms and shower facilities require particular safeguards to protect pupils' privacy, dignity, and welfare. In accordance with the School Premises (England) Regulations 2012, the Education (Independent School Standards) Regulations 2014, and statutory safeguarding guidance, the School will:

26.2.1 Provide suitable changing accommodation and showers for pupils aged 11 years and over, having regard to their age, number, sex, and any specific requirements.

26.2.2 Ensure that pupils aged 11 years or over at the start of the school year are not required or permitted to undress in front of pupils of the opposite biological sex.

26.2.3 Ensure that pupils do not access changing rooms or shower facilities designated for the opposite biological sex.

26.2.4 Consider appropriate alternative arrangements for a gender-questioning pupil who does not wish to use the changing or shower facilities designated for their biological sex. Staff should refer to the section of this policy specifically on children questioning their gender for guidance and the 'Supporting Children Who Are Questioning Their Gender' protocol which can be found in Appendix 9.

26.3 The Designated Safeguarding Lead (DSL) will be consulted in relation to any arrangements that may have safeguarding implications, and the DSL will ensure that relevant risk assessments are completed and reviewed as necessary.

27 Use of school or college premises for non-school/college activities

27.1 Where services or activities are provided separately by another body the school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) and will, through a risk assessment conducted ahead of each booking, and the terms of the booking agreement, ensure that appropriate arrangements are in place to liaise with the school or college on safeguarding and child protection matters where appropriate, and to ensure that the school's premises are not being used to promote terrorism / extremism

27.2 The School will ensure that safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

27.3 When services or activities are provided by the governing body, under the direct supervision or management of the school, the School's arrangements for child protection will apply.

27.4 When the School receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children, the School will follow its safeguarding policies and procedures, including informing the LADO.

28 Sport

28.1 The School will ensure that participation in sport and physical education is safe, fair and compliant with the Equality Act 2010 and statutory safeguarding guidance.

28.2 In accordance with the Equality Act 2010, the school may provide single-sex sporting activities where this is necessary to ensure fairness in competitive sport or to protect the safety of pupils. Where participation is organised on a single-sex basis for safety reasons, no exceptions will be made.

28.3 Where there are no safety concerns and a pupil requests changes to how they participate in sport or physical education, the school will consider the request on an individual basis in line with statutory guidance on requests for support with social transition. Decisions will take account of the child's best interests, the safety and wellbeing of all pupils, and the need to maintain safe and fair sporting environments.

Appendix 1: Indicators of abuse

1. Types of abuse

Part 1 of KCSIE defines the following indicators of abuse, neglect, exploitation and modern slavery; however, staff should be aware that safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another. Staff are trained to exercise their professional curiosity and knowing what to look out for is vital for the early identification of abuse.

1.1. **Abuse**: a form of maltreatment of a child. Somebody may abuse, neglect or exploit 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

1.2. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. It may be caused by online activity, for example, cyberflashing a child who has epilepsy or encouraging a child to self-harm.

1.3. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling or name-calling as well as not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing, hearing, or experiencing the effects of the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

1.4. **Sexual abuse:** involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education. If a child is under 13, the law says they cannot give valid consent to sexual activity. Sexual activity involving a child under 16 is an offence, regardless of whether they agreed to that activity. DSLs must also consider age difference, power, coercion, exploitation and the

circumstances of the relationship. Incidents of sexual abuse outside of school are treated by the School in the same way as those occurring within school.

1.5. **Neglect:** the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

1.6. **Prejudice-based**: All staff should recognise that children may experience prejudice- based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences may affect a child's wellbeing, mental health and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate. The School promotes an inclusive anti-discriminatory culture where racism and other forms of discriminatory behaviour are not tolerated.

1.7. **Domestic Abuse**: Domestic abuse can encompass a wide range of behaviours and may be a single incident or a course of conduct which can encompass a wide range of abusive behaviours, including a) physical or sexual abuse; b) violent of threatening behaviour; c) controlling or coercive behaviour; d) economic abuse; and e) psychological, emotional or other abuse such as 'honour or faith-based abuse', forced marriage, female genital mutilation or reproduction coercion, harassment and stalking. While the statutory definition (The Domestic Abuse Act 2021) states that the person carrying out the behaviour and the person whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected", 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 (known as teenage relationship abuse). All of these can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The police will notify a child's education setting if they have reasonable grounds to believe a child may be a victim of domestic abuse (Operation Encompass (November, 2025).

1.8. **Exploitation**: When someone uses a child for personal gain, sexual gratification, financial gain, or labour. Exploitation can include instances where a child or young person may be groomed to become involved in sexual or criminal activity, or may constitute modern slavery (Modern Slavery statutory guidance). This is a significant distinction where previously they may have been viewed as an offender instead of a victim. Exploitation can be committed or facilitated by an organised network or gang and victims may identify as part of this group. Child exploitation can cause physical and emotional harm, and can negatively impact a child's education, mental and physical health, and moral and social development.

1.9. Child to parent or care giver abuse: Often referenced in local safeguarding partnerships as Child and Adolescent to Parent Violence and Abuse (CAPVA) or Adolescent to Parent Violence and Abuse (APVA)—is defined as any harmful act by a child intended to gain power and control over a parent or carer. It includes physical violence, emotional or psychological intimidation, and financial or economic damage.

2. Signs of abuse

Possible signs of abuse include, but are not limited to:

2.1. the pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference;

2.2. there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;

2.3. the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;

2.4. the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

2.5. the pupil's development is delayed; the pupil loses or gains weight or there is deterioration in the pupil's general well-being;

2.6. the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;

2.7. the pupil is reluctant to go home, or has been openly rejected by his / her parents or carers; and

2.8. inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

The Portsmouth Safeguarding Children Partnership can provide advice on the signs of abuse and the DfE advice What to do if you're worried a child is being abused (March 2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

3. Specific safeguarding issues

3.1. Statutory guidance acknowledges the following as specific safeguarding issues:

3.1.1. children and the court system. There are two separate age appropriate guides for schools to support children in the court system: 5 - 11 year olds and 12 - 17 year olds;

3.1.2. children missing education (see paragraph 3.3 below);

3.1.3. children with family members in prison;

3.1.4. child sexual exploitation (see paragraph 3.4 below);

3.1.5. child criminal exploitation: county lines (see also Criminal Exploitation of children and vulnerable adults: County Lines guidance (Home Office, September 2018);

3.1.6. domestic abuse (including where they see, hear or experience its effects);

3.1.7. homelessness;

3.1.8. so-called 'honour or faith-based' violence (see paragraph 4.2 below);

3.1.9. preventing radicalisation (see Appendix 2 below);

3.1.10. child on child abuse (including harassment and violence) (see paragraph 4.3 below);

3.1.11. prejudice-based harm including racism, faith-based prejudice and other forms of discrimination;

3.1.12. mental health concerns in young people (see paragraph 4.10 below).

3.2. Staff should be particularly aware of the safeguarding issues set out below.

3.3. Children missing education

3.3.1. Children absent from education are those whose absence is unexplainable and/or persistent from education whereas Children missing education are those whose family whereabouts has become unknown and/or the child is not on a school roll. Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. School attendance registers are taken twice daily and are carefully monitored to identify any trends. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Action should be taken in accordance with this policy / missing child policy if any absence of a pupil from the School gives rise to a concern about their welfare.

3.3.2. Where reasonably possible the School will hold at least two emergency contacts for each pupil.

3.3.3. Parents are expected to work with the school in informing the school at the earliest opportunity and within 24 hours in writing. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to

help prevent the risks of a child going missing in the future. The School follows the statutory guidance set out in '*Working together to improve school attendance*' (2024) which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

3.3.4. The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the Children Missing Education statutory guidance for local authorities September 2024 and requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

3.3.5. This will assist the local authority to:

(a) fulfil its duty to identify children of compulsory school age who are missing from education; and

(b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.

3.3.6. The School shall inform the local authority of any pupil who:

(a) fails to attend School regularly; or

(b) has been absent without the School's permission for a continuous period of ten school days or more, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

3.4. Child sexual exploitation (CSE)

3.4.1. Child sexual exploitation is a form of sexual abuse. It can be a one-off occurrence or might happen over time. It occurs where an individual, group or organised network 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:

3.4.2. in exchange for something the victim needs or wants; and / or

3.4.3. for the financial advantage or increased status of the perpetrator or facilitator.

3.4.4. The victim may have been sexually exploited even if the sexual activity appears consensual (including for 16 and 17 year olds). Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

3.4.5. Some of the following signs may be indicators of child sexual abuse, including children who:

(a) appear with unexplained gifts or new possessions;

(b) associate with other young people involved in exploitation;

(c) have older boyfriends or girlfriends;

(d) suffer from sexually transmitted infections or become pregnant;

(e) suffer from changes in emotional well-being;

(f) misuse drugs and alcohol;

(g) go missing for periods of time or regularly come home late; and

(h) regularly miss school or education or do not take part in education.

3.4.6. The following vulnerabilities are examples of the types of things children can experience which might make them more susceptible to child sexual exploitation:

(a) having a prior experience of exploitation, neglect, physical and/or sexual abuse;

(b) lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);

(c) recent bereavement or loss;

(d) social isolation or social difficulties;

(e) absence of a safe environment to explore sexuality;

(f) economic vulnerability;

(g) homelessness or insecure accommodation status;

(h) connections with other children and young people who are being sexually exploited;

(i) family members or other connections involved in adult sex work;

(j) having a physical or learning disability;

(k) being in care (particularly those in residential care and those with interrupted care histories); and

(l) sexual identity.

3.4.7. Not all children and young people with these vulnerabilities will experience child sexual exploitation. Child sexual exploitation can also occur without any of these vulnerabilities being present. Most sexual abuse is committed by individuals known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

3.4.8. Where children are thought to be at risk of CSE colleagues are advised to consult Multi-agency Practice Principles for responding to child exploitation and extra-familial harm (https://tce.researchinpractice.org.uk/ and https://www.portsmouthscp.org.uk/wp-content/uploads/2021/05/Child-Sexual-Exploitation.pdf for advice specifically relating to CSE.

3.5. Child criminal exploitation (CCE)

3.5.1. Child criminal exploitation is a form of abuse. It occurs where an individual, group or organised network takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into criminal 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.

3.5.2. The victim may have been criminally exploited even if the criminal activity appears consensual. The victim may identify as part of the group or organised network coercing them. Victims may be criminalised for actions taken under coercion. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology. The vulnerability of children involved in criminal exploitation is not always easily recognised by adults and professionals. Although indicators of exploitation may be different for boys and girls, some of the following signs may be indicators of child abuse, including children who:

(a) appear with unexplained gifts or new possessions;

(b) associate with other young people involved in exploitation;

(c) have older boyfriends or girlfriends;

(d) suffer from changes in emotional well-being;

(e) misuse drugs and alcohol;

(f) go missing for periods of time or regularly come home late; and

(g) regularly miss school or education or do not take part in education.

3.5.3. The following vulnerabilities are examples of the types of things children can experience which might make them more susceptible to child criminal exploitation:

(a) having a prior experience of neglect, physical and/or sexual abuse;

(b) lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);

(c) recent bereavement or loss;

(d) social isolation or social difficulties;

(e) absence of a safe environment to explore sexuality;

(f) economic vulnerability;

(g) homelessness or insecure accommodation status;

(h) connections with other children and young people who are being sexually exploited;

(i) family members or other connections involved in adult sex work;

(j) having a physical or learning disability;

(k) being in care (particularly those in residential care and those with interrupted care histories); and

(l) sexual identity.

3.5.4. Not all children and young people with these vulnerabilities will experience child criminal exploitation. Child criminal exploitation can also occur without any of these vulnerabilities being present.

3.5.5. Where children are thought to be at risk of CCE colleagues are advised to consult Multi-agency Practice Principles for responding to child exploitation and extra-familial harm (https://tce.researchinpractice.org.uk/).

4. Serious violence

4.1. Indicators

All staff should be aware of indicators, which may signal that children are at risk from, or involved in violent crime. These may include:

(a) Increased absence from school

(b) a change in friendships or relationships with older individuals or groups;

(c) a significant decline in performance;

(d) signs of self-harm or a significant change in wellbeing;

(e) signs of assault or unexplained injuries;

(f) unexplained gifts or new possessions;

(g) being male;

(h) having been suspended, spent time in Alternative Provision or permanently excluded from school;

(i) having experienced child maltreatment;

(j) having been involved in offending, such as theft or robbery;

(k) having used drugs or alcohol in early adolescence; and/or

(l) having previously been a victim or previously perpetrated violence.

4.1.1. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

4.1.2. The School must play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may be victims themselves). Early evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. The Youth Endowment Fund provides practical guidance on preventing violence. The Hampshire and Isle of Wight Violence Reduction Unit

(VRU) are also supportive and can be contacted via https://www.hampshire-pcc.gov.uk/vru-home.

4.2. Honour or faith-based abuse (including FGM and forced marriage)

4.2.1. Honour or faith-based abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage and practices such as breast ironing.

4.2.2. All forms of so called honour or faith-based violence are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.

4.2.3. If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

4.2.4. **Female genital mutilation (FGM):** FGM is a form of honour or faith-based violence. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

4.2.5. There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 40-43 of the Multi-agency statutory guidance on FGM (HM Government, April 2016, updated July 2020) (pages 61-63 focus on the role of schools).

4.2.6. All staff must be aware of the requirement for teachers 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. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

4.2.7. If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory reporting of female genital mutilation - procedural information (December 2016) for further details about the duty.

4.2.8. Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by the School's medical staff.

4.2.9. **Forced marriage** is also a form of Honour or Faith-Based Violence. Forcing a person into marriage is a crime in England and Wales. In addition, since February 2023 it has also been a crime to carry out any conduct whose

purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

4.2.10. Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 39-40 of the The right to choose: government guidance on forced marriage (HM Government, April 2023).

4.2.11. Staff should speak to the DSL if they have any concerns. Pages 79-84 of The right to choose: government guidance on forced marriage (HM Government, April 2023) focuses on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fcdo.gov.uk for advice and information.

4.3. Prejudiced-based harm

4.3.1. The school recognises that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences can have a significant impact on a child's welfare, wellbeing, mental health, sense of safety and willingness to seek help.

4.3.2. Prejudice-based harm may occur in person or online and may include discriminatory bullying, racist or faith-targeted abuse, harassment, derogatory or discriminatory language, and other behaviour motivated by prejudice towards an individual or group.

4.3.3. The school maintains a zero-tolerance approach to racism, prejudice and discriminatory behaviour. All incidents will be taken seriously and addressed promptly and proportionately. Staff should be alert to both the immediate and longer-term impact of prejudice-based harm and should consider the individual circumstances, vulnerability and needs of the child affected.

4.3.4. Where prejudice-based behaviour constitutes, or may be contributing to, a safeguarding concern, it will be considered within the school's safeguarding procedures and referred to the Designated Safeguarding Lead (DSL) without delay. This includes concerns arising from child-on-child abuse.

4.3.5. The school will ensure that:

(a) staff are able to recognise signs and impacts of prejudice-based harm;

(b) pupils are encouraged and supported to report concerns and feel confident that they will be listened to;

(c) incidents are recorded, investigated and monitored appropriately;

(d) appropriate support is provided to children who experience prejudice-based harm;

(e) action is taken in relation to children responsible for harmful behaviour, with consideration of their needs and circumstances;

(f) patterns, repeat incidents and wider contextual factors are considered when assessing risk; and

(g) preventative education promotes respect, equality, inclusion and an understanding that racism, faith-based prejudice and other discriminatory behaviour are unacceptable.

4.3.6. Prejudice-based harm will be addressed through a coordinated approach involving safeguarding, behaviour, anti-bullying and equality and inclusion procedures, as appropriate. The school will work with parents/carers and external agencies where necessary to safeguard children and reduce the risk of further harm.

4.4. Child on child abuse (including harassment and violence)

4.4.1. The conduct of pupils towards each other will, in most instances, be covered by the School's behaviour and discipline policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised.

4.4.2. The School has a zero-tolerance approach to abuse, and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children. The School recognises that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys’ perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

4.4.3. Safeguarding issues can manifest themselves via child on child abuse. This includes, but is not limited to:

(a) bullying (including cyberbullying, prejudice-based and discriminatory bullying);

(b) abuse in intimate personal relationships between children (also known as teenage relationship abuse);

(c) physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element e.g. cyberflashing (Online Safety Act, 2023) or which facilitates, threatens and/or encourages physical abuse);

(d) harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.

(e) encouraging or assisting serious self-harm. “Serious self-harm” means self-harm amounting to the definition of grievous bodily harm as defined in the Offences Against the Person Act 1861. This can include harm by omission as well as a positive act, such as encouraging someone not to eat or drink or take their prescription medication as required online (Online Safety Act, 2023) or in person;

(f) sending false information intended to cause non-trivial harm (Online Safety Act, 2023);

(g) sexual violence, assault by penetration (for example, rape or penetration with an object) and sexual assault; this includes such behaviours taking place outside of school and may include an online element which facilitates, threatens and/or encourages sexual violence. This includes intimate image abuse and the sharing of "deepfakes" (content that has been manipulated to falsely depicts an individual using AI technology) both of which are now criminal offences under the Online Safety Act (2023);

(h) sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse – this includes such behaviours taking place outside of school;

(i) 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;

(j) consensual and non-consensual sharing of nudes and semi-nudes, including those generated using AI, and or videos.

(k) 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;

(l) upskirting (see 4.9 below) is a criminal offence, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;

(m) 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);

(n) discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents.

4.5. Harmful Sexual Behaviour (HSB)

4.5.1. HSB is an umbrella term that includes sexual violence and sexual harassment. The School recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage.

4.5.2. Harmful Sexual Behaviour (HSB) can occur between two or more children of any age and sex. It can also occur through a group of children towards a single child or towards another group of children.

4.5.3. HSB can occur online or face-to-face (both physically and verbally) in and outside of School. It is never acceptable.

4.5.4. The School recognises that HSB exists on a continuum and the escalatory nature of misogyny into sexual harassment or sexual violence. The School prioritises early identification to support their approach to minimising the risk. The School also utilises resources such as NSPCC Sexual Development and Behaviour in Children as a guide for appropriate age and stage development in this area. Challenging behaviours, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras

and lifting up skirts are safeguarding concerns. Dismissing or tolerating such behaviours risks normalising them, and taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

4.5.5. The School takes steps to minimise the risk of all types of child on child abuse. Misogyny, sexual violence and sexual harassment are addressed age appropriately through our RSE provision. Pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and kept under review. Appropriate action is taken to protect pupils identified as being at risk including the particular vulnerabilities of those with a special educational need or disability, or those with protected characteristics. The School has robust anti-bullying procedures in place (see the School's Anti-bullying Policy).

4.5.6. Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. The School will respond to allegations seriously and all victims will be offered appropriate support, including asking the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). The School will respect and support this choice.

4.5.7. The School recognises that children may not find it easy to tell staff about their abuse verbally and that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, threatened. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

4.5.8. The School recognises that the initial response to a report from a child is incredibly important and may encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. No victim should ever be made to feel ashamed. The school will always aim to ensure a calm, considered and appropriate response to any reports, contributing to multi-agency working in line with statutory guidance.

4.1.1 The School also recognises the potential need for alleged perpetrators to be supported and safeguarded, and for the alleged perpetrator to receive an education, in addition to the implementation of any disciplinary sanctions.

4.6. Sexual Harassment

4.6.1. References to **sexual harassment** mean "unwanted conduct of a sexual nature" that can occur online and offline and inside and outside of School. In the

context of child on child sexual harassment, it is likely to: violate a child's dignity; and / or make them feel intimidated, degraded or humiliated; and / or create a hostile, offensive or sexualised environment.

4.6.2. Examples of sexual harassment can include (not exhaustive list): sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names, sexual jokes or taunting, physical behaviour such as brushing against someone or interfering with someone's clothes, displaying pictures/ photos/ drawings of a sexual nature and upskirting.

4.6.3. The school will assess when such behaviour crosses into sexual violence by talking to the victim and considering their lived experience. The School recognises the importance of challenging sexual harassment as, left unchallenged, it can foster a culture that normalises inappropriate behaviour and increases the risk of leading to sexual violence.

4.7. Sexual Violence

4.7.1. References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, assault by penetration (for example, rape or penetration with an object) and sexual assault. Section 187 of the Online Safety Act (2023) includes an offence of sending a photograph or film of a person's genitals to another person and Section 188 includes four offences of sharing or threatening to share an intimate photograph or film. All of these offences are found in section 66B of the Sexual Offences Act 2003.

4.8. Online Sexual Harassment and/or Online Sexual Violence

4.8.1. This includes consensual and non-consensual making or sharing of nudes or semi-nudes. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice on this. In addition, sharing of unwanted explicit content, sexualised online bullying, unwanted sexual comments and messages, including on social media, sexual exploitation, coercion and threats, and coercing others into sharing images of themselves or performing acts they are not comfortable with online.

4.8.2. Further guidance relating to sexual violence and sexual harassment between children in schools can be found in KCSIE (DfE, 2026).

4.9. Making or sharing of nudes or semi-nudes

4.9.1. This means the making (including AI self-generated) or sharing of nudes or semi-nudes by sending or posting the images or videos through mobile picture

messages, via social media platforms or webcams over the internet or Bluetooth media.

4.9.2. The School treats all incidences of making or sharing of nudes or semi-nudes as safeguarding matters to be actioned in accordance with this policy.

4.9.3. Members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of making or sharing of nudes or semi-nudes, members of staff should describe the content of the images as reported to them.

4.9.4. If an incident comes to the attention of a member of staff they should:

(a) NOT delete the imagery or ask the young person to delete it;

(b) NOT ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent);

(c) NOT share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and / or carers;

(d) NOT say or do anything to blame or shame any young people involved;

(e) DO explain to the young person(s) that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

4.9.5. The DSL may in exceptional circumstances view images with the prior approval of the Head and only where:

(a) it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;

(b) it is necessary to report the image to a website or agency to have it taken down; or

(c) a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.

4.9.6. Where viewing an image is unavoidable:

(a) viewing should take place on School premises wherever possible;

(b) the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);

(c) a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;

(d) full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;

(e) any member of staff who views a nude or semi-nude should be given appropriate support.

4.9.7. If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

4.9.8. If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

4.9.9. If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

4.9.10. If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided).Child Exploitation and Online Protection (CEOP), the Internet Watch Foundation or ChildLine should be contacted if the website does not provide this option.

4.9.11. Where a pupil receives unwanted images, the School should advise the pupil and his / her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address. The School will also advise parents to activate their Schoolsmobile account which offers enterprise grade threat protection and age-appropriate policies to protect their children.

4.9.12. Information can be found in the UK Council for Child Internet Safety's 'Sharing nudes and semi-nudes: Advice for education settings working with children and young people; Responding to incidents and safeguarding children and young people (2020, updated March 2024).

4.9.13. The College of Policing has also produced a briefing note Police action in response to making and sharing nudes or semi-nudes (November 2016) which provides information on how police forces treat instances of this nature by young persons.

4.10. Upskirting

4.10.1. Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing parts of their body or clothing, not otherwise visible, to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

4.10.2. Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take

a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

4.10.3. The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.

4.10.4. All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to the making or sharing of nudes or semi-nudes.

4.11. Mental health

4.11.1. The school recognises the clear link between mental health and safeguarding. The DSL is the school's Mental Health Lead and is trained in UK-accredited Mental Health First Aid. It is the Mental Health Lead's responsibility to embed a whole school approach to mental health and wellbeing. They are supported to do this by the Portsmouth Mental Health Support Team (MHST) who also give timely advice to support individual children to get the right support. Their contact details can be found at the beginning of this policy.

4.11.2. Mental health problems can, in some cases, develop into safeguarding concerns. This could involve self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. These can have a lasting impact on a child's mental health, behaviour and education.

4.11.3. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff are well placed, however, to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which the school is well placed to recognise, such as:

(a) significant changes in behaviour
(b) ongoing difficulty sleeping
(c) withdrawing from social situations
(d) not wanting to do things they usually like, and
(e) physical signs of self harm or neglecting themselves

4.11.4. Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff can identify children who may be struggling with their mental health and contemplating suicide and offer support. Staff have the PGS Mental Health Referral Pathway for guidance (Appendix 10) on how to support pupils who may be struggling with their mental health

4.11.5. Staff receive training on how to identify behaviour which may indicate that a child is experiencing mental health problems or is at risk of developing one.

Pastoral staff have access to a range of resources to support pupils' mental health.

4.11.6. If staff have a concern about a child's mental health that is also a safeguarding concern, they should speak to the Designated Safeguarding Lead and follow this procedures set out in this policy. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it is not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option. This is all included within the Mental Health Referral Pathway 2026 document above.

5. Special educational needs and disabilities

5.1. The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's policy on special educational needs and learning difficulties and disability policy. In addition, NSPCC - Safeguarding children with SEND and NSPCC - Safeguarding child protection/deaf and disabled children and young people are both useful links for guidance.

5.2. Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:

5.2.1. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;

5.2.2. these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;

5.2.3. the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;

5.2.4. communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse;

5.2.5. the need for intimate care or that these children are isolated from others,

5.2.6. that these children are more likely to be dependent on adults for care, and

5.2.7. that these children may have issues over 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.

6. Children in care (including kinship care) and previously children in care

6.1. The Governing Body ensures that staff have the skills, knowledge and understanding to keep children in care safe and the information they need in relation to a child's looked after legal status, for example:

6.1.1. whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;

6.1.2. contact arrangements with birth parents or those with parental responsibility;

6.1.3. information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her;

6.1.4. contact details for the allocated Virtual School Head from the local authority to promote a child in care's (including kinship care) educational achievement.

6.2. The DSL maintains these details, including contact details of the child's social worker. See Appendix 5 for the DSL's role in relation to pupils who are children in care.

7. Children in Alternative Provision

7.1. Where a pupil is placed with an alternative provision provider, the School continues to be responsible for the safeguarding of that pupil.

4.1.2 The School must obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment. This includes written confirmation that the alternative provider will inform the School of any arrangements that may put the child at risk (i.e. staff changes), so that the School can ensure itself that appropriate safeguarding checks have been carried out on new staff.

4.1.3 The School should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.

4.1.4 The School reviews the placement, at least half termly, to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed. The DfE has published voluntary national standards for non-school alternative provision, alongside guidance (see below) to support schools in quality assuring providers.

4.1.5 The DfE has issued two pieces of statutory guidance to which the School adheres to when pupils are placed in alternative provision:

(a) Alternative Provision (updated February 2025)

(b) Education for children with health needs who cannot attend school (updated December 2023).

8. Virtual School Heads

8.1. The School recognises the important role of the Virtual School Head (VSH) in promoting the educational achievement, attendance, progress and wellbeing of children who are looked after, previously looked after, children with a social worker and children in kinship care arrangements.

8.2. The Designated Safeguarding Lead (DSL), together with other relevant staff, will work collaboratively with local authorities, social workers, carers, parents and, where appropriate, the Virtual School Head, to promote the educational outcomes and welfare of these pupils.

8.3. For looked after children, the School will contribute to and support the child's Personal Education Plan (PEP), attending meetings and sharing relevant information as required. Whilst the statutory duties relating to designated teachers and the management of Pupil Premium Plus funding apply principally to maintained schools and academies, the School will ensure that an appropriately trained member of staff takes a lead role in supporting looked after and previously looked after children and in liaising with relevant professionals, including the Virtual School Head where appropriate.

8.4. The School recognises that Virtual School Heads have responsibilities to:

8.4.1. promote the educational achievement of children who are looked after by a local authority;

8.4.2. provide advice and information regarding previously looked after children, including those who have left care through adoption, special guardianship orders, child arrangements orders, or who were adopted from state care outside England or Wales;

8.4.3. provide strategic oversight of the educational attendance, attainment and progress of children with a social worker; and promote the educational achievement of children in kinship care arrangements.

8.5. Where appropriate, the School will seek advice from and engage with the relevant Virtual School Head in relation to safeguarding, attendance, educational progress, mental health, wellbeing and any barriers to learning affecting eligible pupils.

9. Care leavers

9.1. The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

10. Young carers

10.1. The School is alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour, wellbeing, vulnerability and access to support. Early identification is essential to ensure young carers receive the support that they need and at the right time. This may include additional support from external partners, or local authority and health services.

11. Children who are questioning their gender

11.1. Pupils are taught that the School is an inclusive and respectful environment where all members of the community, including LGBTQ+ pupils, are treated with dignity and respect. LGBTQ+ pupils

are supported, encouraged to speak openly if they wish, and have access to trusted staff who will listen to and respond to any concerns in a safe and supportive manner.

11.2. The School recognises that children and young people may experience questions or uncertainty about their gender. Any child expressing such feelings will be treated with dignity, respect and compassion. The school's primary responsibility is to safeguard and promote the welfare of every child, ensuring that decisions are made in their best interests while meeting statutory safeguarding, equality and human rights duties. Staff have access to the School's Protocol on 'Supporting Children who are questioning their gender' (Appendix 9).

11.3. Staff should not initiate any action regarding social transition; this guidance applies where a child or their parents has requested that the school make changes or put support in place in order to facilitate the child presenting as the opposite biological sex ("social transition").

11.4. Members of staff should not adopt any changes in relation to social transition unless a decision has been made by the DSL and a child's parents or carers have been involved.

11.5. In making decisions about supporting social transition, the School must comply with our distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by their evaluation of the welfare and best interests of the child and other children.

11.6. Safeguarding Principles

11.6.1. Where a child requests support relating to their gender, the school will take a careful, individualised and evidence-informed approach. Decisions will not be made in isolation or based solely on the wishes of the child or any individual member of staff.

11.6.2. The first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes.

11.6.3. In the vast majority of cases, the school will work collaboratively with parents or carers to determine what is in the child's best interests. In doing so, the DSL may consider:

(a) the child's wishes, feelings, age and level of understanding;

(b) any relevant clinical advice or evidence;

(c) advice from appropriate professionals, including the Designated Safeguarding Lead (DSL), Head of Learning Support and, where appropriate, external agencies;

(d) whether there are any wider safeguarding concerns, mental health needs, special educational needs, disabilities or neurodiversity that may be relevant; and

(e) the potential impact of any proposed changes on the child and the wider school community.

11.6.4. The Designated Safeguarding Lead will be involved in all cases where a child requests support for social transition or where there are safeguarding concerns relating to a child questioning their gender.

11.7. Working with Parents and Carers

11.7.1. Parents and carers play a central role in supporting their child. The school will normally involve parents or carers at the earliest appropriate opportunity when a child requests support relating to their gender.

11.7.2. The school recognises that, in exceptional circumstances, involving parents immediately may increase the risk of harm to the child. In such cases, the DSL will undertake a safeguarding assessment before any decision is made regarding parental involvement and will act in accordance with safeguarding procedures.

11.7.3. Where appropriate, the school will support conversations between children and their parents or carers and may offer for an appropriate member of staff to facilitate or attend discussions if this would assist the family.

11.7.4. If a child simply shares their feelings with a trusted member of staff but does not request changes to their treatment at school, confidentiality will generally be respected unless there are safeguarding concerns requiring further action.

11.8. Requests for Social Transition

11.8.1. Social transition may include changes such as the use of a different name, pronouns, clothing or other aspects of social presentation. Requests for social transition will be considered carefully on a case-by-case basis.

11.8.2. The school acknowledges that current national guidance advises that social transition may constitute a significant intervention with potential longer-term implications (CASS Review, 2024). Decisions will therefore be made cautiously and with appropriate professional advice wherever available.

11.8.3. Particular caution will be exercised in relation to primary-aged children. The school would expect full social transition in primary education to be agreed only in exceptional circumstances following careful consideration of all relevant factors and clinical advice. The Cass Review emphasised that clinical involvement in the decision-making process should include advising on the risks and benefits of social transition as a planned intervention, referencing best available evidence. This is not a role that can be undertaken by staff without appropriate clinical training.

11.8.4. The school recognises that older children may have increasing capacity to participate in decisions affecting them. Nevertheless, decisions will continue to be made by the DSL with regard to safeguarding responsibilities, parental involvement where appropriate, and the importance of maintaining flexibility while avoiding unnecessary pressure on a child to follow a particular pathway.

11.9. Equality, Privacy and School Arrangements

11.9.1. The school will fulfil its responsibilities under the Equality Act 2010, the Human Rights Act 1998 and all relevant safeguarding legislation.

11.9.2. In accordance with current statutory guidance and the school's legal responsibilities under the Equality Act 2010 and safeguarding legislation, any support provided for a pupil's social transition will not include access to toilets, changing facilities or residential accommodation designated for the opposite biological sex. Similarly, where the school provides single-sex sporting activities or physical education, on the grounds of safety or fairness, participation will be based on a pupil's biological sex.

11.9.3. Where a school policy may place a child questioning their gender at a disadvantage, the school will consider whether:

(a) the policy pursues a legitimate aim;

(b) the approach adopted is proportionate;

(c) reasonable alternatives are available; and

(d) the impact on the child and others has been fully considered.

11.9.4. Each decision will be made individually, balancing the child's welfare, the rights of others, safeguarding responsibilities and legal obligations.

11.10. Bullying, Respect and Inclusion

The school will not tolerate bullying, harassment or discrimination directed towards any pupil, including those questioning their gender. Allegations of bullying will be managed in accordance with the school's Behaviour and Anti-Bullying Policies.

11.11. Recording Information

11.11.1. The school will record a child's biological sex accurately within official records as required by law. Relevant staff will have access to information necessary to

fulfil safeguarding responsibilities while respecting confidentiality and data protection requirements.

11.11.2. When considering any request for support with social transition, the School will ensure that all information relating to the request, any actions plus the rationale for decision-making is documented on CPOMS.

11.12. Children Living in Stealth

11.12.1. Where a child has socially transitioned to the extent that their biological sex is unknown to some members of the school community ("living in stealth"), the school recognises that additional safeguarding considerations may arise.

11.12.2. In such circumstances, the DSL will be involved to ensure that safeguarding risks are appropriately assessed and managed, while maintaining confidentiality on a need-to-know basis.

11.13. Review of Decisions

11.13.1. The child's circumstances and needs may change over time. Decisions relating to support for a child questioning their gender will therefore be reviewed periodically, or sooner if:

(a) new safeguarding information becomes available;

(b) the child's wishes change;

(c) parents or carers provide new information;

(d) professional advice changes; or

(e) the practical impact of previous decisions requires reconsideration.

Parents or carers will normally be involved in review discussions unless safeguarding considerations indicate otherwise. The DSL will oversee any review process.

11.13.2. Supporting Children Who Detransition

(a) Where a child wishes to reverse or amend previous arrangements relating to social transition, the school will respond sensitively and without judgement.

(b) The school will work with the child, parents or carers (where appropriate) and relevant professionals to ensure that suitable support is provided, maintaining flexibility and continuing to promote the child's welfare and best interests.

12. Safeguarding children with medical conditions

12.1. The School recognises that pupils with medical conditions, including allergies, may be more vulnerable and require additional support to ensure their safety, wellbeing and full access to

education. The School will comply with its statutory duties under Supporting Pupils at School with Medical Conditions and relevant guidance on Allergy Safety in Schools.

12.2. Staff should be aware that an incident involving the management of a pupil's medical condition, including an allergy-related incident, does not in itself constitute a safeguarding concern or require a referral to Children's Social Care or local safeguarding partners.

12.3. However, safeguarding concerns may arise where an incident indicates that a pupil may be at risk of neglect, abuse, exploitation, or harm because of their medical condition. Examples may include, but are not limited to:

12.3.1. A parent or carer failing to provide the School with essential information about a pupil's medical condition.

12.3.2. A pupil being repeatedly sent to school without prescribed medication, medical equipment, or emergency treatment required to manage their condition safely.

12.3.3. Evidence that a parent, carer, or another adult is persistently failing to meet the pupil's medical needs, thereby placing them at risk of significant harm.

12.4. Circumstances where a child's medical condition may increase their vulnerability to abuse, neglect, exploitation, or coercion, whether within or outside the family.

12.5. Where concerns arise, staff should follow the School's safeguarding procedures and report the matter immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL. The DSL will consider the level of risk and determine whether the concern should be managed as a medical needs matter, addressed through early help, or referred to Children's Social Care and/or other relevant agencies.

12.6. The School recognises that safeguarding and medical needs can overlap. Effective information sharing between safeguarding, pastoral, SEND and medical staff is essential to ensure that pupils with medical conditions receive appropriate support and protection.

Appendix 2 Radicalisation and the Prevent Duty

1 The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

2 The School aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

3 The School is required to take a risk-based approach to the Prevent duty, under paragraph 14 of the Home Office's statutory guidance. The School has a Prevent Duty Risk Assessment which demonstrates our awareness of the specific risks of extremism and radicalisation in our school and our local area. It is reviewed and updated annually.

4 The School has adopted the government's definitions for the purposes of compliance with the Prevent duty (updated March 2024):

4.1 Extremism: "the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

(a) negate or destroy the fundamental rights and freedoms of others; or

(b) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or

(c) intentionally create a permissive environment for others to achieve the results in (a)" or (b)."

4.2 Radicalisation: the process of a person legitimising support for, or use of, terrorist violence. This includes online radicalisation. The internet can play two broad roles in radicalisation: exposure to extremist and terrorist content and socialisation within 'likeminded' networks.

4.3 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.

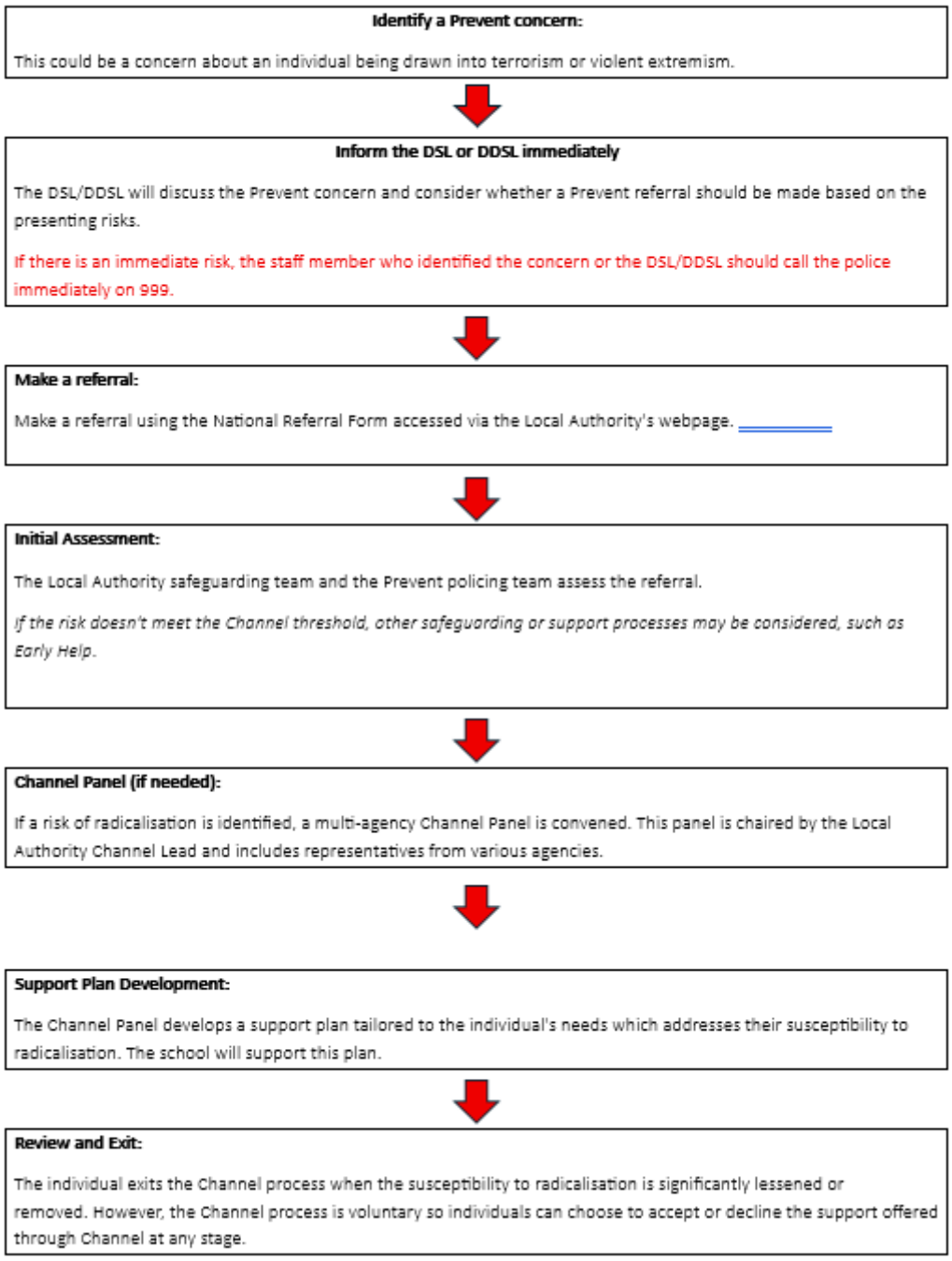
5 There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. As with other safeguarding concerns, staff should be alert to changes in children's behaviour (e.g. becoming withdrawn, school absence) which could indicate that they may be in need of help or protection. See also paragraph 2 of Appendix 1. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability.

6 Radicalisation can occur through many different methods (such as social media) and settings (such as the internet). Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

7 School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a referral to the Channel programme (via the appropriate Multi-Agency Safeguarding Hub), having consulted Channel duty guidance: protecting people susceptible to radicalisation (HM Government, December, 2023). Channel is a multi-agency panel of public sector agencies including Portsmouth City Council, Hampshire Constabulary, Health groups, Youth Offending Service, Mental Health Trust and the Probation Service. The aim of the panel is to protect and divert individuals away from radicalisation and to do so before they have been drawn into terrorism.

8 The School follows the PGS Prevent Referral Pathway July 2025, as shown on the next page:

Prevent Referral Pathway



8.1 The DfE and Home Office's briefing note The use of social media for online radicalisation (July 2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

8.2 In accordance with the Prevent duty, and as detailed in paragraph 19 above (Safer recruitment and supervision of staff), staff should complete an External Visiting Speaker Risk Assessment when inviting external speakers or trainers to the school.

Appendix 3 Concerns about a child - guidance for staff (see also paragraphs 8 and 10 above)

1. Receiving a disclosure

1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.

1.2 Recognise that a child may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful

1.3 Recognise that a child's disclosure should be listened to without judgment, regardless of how long it has taken them to come forward

1.4 Do not ask leading questions, i.e. a question which suggests its own answer.

1.5 Reassure the pupil but do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.

1.6 Keep a sufficient written record of the conversation (see below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record and not contaminated.

1.7 Pass on the record when reporting the concern in accordance with this policy.

2. Recording a concern

2.1 Staff must record all concerns in writing as soon as it is practically possible to do so.

2.2 Records should be neutral and factual. Where completed manually, all records should be signed and dated, with the name of the signatory clearly printed in writing. Records should include:

2.2.1 the pupil's details: name; date of birth; address and family details;

2.2.2 date and time of the event / concern / conversation (using the actual words spoken by the child as far as can be remembered / observations of behaviour and appearance without interpretation);

2.2.3 the action taken and by whom;

2.2.4 the name and position of the person making the record.

2.3 The record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

2.4 If the member of staff has access to the School's 'Child Protection Online Management System' (CPOMS) they should record their concern there, marking it for the attention of the DSL with the above information.

3 Receiving a report of harmful sexual behaviour

3.1 Additional guidance about how to manage a report of harmful sexual behaviour is provided in Part 5 KCSIE. This includes the following advice:

3.1.1 Only record the facts as the child presents them;

3.1.2 Where the report includes an online element, do not view of forward illegal images of a child. See paragraph 4.8 of Appendix 1 above and the UK Council for Child Internet Safety's advice note Sharing Nudes and semi-nudes (December 2020) for advice about what to do when viewing an image is unavoidable;

3.1.3 Manage reports with another member of staff present (preferably the DSL or DDSL), if possible;

3.1.4 Inform the DSL as soon as practically possible if the DSL is not involved in the initial report.

4 Use of reasonable force

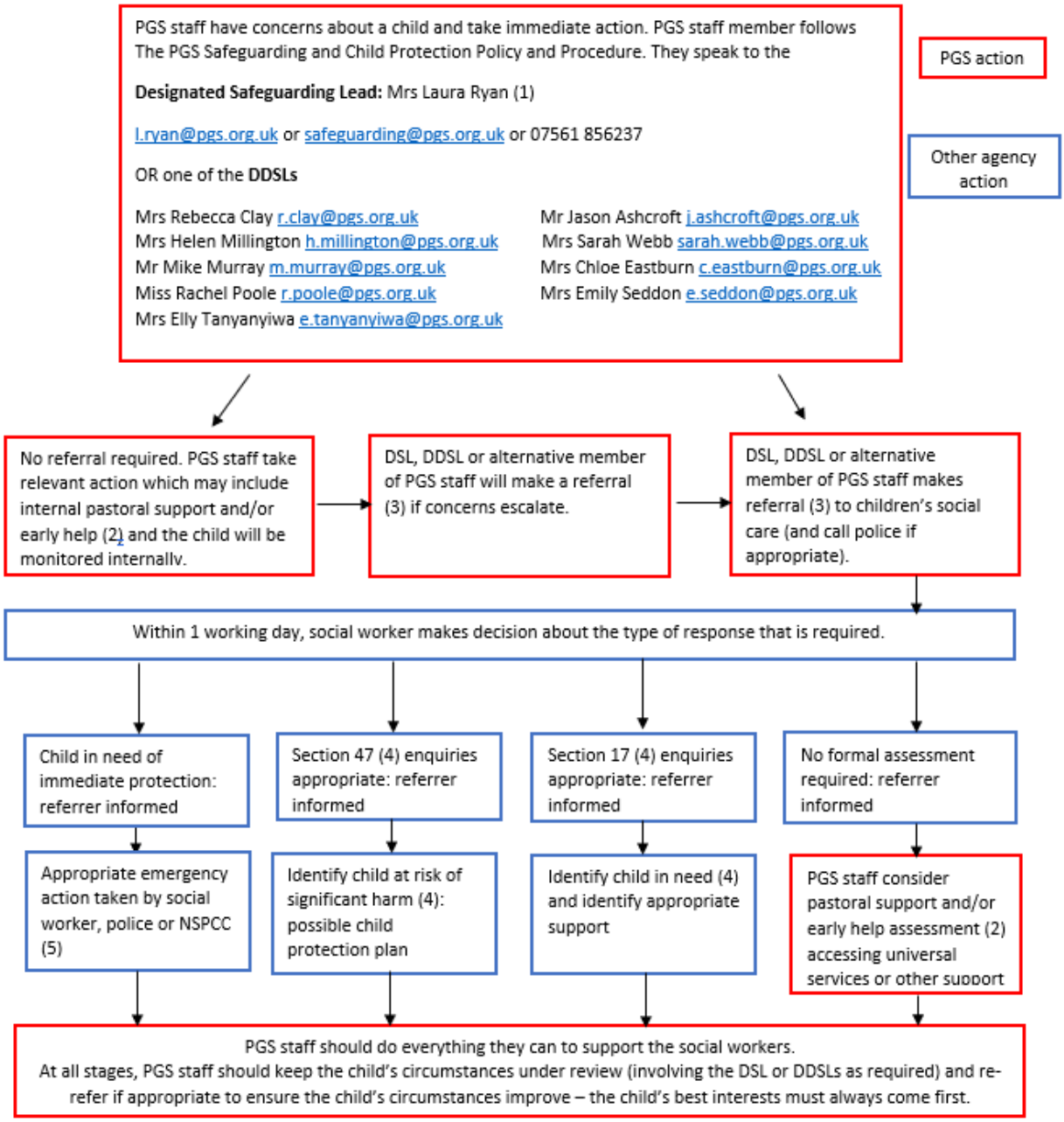
4.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than is 'necessary for the least amount of time'.

4.2 Staff should refer to The PGS Restrictive Interventions Policy (including Use of Reasonable Force) and the PGS Code of Professional Conduct for Staff for more detailed guidance about the use of reasonable force.

5 Concerns about a child – Flow chart of actions

See table on following page:

PGS actions when there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a PGS staff member, see Part four of KCSiE guidance.
(2) Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from Family Help, a Family Help Assessment should be arranged.
(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment.
(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries and decide whether to take action to safeguard or promote the child's welfare.
(5) This could include applying for an Emergency Protection Order (EPO).

Government statutory guidance Working together to safeguard children 2026 informs points 1-5 above.

Appendix 4 Dealing with allegations against staff (see also paragraph 16 above)

1. The School's procedures

1.1 The School's procedures for dealing with allegations made against staff (including supply staff, trainee teachers, volunteers and contractors) will be used where the member of staff has:

1.1.1 behaved in a way that has harmed a child, or may have harmed a child;

1.1.2 behaved or may have behaved in a way that indicates that they may not be suitable to work with children;

1.1.3 possibly committed a criminal offence against or related to a child; or

1.1.4 behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children.

1.2 Any allegations not meeting these criteria will be dealt with in accordance with the Portsmouth Safeguarding Children Partnership procedures. Advice from the LADO(s) will be sought in borderline cases.

1.3 All such allegations must be dealt with as a priority without delay. This includes those allegations made against supply staff, trainee teachers, volunteers and contractors.

1.4 The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (LADO(s)). The LADO(s) will be informed immediately and in any event within one working day of all allegations that come to the School's attention and appear to meet the criteria in paragraph 1.1 above.

1.5 Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.

2 Reporting an allegation

2.1 Where an allegation or complaint is made against any member of staff (other than the Head), including the DSL, the matter should be reported immediately to the Head. The allegation will be discussed immediately with the LADO(s) before further action is taken. Where appropriate, the Head will consult with the DSL. If appropriate, the Chair of Governors and the Lead Safeguarding Governor will be informed of the allegation and the conversation with the LADO.

2.2 Where an allegation or complaint is made against the Head, the matter should be reported immediately to the Chair of Governors or the Lead Safeguarding Governor, without first notifying the Head. The allegation will be discussed immediately with the LADO(s) before further action is taken. The Chair of Governors will consult the Lead Safeguarding Governor, and vice versa.

2.3 Where an allegation is made against any Governor, the matter should be reported immediately to the Chair of Governors or the Lead Safeguarding Governor. If either the Chair of Governors or the Lead Safeguarding Governor is the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the LADO(s) before further action is taken. Where appropriate, the Chair of Governors will consult the Lead Safeguarding Governor, and vice versa.

2.4 If it is not possible to report to the Head or Chair of Governors or Lead Safeguarding Governor in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the

Head or, where appropriate, the Chair of Governors and the Lead Safeguarding Governor.

2.5 The person taking action in accordance with the procedures in this Appendix is known as the Case Manager.

3 Disclosure of information

3.1 The Case Manager will inform the accused person of the allegation as soon as possible after the LADO(s) has been consulted.

3.2 The parents or carers of the child / children involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

3.3 Where the LADO(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

3.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

4 Further action to be taken by the School

4.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The School will take action in accordance with Part 4 of KCSIE and the School's employment procedures.

5 Early Years Foundation Stage (EYFS)

5.1 The School will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS provision (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.

5.2 These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.

6 Ceasing to use staff

6.1 If the School ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement will not be used and a referral to the Disclosure and Barring Service (DBS) will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governing Body without delay. The School may also need to consider a referral to the DBS if a member of staff is suspended, or deployed to another area of work that is not regulated activity.

6.2 If a member of staff tenders his or her resignation, or ceases to provide his or her services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by the School in accordance with this policy and a referral to the DBS will be made promptly if the criteria for referral are met.

6.3 Separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made where a teacher has been dismissed, or would have been dismissed had

he / she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

6.4 If the matter relates to a member of supply staff, the school will inform the supply agency of its process for managing allegations, and agencies should be fully involved and co-operate with the LADO's enquiries.

6.5 If the matter relates to a member of staff employed by a contractor, then the Head would be informed as above, and the employer will also be contacted. The School will work alongside the LADO and the employer to manage the allegation.

7 Malicious allegations

7.1 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.

7.2 Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

7.3 Whether or not the person making the allegation is a pupil or a parent (or other member of the public, including anonymous allegations), the School reserves the right to contact the police to determine whether any action might be appropriate.

8 Record keeping

8.1 Details of allegations found to be malicious will be removed from personnel records.

8.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused.

8.3 An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

8.4 The School will retain all safeguarding records and relevant personnel records for so long as reasonably required.[2]

9 Learning

9.1 In all cases, whether or not they are substantiated, the School will review the facts and determine whether any lessons can be learned and if improvements can be made.

[2] In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all Schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; institutional failures to protect children from sexual abuse or other exploitation.

Appendix 5 Responsibilities of the Designated Safeguarding Lead (DSL)

The name and contact details of the DSL and Deputy DSLs are set out in the contacts list at the front of this policy.

In accordance with Annex B of KCSIE, the main responsibilities of the DSL are:

1.1. Managing referrals

The DSL is expected to:

1.1.1. take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place;

1.1.2. refer cases of suspected abuse to the local authority children's social care as required;

1.1.3. support staff who make referrals to the local authority children's social care;

1.1.4. refer cases to the Channel programme via the relevant Multi-Agency Safeguarding Hub where there is a radicalisation concern as required;

1.1.5. support staff who make referrals to the Channel programme;

1.1.6. refer cases where a person is dismissed or has left due to risk / harm to a child to the Disclosure and Barring Service (DBS) as required; and

1.1.7. refer cases where a crime may have been committed to the police as required[3].[4]

1.2. Work with others

1.2.1. The DSL is expected to:

(a) act as a point of contact with the relevant Local Safeguarding Children Partnership;

(b) liaise with the Head to inform him / her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;

(c) as required, liaise with the Case Manager (see paragraphs 2 and 3 of Appendix 4) and the LADO at the local authority for child protection concerns in cases which concern a staff member;

(d) as required, liaise with the local authority regarding any children in care or kinship. For example, the Virtual School Head and/or Springboard Education;

(e) liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCOs/named person with oversight for SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;

(f) maintain a safeguarding log of issues to assist monitoring and identifying

[3] The ISI Safeguarding Checklist (September 2018) recommends that a referral to the police is made "*immediately/24 hours/one working day*"
[4] The National Police Chief's Council (NPCC) guidance helps to clarify when to consider calling the Police: https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf

patterns of behaviour, either in hard copy or on CPOMS;

(g) act as a source of support, advice and expertise for staff;

(h) ensure that a DDSL is able to cover effectively when the DSL is not available.

1.3. Raise Awareness

1.3.1. The DSL should:

(a) ensure the School's child protection and safeguarding policies and processes are known, understood and used appropriately;

(b) ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this;

(c) ensure this policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the School in this;

(d) Link with the Local Safeguarding Children Partnership to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

1.4. Child protection file

1.4.1. Where children leave the School the DSL shall ensure their child protection file is transferred to any new school or college as soon as possible (and within 5 days of the pupil starting at their new school). This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.

1.4.2. In addition, the DSL will consider if it is appropriate to share any information with the new school or college in advance of a child leaving.

1.4.3. On receiving a child protection file, the DSL will ensure that key staff are aware as required, including the Head of Learning Support.

1.5. Prevent

1.5.1. In accordance with the Prevent duty guidance for England and Wales and Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, December 2023) the DSL has, in addition, the following responsibilities:

(a) acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;

(b) co-ordinating Prevent duty procedures in the School;

(c) liaising with the local prevent lead, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and / or the police where indicated;

(d) undergoing WRAP or other appropriate training including with the Portsmouth Prevent Team;

(e) maintaining ongoing training programme for all school employees including induction training for all new employees and keeping records of staff training;

(f) monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty; and

(g) maintaining and reviewing a risk assessment to mitigate against our pupils being radicalised or drawn into extremist ideology or terrorism (Appendix 2).

1.6. Children in care

1.6.1. The DSL will, where applicable, take lead responsibility for pupils who are children in care.

1.7. Training

1.7.1. The DSL and the Deputy DSL have undertaken training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent duty awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

(a) understand the assessment process for providing Family Help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;

(b) have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

(c) ensure each member of staff has access to and understands the School's child protection and safeguarding policy and procedures, especially new and part-time staff;

(d) are alert to the specific needs of children in need, those with special educational needs and young carers;

(e) understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation, including the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025;

(f) understand the importance of information sharing, both within the school, and with the Local Safeguarding Children Partnership, other agencies, organisations and practitioners;

(g) are able to keep detailed, accurate, secure written records of concerns and referrals. A clear rationale must be recorded for all decisions relating to referrals, including the reasons for making or not making a referral;

(h) understand and support the School with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

(i) are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;

(j) can recognise the additional risks that children with SEN and disabilities (SEND)

face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;

(k) obtain access to resources and attend any relevant or refresher training courses;

(l) assess the risk to pupils at the School of being drawn into terrorism, including being drawn into support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

(m) encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them; and

(n) are able to take lead responsibility for pupils who are children in care.

Appendix 6 Local arrangements

Details of the School's local arrangements, including copies of the Portsmouth Safeguarding Children Partnership Threshold document and Local protocol for assessment and plans for transition to Local Safeguarding Partners can be found using the following website link: www.portsmouthscp.org.uk

This includes:

- contact details and inter-agency contact form;
- Portsmouth Safeguarding Children Partnership (PSCP) threshold document;
- MASH guidance;
- PCSP procedures, including Hampshire, Isle of Wight, Portsmouth and Southampton (HIPS) Safeguarding and Children Partnership policies and procedures;
- training opportunities; and
- assessment.

Parental/Guardian Consent to Sharing Information

(extracted from http://4lscb.proceduresonline.com/portsmouth/p_report_concerns.html):

All Contacts to the Portsmouth MASH should be made with the knowledge and agreement of the family.

They need to know what information has been shared and recorded by the Portsmouth MASH. They must also be aware that the Portsmouth MASH may need to share information with, and to seek information from other agencies to help them decide if additional services are needed, e.g. schools, health visitors, doctors, police, housing etc.

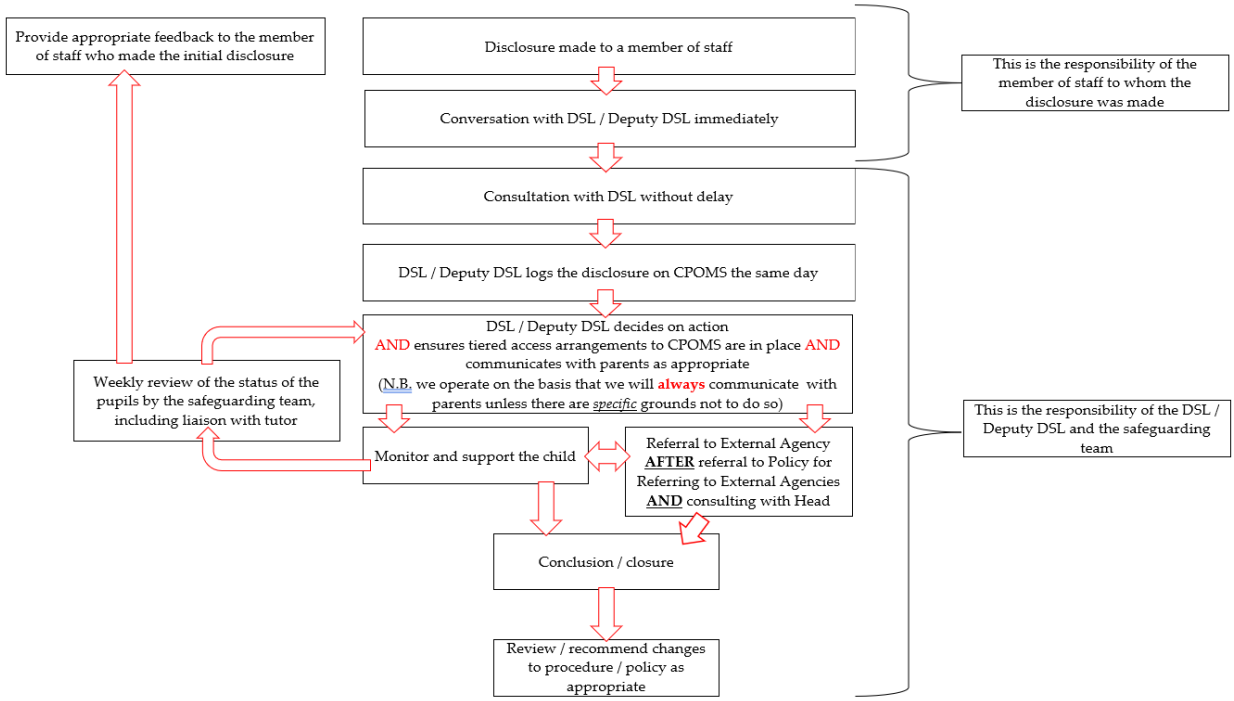
The exceptions to this are:

- *when seeking consent to share information would put a child, young person or others at risk of significant harm, or*
- *if it would undermine the prevention, detection or prosecution of a serious crime, or*
- *the professional has either tried to seek consent or consent was refused, and they feel that the indicators clearly demonstrate the threshold for tier 3 or 4 are met* ***and*** *not to do so would potentially have a significant impact on the child's safety and well-being*

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

*If you want to know more about how MASH will use your information, please see Portsmouth City Council's '****data protection privacy notice****'.*

Appendix 7 Flow chart of safeguarding actions



Appendix 8 EYFS Framework 2026

Early Years Foundation Stage (EYFS) Safeguarding

1. Introduction

1.8. This appendix should be read alongside The PGS Safeguarding and Child Protection Policy, Keeping Children Safe in Education (KCSIE, 2026), Working Together to Safeguard Children (2026), and the **EYFS Statutory Framework for Group and School-Based Providers (September 2026)**.

1.9. Children in the Early Years Foundation Stage are particularly vulnerable due to their age, stage of development and dependence upon adults to meet their care, emotional and educational needs. All staff working within the Pre-School and Reception have a collective responsibility to safeguard and promote the welfare of every child and to create an environment in which children feel safe, secure and valued.

2. Roles and Responsibilities

2.1. All EYFS staff will:

2.1.1. know the identity of the DSL and Deputy DSLs at the School;

2.1.2. maintain an attitude of "it could happen here";

2.1.3. report any safeguarding concern immediately using the school's reporting procedures and raise concerns about the conduct of adults, unsafe practice or safeguarding failures in accordance with the school's allegations management and whistleblowing procedures;

2.1.4. understand the additional vulnerabilities of very young children;

2.1.5. maintain appropriate professional boundaries;

2.1.6. undertake safeguarding and EYFS statutory training as required;

2.1.7. ensure children's care needs are met safely and respectfully at all times.

3. Safer Recruitment and Suitability

3.1. The school follows safer recruitment procedures for all adults working within the EYFS.

3.2. Before any adult begins work with children, all required pre-employment checks, including enhanced DBS checks and any other statutory vetting checks, must be completed. Staff must not begin regulated activity until these checks have been received and deemed satisfactory.

3.3. All volunteers working within the EYFS are subject to the appropriate enhanced DBS requirements in accordance with the EYFS Statutory Framework (2026). Volunteers must not be

permitted to begin working until the School has received the volunteer's enhanced DBS certificate, including barred list information.

3.4. All staff have a continuing duty to disclose any circumstance that may affect their suitability to work with children, including cautions, convictions, investigations or other relevant changes in circumstances.

3.5. Visitors and contractors are supervised where appropriate and never left alone with children unless all safeguarding requirements have been met.

4. Child Protection

4.1. Any concern about a child's safety or welfare, including physical abuse, emotional abuse, sexual abuse or neglect, must be reported immediately to the DSL.

4.2. Staff should be particularly alert to:

4.2.1. unexplained injuries;

4.2.2. significant changes in behaviour;

4.2.3. concerning comments made by children;

4.2.4. poor hygiene or persistent unmet care needs;

4.2.5. repeated absence or patterns of non-attendance;

4.2.6. indicators of domestic abuse;

4.2.7. concerns regarding parental mental health or substance misuse;

4.2.8. signs of exploitation or online harm.

4.3. No member of staff should investigate concerns themselves. All concerns must be recorded promptly on CPOMS and shared with the DSL in accordance with school procedures.

5. Supervision and Ratios

5.1. Statutory adult-to-child ratios will be maintained at all times.

5.2. Children will be appropriately supervised throughout the school day, during transitions, outdoor learning, educational visits and extended provision.

5.3. Risk assessments will be undertaken where additional supervision is required.

6. Dogs on the Premises

6.1. The school recognises its duty to provide a safe environment for all children.

6.2. In accordance with the EYFS Statutory Framework (September 2026), no dogs (particularly banned dog breeds) may be kept on or be present on the School premises. The only exception is

our School pastoral dog that has received extensive training through PAWS Therapy Dog Training.

7. Safer Sleep

7.1. Where very young children require sleep or rest during the school day, staff will follow the current national safer sleep guidance and the requirements of the EYFS Statutory Framework.

7.2. Staff responsible for sleeping children are appropriately trained to ensure they:

7.2.1. provide a safe sleeping environment;

7.2.2. place young children down safely in accordance with current safer sleep guidance;

7.2.3. carry out and record regular checks while children are sleeping;

7.2.4. respond promptly should a child become distressed or unwell;

7.2.5. communicate sleep arrangements with parents and carers.

8. Toileting, Intimate Care and Personal Care

8.1. Children's privacy, dignity and independence are promoted at all times.

8.2. Personal care is carried out by appropriately trained staff.

8.3. Where possible:

8.3.1. children are encouraged to develop independence;

8.3.2. another member of staff is aware when intimate care is being provided;

8.3.3. appropriate records are maintained where required;

8.3.4. parents are informed of significant incidents.

9. Online Safety and Screen Use

9.1. Technology may enhance learning when used appropriately.

9.2. In line with the EYFS Statutory Framework (2026), the school has regard to current government guidance on children's screen use.

9.3. Within Pre-School and Reception:

9.3.1. screen use supports planned learning rather than replacing active play;

9.3.2. children spend the majority of their day engaged in play, communication, physical activity and direct interaction;

9.3.3. all digital content is age-appropriate;

9.3.4. children are supervised whenever technology is used;

9.3.5. staff model safe and responsible technology use.

9.3.6. online safety is taught through age-appropriate activities and reinforced through everyday routines.

10. Attendance

10.1. Regular attendance supports children's safety, wellbeing and development. The PGS Attendance and Registration Policy reflects this and provides additional detail.

10.2. The school follows up unexplained absences promptly and works with families where attendance causes concern.

10.3. Persistent absence or repeated patterns of non-attendance may be considered alongside other safeguarding information.

11. Behaviour

11.1. Positive relationships underpin behaviour management within the EYFS.

11.2. Staff use developmentally appropriate strategies that promote emotional regulation, communication and resilience.

11.3. Physical intervention is used only where lawful, proportionate and necessary to prevent immediate harm.

12. Partnership with Parents and Carers

12.1. Strong partnerships with parents and carers are essential to safeguarding children.

12.2. The School will:

12.2.1. share safeguarding information appropriately;

12.2.2. encourage parents to raise concerns;

12.2.3. work collaboratively with external agencies where required;

12.2.4. maintain confidentiality in accordance with statutory guidance.

13. Training

13.1. All EYFS staff receive whole-school safeguarding and child protection training.

13.2. Training is also specifically designed and delivered to EYFS staff caring for 0 – 5-year-olds and is appropriate to the age of the children being cared for.

13.3. The safeguarding training for all EYFS practitioners covers the following areas:

13.3.1. What is meant by the term safeguarding.

13.3.2. The main categories of abuse, harm and neglect.

13.3.3. The factors, situation and actions that could lead or contribute to abuse, harm or neglect.

13.3.4. How to work in ways that safeguard children from abuse, harm and neglect.

13.3.5. How to identify signs of possible abuse, harm and neglect at the earliest opportunity.

These may include:

(a) Significant changes in children's behaviour.

(b) A decline in children's general well-being.

(c) Unexplained bruising, marks or signs of possible abuse or neglect.

(d) Concerning comments or behaviour from children.

(e) Inappropriate behaviour from practitioners/childminders and assistants or household members, or any other person working with the children. This could include inappropriate sexual comments; excessive one-to-one attention beyond what is required through their role; or inappropriate sharing of images.

(f) Any reasons to suspect neglect or abuse outside the setting, for example in the child's home, or that a child may experience emotional abuse or physical abuse because of witnessing domestic abuse or coercive control or that a girl may have been subjected to (or is at risk of) female genital mutilation.

13.3.6. How to respond, record and effectively refer concerns or allegations related to safeguarding in a timely and appropriate way.

13.3.7. The School's safeguarding policy and procedures.

13.3.8. Legislation, national policies, codes of conduct and professional practice in relation to safeguarding.

13.3.9. Roles and responsibilities of staff and other relevant professionals involved in safeguarding (including EYFS).

13.4. Training for the DSL must cover the elements listed below:

13.4.1. How to build a safer organisational culture.

13.4.2. How to ensure safer recruitment.

13.4.3. How to develop and implement safeguarding policies and procedures.

13.4.4. If applicable, how to support and work with staff to safeguard children.

13.4.5. Local child protection procedures and how to liaise with local statutory children's services agencies and with the local safeguarding partners to safeguard children.

13.4.6. How to refer and escalate concerns (including as described at paragraph [3.8/3.9] of the EYFS).

13.4.7. How to manage and monitor allegations of abuse against other staff.

13.4.8. How to ensure internet safety.

13.5. The Head of Pre-School is a Deputy Designated Safeguarding Lead and is trained to the same level as the DSL. A trained DSL / DDSL is always available during EYFS operating hours.

14. Review

14.1. This appendix will be reviewed annually or earlier where changes in legislation or statutory guidance require amendment.

Appendix 9 Protocol for Staff: Supporting Children Who Are Questioning Their Gender

Purpose:

To ensure that all children are treated with dignity, respect and compassion, while safeguarding their welfare, involving parents appropriately, and ensuring that all actions and decisions are accurately recorded.

NB. DSL refers to the Designated Safeguarding Lead and includes Deputy Designated Safeguarding Leads when the DSL is not available.

Staff Protocol

Step 1: Listen and Reassure

Where a child expresses uncertainty, distress or questions about their gender:

Staff should:

- Thank the child for speaking to them.
- Listen carefully and sensitively.
- Reassure the child that they will be supported.
- Clarify what the child is asking for or expressing.
- Explain that information will need to be shared with the DSL to ensure appropriate support and safeguarding.

Staff must not:

- Promise confidentiality.
- Initiate any particular action or outcome. This may include suggesting or implementing changes to names, pronouns, clothing or other social transition arrangements.
- Make decisions independently.

Step 2: Record Immediately

As soon as possible following the conversation:

- Create a factual CPOMS entry.
- Record the child's own words wherever possible.
- Record the date, time and context.
- Record any requests made by the child.

Step 3: Inform the DSL

All disclosures, requests or concerns relating to a child questioning their gender must be referred to the DSL as soon as possible and on the same working day.

Step 4: DSL Initial Assessment

The DSL will:

- Add the child to our safeguarding case list (if not already on it)

- Review the CPOMS record.
- Meet with the child if appropriate.
- Assess immediate safeguarding risks.
- Consider any mental health, SEND, neurodiversity or welfare concerns.
- Determine whether parental involvement can proceed immediately or whether there is a potential risk of harm.

Step 5: Parent and Carer Involvement

In the vast majority of cases, parents/carers should be involved at the earliest appropriate opportunity.

The DSL will:

- Inform parents of the child's expressed feelings or requests.
- Work collaboratively with the family.
- Facilitate conversations where appropriate.
- Ensure that support plans are developed jointly wherever possible.

Exception

If there is reason to believe that immediate parental involvement may place the child at risk of significant harm:

- Advice may be sought from Children's Services, the LADO or other relevant agencies.
- The rationale for any delay in parental involvement must be fully documented.

Step 6: Consideration of Any Requested Support

If a child requests support or changes relating to social transition:

The DSL, relevant pastoral staff, SENCO (where appropriate) and parents/carers will consider:

- The child's age and understanding.
- The child's wishes and feelings.
- Safeguarding implications for all children. The impact on other pupils is an important consideration.
- Mental health, wellbeing, SEND or neurodiversity considerations.
- Advice from relevant professionals.
- Legal and equality duties.

No member of staff should implement any change until a formal decision has been made by the School. This decision sits with the DSL.

Step 7: Implementation of Agreed Support

Where support arrangements are agreed:

- A clear support plan will be created.
- Relevant staff will be informed on a need-to-know basis.
- Responsibilities and expectations will be clarified.
- Arrangements for monitoring and review will be established.

The DSL will oversee implementation. All actions and the rationale for them must be recorded on CPOMS.

Step 8: Ongoing Monitoring and Safeguarding

The school will continue to monitor:

- The child's overall wellbeing, capturing the voice of the child, parent/carers' voices, staff observations
- Attendance and academic engagement.
- Peer relationships, including any potential bullying or harassment concerns.
- The effectiveness of agreed support measures.

Any emerging concerns must be referred immediately to the DSL.

Step 9: Review

The DSL will arrange periodic reviews and sooner if:

- The child's wishes change.
- New safeguarding information emerges.
- Parents provide new information.
- Professional advice changes.
- Existing arrangements are causing difficulties.
- The child detransitions or wishes to amend previous arrangements.

Parents/carers will normally be involved in reviews unless safeguarding considerations indicate otherwise.

All review meetings and decisions must be recorded.

Appendix 10 Portsmouth Grammar School (PGS) Mental Health Referral Pathway

Purpose

The purpose of this pathway is to ensure that any pupil experiencing emotional, psychological, behavioural or mental health difficulties receives timely, appropriate and proportionate support. The pathway provides a clear route from initial concern through assessment, intervention, monitoring and, where necessary, referral to external specialist services.

The pathway adopts a graduated approach, ensuring that pupils receive support at the most appropriate level of need, whilst maintaining clear oversight of safeguarding and wellbeing concerns.

The **Designated Safeguarding Lead (DSL)** acts as the school's **Mental Health Lead**, coordinating mental health referrals and triage in collaboration with the **School Nurses**, **School Counsellors** and **Head of Learning Support**. Together, these colleagues form the school's **Mental Health Triage Team**, working closely with Tutors, Heads of Year, House Staff, pastoral teams, safeguarding staff, senior leaders, parents and external agencies. The purpose of the triage process is to identify need, assess risk and determine the most appropriate level of support.

It is important to note that if staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it is not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Roles Within the Triage Team

Mental Health Lead (DSL)

The Mental Health Lead is responsible for:

- Overseeing the school's mental health referral pathway
- Coordinating triage and decision-making
- Ensuring safeguarding considerations are central to all decisions
- Assessing whether concerns require safeguarding intervention
- Coordinating multi-agency working
- Overseeing referrals to external agencies where appropriate
- Supporting pastoral teams in implementing support plans
- Monitoring pupils presenting with complex or high-risk needs

School Nurses

The School Nurses are responsible for:

- Assessing physical health concerns and symptoms
- Identifying health factors affecting wellbeing
- Reviewing sleep, nutrition, health
- Monitoring medical conditions potentially impacting mental health
- Providing health advice and short-term support
- Advising the triage team regarding risk and welfare concerns

School Counsellors

The School Counsellors are responsible for:

- Assessing emotional wellbeing and mental health presentations
- Exploring social, emotional and psychological stressors
- Delivering short-term counselling interventions
- Advising the triage team regarding appropriate support
- Monitoring emotional wellbeing and progress

Head of Learning Support

The Head of Learning Support is responsible for:

- Identifying SEND and neurodiversity factors that may contribute to emotional difficulties
- Advising on reasonable adjustments
- Supporting pupils whose wellbeing is affected by learning needs
- Coordinating learning support interventions
- Liaising with Educational Psychologists and specialist services

Pastoral Team

Heads of Year, Tutors and House Staff are responsible for:

- Identifying concerns at an early stage
- Maintaining regular contact with pupils and families
- Monitoring attendance, engagement and academic progress
- Implementing agreed support plans
- Providing feedback to the Mental Health Triage Team

LJR Summer 2026

Appendix 11 Allocation of tasks and Version control

Allocation of tasks: in accordance with paragraph 6 of the policy above, the Governing Body has allocated tasks according to the table below:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	The Designated Safeguarding Lead (DSL)	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	The Designated Safeguarding Lead (DSL) and all Deputy Designated Safeguarding Leads	As required, and at least termly
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	The Designated Safeguarding Lead and all Deputy Designated Safeguarding Leads	As required, and at least termly
Seeking / Receiving input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	The Designated Safeguarding Lead (DSL) and all Deputy Designated Safeguarding Leads	As required, and at least annually
Formal annual review	The Governing Body	At least annually

Version Control

Date Approved	1st September 2026 (Governing Body)
Date Reviewed	10th October (Safeguarding Committee) / 5th December 2025 (Governing Body)
Next Review Date	Autumn 2026
Policy author (SMT)	Designated Safeguarding Lead
Policy owner (Governing Body)	Lead Safeguarding Governor
Status	ISI document to be made available
Report	Safeguarding and Pastoral

Ph4070926