



London Nautical School

Safeguarding Policy

2022 / 2023

Document Information

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Version History

Version	Date	Amended By	Notes on Revision	Document Version.
1.0	8 December 2022		Encompassed changes to KCSiE 2022	1.0

To Be Read in conjunction with

Policy	Date	Document Index No.	Notes
Keeping children Safe in Education	2022		
Staff Code of Conduct	Sept 2022		
Definition and a guide for practitioners - Child Sexual Exploitation (CSE)	2017		DfE
The Domestic Abuse Act 2021 (Part 1)	2021		
The Serious Crime Act 2015	2015		
Counter Terrorism and Security Act 2015	2015		
UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020)	2020		
(UK) Data Protection Act 2018	2018		
Whistleblowing	2008		Via Lambeth
Advice to schools and colleges on gangs and youth violence	2013		
Criminal exploitation of children and vulnerable adults: county lines	2020		
Female Genital Mutilation Act 2003	2003		
Forced marriage	2022		
Modern slavery: how to identify and support victims	2023		

Mental health and behaviour in schools	2018		
Acceptable Use	2022		
Data Protection	2022		
Social Media	2022		
Cyber Choices Programme	2023		Cyber Choices - National Crime Agency
Children Act	1989		
Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings'	2009		

The policy has been revised to reflect the following changes that come into effect on the 1st of September 2022 and is detailed in the KCSIE (2022) statutory guidance as outlined below.

Section	Changes
Throughout	All references to ' <i>Keeping Children Safe in Education (2021)</i> have been removed and replaced with regards to ' <i>Keeping Children Safe in Education (2022)</i> . https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
Page 19 1.1	KCSIE (2022), paragraph 4: Safeguarding and promoting the welfare of children is defined by this guidance as: <ul style="list-style-type: none"> • protecting children from maltreatment. • preventing impairment of children’s mental and physical health or development. • ensuring that children grow up in the circumstances consistent with the provision of safe and effective care; and • taking action to enable all children to have the best outcomes.
Page 20 2.3	At London Nautical School, we are committed to safeguarding children and young people, and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child. Staff should share concerns about a child with the Designated Safeguarding Lead. However, it should be remembered that sometimes children will not feel ready or know how to tell someone they are abused, exploited, or neglected, and they may not know if their experiences are harmful.
Page 20 2.6	Children at The London Nautical School are taught to keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to individual children's specific needs and vulnerabilities, including children who are victims of abuse and children with special educational needs or disabilities. [give two or three examples of how children are helped to ‘recognise when they are at risk and how to get help when they need it.]
Page 20 2.7	The London Nautical School assesses the wider community on the broader issues concerning its pupils' well-being and safety. KCSIE (2022), paragraph 23 says: ‘Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms, and children can be vulnerable to multiple harms, including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse of their intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.’
Page 20 2.8	Types of Abuse and Neglect can be found in ‘Keeping Children Safe in Education (2022)’ (Part 1 and Annex B) These signs and symptoms could be copied into the policy document. Make sure reference is made to the additional sentence in paragraph 26: ‘Harm can include ill-treatment that is not physical as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, for example, to the impact on children of all forms of domestic abuse.’
Page 28	The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

	<p>Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.</p> <p>Indicators of child sexual exploitation may include:</p> <ul style="list-style-type: none"> • Acquisition of money, clothes, mobile phones, etc., without plausible explanation. • Gang association and isolation from peers/social networks. • Exclusion or unexplained absences from school, college, or work. • Leaving home/care without explanation and persistently going missing or returning late. • Excessive receipt of texts/phone calls. • Returning home under the influence of drugs/alcohol. • Inappropriate sexualised behaviour for age/sexually transmitted infections. • Evidence of/suspicions of physical or sexual assault. • Relationships with controlling or significantly older individuals or groups. • Multiple callers (unknown adults or peers). • Frequenting areas are known for sex work. • Concerning the use of the internet or other social media. • Increasing secretiveness around behaviours; and • Self-harm or significant changes in emotional well-being. <p>Potential vulnerabilities include:</p> <p>Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.</p> <ul style="list-style-type: none"> • Having a prior experience of neglect and physical and sexual abuse. • 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). • Recent bereavement or loss. • Social isolation or social difficulties. • Absence of a safe environment to explore sexuality. • Economic vulnerability. • Homelessness or insecure accommodation status. • Connections with other children and young people who are being sexually exploited. • Family members or other connections involved in adult sex work. • Having a physical or learning disability. • Being in care (particularly those in residential care and those with interrupted care histories); and • Sexual identity. <p>More information can be found in: Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)</p>
Page 29	Information about Child Criminal Exploitation can be found in KCSIE (2022) pages 37 – 3,9 and Annex, B pages 140 - 142.

	<p>CCE occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and b) for the financial or another advantage the perpetrator or facilitator and through violence or the threat of violence.</p> <p>The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology.</p> <p>Some of the following can be indicators of CCE:</p> <ul style="list-style-type: none"> • children who appear with unexplained gifts or new possessions. • children who associate with other young people involved in exploitation. • children who suffer from changes in emotional well-being. • children who misuse drugs and alcohol. • children who go missing for periods or regularly come home late; and • children who regularly miss school or education or do not participate in education.
<p>Page 30</p>	<p>‘County Lines’ is:</p> <p>County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or another form of “deal line”.</p> <p>Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure victims’ compliance times.</p> <p>Children can quickly become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.</p> <p>See KCSIE (2022) page 141/142.</p>
<p>Page 31</p>	<p>Definition</p> <p>The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour or as a single incident, between two people over the age of 16 who are 'personally connected'</p> <ul style="list-style-type: none"> (a) physical or sexual abuse. (b) violent or threatening behaviour. (c) controlling or coercive behaviour. (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and (e) psychological, emotional, or other abuse. <p>People are 'personally connected' when they have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or their narratives.</p> <p>The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of the abuse and they are related to the abusive person.</p> <p>(The definition can be found here: https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted)</p> <p>Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity,</p>

	<p>socioeconomic status, sexuality, or background. Domestic abuse can occur inside or outside the home.</p> <p>The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.</p> <p><i>[If the school is part of Operation Encompass, add that information here. Even if a school/area is not part of Operation Encompass, it provides advice. It helps service all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1 PM Monday to Friday 0204 513 9990 (charged at local rate).]</i></p>
<p>Page 32</p>	<p>Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.</p> <p>FGM typically occurs between birth and around 15 years old; however, it is believed that most cases happen between the ages of 5 and 8.</p> <p>Risk factors for FGM include:</p> <ul style="list-style-type: none"> ● low level of integration into UK society ● mother or a sister who has undergone FGM ● girls who are withdrawn from PSHE ● visiting female elders from the country of origin ● being taken on an extended holiday to the country of origin ● talk about a ‘special’ procedure to become a woman <p>Symptoms of FGM</p> <p>FGM may be likely if there is a visiting female elder, there is talk of a particular procedure or celebration to become a woman, or parents wish to take their daughter out of school to visit an ‘at-risk’ country (especially before the summer holidays), or parent wants to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.</p> <p>Indications that FGM may have already taken place may include:</p> <ul style="list-style-type: none"> ● difficulty walking, sitting, or standing and may even look uncomfortable. ● spending more extended than usual normal in the bathroom or toilet due to difficulties urinating. ● spending long periods away from a classroom during the day with bladder or menstrual problems. ● frequent urinary, menstrual or stomach problems. ● prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g., withdrawal or depression) on the girl’s return ● reluctance to undergo regular medical examinations. ● confiding in a professional without being explicit about the problem due to embarrassment or fear. ● talking about pain or discomfort between her legs
<p>Page 35</p>	<p>All staff at London Nautical School know that mental health problems can, in some cases, indicate that a child has suffered or is at risk of abuse, neglect or exploitation.</p> <p>School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.</p> <p>Suppose staff have a mental health concern about a child that is also a safeguarding concern. In that case, immediate action should be taken by speaking to the designated safeguarding lead or a deputy.</p>

<p>Page 39</p>	<p>At London Nautical School, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.</p> <p>This may mean they are more vulnerable and face educational barriers to attendance, learning, behaviour, and poor mental health.</p> <p>We consider these needs when further harm planning to be a support pupil with a social worker.</p>
<p>Page 33</p>	<p>The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession, the rate at which observation may have been made).</p> <p>Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out and discuss any such issues with the safeguarding lead and children's social care.</p>
<p>Page 32</p>	<p>So-called 'honour-based' abuse (HBA) encompasses crimes committed to protect or defend the honour of the family and including Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called honour-based violence) and should be handled and escalated as such.</p> <p>When concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.</p>
<p>Page 35</p>	<p>Knowing where children are during school hours is an essential aspect of Safeguarding. Missing school can indicate abuse and neglect and may raise other issues, including the criminal exploitation of children.</p> <p>We monitor attendance carefully and address poor or irregular attendance without delay.</p> <p>We will always follow up with parents/carers when pupils are not at school. This means we need at least two up-to-date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.</p> <p>In response to the guidance in Keeping Children Safe in Education (2022), the school has:</p> <ol style="list-style-type: none"> 1. Staff who understand what to do when children do not attend regularly 2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions). 3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage. 4. Procedures to inform the local authority when we plan to take pupils off-roll when they: <ol style="list-style-type: none"> a. leave school to be home educated b. move away from the school's location c. remain medically unfit beyond compulsory school age d. are in custody for four months or more (and will not return to school afterwards), or e. are permanently excluded <p>We will ensure that pupils who are expected to attend the school but fail to take their place will be referred to the local authority.</p> <p>When a pupil leaves the school, we will record their new school's name and an expected start date.</p>

<p>Page 33</p>	<p>As a minimum, schools should include the following in their safeguarding policy.</p> <p>As part of the Counter Terrorism and Security Act 2015, schools must protect children from being drawn to terrorism. This has become known as the 'Prevent Duty'.</p> <p>Where staff are concerned that children and young people are developing extremist views or showing signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.</p> <p>The Designated Safeguarding Lead has received training about Prevent Duty and tackling extremism and is a contact for staff with any concerns they may have.</p> <p>We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.</p> <p>Staff should be alert to changes in children's behaviour, indicating that they may need help or protection. The team should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, including the designated safeguarding lead (or deputy) making a Prevent referral.</p> <p>We are committed to ensuring that our pupils are offered a broad and balanced curriculum to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning whilst making a positive statement of a fair, just and civil society.</p> <p>Recognising Extremism</p> <p>Early indicators of radicalisation or extremism may include:</p> <ul style="list-style-type: none"> ● showing sympathy for extremist causes ● glorifying violence, especially to other faiths or cultures ● making remarks or comments about being at extremist events or rallies outside school ● evidence of possessing illegal or extremist literature ● advocating messages like illegal organisations or other extremist groups ● out of character changes in dress, behaviour, and peer relationships (but there are also compelling narratives, programmes, and networks that young people can come across online, so involvement with groups may not be apparent.) ● secretive behaviour ● online searches or sharing extremist messages or social profiles ● intolerance of difference, including faith, culture, gender, race, or sexuality ● graffiti, artwork or writing that displays extremist themes ● attempts to impose extremist views or practices on others ● verbalising anti-Western or anti-British views ● advocating violence towards others
<p>Page 38</p>	<p>Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Governing bodies and proprietors should ensure their child protection policy reflects that other barriers exist when recognising abuse and neglect in this group of children.</p> <ul style="list-style-type: none"> ● These can include: ● assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration. ● These children are more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.

	<ul style="list-style-type: none"> • the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and • communication barriers and difficulties in managing or reporting these challenges <p>At London Nautical School, we provide extra pastoral support and attention for these children, along with ensuring appropriate communication support is in place.</p>
Page 34	<p>Governing bodies and proprietors should ensure that their child protection policy includes:</p> <ul style="list-style-type: none"> • procedures to minimise the risk of child-on-child abuse. • the systems in place (and they should be well promoted, quickly supporting for the understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously. • how allegations of child-on-child abuse will be recorded, investigated, and dealt with. • transparent processes for how victims perpetrated other children affected by child-on-child abuse will be supported. • a recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is not being reported in written statements sent, which makes clear there should be a zero-tolerance approach to abuse. For example, it should never be passed off as “banter”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. • recognition that 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; and • the different forms peer on peer abuse can take, such as: <ul style="list-style-type: none"> • bullying (including cyberbullying, prejudice-based and discriminatory bullying). • abuse in intimate personal relationships between peers. • physical abuse can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing bodily harm. • sexual violence and sexual harassment. <p>KCSIE 2022 Part 5 and the separate guidance ‘Sexual violence and sexual harassment between children in schools and colleges set out how schools and colleges should respond to reports of sexual violence and sexual harassment.</p> <p>Sharing nudes and semi-nudes (previously known as ‘sexting’)</p> <p>In cases where nudes or semi-nudes have been shared, we follow the guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020)</p> <p><i>Schools should ensure that their policy is in line with the guidance outlined in KCSIE (2022) Part Five (page 103)</i></p>
Page 40	<p>A private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.</p> <p>A close family relative is a ‘grandparent, brother, sister, uncle or aunt’ and includes half-siblings and stepparents; it does not include great-aunts or uncles, grandparents, or cousins.</p> <p>Parents and private foster carers have a legal duty to inform the relevant local authority at least six weeks before the arrangement starts.</p> <p>Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately</p>

	<p>fostered children are affected by abuse and neglect or be involved in trafficking, child sexual exploitation or modern-day slavery.</p> <p>Schools must report to the local authority where they know or suspect that a child is subject to a private fostering arrangement. Although schools have responsibility for informing Local Authorities, there is no duty for anyone, including the personal fostering carer or social workers, to notify the school. However, it should be clear to the school who has parental responsibility.</p> <p>School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the child's family to ensure they know their duty to inform the LA. The school itself must care for and notify private fostering arrangements.</p> <p>On admission to the school, we will take steps to verify the adults' relationship to the pupil being registered.</p>
Page 24	<p>The Designated Safeguarding Lead is responsible for safeguarding and child protection at London Nautical School. The critical role of the Designated Safeguarding Lead is to:</p> <ul style="list-style-type: none"> ● manage referrals from school staff or any others from outside the school. ● work with external agencies and professionals on matters of safety and safeguarding. ● undertake training. ● raise awareness of safeguarding and child protection amongst the staff and parents; and ● ensure that child protection information is transferred to the pupil's new school ● be aware of pupils who have a social worker* <p>help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.</p>
Page 25	<p>If the DSL is not available, staff should speak to a member of the SLT and take advice from local children's social care (KCSIE (2022), paragraph 55)</p>
Page 43	<p>LOW-LEVEL CONCERNS ABOUT STAFF BEHAVIOUR</p> <p>Allegations or concerns about an adult working in the school, whether as a teacher, supply teacher, other staff, volunteers, or contractors.</p> <p>At London Nautical School, we recognise that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the headteacher without delay; any concerns about the headteacher should go to the Chair of Governors, who can be contacted by email:- asmith@Ins.org.uk</p> <p>Any concerns about the conduct of a staff member, supply teachers, volunteers or contractors should be reported to the headteacher/principal.</p> <p>Concerns may come from various sources, for example, a suspicion, complaint, or disclosure made by a child, parent, or another adult within or outside the organisation; or because vetting checks are undertaken.</p> <p>The headteacher/principal must decide whether the concern is an allegation or low-level anxiety. The term 'low-level' situation does not mean it is insignificant; the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).</p> <p>Allegations</p> <p>It is an allegation if the person* has:</p> <ul style="list-style-type: none"> ● behaved in a way that has harmed a child or may have harmed a child. ● possibly committed a criminal offence against or related to a child and.

- behaved towards a child or children in a way that indicates they may pose a risk of harm to children or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers, and contractors.)

Allegations should be reported to the LADO 'without delay.

Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine any foundation for the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation but to ensure that an appropriate investigation is carried out, whether this is the police, children's social care, the school or college, or a combination of these.

Low-level Concerns

Concerns may be graded Low-level if the problem does not meet the criteria for an allegation and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate behaviour outside of work. Example behaviours include, but are not limited to:

- being over-friendly with children.
- having favourites.
- taking photographs of children on their mobile phones.
- 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.

When matters have been raised via a third party, the headteacher/principal should collect as much evidence as possible by speaking:

- directly to the person who raised the concern unless it has been raised anonymously.
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer where, for example, they have found themselves in a situation that could be misinterpreted and appear compromising to others. On reflection, they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous, then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely, and comply with the (UK) Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended to keep it at least until the individual leaves their employment.

Records should be reviewed to identify potential patterns of concerning, problematic or inappropriate behaviour.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

	<p>The records review might identify broader cultural issues within the school or college that enabled the behaviour. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.</p> <p>See also Developing and implementing a low-level concerns policy (Farrer & Co) https://www.farrer.co.uk/news-and-insights/developing-and-implementing-a-low-level-concerns-policy-a-guide-for-organisations-which-work-with-children/</p>
Page 44	<p>The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers, has:</p> <ul style="list-style-type: none"> ● behaved in a way that has harmed a child or may have harmed a child. ● possibly committed a criminal offence against or related to a child. ● behaved towards a child or children in a way that indicates they may pose a risk of harm to children or <p>behaved or may have behaved in a way that indicates they may not be suitable to work with children.</p>
Page 24	<p>The critical training elements are:</p> <p>Induction Training – this is mandatory and should include.</p> <ul style="list-style-type: none"> ● the child protection policy. ● the behaviour policy. ● the staff behaviour policy (sometimes called a code of conduct). ● the safeguarding response to children who go missing from education; and ● the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). (See KCSIE (2022)) <p>DSLs – attend training every two years; in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually.</p> <p>All other staff – will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.</p> <p>Members of the Governing Body of the school take part in mandatory safeguarding training to ensure that they can ‘assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective.’ This training is regularly updated. (See KCSIE (2022), paragraph 81.)</p> <p>Safer Recruitment training is available to all relevant staff and governors involved in the recruitment process.</p>
Page 46	<p>Where there are concerns about how safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.</p> <p>A whistleblowing disclosure must be about something that affects the public, such as:</p> <ul style="list-style-type: none"> ● a criminal offence has been committed, is being committed or is likely to be committed ● a legal obligation has been breached ● there has been a miscarriage of justice ● the health or safety of any individual has been endangered ● the environment has been damaged ● information about any of the above has been concealed. <p>The NSPCC runs a whistleblowing helpline on behalf of the government. The number is 0808 800 5000.</p>
Page 37	<p>At London Nautical School, we manage this risk by:</p>

	<p>“When children use the school’s network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems which are regularly reviewed for their effectiveness. However, many pupils can access the internet using their data plan. To minimise inappropriate use, as a school we...”</p> <p>The policy must refer to how children will be kept safe when accessing ‘online learning’ outside school.</p> <p>See KCSIE (2022) paragraph 48</p>
<p>In Anti-Bullying Policy</p>	<p>The fact that AOL child or a young person may be LGBT is not an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child or children perceived to be LGBT (whether) can be just as vulnerable as children who identify as LGBT.</p> <p>Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. At London Nautical School we endeavour to reduce the additional barriers faced by providing a safe space and support if required.</p> <p>See KCSIE (2022), page 49</p>

WHOLE SCHOOL POLICY FOR SAFEGUARDING INCORPORATING CHILD PROTECTION

The London Nautical School

Policy Consultation & Review

This policy is available on our school website and requested by the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.

We recognise our staff's expertise by undertaking safeguarding training and managing safeguarding concerns daily. Therefore, we invite staff to contribute to and shape this policy and associated safeguarding arrangements.

The policy is provided to all staff at induction alongside our Staff Code of Conduct, behaviour policy and the safeguarding response to those pupils who are missing from education. In addition, all staff are provided with Part One of the statutory guidance [Education](#), DfE (2022).

This policy will be reviewed in full by the Governing Board annually. This policy was last reviewed and agreed upon by the Governing Board on [insert date]. It is due for review on [insert date].

Signature



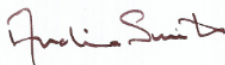
Headteacher

Mr M Schofield

Date:

8th December 2022

Signature



Chair of Governors

Mr A Smith

Date:

8th December 2022

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1. PURPOSE & AIMS

1.1 The purpose of London Nautical School's safeguarding policy is to ensure every child who is a registered pupil at our school is safe and protected from harm. This means we will always work to:

- Protect children and young people at our school from maltreatment.
- Prevent impairment of our children's and young people's mental and physical health or development.
- Ensure that children and young people at our school grow up in the circumstances consistent with providing safe and effective care.
- Undertake that role to enable children and young people at our school to have the best outcomes.

1.2 This policy will give clear direction to all staff, including supply staff, volunteers, visitors, and parents, about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our school.

1.3 Our school fully recognises its contribution to protecting children from harm and supporting and promoting good care of all registered pupils at our school. The elements of our policy are prevention, protection, and support.

1.4 We recognise that our safeguarding responsibilities are linked to ensuring that appropriate safeguarding responses are in place for children absent from school or who go missing from education, particularly on repeat occasions. The Attendance Lead will regularly liaise with the Designated Safeguarding Lead to discuss all persistently absent pupils and those who go missing to identify the risk of abuse and neglect, including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm.

1.5 This policy applies to all pupils, staff, parents, governors, volunteers, and visitors.

2. OUR ETHOS

2.1 The child's welfare is of paramount importance. Our school will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. Children at our school will be able to speak freely to any member of staff at our school if they are worried or concerned about something. All staff will reassure victims that they are being taken seriously and will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.

2.2 Everyone who meets children and their families has a role to play in safeguarding children. We recognise that staff at our school play a vital role as they can identify early concerns and help children prevent problems. **Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.** When concerned about the welfare of a child, staff members must always act in the **best interests** of the child and the school] we are committed to safeguarding children and young people, and we expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. Staff should share concerns about a child with the Designated Safeguarding Lead. However, it should be remembered that sometimes children will not feel ready or know how to tell someone they are abused, exploited, or neglected, and they may not if their experiences are harmful. We will always act in the best interest of the child.

2.4 Where there is a safeguarding concern, the child's wishes and feelings are considered when determining what action to take and what services to provide. Our systems are well promoted, quickly

understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

2.5 All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, respond to a disclosure from a child and record and report this information. We will not make promises to any child, and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose.

2.6 Children at London Nautical School are taught how to keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to individual children's specific needs and vulnerabilities, including children who are victims of abuse and children with special educational needs or disabilities.

2.7 The school assesses the wider community and the broader pupils' well-being and safety.

Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms, and children can be vulnerable to multiple injuries, including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.'

At all times, we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with [Working Together to Safeguard Children \(2018\)](#) and the [Lambeth Safeguarding Children Partnership](#)

2.8 As part of our responsibilities for safeguarding and promoting the welfare of children, we will provide a coordinated offer of early help when children's additional needs are identified.

Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms, and children can be vulnerable to multiple injuries, including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.'

These may include if a child:

- is disabled and has specific additional needs.
- has special educational needs (whether they have a statutory education, health, and care plan).
- has a mental health need?
- is a young carer.
- is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups.
- is frequently missing/goes missing from care or home.
- is misusing drugs or alcohol themselves.
- is at risk of modern slavery, trafficking, or exploitation.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- has returned home to their family from care.
- is showing early signs of abuse and neglect.
- is at risk of being radicalised or exploited.
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child

- has a family member in prison or is affected by parental offending.
- is persistently absent from education, including persistent absences for part of the school day.

3. ROLES AND RESPONSIBILITIES

Local Authority Contacts

Lambeth Integrated Referral Hub: 020 7926 3100

Out of hours: 0207 926 1000

Local Authority Designated Officer (LADO): Andrew Zachariades

Telephone: 0207 926 4579 / 0772 082 8700 Email: lado@lambeth.gcsx.gov.uk

Senior Safeguarding Manager (Early Years, Primary schools, High schools, and colleges):

Deborah Carter

Telephone: 07596955299 Email: dcarter@lambeth.gov.uk

Education Prevent Officer: Lydia Nixon

Telephone: 0207 926 3668 Email: lnixon@lambeth.gov.uk

Head of Inclusion, Education and Learning: Stuart Boffin

Telephone: 0207 926 0296 Email: sboffin@lambeth.gov.uk

CSE Co-ordinator Children's Services: Claire McDonald

Telephone: 0207 926 0296 Email: CMcDonald@lambeth.gov.uk

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Mr Knight	mknight@Ins.org.uk
Mental Health Lead	Ms T Simmonds	tsimmonds@Ins.org.uk
Deputy DSL	Miss Harvey	nharvey@Ins.org.uk
Headteacher/Principal	Mr Schofield	mschofield@Ins.org.uk
Named Safeguarding Governor	Ms Pape	epape@Ins.org.uk
Chair of Governors	Mr Smith	asmith@Ins.org.uk

3.1 It is the responsibility of every member of staff, volunteer, and regular visitor to our school to ensure that they carry out the requirements of this policy and always work in a way that will safeguard and promote the welfare of all the pupils at this school. This includes providing a safe environment in which children can learn.

The Governing Board

3.2 The Governing Board of London Nautical School is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our Governing Body takes collective responsibility to safeguard and promote the welfare of our pupils, we also have a named governor who champions safeguarding within the school.

3.3 The Governing Board will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our school website and has been written in line with Local Authority guidance and the requirements of the Lambeth Safeguarding Children Partnership policies and procedures.
- The school contributes to inter-agency working in line with Working Together to Safeguard Children (2018).
- A senior member of staff from the leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL(s) who is an appropriately trained member to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be a cover for this role. The role will be evidenced explicitly in the role holder's job description.
- All staff receive a safeguarding induction and are provided with a copy of this policy, the staff code of conduct, the behaviour policy and the school's safeguarding response for those pupils who go missing from education, as detailed in section Y.

- All staff undertake appropriate child protection training that is updated annually and online safety training.
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance.
- Safer recruitment practices are followed by the requirements of [Keeping Children Safe in Education](#) DfE (2022).
- They remedy any weakness regarding our safeguarding arrangements brought to their attention without delay.

3.4 The governing board will receive a safeguarding report at each meeting that will record the training that has taken place, the number of staff attending and any special training requirements for the school. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual pupils.

The Headteacher

3.5 At London Nautical School the Headteacher is responsible for:

- Identifying a senior staff member from the leadership team to be the Designated Safeguarding Lead (DSL).
- Identifying alternate staff members to act as the Designated Safeguarding Lead (DSL) in their role to ensure there is always cover for the position.
- Ensuring that the policies and procedures adopted by the governing body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- Ensuring all staff and volunteers can raise concerns about poor or unsafe practices. Such problems are addressed sensitively by the whistle-blowing procedures.
- Liaise with the LADO in the event of an allegation of abuse against a staff member or volunteer.

The Designated Safeguarding Lead (DSL)

3.6 The Designated Safeguarding Lead is responsible for safeguarding and child protection at London Nautical School. The critical role of the Designated Safeguarding Lead is to:

- manage referrals from school staff or any others from outside the school.
- work with external agencies and professionals on matters of safety and safeguarding.
- undertake training.
- raise awareness of safeguarding and child protection amongst the staff and parents; and

- ensure that child protection information is transferred to the pupil's new school
- be aware of pupils who have a social worker*
- help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff. The DSL will carry out their role by the responsibilities outlined in Annex C of 'Education. Will advise and supports a child on welfare and advise on report protection matters. Any concern for a child's safety or interest will be recorded in writing and given to the DSL.

3.7 During term time, a deputy will always be available (during school or college hours) for staff in the school or college to discuss safeguarding concerns. If the DSL is unavailable on the school site in person in exceptional circumstances, we will ensure they are available via telephone and any other relevant media.

3.8 The DSL at London Nautical School will represent our school at child protection conferences and core group meetings. Through appropriate training, knowledge and experience, our DSL will liaise with Children's Services and other agencies where necessary, make referrals of suspected abuse to Children's Services, participate in strategy discussions and other interagency meetings, and contribute to the assessment of children.

3.9 The DSL will maintain records and child protection files, ensuring they are kept confidential and stored securely (see section 7 for more information.)

3.10 The DSL is responsible for ensuring that all staff members and volunteers know our policy and the procedure they need to follow. They will ensure that all staff, volunteers, and regular visitors have received appropriate child protection information during induction and have been trained within the school.

3.11 The DSL will obtain details of the Local Authority Personal Advisor appointed to guide and support a child who is a caregiver.

3.12 The DSL(s) will work with the headteacher and senior leaders, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing or have experienced and identifying the impact that these issues might be having on children's attendance, engagement, and achievement.

3.13 This will include understanding their academic progress and attainment, maintaining a high aspirations culture for this cohort, and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential.

3.14 We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm and educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. The DSL will use the information child with a social worker to make decisions in the best interests of the child's safety and welfare and help promote educational outcomes. The DSL will ensure that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

3.15 If the DSL is unavailable, staff should speak to the deputy DSL, a member of the SLT, and take advice from local children's social care (KCSIE (2022), paragraph 55).

3 TRAINING & INDUCTION

The critical training elements are:

Induction Training – this is mandatory and should include.

- the child protection policy.
- the behaviour policy.
- the staff behaviour policy (sometimes called a code of conduct).
- the safeguarding response to children who go missing from education; and
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). (See KCSIE (2022))

DSLs – attend training every two years, and in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually.

All other staff – will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Members of the Governing Body of the school take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective.' This training is regularly updated. (See KCSIE (2022), paragraph 81.)

Safer Recruitment training is available to all relevant staff and governors involved in the recruitment process.

4.1 When new staff join our school, they will be informed of the safeguarding arrangements. They will be given a copy of our school's safeguarding policy and the staff code of conduct, Part one of '*Keeping Children Safe in Education*, who our Designated Safeguarding Lead (DSL) and Deputy DSLs are. They will also receive a copy of the behaviour policy and the school's response to children who go missing from education – this information is included in section 6 of this policy. All staff are expected to read these vital critical documents. They will also be provided with details.

4.2 Every new member of staff or volunteer will receive safeguarding training during their induction period within 1 week of joining the school. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child (including reassuring victims that they are being taken seriously and that they will be supported and kept safe), how to record, the processes for referral to Children's Services and the statutory assessments under Section 17 and Section 47 as well as the remit of the role of the Designated Safeguarding Lead (DSL). The training will also include information about whistleblowing concerning concerns about another adult's behaviour and suitability to work with children. Staff will also receive online safety training as this is part of the overarching safeguarding approach of our school.

4.3 In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff in understanding and discharging their role and responsibilities as set out in Part one of '*Keeping Children Safe in Education*. To achieve this, we will ensure that:

- all members of staff will undertake appropriate safeguarding training on an annual basis, and we will evaluate the impact of this training.
- all staff members receive regular safeguarding and child protection updates (for example, via email, e-bulletins, and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

4.4 All regular visitors, temporary staff and volunteers to our school will be given a set of safeguarding procedures; they will be informed of our DSL and alternate staff members and the recording and reporting system. (See Appendix 2).

4.5 The DSL, the alternate designated member(s) of staff and any other senior member of the team who may be in a position of making referrals or attending child protection conferences or core groups will attend one of the multi-agency training courses organised by Lambeth School Services and the Lambeth Safeguarding Partnership at least once every two years. The DSL and alternate will attend Designated Safeguarding Lead (DSL) training every two years. In addition to formal training, DSL will ensure that they update their knowledge and skills regularly but at least annually, to keep up with any developments relevant to their role.

4.6 Our governing body will also undertake appropriate training to ensure they can carry out their duty to safeguard all the children at our school. Training for Governors to support them in their safeguarding role is available from Lambeth School Services.

4.7 We actively encourage all our staff to keep up to date with the most recent local and national safeguarding advice and guidance; Annex A of '*Keeping Children Safe in Education (2022)*' provides links to guidance on specific safeguarding issues such as Child Sexual Exploitation and Female Genital Mutilation. In addition, local guidance can be accessed via [Lambeth Safeguarding Children Partnership](#)

5. PROCEDURES FOR MANAGING CONCERNS

5.1 London Nautical School adheres to child protection procedures that have been agreed locally through the Lambeth Safeguarding Children Partnership. Where we identify children and families in need of support.

5.2 Every staff member, including volunteers working with children at schools, advised maintaining '*it could happen here*' where safeguarding is concerned. When concerned about child welfare, staff members should always act in their best interest and be responsible for the actions outlined in this policy.

5.3 All staff are encouraged to report concerns and not see these as insignificant. Occasionally, a single incident, such as an injury or disclosure of abuse, is justified. More often, however, problems accumulate over a period and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in the policy immediately to allow the DSL to build up a picture and access support for the child at the earliest opportunity. Reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

5.4 School staff's responsibility is not to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise problems and inform the DSL with the information outlined in this policy.

5.5 The Designated Safeguarding Lead (DSL) should be the first point of contact for concerns and queries regarding safeguarding concerns in our school. Any staff member or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the alternate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior staff member.⁶ All concerns about a child or young person should be reported without delay and recorded in writing using the agreed system in the setting (see Appendix 1 for suggested template). Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved

- a note of any action taken, decisions reached and the outcome

5.7 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from the Lambeth Integrated Referral Hub as required. All information and activities taken, including the reasons for any decisions made, will be fully documented.

5.8 All referrals will be made in line with Lambeth Children's Services procedures as outlined in Appendix 3.

5.9 If there is a risk of immediate serious harm to a child immediately, a referral should be made to Lambeth Integrated Referral Hub directly. Anybody can make a referral in these circumstances. If the child's situation does not appear to improve, the staff member with concerns should press for reconsideration by raising concerns with the DSL and Headteacher. Problems could always lead to support for the child at some point.

5.10 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Lambeth Children Services or the police if:

- the situation is an emergency, and the designated senior person, their alternate and the Headteacher are all unavailable.
- they are convinced that a direct report is the only way to ensure the pupil's safety.

5.11 Any member of staff who does not feel that concerns about a child have been responded to appropriately and by the procedures outlined in this policy should raise their relations with the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point should contact Lambeth Children Services directly with their concerns.

6. Specific Safeguarding Issues

Contextual Safeguarding

6.1 At London Nautical School, we recognise that safeguarding incidents and behaviours can be associated with factors outside of the school environment and occur between children outside of the school. This is known as contextual safeguarding. It safeguards using contextual knowledge and considers whether children are at risk of abuse or exploitation in situations outside their families. Training will ensure staff, visitors, and volunteers know that extra-familial harms take various forms. Children can be vulnerable to multiple injuries, not limited to) sexual exploitation, criminal exploitation, and serious youth violence. When reporting concerns, staff should include as much information and background detail as possible so the DSL can make a referral with a holistic view of the child. This will allow any assessment to consider all the available evidence and the level of abuse. We recognise that children with special educational needs (SEND) can face additional safeguarding challenges in staff training. These indicators of possible abuse, such as behaviour, mood, and injury, relate to the child's disability without further exploration.

- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

6.3 At London Nautical School, we recognise that a previously looked after child potentially remains vulnerable, and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with and previously looked after children, all necessary work action must be taken to safeguard these children, who are a particularly vulnerable group.

Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE): County Lines and severe violence

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants and (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc., without plausible explanation.
- Gang association and isolation from peers/social networks.
- Exclusion or unexplained absences from school, college, or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas are known for sex work.
- Concerning the use of the internet or other social media.
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect and physical and sexual abuse.
- 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).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.

- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

Child Criminal Exploitation (CCE)

CCE occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants and (b) for the financial or another advantage of the perpetrator or facilitator and/and through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.
- children who suffer from changes in emotional well-being.
- children who misuse drugs and alcohol.
- children who go missing for periods or regularly come home late; and
- children who regularly miss school or education or do not participate in education.

County Lines and severe violence

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or another form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure victims’ compliance times.

Children can quickly become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

6.4 At London Nautical School, we train staff to recognise that both CSE and CCE are forms of abuse, and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to various other factors, including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when the activity appears consensual.

6.5 At London Nautical School, we recognise that Child Sexual Exploitation is a form of child sexual abuse. This power imbalance coerces, manipulates, or deceives a child or young person into sexual activity (a) in exchange for something the victim needs or wants, and b) for the perpetrator's financial advantage or increased status. Child sexual exploitation does not always include physical contact; it can also occur using technology. We understand that some children may not realise they are being exploited, e.g., they may believe they are in a genuine romantic relationship.

6.6 At London Nautical School, we understand that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines illegally. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, markets, and seaside towns. The key to identifying potential involvement in county lines is missing episodes when the victim may have been trafficked to transport drugs.

6.7 We understand that children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be compelled to be forced into carrying weapons such as knives or begin to take a knife for protection from harm from others. We will treat these children as victims understanding that they have been criminally exploited even if the activity appears to be something they have agreed or consented to. We recognise that the experience of exploited girls can be very different from that of boys and that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

6.8 At London Nautical School, staff are aware of the indicators and risk factors which may signal a child is vulnerable to or involved with serious violent crime. We refer to the Home Office's [Preventing youth violence and gang involvement](#) and [Criminal exploitation of children and vulnerable adults: county lines](#) guidance for more information.

6.9 If a child is suspected to be at risk of or involved in county lines, a referral to the Lambeth Integrated Referral Hub will be made alongside consideration of the availability of local services/third sector providers who offer support to victims of county lines exploitation.

Domestic Abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour or as a single incident, between two people over the age of 16 who are 'personally connected'

- (a) physical or sexual abuse.
- (b) violent or threatening behaviour.
- (c) controlling or coercive behaviour.
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional, or other abuse.

People are 'personally connected' when they have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with e shared parental responsibility for the same child or are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of the abuse and they are related to the abusive person.

(The definition is found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can occur inside or outside the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Even if a school/area is not part of Operation Encompass, it provides advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8 AM to 1 PM, Monday to Friday on 0204 513 9990 (charged at local rate).]

So-called 'honour-based violence (including Female Genital Mutilation and Forced Marriage

So-called 'honour-based' abuse (HBA)

It encompasses crimes committed to protect or defend the family's honour, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as a concern that a child might be at risk of HBA; they must contact the Designated Safeguarding Lead urgently.

FGM

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically occurs between birth and around 15 years old; however, it is believed that most cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elders from the country of origin
- being taken on an extended holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a particular procedure or celebration to become a woman, or parents wish to take their daughter out of school to visit an 'at-risk' country (especially before the summer holidays), or parents want to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting, or standing and may even look uncomfortable.
- spending more time in the bathroom or toilet due to difficulty urinating.
- spending long periods away from a classroom during the day with bladder or menstrual problems.

- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g., withdrawal or depression) on the girl's return
- reluctance to undergo regular medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

6.10 At London Nautical School, we recognise that our staff are well placed to identify concerns and act to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV) and provide guidance on these issues through our safeguarding training. Suppose staff have a concern regarding them being at risk of HBV. In that case, they should inform the DSL, who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

6.11 Where FGM has taken place, since 31 October 2015, there has been a mandatory reporting duty placed on teachers. [Section 5B of the Female Genital Mutilation Act 2003](#) (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales 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. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement, and further information on when and how to make a report can be found in the following Home Office guidance: [Mandatory Reporting of Female Genital Mutilation- procedural information](#) Home Office (December 2015) Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out and discuss any issues with the safeguarding lead and children's social care. The duty does not apply to at-risk or suspected cases.

6.12 At London Nautical School we recognise that forcing a person into a marriage is a crime in England and Wales. A forced marriage is entered without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional, or psychological. The Forced Marriage Unit has [statutory guidance](#) and [Multi-agency guidelines](#) and can be contacted for advice or more information: Contact 020 7008 0151 or email fm@fco.gov.uk.

Preventing radicalisation and extremism

As part of the Counter Terrorism and Security Act 2015, schools must prevent people from being drawn into terrorism. This is known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or showing signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about Prevent Duty and tackling extremism and can support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, indicating that they may need help or protection. Staff should use their judgement to identify children at risk of radicalisation and act proportionately, which may, including gate safeguarding lead (or deputy), make a Prevent referral.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages like illegal organisations or other extremist groups
- out of character changes in dress, behaviour, and peer relationships (but there are also compelling narratives, programmes, and networks that young people can come across online, so involvement with groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race, or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

6.13 We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability today. At London Nautical School, we will ensure that:

- Through training, staff, volunteers, and governors understand radicalisation and extremism, why we need to be vigilant in school, and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- The DSL has received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism.
- The DSL will make referrals by following our school procedures and attending Channel meetings as required.
- Through our curriculum will promote pupils' spiritual, moral, social, and cultural development.

Peer-on-peer abuse- Child-on-child sexual violence and sexual harassment

6.14 At The London Nautical School all staff are trained so that they are aware that safeguarding issues can manifest themselves via peer-on-peer abuse and sexual violence. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing bodily harm.
- sexual violence and sexual harassment.
- up skirting.
- sexting (also known as youth-produced sexual imagery); and
- initiation/hazing type violence and rituals.

6.15 We recognise that children are vulnerable to physical, sexual, and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as that achieved by an adult, so all staff and volunteers must remember the impact on both the victim of the abuse and focus on the support for the child or young person exhibiting the harmful behaviour. We understand that abuse can occur in intimate personal relationships between peers and that consensual and non-consensual sharing of nudes and semi-nudes' images/and videos¹ (also known as sexting or youth-produced sexual imagery) is a form of peer-on-peer abuse.

6.16 We understand that even if there are no reports in our setting, it does not mean it is not happening; it may be that it is just not being reported. We recognise that pupils may not find it easy to tell staff about their abuse and 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 which may come from a friend or overheard the conversation and will always be taken as seriously as abuse perpetrated by an adult. The same safeguarding children's procedures will apply to any likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating to peer-on-peer abuse; it must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Doing this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in the worst-case scenario, a culture that normalises abuse leading to children accepting irregular and dangerous behaviour.

6.17 At London Nautical School, all staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor will a victim ever feel ashamed for making a report.

6.18 All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about peer-on-peer abuse. The DSL will respond to any problems related to peer-on-peer abuse in line with the guidance outlined in Part five of '*Keeping Children Safe in Education and colleges* (2022). We will ensure that all concerns, discussions, and decisions are recorded. Any identified actions are followed up with worker agencies, including police and Social Care, to respond to sexual violence and harassment concerns. There are concerns or worries about developmentally inappropriate or harmful sexual behaviour from the Harmful Sexual Behaviour (HSB) Team as required to ensure we are correctly the child(ren).

6.20 Support will depend on the circumstances of each case and the needs of the child; it may include completion of risk assessments to support children to remain in school whilst safeguarding other children and the victim, delivery of the early intervention in respect of and referral to Lambeth IRH and HSB team.

¹ UKCIS guidance: [Sharing nudes and semi-nudes advice for education settings](#)

Modern Slavery

6.21 At London Nautical School, we understand that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance on [Modern slavery: how to identify and support victims](#) for concerns of this nature.

Safeguarding responses to children who go missing

They know where children are during school term time. Missing school can indicate abuse and neglect and may raise concerns about other safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up-to-date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2022), the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age
 - d. are in custody for four months or more (and will not return to school afterwards), or
 - e. are permanently excluded

We will ensure that pupils who are expected to attend the school but fail to take their place will be referred to the local authority.

When a pupil leaves the school, we will record their new school's name and expected start date.

6.22 At London Nautical School, all staff should be aware of the safeguarding responsibilities for children who are missing education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

6.23 At London Nautical School, we adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who are missing:

- An attendance register is taken at the start of the first session of each school day and once during the second session.
- We make every effort to contact parents and carers and follow up with emergency contacts.
- We hold at least two emergency contact numbers for each pupil on our roll wherever possible.
- Staff will alert DSLs to any concerns regarding children absent from school.

- The DSLs will meet regularly with the Attendance Lead, SENCo and other pastoral team members to ensure that each response is thorough and considers all the relevant information about individual children.
- We will follow the procedures outlined in our attendance policy, including undertaking first-day day calling and monitoring data to ensure we intervene early in cases of poor attendance or unexplained absences.
- When removing a child from the roll at the standard and non-standard transition points, we will inform the Local Authority by statutory requirements and pass on all safeguarding files.

Mental Health

All staff at London Nautical School know that mental health problems can, in some cases, indicate that a child has suffered or is at risk of abuse, neglect or exploitation.

School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

Suppose staff have a mental health concern about a child that is also a safeguarding concern. In that case, immediate action should be taken by speaking to the designated safeguarding lead or a deputy. [Explain how to do this in your school.]

If the school has a Senior Mental Health Lead, they should be named here, along with information about how they can be contacted.]

6.24 At London Nautical School, all staff are made aware, through training, that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Our staff are well placed to observe children daily and identify those whose behaviour suggests that they may be experiencing a mental health problem or at risk of developing one.

6.25 We understand that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence, and adulthood. Therefore, through training, staff know how children's experiences can impact their mental health, behaviour, and education. All staff are knowledgeable if they have a mental health concern about a child that is *also* a safeguarding concern, they should take immediate action by passing the information on to a Designated Safeguarding Lead.

6.26 At London Nautical School we have a named Mental Health Lead. There are clear systems and processes for identifying possible mental health problems and working with other agencies as required to respond to these concerns. Designated Safeguarding Leads refer to [Mental Health and Behaviour in Schools' DfE guidance for further support](#).

Online Safety

At London Nautical School, we manage this risk by:

“When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems which are regularly reviewed for their effectiveness.

6.27 At London Nautical School, all staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. We understand that in many cases, abuse will occur concurrently via online channels and in daily life. We know that children can also abuse their peers online. This abuse includes harassing and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of offensive videos such as pornography.

6.28 As part of the requirement for staff to undergo regularly updated safeguarding training, online safety training is also delivered; we will ensure online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

6.29 More details can be found in our Acceptable Use, Data Protection and Social Media policies, which consider the 4Cs, content, contact, conduct and commerce.

6.30 At London Nautical School, we recognise that technology and risks and harms related to the internet evolve and change rapidly. Therefore, we carry out an annual review of our approach to online safety, supported by a risk assessment (on at least a yearly basis) that considers and reflects the risks children face in our setting.

Cybercrime

6.31 We understand that cybercrime is a criminal activity using computers and the Internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale at speed) or (crimes that can be committed only by computer).

6.32 If there are concerns about a child in this area, the designated safeguarding lead will consider a referral to the [Cyber Choices programme](#), which aims to intervene where young people are at risk of committing or being drawn into low-level cyber-dependent offences and divert them to the more positive use of their skills and interests. It aims to intervene where young people are at risk of committing, or being drawn into, low-level dependent offences and divert them to the positive use of their skills and interests.

Children with special educational needs and disabilities or physical health issues

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Governing bodies and proprietors should ensure their child protection policy reflects others when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children are more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges

6.33 At London Nautical School, we recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children are more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

6.34 We work to address these additional challenges and consider extra pastoral support and attention for these children, along with ensuring appropriate communication support.

6.35 At London Nautical School, we also recognise that pupils who attend Alternative Provision will often have complex needs, and due to this, we are aware of the additional risk of harm these children may be vulnerable to.

Private Fostering

6.36 A private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, grandparents, or cousins.

Parents and private foster carers have a legal duty to inform the relevant local authority at least six weeks before the arrangement starts; not doing so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools must report to the local authority where they know or suspect that a child is subject to a private fostering arrangement. Although schools have a responsibility to the local authority, there is no duty for anyone, including personality foster carers or social workers, to notify the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the child's family to ensure they know their duty to inform the LA. The school itself must report fostering arrangements to the local authority.

On admission to the school, we will take steps to verify the adults' relationship to the child being registered.

7. RECORDS AND INFORMATION SHARING

7.1 If staff are concerned about the welfare or safety of any child at our school, they will record their concern either on the agreed reporting form (Appendix 1) or through the setting's electronic system (CPOMS). Any problems should be passed to the DSL without delay.

7.2 Any information recorded will be kept in a separate named file, in a secure cabinet if a paper system is used and not with the child's academic file. These files will be the responsibility of the DSL. Child protection information will only be shared within a school based on the 'need to know the child's interests and understand that it remains strictly confidential.

7.3 Child protection information will be kept up to date. Each concern logged will include:

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

Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored on the child's file, whether an electronic or paper system is used. All our safeguarding records will include a chronology and contents front cover and will record significant events in the child's life.

7.4 When a child leaves our school (including in-year transfers), the DSL will contact the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school. This will be within five days of an in-year transfer in the first five days starting a new term. Not providing information per the timescales can impact the child's safety, welfare, and educational outcomes.

7.5 We will retain evidence to demonstrate how the file has been transferred; this may be in the form of written confirmation of receipt from the receiving school and proof of recorded delivery.

7.6 Before a child leaves, we will consider if it would be appropriate to share any additional information with the new school or college to help them put the proper support to safeguard this child.

7.7 Where a parent elects to remove their child from the school roll to home educate, the school will decide to pass any safeguarding concerns to the Inclusion and Education Welfare Services within Lambeth.

8. WORKING WITH PARENTS & CARERS

8.1 The London Nautical School is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them in understanding our statutory responsibilities in this area.

8.2 When new pupils join our school, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents and available on the school website. Parents and carers will be notified of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to contact Lambeth Integrated Referral Hub.

8.3 We are committed to positively, openly, and honestly working with parents. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to safeguard a child from harm.

8.4 We will seek to share with parents any concerns we may have about their child *unless* doing so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the school's concerns about a child will not prevent the DSL from making a referral to Lambeth IRH in those circumstances where it is appropriate to do so.

8.5 To keep children safe and provide appropriate care for them, the school requires parents to provide accurate up-to-date information regarding:

- Full names and contact details of all adults with whom the child usually lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above).
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).

The school will retain this information on the pupil file. The school will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission, and the date school has been supplied with the adult's full details in writing.

8.6 At London Nautical School, we are working in partnership with Lambeth Met Police and Lambeth Children's Services to identify and provide appropriate support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass. To achieve this, Lambeth Multi-Agency Safeguarding Hub will share police information of all domestic incidents where one of our pupils has been present with the Designated Safeguarding Lead(s). Upon receipt, the Designated Safeguarding Lead will decide on the child's appropriate support; this could be silent or overt. We will record this information and store this information.

9. CHILD PROTECTION CONFERENCES

At London Nautical School we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to harm further, as well as facing educational barriers to attendance, learning, behaviour, and poor mental health.

We consider these needs when planning to support pupils with a social worker.

9.1 Children's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will occur once a child has been made the subject of a Child Protection Plan to monitor the child's safety and the required reduction in risk.

9.2 Staff members may be asked to attend a child protection conference or core group meetings on behalf of the school regarding individual children. Usually, the person representing the school at these meetings will be the Headteacher or DSL. In any event, the person attending will need to have as much relevant up-to-date information about the child as possible; any staff member may be required to contribute to this process.

9.3 All reports for child protection conferences will be prepared in advance using the guidance provided by the Lambeth Safeguarding Children Partnership. The information in the account will be shared with parents before the conference as appropriate. It will relate to the child's physical, emotional, and intellectual development and presentation at school. To complete such reports, all relevant information will be sought from staff working with the child in school.

9.4 Clearly, child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than with another profession. We will work with an openly and honestly parent whose child has been referred to Children's Services or is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children, and we aim to achieve this in partnership with our parents.

10. SAFER RECRUITMENT

10.1 We will ensure that the Headteacher and at least one Governing Body member have completed appropriate safer recruitment training. At all times, the Headteacher and Governing Body will ensure that safer recruitment practices are followed by the requirements of *'Keeping Children Safe in Education'*, DfE (2022). At least one person involved in the interview will have received safer recruitment training.

10.2 At London Nautical School, we will use the recruitment and selection process to deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities.

10.3 We require details of a candidate's present (or last) employment and reason for leaving; entire employment history (since leaving school, including education, employment, and voluntary work), reasons for any gaps in employment and evidence of original academic certificates. We do not accept testimonials and insist on taking up references before the interview. We will question the contents of the application forms. If we are unclear, the candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

10.4 At London Nautical School I, we use a range of selection techniques to identify the most suitable person for the post. The interview panel agrees upon structured questions, and any areas of concern are explored to determine the applicant's suitability to work with children.

10.5 We will undertake Disclosure and Barring Service checks and other pre-employment checks as outlined in *'Keeping Children Safe in Education'* to ensure we recruit and select the most suitable people to work with our children.

10.6 We will maintain a Single Central Register (SCR) of all safer recruitment checks in line with statutory requirements. A senior member of staff will check the SCR regularly to ensure that it meets statutory requirements.

10.7 At London Nautical School, we recognise that safer recruitment is not just about carrying out the proper DBS checks and is not limited to recruitment procedures. Therefore, we understand the importance of continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. Further information about all these processes can be found in our Recruitment and Selection policy.

11. SAFER WORKING PRACTICE

11.1 All adults who meet our children have a duty of care to safeguard and promote their welfare. We have a legal obligation to ensure that all adults who work with or on behalf of our children are competent, confident, and safe.

11.2 All staff will receive a copy of our school's code of conduct at induction. They will be expected to know our school's Code of Conduct and policy for positive handling and carrying out their duties. There will be occasions when some form of physical contact is inevitable. For example, read the policy for safe restraint if a child has an accident, is hurt, or is hurt, or is in a situation of danger to themselves or others. This must be adhered to.

11.3 If staff, visitors, volunteers, or parent helpers work with children alone, they will be visible to other staff members wherever possible. They will be expected to inform another member of staff whereabouts in school, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

11.4 All staff and volunteers will give guidance about acceptable conduct and safe practice during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in 'Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings' (May 2019). All staff and volunteers are expected to carry out their work by following the guidance and will be made aware that failure could lead to disciplinary action.

12. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS

LOW-LEVEL CONCERNS ABOUT STAFF BEHAVIOUR

Allegations or concerns about an adult working in the school, whether as a teacher, supply teacher, other staff, volunteers, or contractors.

At London Nautical School, we recognise that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the headteacher without delay; any concerns about the headteacher should go to the Chair of Governors, who can be contacted by email at asmith@LNS.org.uk

Any concerns about the conduct of a staff member, supply teachers, volunteers or contractors should be reported to the headteacher.

Concerns may come from various sources, for example, a suspicion, complaint, or disclosure made by a child, parent, or another adult within or outside the organisation; or because vetting checks are undertaken.

The headteacher/principal must decide whether the concern is an allegation or low-level anxiety. The term 'low-level' situation does not mean it is insignificant; the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

Allegations

It is an allegation if the person* has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child and.
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers, and contractors.)

Allegations should be reported to the LADO 'without delay.

Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine any foundation for the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate behaviour outside of work. Example behaviours include, but are not limited to:

- being over-friendly with children.
- having favourites.
- taking photographs of children on their mobile phones.
- 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.

If the concern has been raised via a third party, the headteacher/principal should collect as much evidence as possible by speaking:

- directly to the person who raised the concern unless it has been raised anonymously.
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and, on reflection, they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous, then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely, and comply with the (UK) Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended to keep it at least until the individual leaves their employment.

Records should be reviewed to identify potential patterns of concerning, problematic or inappropriate behaviour.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records review might identify broader cultural issues in the school or college that enabled the behaviour. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

See also Developing and implementing a low-level concerns policy (Farrer & Co)

<https://www.farrer.co.uk/news-and-insights/developing-and-implementing-a-low-level-concerns-policy-a-guide-for-organisations-which-work-with-children/>

12.3 At London Nautical School, we recognise our responsibility to report/refer allegations or behaviours of concern and harm to children by adults in positions of trust, which the school does not employ, to the LADO service directly at <https://www.lambethsaferchildren.org.uk/lado-referrals>

These are adults, such as those in the voluntary sector, taxi drivers, escorts, and foster carers.

12.4 We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. When concerns arise, we will always ensure that the procedures outlined in Part 4 of *'Keeping Children Safe in Education, DfE (2022)* are adhered to and seek appropriate advice. The first point of contact for schools regarding concerns and allegation issues (including for supply teachers) is via the Local Authority Designated Officer on 02079264679. Following the advice, the LADO referral form should be completed and sent to lado@lambeth.gov.uk

See Appendix 4 for further details.

12.5 If an allegation is made or information is received about *any* adult who works/volunteers in our setting, which indicates that they may be unsuitable to work/volunteer with children, the member of staff receiving the information should inform the Headteacher immediately. This includes concerns relating to agency and supply staff and volunteers. Should an allegation be made against the Headteacher, this will be reported to the Chair of Governors. Suppose neither the Headteacher nor Chair of Governors is not contactable on that day. In that case, the information must be passed to and dealt with by either the member of staff acting as Headteacher or the Vice Chair of Governors.

In the event of allegations of abuse being made against the Headteacher, the procedure described in 12.4 should be followed.

12.6 The Headteacher or Chair of Governors will seek advice from the LADO within one working day. No staff or governing body member will undertake further investigations before receiving advice from the LADO.

12.7 When using a supply agency, we inform the agency of our process for managing allegations against staff and keep them up to date with any policy developments. Where concerns are raised about an individual and the school is not their employer, we recognise that we still have a responsibility to ensure allegations are dealt with appropriately. To achieve this, we will liaise with relevant parties, including the LADO, to determine a suitable outcome. Whilst the supply agency should be fully involved and co-operate with any enquiries from the LADO, police and or children's services, we recognise that the school will usually take the lead in investigating as we have direct access to any affected children and other school staff to collect the facts.

12.8 Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Chair of Governors should contact the LADO directly via email at lado@lambeth.gcsx.gov.uk

Whistleblowing

Where there are concerns about how safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the public, such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

12.9 Further information and guidance, forms, leaflets, and the Allegations Against Persons whom Work/Volunteer with Children Procedures are found on the [Lambeth Safeguarding Children Partnership Website](#). Further national guidance can be found at [Advice on whistleblowing](#). The [NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is open from 8:00 am to 8:00 pm, Monday to Friday or via email: help@nspcc.org.uk.

12.10 The School has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of several listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. In that case, a referral will be made as soon as possible after the resignation or removal of the individual by advice from the LADO and HR. The school must also consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency) if a teacher is dismissed or the setting ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first.

Concerns that do not meet the harm threshold

12.11 The term 'low-level' concern does not mean it is insignificant; the behaviour towards a child does not meet the above-mentioned thresholds. In Lambeth, the 'low level' concern process is to consult with the Senior Safeguarding Manager Deborah Carter on 020 7926 4679 or dcarter@lambeth.gov.uk. At London Nautical School, we promote an open and transparent culture in which all concerns about all

adults working in or on behalf of the school or college (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately.

12.12 We have a policy which sets out what low-level concerns are, the importance of sharing these appropriately, and how the setting addresses unprofessional behaviour and supports the individual to correct it early. This includes when staff should self-refer, where, for example, they have found themselves in a situation that could be misinterpreted and appear compromising to others. On reflection, they believe they have behaved in such a way that they consider falls below the expected professional standards.

12.13 At London Nautical School, we understand the importance of recording low-level concerns and the actions taken considering these being reported. The records are kept confidential and stored securely. We will review the records we hold to identify potential patterns and act.

12.14 We recognise that low-level concerns should not be included in references unless they relate to a reference, such as misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it should be referred to in a reference.

13. Use of premises for non-school/college activities

13.1 Where we hire or rent out our facilities/premises to organisations or individuals (for example, community groups, sports associations, and service providers to run community or extra-curricular activities), we ensure that appropriate arrangements are in place to keep children safe.

13.2 We will seek assurances that the body concerned has appropriate safeguarding and child protection policies and procedures (including inspecting these as needed). 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. Failure to comply with this would lead to the termination of the contract.

14 RELEVANT POLICIES

14.1 To underpin the values and ethos of our school and our intent to ensure that pupils at our school are appropriately safeguarded, the following policies are also included under our safeguarding umbrella:

- Staff Code of Conduct
- Equalities including LGBTQ
- School Child Missing in Education
- Low-Level Concerns
- Anti-Bullying
- Behaviour which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Recruitment & Selection (which adheres to Part 3 of [Keeping Children Safe in Education 2022](#)).
- Whistleblowing
- Attendance
- Online Safety, Data Protection and GDPR
- Health and Safety, including site security

- Harassment and discrimination, including racial abuse
- Meeting the needs of pupils with medical conditions
- Intimate Care
- First aid
- Educational visits, including overnight stays
- RSHE

15. STATUTORY FRAMEWORK

The following legislation and guidance have devised this policy:

- [Working Together to Safeguard Children](#) DfE (July 2018)
- [Keeping Children Safe in Education](#) DfE (2022)
- [Guidance for Saferhttps://saferrecruitmentconsortium.org/ Working Practices for Adults who work with Children and Young People in Education Settings](https://saferrecruitmentconsortium.org/WorkingPracticesforAdultswhoworkwithChildrenandYoungPeopleinEducationSettings) (May 2019)
- [What to do if you're worried a child is being abused](#) DfE (March 2015)
- [Information sharing: advice for practitioners providing safeguarding services](#) DfE (July 2018)
- [The Prevent duty: Departmental guidance for schools and childcare providers](#) DfE (June 2015)
- [Mandatory Reporting of Female Genital Mutilation- procedural information](#) Home Office (December 2015)
- [Sexual violence and sexual harassment between children in schools and colleges](#) DfE (June 2021)
- [Teaching online safety in school](#) DfE (June 2019)
- [Mental Health and Behaviour in Schools](#) DfE (November 2018)
- [Data protection: a toolkit for schools](#) DfE (September 2018)
- [Promoting the education of children with a social worker](#) (June 2022)
- [Preventing youth violence and gang involvement](#)
- [Criminal exploitation of children and vulnerable adults: county lines](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(2019\)](#)
- <https://www.lambethsaferchildren.org.uk/>



Appendix 1: Draft Recording Form for Safeguarding Concerns

Staff, volunteers, and regular visitors must complete this form and pass it to Mr M Knight if they have a safeguarding concern about a child in our school.

Full name of the child	Date of Birth	Class/Tutor/Form Group	Your name and position in the school

Nature of concern/disclosure
<p>Please include where you were when the child made a disclosure, what you saw, who else was there, what the child said or did, and what you said.</p> <p>Time & date of incident:</p> <p>Who are you passing this information to?</p> <p>Name:</p> <p>Position:</p> <p>[Ensure that if there is an injury, this is recorded (size and shape), and a body map is completed]</p> <p>[Make it clear if you have raised a concern about a similar issue previously]</p>
<p>Your signature: Time form completed:</p> <p>Date:</p>



Time form received by DSL:

Action taken by DSL:

Referred to...?

Attendance Police DSL LADO IRH Community & Other
Lead Partnerships

Date:

Time:

Parents informed? Yes / No (If No, state reason)

Feedback given to...?

Pastoral team Teacher Child Person who recorded disclosure

Further Action Agreed:

e.g. School to instigate a Family Support Process, assessment by Children's Services

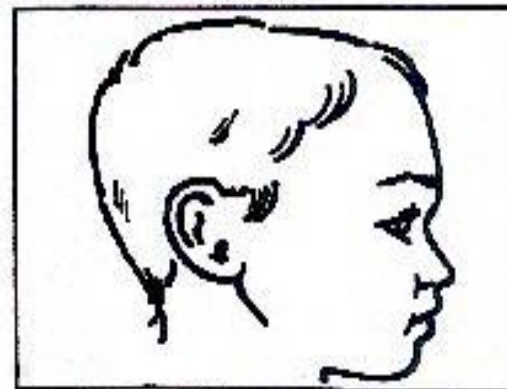
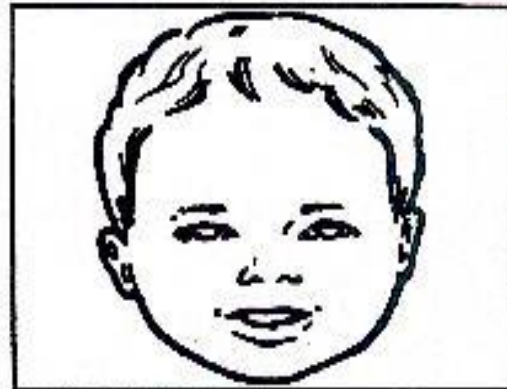
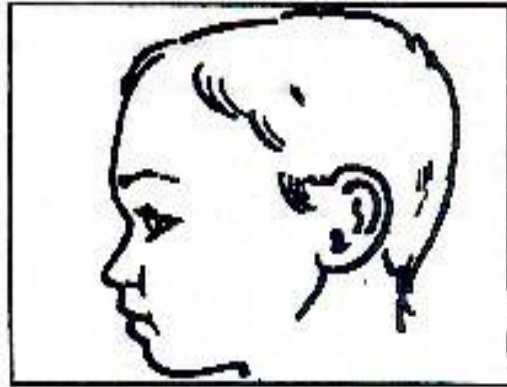
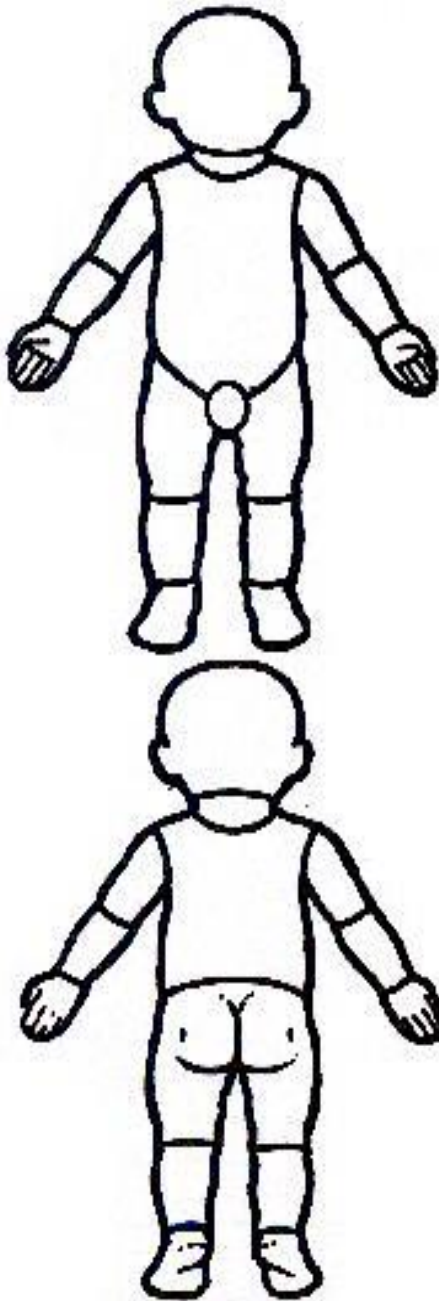
Full name:

DSL Signature:

Date:

Body Map

Young Child



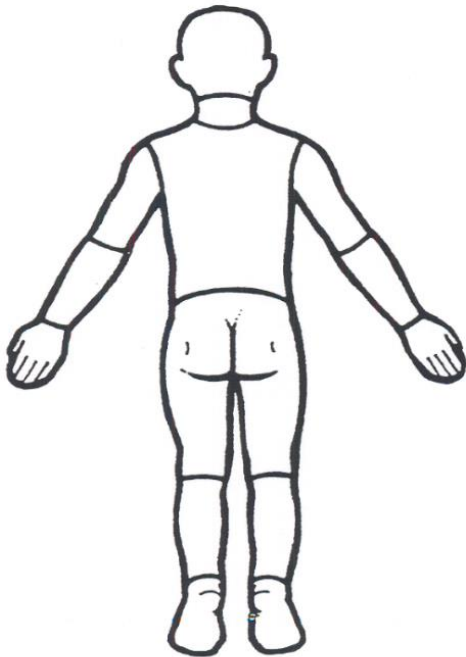
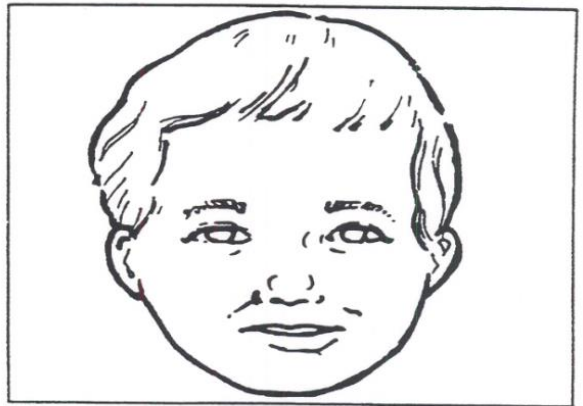
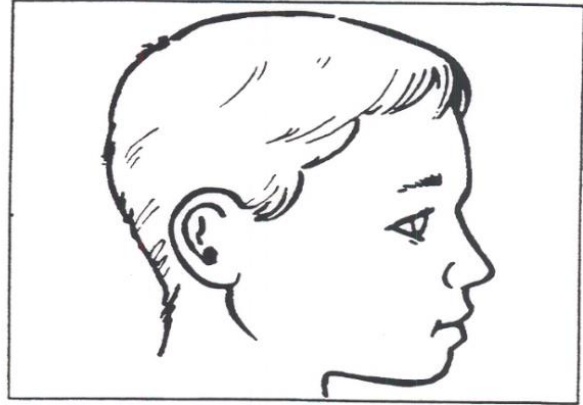
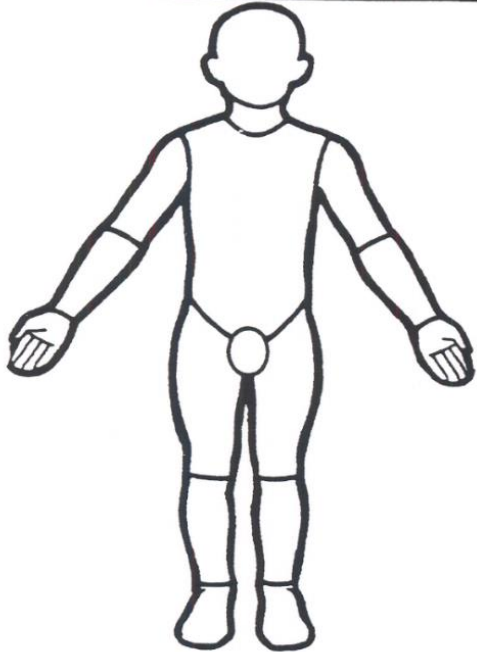
Indicate clearly where the injury was seen and attach this to the Recording Form

Indicate clearly where the injury was seen and attach this to the Recording Form

Older Child

OLDER CHILD

Name



244

Appendix 2: Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers.

London Nautical School

We all have a statutory duty to safeguard and promote the welfare of children,

We all have a statutory duty to safeguard and promote the welfare of children, and at our school, we take this responsibility seriously.

Suppose you have concerns about a child or young person in our school. In that case, you must share this information immediately with our Designated Safeguarding Lead (DSL) or one of the alternate post holders.

Do not think your worry is insignificant if it is about hygiene, appearance, or behaviour – we would instead tell you as we would rather know about something that appears small than miss a worrying situation.

Suppose you think the matter is grave and may be related to child protection, for example, physical, emotional, sexual abuse or neglect. In that case, you must find one of the designated professionals detailed below and provide them with a written record of your concern.

A copy of the form to complete is attached to this, and others can be obtained from Mike Knight (DSL)/ Natalie Harvey (DDSL). Please ensure you meet all sections as described.

If you cannot locate them, ask a school office staff member to find them and to ask them to speak with you immediately about a confidential and urgent matter.

Any allegation concerning a staff member, a child's foster carer or a volunteer should be reported immediately to the Headteacher. If an allegation is made about the Headteacher, you should pass this information to the Chair of the Governing Body. Alternatively, you can contact the LADO on 020 7926 4679. [NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is open from 8:00 am to 8:00 pm, Monday to Friday or via email: help@nspcc.org.uk.

The people you should talk to in school are:

Designated Safeguarding Lead (DSL): Mr M Knight

Location of office: 71

Contact Number: 0207 928 6801 ext 226

Deputy Designated Lead: Miss N Harvey

Location of office:208

Contact Number: 0207 928 6801 ext 216

Chair of Governing Body: Mr A Smith

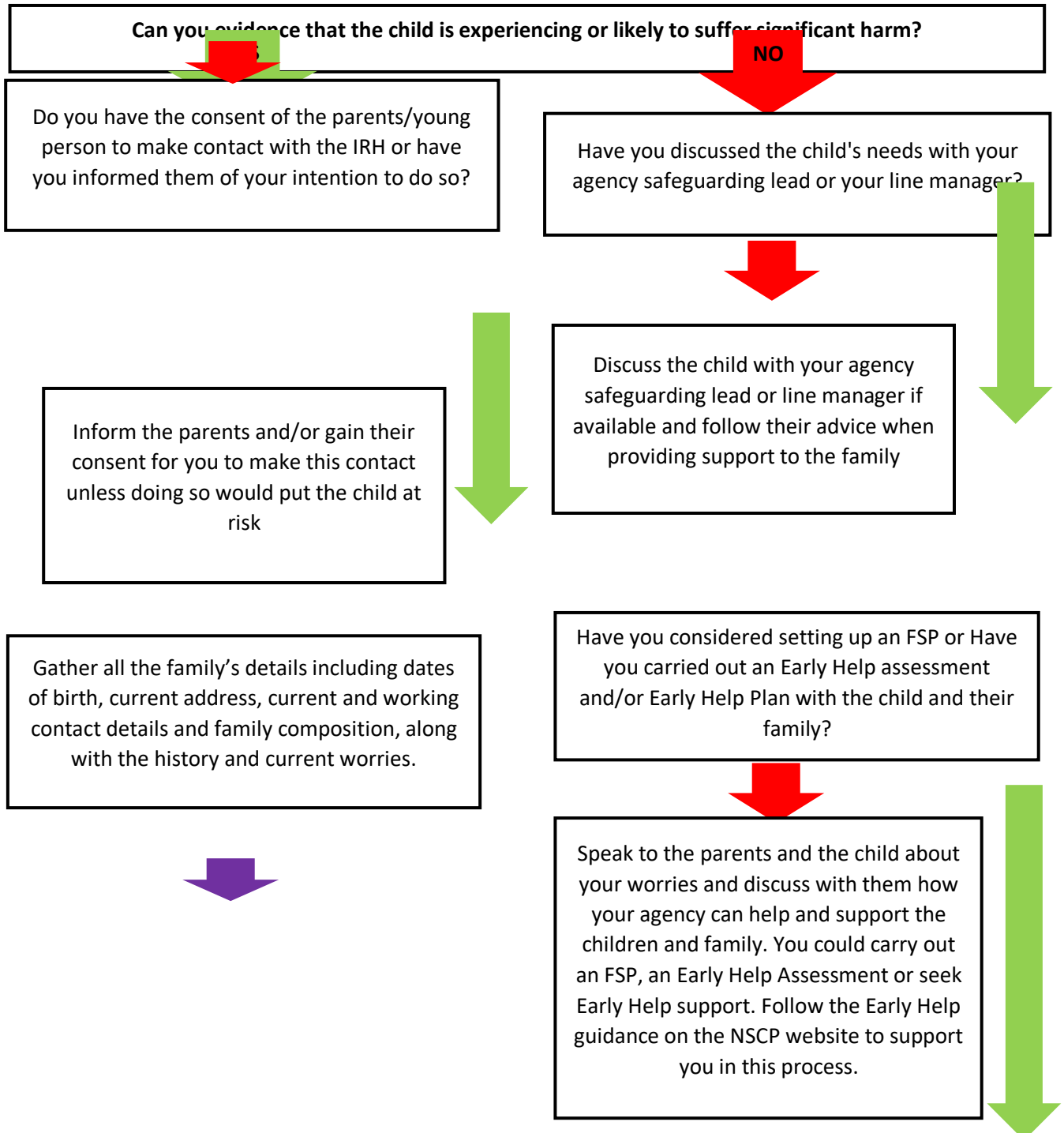
Contact email: asmith@LNS.org.uk

At London Nautical School we strive to safeguard and promote the welfare of all our children.

Appendix 3: Local Safeguarding Procedures

Integrated Referral Hub

Before contacting the IRH, please answer the following questions and follow the advice provided:



Call IRH .This number can be found in the staffroom. Have a discussion with a Duty Social Worker. A copy of the discussion will be securely emailed or posted to you. Follow the advice given by the duty social worker.

Keep a record for your own agency's safeguarding recording process

NB: The contact number for parents, carers and members of the public is

02079263100



Where you have carried out an Early Help Assessment and Plan which has been reviewed and amended as required - and the child's needs are not being met or in fact have increased, gather the information requested in this form and then contact IRH.

Appendix 4: Advice for schools, colleges, and alternative education providers where there are concerns about an adult who works within the setting.

[Links and guidance](#)

How to make a referral

1. Discuss your referral with Lambeth's Designated Officer, Andrew Zachariades, on **020 7926 4679** or **07720 828 700**
2. Download the **Allegations Referral Form**
3. Complete the form with as much detail as possible
4. Email the completed form to **LADO@lambeth.gov.uk** and the Integrated Referral Hub on **helpandprotection@lambeth.gov.uk**

Links

Lambeth Designated Officer:
Andrew Zachariades

Call 020 7926 4679

Call 07720 828 700

Download Allegations Referral Form

LADO@lambeth.gov.uk

Integrated Referral Hub

Call 020 7926 3100

helpandprotection@lambeth.gov.uk

Appendix 5:

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD

