Habs

HABERDASHERS'
ELSTREE SCHOOLS

Safeguarding Policy

Policy Type	Statutory
Regulation	ISSR: Part 3, 7
Reviewed by	Deputy Head Pastoral
Approval Committee	Board
Last Review	Autumn 2026
Next Review	Autumn 2027

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1 Related Information

1.1 Availability of Statutory Policies

All statutory policies are available on the School's website and on Firefly.

1.2 Statutory Guidance

This statutory policy has been reviewed in accordance with the following guidance:

ISSR Part 3
7. The standard in this paragraph is met if the proprietor ensures that—
7(a) arrangements are made to safeguard and promote the welfare of pupils at the School; and
7(b) such arrangements have regard to any guidance issued by the Secretary of State.

1.3 Supporting Documents

The following related information is referred to in this policy:

Acceptable Use Policy-Staff
Acceptable Use Policy- Students
Attendance Policy (Boys' School)
Attendance Policy (Girls' School)
Admissions Policy
Anti-Bullying Policy
Anti-Racism Policy
Behaviour, Rewards and Sanctions Policy (Boys' School)
Behaviour, Rewards and Sanctions Policy (Girls' School)
Code of Conduct for Staff
Online Safety and Mobile Phone Policy
First Aid Policy
Individual Needs and SEND Policy
Little Habs Safeguarding Policy
Lone Working Policy
Low-Level Concern Policy
Missing Child Policy
PSHE Policy
Relationship, Sex and Education Policy (Boys' School)
Relationship, Sex and Education Policy (Girls' School)
Safer Recruitment and Disclosure Policy
Whistleblowing Policy

1.4 Terminology

DSL means Designated Safeguarding Lead.

Executive Principal oversees both Haberdashers' Boys' School and Haberdashers' Girls' School and the central functions comprising the Haberdashers' Elstree Schools.

Head where not explicitly defined, means the Headmaster of Haberdashers' Boys' School and Headmistress of Haberdashers' Girls' School.

Governor means a Director of Haberdashers' Aske's Elstree Schools Limited acting in a governance capacity of one or more of the Haberdashers' Elstree Schools.

Parents includes one or both parents, a legal guardian, or education guardian.

School means Haberdashers' Boys' School and Haberdashers' Girls' School, which are operated by the Haberdashers' Aske's Elstree Schools Limited, the Schools Trustee of Haberdashers' Aske's Charity.

Student or **Students** means any student or students in the School at any age.

2 Policy Statement

Safeguarding underpins everything the School does with children if they are to thrive in all areas of life at the School and beyond. Every member of staff, supply staff, trainee teacher, volunteer or contractor who comes into contact with children at the School has a role to play in safeguarding, a responsibility to act and to be confident reporting concerns, sharing information and putting the child's needs first, regardless of how difficult it might be or how uncomfortable it might feel. Staff are encouraged to maintain the attitude of 'it could happen here.'

This policy has been approved by the Governors and applies to all members of staff (including Professional Service Staff who work centrally), governors, supply staff, trainee teachers, visiting music teachers, sports coaches and volunteers. It is available to Parents via the School website and also available to Parents in paper form on request. It applies to all those who work with Students even where this is away from the School, for example, at an activity centre or an educational visit. It also applies to EYFS (Early Years Foundation Stage) provision.

This policy has been developed in accordance with, and is directed by, the following legislation, statutory guidance and advice:

- Children and Social Work Act 2017
- Children Missing Education (September 2016)
- Counter-Terrorism and Security Act 2015
- Modern Slavery Statutory Guidance 2026
- Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers (updated May 2024)
- Keeping Children Safe in Education (KCSIE) (September 2026)
- London Safeguarding Children Board Child Protection Procedures 7th Edition 2024
- Prevent Duty Guidance for England and Wales (updated March 2024)
- The Children Act 1989, 2004
- The Education Act 2002
- The Female Genital Mutilation Act 2003 (via the Serious Crime Act 2015)
- What to do if you are worried a child is being abused (March 2015)
- Working Together to Safeguard Children ( ] (March 2026)
- Voyeurism (Offences) Act 2019
- Working Together to Improve School Attendance (July 2026)
- JlEarly years foundation stage statutory framework for group and school-based providers July 2025
- Generative AI in education June 2025

- RSE and Health Education July 2025
- Restrictive interventions, including use of reasonable force, in schools April 2026

This policy aims to be a child-centred policy where the needs and views of the child are foremost in the decision-making and in the policy itself. Children want to be respected, their views heard, to have stable relationships with professionals built on trust and to have consistent support provided for their individual needs. “Nothing is more important than children’s welfare” (Working Together to Safeguard Children December 2026). This premise underpins the provision and planning of PSHE and RSE lessons, form time and assemblies, the reviewing of anti-bullying procedures and policies, as well as the positive relationships Students have with teachers and tutors and the range of staff available for Students to turn to for support.

No single professional can have a full picture of a child’s needs and circumstances. In order for children and their families to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy is reviewed annually, approved by the Board of Governors and signed off by the Chair of Governors. There may be a need, either through reviews or a change in staffing, legislation or guidance, to update the policy at any time during the School year. If this is the case the Designated Safeguarding Lead(s) would inform the governing body via the Clerk to the Governors and the Governor with responsibility for safeguarding matters.

The Safeguarding Governor has oversight of safeguarding procedures in place and liaises closely with the DSL at each school. This includes two-weekly meetings by phone or face to face with the DSL, as well as termly joint school safeguarding meetings. Matters discussed may include any major bullying incidents, trends, updates in EDI, filtering and monitoring, any new legislation, key safeguarding issues, including cross-school issues. When visiting, they also talk to other members of staff and children to help satisfy themselves that safeguarding processes are in place and being followed and regularly feed back to the Governing Board on safeguarding matters. Safeguarding monitoring reports, including trends, training, attendance, filtering and monitoring, child protection activity and allegations management, are reviewed termly by governors. This also includes a review of logs including bullying, serious sanctions, racism, homophobia, harmful sexual behaviours and where reasonable force has been used (see **behaviour policy** for further detail on reasonable force.). The School fully recognises its duties and responsibilities in respect of child protection and the safeguarding of all its Students is its highest priority. Every member of staff, supply staff, trainee teachers, including visiting music teachers, sports coaches, volunteers and Governors is under a general legal duty to:

- Protect all children from all kinds of abuse
- Be aware of the School’s Child Protection procedures and to follow them
- To always act in the best interests of the child, ensuring early help is sought whatever the concern.

Safeguarding and promoting the welfare of children is defined as: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or without the home, including online; preventing the impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes (KCSIE (September 2026). Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional

support, even if they are not suffering harm or at immediate risk. “Children” includes everyone under the age of 18.

Family help (including universal services, community-based early help, and targeted early help support) is support for children of all ages that improves a family’s resilience and outcomes or reduces the chance of a problem getting worse. Any child may benefit from Family Help, but all school staff should be particularly alert to the potential need for early help for a child who is disabled or has specific additional needs, has SEND, has a mental health need, is a young carer, children who are homeless, living in temporary accommodation, or experiencing housing instability, is pregnant and/or a parent, exhibits early signs of abusive violent and/or harmful behaviours, is showing signs of being drawn into anti-social or criminal behaviour such as gangs or county lines, frequently goes missing from education, home or care, has been frequently removed from the classroom, has experienced multiple suspensions or is at risk of being permanently excluded, is at risk of exploitation, modern slavery, trafficking or CCE/CSE, is at risk of being radicalised or exploited, has a parent or carer in custody, is in a home presenting challenges for the child such as drug or alcohol misuse, mental health issues or domestic abuse, is misusing substances themselves, is at risk of honour or faith-based abuse such as FGM, or is a privately fostered child.

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

3 The Designated Safeguarding Lead and other Key Staff

Each School has appointed a member of the Senior Leadership Team to be Designated Safeguarding Lead for Child Protection (DSL). The DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring processes in place). The role includes liaising with local authorities, liaising with the Governor responsible for overseeing safeguarding matters, training (staff, governor and appropriate Student training), secure record-keeping and transfers of such records, as well as maintaining an overview of safeguarding within the School. See Appendix B – Role of the Designated Safeguarding Lead.

The DSL for each school has the time, status and authority to be responsible for such matters. They are supported by the Head in their role. The Parents are welcome to contact the DSL if they have any concerns about the welfare of any child in the School, whether their concerns relate to their own child, another child in the School or to any other member of the School community. The Parents or Students may also discuss concerns with a form tutor or another member of staff who will notify the DSL in accordance with the procedures outlined in Section 6 “Identifying and Recognising Signs of Abuse and Neglect” and Section 7 “Reporting Concerns”. If concerns relate to a member of staff, Parents or Students should contact the Head. All staff, including the DSL, will always report allegations of abuse against staff to the Head without delay (see Section 8 on “Allegations”). If the concern relates to the Head, they should contact the Executive Principal. If the concern relates to the Executive Principal, they should contact the Chair of Governors. Where a member of staff works across both Schools, they should contact the appropriate Head, based on the school at which the child or children are on roll, and if unsure, should contact the Executive Principal.

The DSLs and the deputy DSLs receive updated child protection training at least every two years so that they have a complete safeguarding picture. This will include local inter-agency working protocols and training in Prevent duties. This is supplemented with regular updates, for example, scenario training, e-bulletins and staff meetings at least annually. The DSL has

relevant multi-agency training to make referrals and would normally lead on referrals, including those to Channel (the Prevent referral programme). The DSL will also support staff who make direct referrals to Social Care or Channel, and is available for general safeguarding advice for Students, staff and Parents.

Designated Safeguarding Leads (DSL) are as follows:

- Boys' School – Miss Katie Barron, Deputy Head (Pastoral), member of the Senior Leadership Team 020 8266 1712
- Girls' School – Mrs Claire Brown, Head of Junior School, member of the Senior Leadership Team 020 8266 2302

Students, staff and Parents are able to seek safeguarding support or advice during the working day in term time (between 8am and 4pm on any school day) by calling 020 8266 1983/1913 (Boys' School) or 020 8266 2304/ 2473 (Girls' School), or by emailing safeguardingboys@habselstree.org.uk or safeguardinggirls@habselstree.org.uk. Between 4pm and 6pm students, staff and parents can call the school office on 020 8266 1700 (Boy's School – until 5.30pm) or 0208 266 2300 (Girls' School – until 6pm) and ask to be put in touch with a DSL. Should an urgent safeguarding issue arise outside these times, parents and students are advised to seek external support or to contact emergency services as appropriate. Contact numbers can be found here.

In the absence of the DSL, a deputy DSL should be contacted.

Boys' School

The Deputy DSLs in the Boys' Senior School are:

- Mr Robert Sykes, Headmaster, 0208 266 1700
- Mr Adam Lawrence, Head of Upper School, 020 8266 1751
- Mr Tom Hardman, Head of Middle School, 0208 266 1753
- Mr Michael Broadwith, Head of Sixth Form, 0208 266 1742
- Mrs Susanna Muller, Pastoral Support Manager 0208 266 1700

The Deputy DSLs in the Boys' Preparatory and Pre-Preparatory School are:

- Mrs Michelle Best, Head of Prep and Pre-Prep School, 0208 266 1934
- Mr Paul Swindell, Deputy Head (Pastoral), Preparatory School, 0208 266 1879

Girls' School

The Deputy DSLs in the Girls' Senior School are:

- Dr Hazel Bagworth-Mann, Headmistress 0208 266 2420
- Mrs Camilla Milsom, Assistant Head (Head of Sixth Form) 0208 266 2429
- Ms Gillian Aldcroft, Head of Upper School 0208 266 2348
- Mr Keith Brown, Head of Middle School 0208 266 2477
- Mrs Tania Jackson, Pastoral Support Manager 0208 266 2304

The Deputy DSL in the Girls' Junior School is:

- Mrs Ursula Elliott, Deputy Head (Pastoral) 0208 266 2343

Little Habs

The DSL and Deputy DSLs in Little Habs are:

- Ms Victoria Huggett (DSL), Nursery Manager 0208 266 1951 (
- Miss Becky Nutkins (DDSL), Nursery Teacher 0208 266 1951

Please refer to the Little Habs Safeguarding policy for further information. Staff working at Little Habs Nursery should also refer to their safeguarding policy.

The nominated School Governor with responsibility for Safeguarding and Child Protection is Mr Sural Bhanshaly. He can c be contacted through the telephone number of the trustees, The Worshipful Company of Haberdashers, 0207 246 9988.

4 Contact Numbers

The Chair of the Governing Body is Mr Julian Gregory, and the Vice Chair is Ms Henrietta Afolami. They may be contacted by email via the Clerk to the Governors: tmonod@habselstree.org.uk or via the Haberdashers' Company, c/o Haberdashers' Hall, 18 West Smithfield, London WC1A 9HQ. Telephone 020 7246 9988.

Information for professionals and volunteers working with children residing in Hertfordshire can be found at:
https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/hertfordshire-safeguarding-children-board/professionals-and-volunteers/professionals-and-volunteers.aspx#

Useful contacts include:

MASH – Multi-Agency Safeguarding Hub (for referrals of Students living in Herts) Professionals – report a concern about a child or young person | Hertfordshire County Council	Tel: 0300 123 4043
Where there are concerns for a child, a professional consultation is available by phoning: Consultation Hub	Tel: 01438 737511 (professionals only)
Where there are clear concerns about risk of harm to a child, a referral should be made to: Hertfordshire.gov.uk/child protection	Tel: 0300 123 4043

CPSLO - Child Protection School Liaison Officer: Development manager (county wide) Paula Hayden Paula.hayden@hertfordshire.gov.uk Christina (Chrissy) Lea CPSLO Christina.Lea@hertfordshire.gov.uk	Tel: 07811 822 057 Tel: 01992 531 907
Prevent non-emergency advice: prevent@herts.pnn.police.uk	Tel: 020 7340 7264 counter.extremism@education.gov.uk
If you want to report a case of FGM, call Herts Police	Tel: 01707 354000/101
Children's Safeguarding Contacts London – London Safeguarding Children Board (londonscb.gov.uk)	
Barnet MASH Email: MASH@Barnet.gov.uk Secure Email: mash@barnet.gcsx.gov.uk	020 8359 4066
Harrow MASH Email: duty&assess@harrow.gov.uk.cjsm.net	Telephone: 020 8901 2690 Out of hours: 020 8424 0999
Operation Encompass – for domestic abuse. The helpline is available for staff in educational settings Monday to Friday 8am to 1pm.	020 4513 9990
NSPCC Whistleblowing Helpline	Tel: 0800 028 0285 help@nspcc.org.uk
Families First (hertfordshire.gov.uk)	

If you have a serious safeguarding concern about an adult at School, first inform the Head who may contact lado.referral@hertfordshire.gov.uk. The Head will then be directed to the Hertfordshire Local Designated Officer on duty. The LADO will not deal directly with parents.

The following telephone numbers may be useful for Students:

- Hertfordshire Contact Centre Tel: 0300 123 4043
- Childline Tel: 0800 1111
- NSPCC Tel: 0808 800 5000
- Confidential Anti-Terrorism Helpline Tel: 0800 789312

NB: The School's catchment area includes several boroughs and authorities, so telephone numbers of other local authorities are available from the DSL. To find out what borough a child is in go to www.gov.uk/report-child-abuse-to-local-council

5 Providing a Safe Environment for Students and Staff

Every Student should feel safe and protected from any form of abuse which, in this policy, is detailed further in Section 6. The priority as a School is to provide all Students with a safe, secure and supportive environment in which they can learn, develop and have the best outcomes.

The School will ensure that safeguarding arrangements relating to the use of premises, changing facilities, toilets, overnight accommodation and educational visits are kept under review and are managed in accordance with current statutory guidance and risk assessment processes.

To ensure an effective safeguarding culture, the School will take all reasonable measures to:

- Protect each child from any form of abuse, whether from an adult, another Student or any other young person
- Ensure that all staff and volunteers are alert to the signs of abuse both in the School and from outside
- Establish, maintain and promote an environment and ethos in which Students, the School staff and volunteers feel safe and secure, are encouraged to talk and are confident of being listened to when they have concerns about the safety and wellbeing of a child
- Ensure that children are aware of how to safely report concerns they may have about their own safety and wellbeing or that of others
- Include opportunities in the PSHE and RSE curricula, assemblies and elsewhere for children to develop the skills they need to recognise and stay safe from abuse, including appropriate education around family relationships, personal intimate relationships, child-on-child abuse, radicalisation, discrimination, derogatory behaviour or other forms of physical violence and conflict, developing emotional intelligence and resilience, accessing appropriate support and e-safety
- The School adopts a whole-school approach to preventative education and will promote a culture of respect and zero tolerance towards sexism, racism, misogyny, misandry, homophobia, biphobia, sexual harassment, sexual violence, derogatory behaviour and other forms of violence and conflict. These values are reinforced through the School's behaviour expectations, pastoral support, PSHE curriculum, assemblies and wider educational provision
- Work with Parents to build an understanding of the School's responsibility for the welfare of their children
- Provide sufficient support and guidance so that Students have a range of appropriate adults to whom they can talk if they experience difficulties
- Provide the services of a School Counsellor and ensure Students know how to access this support in the School
- Contribute to the prevention of abuse by ensuring that the provision of teaching helps Students to protect themselves and develops responsible attitudes to adult life and parenthood
- Deal sensitively and appropriately with every suspicion or disclosure of abuse
- Follow the local inter-agency procedures of the Safeguarding Partnerships (where a referral is made to another local safeguarding children's board their procedures and advice will be followed)
- Support a child who has previously been looked after and may now still be vulnerable; the DSL will inform appropriate staff of relevant information in these circumstances

- The DSL will liaise with the child's Virtual School if they are in care or have previously been in care
- Support children who have been abused in accordance with their Child Protection Plan
- Support children in need of additional support, for example through CAMHS or other agencies, and their families in order to provide early intervention and help
- Provide guidance to Parents, children and staff about obtaining suitable support
- Work with other agencies to provide the best support for the Student and/or their Parents
- Design and operate procedures which promote this policy, including relevant child protection training for all staff
- Ensure that all staff are identifiable on the School site as described in the School's policy on security
- Ensure that the DSL makes prompt contact with the police if a criminal offence is suspected taking context into account.

5.1 Medical, Health and Safety

The School will take all reasonable measures to:

- Be alert to the medical needs (and other possible needs) of children with medical conditions, whether physical or mental health issues
- Operate clear and supportive policies on drugs, alcohol and substance misuse
- Operate robust health and safety procedures
- Take practicable steps to ensure that School premises are secure
- Ensure all visitors sign in on arrival and out on departure and are escorted while on the School premises by a member of staff or appropriately vetted volunteer. All visitors are given a visitor badge which must be clearly displayed at all times
- The School has a Lone Working Policy for working in the School outside of normal working hours or in the School holidays
- Provide relevant and up to date medical and health and safety training.

The DSL for Safeguarding and Child Protection is on the School's Health and Safety Committee and works closely with the School Nurses and Counsellors, and Head of Individual Needs.

5.2 Supporting Pupils with Medical Conditions at School

The School follows statutory guidance set out by the Department for Education on Supporting Pupils at School with Medical Conditions (Supporting pupils at school with medical conditions). Key points are as follows:

- **Individual Healthcare Plans (IHPs)**: The School Nurses will work with parents, and health care providers where appropriate, to create IHPs for children with specific medical needs. The IHP will provide a description of their condition, detail triggers, symptoms, medication, emergency treatment, and emergency contacts. Where appropriate, the IHP may also include recommended adjustments to curriculum or school activities.
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- **Support and Adjustments for Medical Conditions:** The School recognises that medical conditions can also present wider emotional and pastoral challenges. Appropriate support, including pastoral care and reasonable adjustments where

needed, should not ordinarily be delayed while waiting solely because a child is awaiting assessment, diagnosis or specialist advice, and will be considered on a case-by-case basis in line with the child's individual needs and the school's professional judgement. Where adjustments are deemed to be in the child's best interest, these should be implemented as soon as is reasonably practicable. If the needs are unclear, or where there is concern that adjustments may not be in the child's best interest, written medical advice and recommendations will be sought first. **Staff Training**: Designated staff will receive appropriate training from the School Nurses or the child's healthcare professionals before they can administer medicines or oversee medical procedures.

- **Student Independence**: Students are encouraged and supported to take responsibility for managing their own medical conditions and procedures as and when they are competent to do so.

Staff should be aware that children with medical conditions may be more vulnerable to safeguarding concerns, difficulties with attendance, social isolation, emotional wellbeing needs or barriers to learning, and should ensure that support is coordinated effectively and reviewed regularly. Staff should be aware that an incident relating to the management of a pupil's medical condition, including allergies, would not in itself normally require a safeguarding referral. However, where concerns arise that a pupil may be at risk of neglect, abuse or exploitation, for example where relevant medical information is withheld from the School or a pupil is repeatedly sent to School without essential medication, the matter should be treated as a safeguarding concern and considered in line with this policy.

5.3 The use of 'reasonable force' in schools

There are limited circumstances where it is appropriate for staff in schools to use 'reasonable force' to safeguard children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time.' Please see the behaviour policy for more detail.

6 Child Protection Training and Teaching

All staff (including volunteers in regulated activity) are given regular Child Protection training (which includes Prevent awareness, how to identify children at risk, and online safety) in line with the recommendations and advice of the Safeguarding Partnerships. The Head, DSL, deputy DSLs and other nominated staff complete Child Protection DSL training every two years.

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

All staff must read and confirm they have understood Part One of KCSIE (September 2026) in order to fully understand and discharge their role and responsibility in terms of safeguarding children. Staff are also expected to read and understand this Safeguarding Policy, where the

name and role of the DSL is detailed, in order to fulfil these responsibilities and to be able to respond to safeguarding concerns relating to Students or staff.

New staff joining partway through the year will also be issued with a copy of the Child Protection Awareness pack, containing photographs of the DSLs, either meet with or watch a brief video induction from the (Deputy) DSL, and complete Child Protection training online.

Visiting music teachers (VMTs), invigilators, PE coaches, trainee teachers, supply staff and volunteers are given appropriate child protection training and as part of this are made aware of the School's child protection procedures and how to report any concerns.

All staff, trainee teachers, supply staff and volunteers as part of their induction, should undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). Staff are directed to read the following documents:

- The School's Safeguarding Policy including the role and identity of the DSLs (this policy) which includes information on Children Absent from Education and procedures to deal with child-on-child abuse
- KCSIE Part 1 (September 2026)
- Behaviour, Rewards and Sanctions Policy
- The Code of Conduct for Staff which includes guidance on staff/pupil relationships and communications using social media
- Low Level Concerns Policy
- Whistleblowing Policy
- Staff ICT Acceptable Use Policy.

All Governors of the School are required to complete relevant safeguarding training and updates so that they can 'assure themselves that the safeguarding policies and procedures in school are effective and support the delivery of a robust whole school approach to safeguarding'. (KCSIE 2026 Part 2, paragraph 85).

The School's catering, cleaning and grounds contractors that work on campus, have their own child protection training at level 1 and maintain their own records. The managers of these contracted companies are encouraged to attend the School's inset training in addition to this. Notices with photos and details of how to contact the DSL are posted on their notice board.

Regular contractors will complete a Comfort Letter confirming that all employees in their company who visit the site have read the Safeguarding Policy, KCSIE Part One and watched the Safeguarding Induction video prepared by the DSL. They will be given photographic ID from the HR team once their identity is confirmed. For ad hoc contractors not in regulated activity, for example one making emergency repairs, supervision is provided.

All self-employed contractors will be required to read the Safeguarding Policy, watch the Safeguarding Induction video prepared by the DSL and any other mandatory policies depending on their role.

All safer recruitment checks for contractors will be undertaken by the HR Team.

For Commercial Hirers, all safer recruitment checks, including enhanced DBS checks and the required safeguarding training are the responsibility of the hiring organisation as per the terms of hire agreement. Necessary documentation is kept by the Commercial Team on record and will be requested for any new staff throughout the term of the agreement. Names of staff on site is also issued by the organisation and checked by the Commercial Team.

The DSL works closely with the Head of PSHE and pastoral leaders across the Schools to ensure that children are taught about safeguarding, including online and keeping themselves safe in an age-appropriate way. Teaching will include, where appropriate, healthy and respectful relationships, boundaries and consent, equality and prejudice, recognising abusive or controlling behaviours, sexual harassment and sexual violence, and understanding online harms including deepfakes, pornography, harmful online influences and how to seek support.

7 Identifying and Recognising Signs of Abuse, Neglect and Exploitation

All Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, neglected, or at risk of modern slavery, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity. Staff training covers the types of abuse, neglect and other safeguarding issues or causes for concern and the signs and symptoms in greater detail; the main points are highlighted below.

7.1 Types of Abuse and Neglect

All School staff should be aware that abuse, neglect, exploitation, modern slavery and safeguarding issues often overlap and are rarely standalone events that can be covered by one definition or label. All staff, but especially the DSLs should consider whether children are at risk of abuse or exploitation in situations outside their families (contextual safeguarding). Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation (including financial exploitation), sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse – including physical, sexual, emotional abuse and stalking), serious youth violence, county lines and radicalisation.

Types of abuse/neglect (as described in KCSIE (September 2026)):

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Physical Abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when Parents fabricate the symptoms of, or deliberately induce, illness in a child.

Emotional Abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child

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

Sexual Abuse: involves forcing, causing or or enticing a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (for example, rape or assault by penetration and non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the school policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

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

7.2 Signs of Abuse

7.2.1 Signs of possible Physical Abuse

Unexplained injuries, bruising, scalds, injuries on parts of the body where accidental injury is unlikely

- The child may be reluctant for you to contact Parents, they may flinch when approached or touched, they may be reluctant to change for PE, they may cover their legs and arms even when hot, they may exhibit behaviour which is unusual for them.

7.2.2 Signs of possible Emotional Abuse

Failure to grow or thrive, sudden speech disorders, delayed development

- Compulsive nervous behaviour, unwillingness to socialise, excessive fear of mistakes and excessive lack of confidence, reluctance to have their Parents contacted, excessive deference towards others, especially adults.

7.2.3 Signs of possible Sexual Abuse

- Pain, itching, bruising or bleeding in the genital or anal areas, STDs, recurrent urinary tract infections, stomach pain or discomfort when the child is sitting or walking
- Sudden and unexplained changes in behaviour, apparent fear of someone, self-harm, eating disorders or suicide attempts, sexualised behaviour inconsistent with the child's age, reluctance to change for PE, possession of unexplained amounts of money or gifts.

7.2.4 Signs of possible Neglect

- Being constantly hungry and sometimes stealing food, unkempt, loss of weight or constantly underweight, being dressed inappropriately for the weather conditions, untreated medical conditions
- Being tired all the time, frequently missing School or being late, unable to socialise, often left unsupervised.

7.3 Children with Special Educational Needs and Disabilities

Children with special educational needs disabilities (SEND) can face additional safeguarding challenges. This policy reflects the fact that additional barriers can exist when recognising abuse, neglect and exploitation 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 disability without further exploration
- These children being 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 disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care and
- These children may have issues over cognitive understanding- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

Reports of abuse involving children with SEND should therefore require liaison with the (Deputy) DSL and the special educational needs coordinator (SENCO), alongside appropriate pastoral support.

7.4 Children who are lesbian, gay, bisexual or gender questioning

A young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm; however they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are. Staff should be alert to these vulnerabilities and take appropriate steps to prevent and respond to bullying and discrimination.

The School recognises that children may question their gender and may need support from trusted adults. Staff should take time to understand the thoughts and feelings of children who are questioning their gender and exercise professional curiosity where there are wider welfare, safeguarding or wellbeing concerns. The Cass review identified that a cautious approach is necessary, as there remain many unknowns about the impact of social transition and gender-questioning children may have wider vulnerabilities, including in some cases, additional needs or neurodivergence. The School will not initiate action around social transition, but its role is to provide support, listen to and understand the child's views, and consider carefully any requests that are raised by a child or their parents. Social transition is an active intervention and any requests relating to social transition will be considered carefully, with the best interests of the child and the impact on other children as primary considerations.

It is recommended that when supporting a gender questioning child, families should be encouraged to seek clinical help and advice. The School will work in partnership with parents, involving them as a matter of priority and giving their views great weight, except for in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child. The School will endeavour to create a culture where children feel safe to share their concerns with staff and where discrimination and bullying will not be tolerated.

In supporting children who are questioning their gender, the School will have regard to the relevant provisions of Keeping Children Safe in Education (September 2026) and the recommendations of the Cass Review (2024), together with any other applicable statutory guidance or legal requirements. Any request relating to social transition will be considered on a case-by-case basis, led by the DSL and relevant school leaders, taking into account the best interests of the child, the views of parents, the impact on other children, safeguarding considerations and the School's legal responsibilities. The School recognises that particular caution should be exercised in relation to younger children, especially pre-pubertal children, and that age and stage of development are important considerations when making decisions about support and any request relating to social transition. Decisions will be recorded, reviewed and kept under ongoing consideration as a child's needs and circumstances may change over time.

Where a gender-questioning child does not wish to use facilities designated for their sex, the School will consider whether suitable alternative arrangements can be provided without compromising the provision of single-sex facilities or the safety, privacy, dignity, comfort and wellbeing of any child. The School will also manage participation in sport, physical education and residential accommodation in accordance with relevant statutory guidance, safeguarding considerations and equality obligations, taking account of the safety, privacy and wellbeing of all children.

7.5 Other Specific Safeguarding Issues

Staff should be aware that children who are homeless, living in temporary accommodation or experiencing housing instability may be more vulnerable to safeguarding concerns and may require additional support or early help.

The School recognises that young carers may face additional safeguarding, attendance, wellbeing and educational challenges. Staff should be alert to indicators that a child has caring responsibilities and ensure appropriate support and referrals are made where necessary.

All staff are made aware of, and alert to, other specific safeguarding issues, and given particular advice on these, by the DSL in the annual refresher training or interim updates. Further information can be obtained from the DSL.

7.6 Children Absent from Education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Children persistently absent with unexplainable and/or persistent absences from education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. It is important that the School response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Staff are alert to patterns of regular absence and will alert the DSL in line with other potential safeguarding concerns.

The School has an admissions register which is kept accurate and up to date. The School, where reasonably possible, will hold more than one emergency contact number for each Student. The School monitors student attendance through the daily register and has a duty to inform the local authority of any Student who fails to attend School regularly or has been absent for a continuous period of 10 days or more without permission from the School or because of illness, unavoidable cause or religious holiday.

In line with the now statutory guidance from 'Working Together to Improve School Attendance', the School will work with local authority children's services where absence indicates safeguarding concerns and will let the LEA know when children leave the school at non-transition points. The School will also notify the LEA within five days of adding a student's name to the admission register at a non-standard transition point. Where the whereabouts of a child is unclear or unknown, the School will liaise with the LEA and wider authorities where necessary to make enquiries to try to find out where the child is.

Where a parent notifies the school in writing that they are home educating, the School will delete the child's name from the admission register and inform the local authority. However, where parents only orally indicate that they intend to withdraw the child to be home educated, the School will consider notifying the LEA at the earliest opportunity.

The School's attendance monitoring systems regularly highlight Students whose attendance falls below 95% to pastoral staff to ensure that attendance is closely monitored, and regular absence is followed up in the best interests of the child.

For further information see the **Attendance Policy** and **Missing Child Policy**.

7.7 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) including County Lines, and Serious Violence

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. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them. It should be noted that exploitation does not always involve physical or in-person contact; it can also be facilitated and/or take place online. CSE and CCE can affect both male and female children and can include children who have been moved (trafficked) for the purpose of exploitation. This may constitute modern slavery. In accordance with the Modern Slavery statutory guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified. The experience of girls who are criminally exploited can be very different to that of boys. Indicators may not be the same, however all staff should be aware that girls are at risk of criminal exploitation too. It should be noted that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff should be aware the following can be indicators of both child criminal and sexual exploitation; unexplained gifts, money or new possessions indicating a child may have been approached by, or are involved with individuals associated with criminal networks or gangs and may be at risk of criminal and sexual exploitation, associate with other children involved in exploitation, suffer from changes in emotional wellbeing, misuse alcohol or other drugs, go missing for periods of time or regularly come home late, regularly miss school or do not take part in education,.

'County lines' is a term used specifically to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of 'deal line'. This activity can happen locally as well as across the UK. Children are increasingly being targeted and recruited online using social media. Children can become easily trapped by this type of exploitation as county line gangs can manufacture drug debts which need to be worked off or threaten serious violence or kidnap towards victims (and their families) if they attempt to leave the county lines network. Specific indicators of involvement in county lines include children who go missing and are subsequently found in areas away from their home, have been the victim, perpetrator or alleged perpetrator of serious violence, are involved in receiving requests for drugs via a phone line, moving drugs or handling and collecting money for drugs, exposed to 'plugging', found in accommodation they have no connection with, owe a 'debt bond' or have bank accounts to facilitate drug dealing.

Forms of exploitation may include forcing or manipulating children to move, store and sell drugs and money through county lines, working in cannabis factories, shoplifting or pickpocketing, being manipulated into committing vehicle crime or threatening/committing serious violence to others. Additionally, going missing and being found in areas away from their home, or being found in accommodation they have no connection with are also possible signs of involvement.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration or non-penetrative acts. It may include non-contact activities or grooming a child in preparation for abuse including via the internet. It can occur over time or be a one-off occurrence. CSE can affect any child who has been coerced into engaging in sexual activities, including those who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Victims may be criminalised for actions taken under coercion. Additional specific indicators of CSE that may be present in CSE are children who have older boyfriends or girlfriends, suffer from sexual transmitted infection or display behaviours beyond developmentally expected.

Serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. All staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL who will assess the risk to the student and others in the school, considering wider information or concerns, and take appropriate action. All staff should be aware they play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence who may also be victims themselves. The School recognises that children involved in serious violence may themselves be victims of abuse, criminal exploitation or trauma, and safeguarding responses will take account of the child's broader needs and circumstances. Early, evidenced-based, support for those considered at risk is vital, options may include support plans, access to trusted adults and referrals to relevant agencies.

All staff should be alert to indicators that signal children are at risk from or involved in serious violent crime. Signs include increased absence from school, changes in friendships or relationships with older individuals or groups, social isolation, significant declines in performance, signs of self-harm or significant changes in wellbeing or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Risk factors which increase the likelihood of involvement in serious violence are children with disrupted education or a history of offending.

7.8 Mental Health

All staff have a role in promoting good mental wellbeing. Staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns, including self-harm, suicidal ideation and risk of suicide. It could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be

experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise. This may include significant changes to behaviour, ongoing difficulty sleeping, withdrawing from social situations, not wanting to do things they usually like and physical signs of self-harm or neglecting themselves. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child, immediate action should be taken, following the Safeguarding Policy, and communicating with the DSL. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. This will usually be done in consultation with a DSL or Deputy DSL and the nursing team. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from the school counsellor or NHS 111.

On rare occasions, a Student's mental health difficulties may be so severe that the School judges that the best way to safeguard a Student or other members of the school community is to ask parents/guardians not to send the Student into school. This will always be in consultation with the Student's parents/guardians and the external medical professionals who will almost certainly be involved at this stage. Whilst a Student is not attending for mental health reasons, the School will continue to provide schoolwork as appropriate, offer pastoral support and engage with external agencies as necessary. The School will work with parents/guardians and medical professionals to ensure a plan for the Student to return to school when it is safe for them to do so is in place and regularly reviewed.

7.9 Honour or faith-based abuse

Honour or faith-based abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of honour or faith-based abuse are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of , or already having suffered from this.

7.10 FGM Mandatory Reporting Duty

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.

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 along with regulated health and social care professionals in England and Wales, to report to the police, where they discover (either through disclosure by the victim or by 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. It will

be rare for teachers to see visual evidence, and they should not be examining Students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

7.11 Forced Marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or another form of coercion is used to cause a person to enter into a marriage. Staff should report to the DSL any Student they believe to be vulnerable. It is now a crime to carry out any conduct whose purpose is to cause a child to marry before the age of 18, even if violence, threats or another form of coercion are not used.

7.12 Preventing the Radicalisation of Children and Young People

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools’ or colleges’ safeguarding approach. Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The School aims to protect and safeguard Students at risk of radicalisation and staff are alert to, and assess the risk of, Students being drawn into terrorism and extremist ideology. The School encourages healthy debate and discussion of issues at age-appropriate levels and in various areas, not just PSHE, and promotes a tolerant, respectful culture across the School. The School’s Friday Faith assemblies are an example of this. Staff use their professional judgment to identify Students who might be at risk of radicalisation and who may be in need of help or protection. If a member of staff has concerns over a Student at risk they will share that with the DSL who will refer the issue to the local Children’s Social Care/Safeguarding Partnerships and the local Prevent Coordinator and/or Channel Panel, a programme focussing on early support for a child or young person identified as being vulnerable to being drawn into terrorism or radicalisation.

7.13 Online Safety

All staff should be 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. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making, possessing, or sharing of nudes or semi-nude images or content, including those generated by AI, especially around group chats, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the DSL or deputy DSL.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- Content (being exposed to illegal, inappropriate or harmful content, e.g., pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories)
- Contact (being subjected to harmful online interaction with other users or generative AI applications that simulate this; e.g., peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes)
- Conduct (online behaviour that increases the likelihood of, or causes, harm e.g., the making, sending, and receiving explicit images, including those generated using AI, and online bullying)
- Commerce (risks such as online gambling, inappropriate advertising, phishing or financial scams. If students or staff are at risk, please report to the anti-phishing working group (https://apwg.org/)).

Measures are in place for appropriate online filters and monitoring systems which are regularly reviewed to help ensure the online safety of Students whilst at School. The filtering and monitoring also covers access to AI sites. The DSLs monitor and respond to any concerns which are triggered by the filtering and monitoring system. All staff should, as part of their online safety training at induction, gain an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The School aims to work in close partnership with Parents to ensure that children understand the opportunities associated with ICT and generative artificial intelligence (AI), whilst also understanding and knowing how to keep themselves safe. The safeguarding training that Staff receive also involves online safety training.

Within the ICT and PSHE curriculums, Students are taught a range of topics which include keeping safe online. Online safety education includes understanding the risks associated with AI-generated content, including deepfakes, manipulated images and videos, online misogyny, harmful influencers, pornography and the sharing of sexualised content. Students are taught how to identify such risks and seek support where required. The School has an Online Safety and Mobile Phone Policy, Students sign an Acceptable Use Policy and there is also a Mobile Phone Policy to ensure the school is a mobile phone-free environment by default.

Cybercrime is criminal activity committed using computers and/or the internet. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime without understanding the legal or ethical implications. If there are concerns about a child in this area, the DSL should consider referring into the Cyber Choices Programme.

7.14 Bullying

The School has an Anti-Bullying Policy. A bullying incident will be treated as a child protection concern if there is reasonable cause to believe the child is suffering or likely to suffer significant harm. No one person works on their own when dealing with a bullying incident and the threshold for referral is discussed in all cases. Details of cases are reported to Governors in safeguarding reviews throughout the year. The School maintains a bullying register.

7.15 Domestic Abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The definition of domestic abuse ensures that different types of relationships are captured including ex-partners and family members. It can encompass a range of behaviours including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be 'personally connected.' Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent or care giver abuse. It is noted that young people can experience domestic abuse within their own intimate relationships, and this form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse.' Anyone can be a victim of domestic abuse regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and it can take place inside or outside of the home. Experiencing or witnessing domestic abuse can have a serious, long lasting emotional and psychological effect on children and they may sometimes blame themselves for the abuse.

Operation encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. This includes all children connected to a household. The duty applies to all children in education from reception to the age of 17. The aim of the duty is to support education settings to provide timely, informed support to children affected by domestic abuse, and to ensure the school has up to date information about the child's circumstances and enable immediate support to be put in place according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures or referrals and applies solely to domestic abuse incidents. Where appropriate, the police and/or school should make a referral to local authority children's social care if they are concerned about a child's welfare.

7.16 Child-on-Child Abuse (Including harassment and violence)

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school and online. All staff should be clear of the policy and procedures with regard to child-on-child abuse and the important role they play in preventing and responding where they feel a child may be at risk from it and in creating a culture in which sexual harassment, sexual violence, sexist language and derogatory behaviour are recognised as unacceptable and are challenged. All staff should understand times when children might be at highest risk around the school day, such as immediately after school and that even if there are no reports in their School, it does not mean it is not happening, it may be the case that it is just not being reported. If staff have **any** concerns about child-on-child abuse they should speak to their DSL or Deputy DSL. Staff should understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as 'just banter,' 'having a laugh,' 'part of growing up' or 'boys being boys' can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. It is preventable and

recognising the risks early can be key to preventing children from going on to commit abuse or violence. Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based bullying and discriminatory bullying)
- Discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),
- Serious physical assault and harm, or threat of harm with a weapon,
- Sexual violence, such as rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment and Harmful Sexual Behaviour (HSB), i.e. unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of School. This may include sexual comments, remarks, jokes, online sexual harassment and behaviours potentially criminal in nature, such as grabbing bottoms, breasts or genitalia, pulling down trousers, flicking bras or lifting skirts. Such behaviour may be stand-alone or part of a broader pattern of abuse. Dismissing or tolerating such behaviours risks normalising them. Sexual harassment and HSB is likely to violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.
- Consensual and non-consensual making, possessing or sharing of nudes or semi-nudes, including AI-generated images and content. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

- Sexual exploitation, coercion and threats.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Harmful Sexual Behaviours (HSB) is an umbrella term and applies to behaviour occurring online, face to face or both. Children's sexual behaviour exists on a wide continuum ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. When assessing HSB, considering the ages and developmental stage of the children involved is critical. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years', or if one is pre-pubescent and the other is not. However, a younger child may also abuse an older child. Early intervention in inappropriate behaviour, such as misogyny or misandry, can help to prevent escalation to more serious abuse such as sexual harassment and sexual violence. Children who display HSB may have experienced their own abuse and trauma, and it is important they are offered appropriate support.

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7.16.1 Responding to Reports of Sexual Violence and Sexual Harassment (KCSIE (September 2026)

- Students may make a report about any harmful sexual behaviours, sexual violence or harassment they experience or witness via their Form Tutor/ Head of House or Head of Year/ Head of Section/ School Nurse/ Counsellor/ Pastoral Support Manager/ DSL or any teacher they feel comfortable talking to. They can call the direct safeguarding line or email safeguardingboys@habselstree.org.uk or safeguardinggirls@habselstree.org.uk. Students also have access to anonymous reporting. All reporting routes are regularly promoted and easily accessible to all students.
- If possible, such reports should be managed with two members of staff present, preferably one of them being the DSL or a deputy.
- The School's initial response to a report from a child is important. It is essential that ALL victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment nor should they ever be made to feel ashamed for making a report. It's important to explain that the law is in place to protect young people rather than to criminalise them, and this should be explained in such a way that avoids distressing them.
- All staff are trained as part of the annual child protection and safeguarding training how to raise a concern with the DSL.
- Junior School, Prep and Pre-Prep staff are provided with additional training each term, to reflect on case studies that articulate how KCSIE applies specifically to primary aged pupils and EYFS.
- If there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm', a referral will be made to appropriate external agencies.

7.16.2 Action following a Report of Sexual Violence, Harmful Sexual Behaviour and Sexual Harassment

- Immediate consideration should be given as to how to best support and protect the victim and the alleged perpetrator (and any other children involved/impacted)
- The starting point regarding any report is the School's zero-tolerance approach to any harmful sexual behaviour, sexual harassment, violence or abuse. Staff will be especially careful not to normalise or allow any implication that such behaviour can be dismissed as 'banter'. The School will carefully consider any report of harmful sexual behaviour, sexual violence and/or sexual harassment. The School recognises that whilst any child may be the victim or perpetrator of child-on-child abuse, for some forms of abuse, particularly harmful sexual behaviour, sexual harassment and sexual violence, 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 regardless of the sex or gender of those involved. The DSL (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the School's initial response
- The DSL will take into account the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
- The DSL will take into account the ages and developmental stages of the children involved and the nature of the alleged incident(s) including whether a crime may have been committed and consideration of where it sits on the harmful sexual behaviour continuum.

- The DSL will take into account any power imbalance between the children e.g. is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty? The DSL will consider if the alleged incident is a one-off or a sustained pattern of abuse and consider if there are any ongoing risks to the victim, other children or the School staff and also consider other related issues and wider context in line with contextual safeguarding
- Reports of sexual violence or sexual harassment should include the time and location of the incident. Subsequent risk assessments will include any actions to make the location safer
- It is important to understand intra-familial harms and identify any necessary support for siblings following incidents of harmful sexual behaviour, sexual violence or sexual harassment.

7.16.3 Options to Manage the Report

Every report will be considered on a case-by-case basis with the DSL or deputy taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required. There are four likely options to consider when making a report:

1. Manage internally – if the DSL considers that the child concerned is not in need of Family Help or statutory intervention then it may be appropriate to handle the incident internally through the School's own pastoral support processes, utilising the School's behaviour and bullying policies and providing pastoral support. It will still be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions, and reasons for decisions should be recorded.

2. Family Help (including universal services, community-based early help and targeted support) – this means providing support as soon as a problem emerges and can be particularly helpful to address non-violent harmful sexual behaviour and may prevent escalation to sexual violence. Family help, will work best alongside the School's policies and engagement with Parents. It will still be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions, and reasons for decisions should be recorded.
3. Referrals to local authority children's social care – where a child has been harmed, is at risk of harm, or is in immediate danger the DSL will make a referral to the local children's social care. Unless there is a compelling reason not to, the DSL will inform the Parents. The School will not wait for the outcome of the social care investigation before protecting the victim and other children but will work alongside and co-operate with the relevant lead social worker to ensure the best support possible is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support. If the social care's review of the evidence means they do not believe statutory intervention is relevant, but the DSL is still concerned for the safety of the child, the DSL should be prepared to refer again. It will still be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded.

4. Reporting to the police – any report to the police regarding a student aged under 18 will generally be in parallel with a referral to children's social care. The DSL (and

deputy) will follow local processes for referrals. Where a report of rape, assault by penetration or sexual assault is made the DSL must pass this on to the police, even if the alleged perpetrator is under ten years old. Unless there are compelling reasons, the School will inform the Parents. It will still be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions, and reasons for decisions should be recorded.

Where there is a safeguarding concern, School leaders should ensure the child's wishes and feelings are taken into account when determining what action to take. No matter what course of action is followed, the School will endeavour to provide support within its own pastoral structures, as well as helping signpost the Student(s) to external sources of support where appropriate.

7.16.4 Ongoing Response for the Victim

- The School will consider the age and developmental stage of the victim, the nature of the allegations and the potential risk of further abuse
- The needs and wishes of the victim will be paramount. Wherever possible, the victim should be supported to continue in their normal school routine.
- Victims may not disclose the whole picture immediately but provide information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. The victim will find it helpful to have a designated trusted adult to talk to and the School will respect this choice
- If the victim finds it difficult to maintain a full timetable, allowances will be made and a physical space to which the Student can withdraw will, where appropriate and possible, be provided
- The School will do everything it reasonably can to protect the victim from bullying or harassment as a result of any report they have made and provide ongoing support if necessary, continuing to work with social care and other agencies as required
- Efforts will be made to remove the perpetrator from classes they share with the victim and to keep them apart, for example on transport. These actions are in the best interests of the children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator
- If the victim moves to another educational institution the School will make them aware of any ongoing support needed; the DSL will ensure this happens, discussing with the victim and their Parents if appropriate. Any CP and safeguarding files will be transferred in accordance with the mandatory processes.

7.16.5 Ongoing Response for the Alleged Perpetrator

- The School will be mindful of the difficult balancing act of safeguarding the victim and providing the alleged perpetrator with an education and safeguarding support as appropriate and implementing any disciplinary sanctions
- The School will consider the age and developmental stage of the alleged perpetrator, and the nature of the allegations
- The School will consider the proportionality of the response and support and sanctions should be considered on a case-by-case basis
- The School will be mindful that, as well as potentially posing a risk of harm to other children, there is a possibility that the alleged perpetrator may have unmet needs. Their own harmful sexual behaviour may be a symptom of either their own abuse or exposure to abusive practices and/or materials. The School may take advice, as

appropriate, from children's social care, specialist sexual violence services and the police
- Where a criminal investigation into a sexual assault leads to a conviction or a caution, the School should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion
- If the alleged perpetrator moves to another educational institution, the DSL must make them aware of any ongoing support needs and where appropriate, potential risk to other children and staff. Any CP and safeguarding files will be transferred in accordance with the mandatory processes.

7.16.6 Helpful Contacts

- Child Exploitation and Online Protection command (CEOP)
- The UK Safer Internet Centre provides an online safety helpline for professionals 0344 381 4772
- NSPCC helpline for professionals 0808 800 5000
- NSPCC – Safeguarding children with special educational needs and disabilities
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) – emotional and practical support for victims of sexual violence accessed via Rape Crisis and The Survivors Trust
- Centre of Expertise on Child Sexual Abuse (CSA Centre) resources including a new document from the Children's Society called 'Preventing Child Sexual Exploitation' to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours
- CAMHS – child and adolescent mental health services
- Rape Crisis Centre – therapeutic support for children who have experienced sexual violence
- Internet Watch foundation – potentially removes illegal images.
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Take it Down, a tool provided by the National Centre for Missing and Exploited Children, to help them anonymously remove nudes or semi-nudes that they believe have been or could be shared online.
- Childline Report Remove Tool: Remove a Nude Image Shared Online.
- The Anti-Bullying Alliance – guidance for schools about sexual and sexist bullying.
- The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

7.17 Signs of Abuse or where Safeguarding Concerns should be Raised

Possible signs or indicators of abuse include (but are not limited to):

- Disclosure of abuse or any comment which gives rise to that inference
- There is no reasonable or consistent explanation for a Student's injury; the injury is unusual in kind or location; there are a number of injuries or a pattern to them
- The Student's behaviour changes suddenly, or their behaviour stands out as being extremely challenging behaviour or possibly extreme model behaviour
- The Student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- The Student's development is delayed
- The Student loses or gains weight
- Self-harming behaviour, including cutting and drug and alcohol abuse
- The Student uses inappropriate sexual language

- The Student displays a high level of anxiety
- The Student isolates themselves and becomes withdrawn
- The Student appears neglected, for example, hungry or inadequately clothed
- The Student is reluctant to go home, or has been openly rejected by Parents
- The Student's friendship circle in or out of the School changes significantly and/or suddenly.
- Drug taking and/or alcohol misuse
- Unexplained and/or persistent absence from education
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation
- Consensual and non-consensual making or sharing of nudes or semi-nudes

8 Reporting Concerns

8.1 What school staff should do if they have concerns about a child

All staff (including supply staff, trainee teachers, and volunteers) have a professional duty to take immediate action on suspicions of abuse or reported allegations of abuse concerning Students. They also have a professional duty to report wider concerns about Students so that prompt action and early intervention can be taken to ensure they have the best outcomes. Staff should not assume a colleague will take action or share information that might be critical in keeping children safe.

Every report, disclosure or suspicion of abuse from within or outside the School will be taken seriously. Staff are aware, from training and from their reading of KCSIE (September 2026) that concerns should be raised immediately with the DSL.

The DSL will offer advice to staff reporting concerns and keep the Head informed of all referrals or allegations unless the Head is the subject of the complaint which should then be reported to the Executive Principal. Where the allegation is about the Executive Principal, then the complaint should be made directly to the Chair of the Governing Body, Mr Julian Gregory, or in his absence the Vice Chair, Ms Henrietta Afolami. Where the allegation is about a member of staff who works across both Schools, they should contact the appropriate Head, and if unsure, should contact the Executive Principal.

In the event of a situation where there is a conflict of interest in reporting the matter to the Head, Executive Principal or Chair of Governors, this should be reported directly to the LADO.

If staff have a safeguarding concern or allegation about another member of staff (including supply staff, trainee teachers, volunteers or contractors) that **does not** meet the harm threshold, then this should be shared in accordance with the Low-Level Concerns Policy.

The DSL or Deputy DSL should always be available during term time to discuss safeguarding concerns but in exceptional circumstances where he/she is not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local authority children's social care. Action should then be shared with the DSL or Deputy DSL as soon as is practically possible. A DSL or Deputy DSL will also be contactable for any safeguarding concerns from Commercial Hirers outside of term time. Please refer to Appendix C.

Concerns should be raised via MyConcern, with the date and time of the disclosure or cause for concern noted, and naming others present so that accurate records are maintained.

Should a child be at risk of immediate harm, the staff member should also see the DSL or Deputy DSL in person without delay. Staff are aware of the need to respond immediately and to record accurately as records may be required to be disclosed in possible court proceedings. Any potential evidence must be safeguarded and preserved (for example, scribbled notes, mobile phones containing messages or screenshots of online evidence, clothing, and computers).

All staff are aware that confidentiality must not be promised and that leading, or closed-type questions, must not be asked. If a child makes a disclosure, staff must listen carefully to the child and keep an open mind. Staff should not take a decision as to whether or not abuse has taken place. Any discussions will be handled with tact and sympathy and staff are made aware that the way in which they talk to a child may affect the evidence if the matter proceeds to court. The child will be reassured that they have done the right thing in coming forward and that information will only be shared with those who need to know.

8.2 Options for Action

Each concern will be taken on a case-by-case basis and options will include:

- Managing any support for the child internally via the school's own pastoral support processes
- Undertaking a community-based Early Help or Family help assessment
- The DSL might seek advice from the Safeguarding Partnerships using, for example, the Hertfordshire Consultation Hub on 01438 737 511. This is a Hertfordshire Multi-Agency Team providing a safeguarding consultation to practitioners with advice and guidance when the threshold for referral might not be met or the safeguarding needs of the child are unclear. It is not anonymous, and the DSL will share information about the Student, including their name. The DSL is under an obligation to act on advice given by this service, or that provided by another local Safeguarding Partnership.
- Making a referral to statutory services for example as the child might be in need, is in need or suffering, or is likely to suffer harm. The Parents will be informed about the need to refer whenever possible, except where, in doing so, the School would expose the child to further risk. The School is not required to gain the consent of Parents before referring an incident to the Designated Officer (LADO).

The DSL will take into consideration contextual safeguarding including whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

This might be followed by a Strategy Meeting or a Child Protection meeting in order to assess a child's needs with other agencies and to co-ordinate support in the School and/or with external agencies. The School will listen to the views of the child and the DSL will take these views into account in their decision-making. There may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a Student's wishes. The DSL and all staff will always act in the best interest of the child.

It is important to note that in exceptional circumstances where a DSL or Deputy DSL is not available, this should not delay appropriate action taking place and any staff member can refer their concerns directly to the relevant children's social care department. The local authority should make a decision within one working day of a referral being made about the type of response that is required and should let the referrer know the outcome.

Contact details for Hertfordshire and other local authorities can be found here. There is a flow chart outlining this process in KCSIE (September 2026).

8.3 Data Protection

The Data Protection Act 2018, GDPR and the Data (Use and Access) Act 2025 do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

9 Allegations

9.1 Guidelines for Concerns or Allegations against staff including supply teachers, trainee teachers, volunteers and contractors

The School will take all reasonable measures to design and operate procedures which, so far as possible, ensure that staff and others who are innocent are not prejudiced by false allegations (referring to Part Four of KCSIE (September 2026) which looks at allegations of abuse made against teachers and other staff)).

The School has procedures for dealing with allegations against staff, contractors and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. These procedures, to be found in the Appendix, follow the guidance in KCSIE (September 2026) (Part Four: Safeguarding Concerns or Allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors).

If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, trainee teachers, volunteers and contractors) posing a risk of harm to children, then this should be referred to the Head who will consider whether an onward referral to the LADO is required. Where required, the Head will contact the LADO, Hertfordshire, promptly and within one working day, without any prior investigation undertaken by the School. Any doubts or concerns over an allegation of abuse against a member of staff or apparently borderline cases can be discussed informally with the LADO.

Where a member of staff works across both Schools, they should contact the appropriate Head, and if unsure, should contact the Executive Principal.

Where appropriate the Head may consult with the DSL before reporting to the LADO, unless the allegation is against the DSL in which case the Head will go straight to the LADO. The accused person will be informed as soon as possible after the LADO has been consulted. Appropriate support will be provided, and a representative will be appointed to keep the accused person informed of the progress of the case as appropriate. The School would seek suitable legal advice as to due process and appropriate procedure.

Where an allegation is made about the Head of Prep School or Head of Junior School, this should be referred to the Head.

Where an allegation is made against the Head, this should be referred to the Executive Principal without first notifying the Head. The Executive Principal will inform the Chair of the Governing Body, Mr Julian Gregory, or in his absence the Vice Chair, Ms Henrietta Afolami.

Where an allegation is made against the Executive Principal, the person receiving the allegation should immediately inform the Chair of the Governing Body, Mr Julian Gregory, or in his absence the Vice Chair, Ms Henrietta Afolami without first notifying the Executive Principal.

For an allegation against the Chair of Governors (or Vice Chair), this would be reported to the LADO via the Executive Principal. If there is a conflict of interest, the allegation should be reported directly to the LADO.

Suspension will not be an automatic response to an allegation. The School has a duty of care to its employees and will offer appropriate advice when allegations are made and following guidance in KCSIE (September 2026) (Part Four: (Safeguarding Concerns or Allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors). The LADO will be consulted as to the appropriate action to take and full consideration given to all the options, subject to the need to ensure:

- The safety and welfare of the Students or Student concerned
- The need for a full and fair investigation.

Where an allegation by a Student is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's Behaviour, Rewards and Sanctions Policy.

Where Parents have made a deliberately invented or malicious allegation the Head will consider (in accordance with the School's terms and conditions) whether to require Parents to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably. The School reserves the right to contact the police to determine whether any action might be appropriate, whether or not the person making the allegation is a Student or Parents.

Staff are given clear and detailed guidance in the Code of Conduct for Staff on ensuring their behaviour or actions do not place them at risk of harm or of allegations of harming a Student.

If the School ceases to use the services of a member of staff (or governor or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service (DBS). Any such incident will be followed by a review of the safeguarding procedures in the School, with a report presented to governors without delay. Where a member of staff resigns and there are child protection concerns, this will also be reported to the DBS. The School will inform the Teaching Regulation Agency (TRA) in both such cases.

Where the School becomes aware of an allegation against a former member of staff, the School will seek advice and guidance from the LADO and/or the police.

9.2 Low-Level Concerns

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold, this should be shared in accordance with the School's Low-Level Concerns policy (see policy for more detail).

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or behalf of the school may have acted in a way that:

- is inconsistent with the School’s Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Such examples might include staff being over-friendly with children, having favourites, taking photographs of Students on personal mobiles, engaging with a child on a one-to-one basis in a secluded area of behind a closed door, or humiliating pupils. See separate Low-Level Concern Policy for more detail which deals with the process to deal with any concerns (including allegations) which **do not** meet the harm threshold. Reports should be shared with the Head (via the DSL if preferred) and recorded and dealt with proportionately and appropriately.

9.3 Whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school’s safeguarding regimes and know that such concerns will be taken seriously by the senior leadership team. There will be no retribution or disciplinary action taken against a member of staff for making a report, provided that it is done in good faith. The School has a Whistleblowing Policy which explains how to raise such concerns. Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, they can also contact help@nspcc.org.uk

9.4 Guidelines for Allegations by one Student Against Another

A Student against whom an allegation of abuse has been made may be suspended from the School during the investigation process and the Behaviour Rewards and Sanctions Policy will apply. The School will take advice from the relevant children’s social care and/or the police on the investigation of such allegations and take all appropriate action to ensure the safety and welfare of all Students involved including the Student or Students accused of abuse. If it is necessary for a Student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the relevant children’s social care, Parents are informed as soon as possible, and that the Student is supported during the interview by an adult.

10 The Appointment of Staff and the Recruitment of Volunteers

The School recruits all staff and governors in accordance with the Safer Recruitment and Disclosure Policy, which reflects the statutory requirements of KCSIE (September 2026, Part Three: Safer Recruitment) and the EYFS statutory framework. The School will take all reasonable measures to:

- Ensure that it practises safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by another organisation such as supply or agency) to work with children and young people.
- Ensure that it carries out all necessary checks on the suitability of members of the governing body, including Section 128 prohibition from management checks.

- Online searches can be carried out on shortlisted candidates as part of the recruitment process in accordance with the School's Safer Recruitment and Disclosure Policy, and that any concerns identified are explored appropriately before appointment.
- Ensure that where the School ceases to use the services of any person (whether employed, contracted, a volunteer or Student) because that person was considered unsuitable to work with children, a prompt and detailed report is made to the Disclosure and Barring Service (DBS) and Teaching Regulation Authority (TRA), where appropriate
- Ensure that where staff are supplied by another organisation, agency or third-party provider, appropriate assurances are obtained that all required safeguarding and safer recruitment checks have been completed and that appropriate safeguarding procedures apply.
- Ensure that any visiting speaker, whether invited by staff or Students, has been suitably vetted in accordance with the Prevent statutory guidance
- Ensure that host families, and adults living in homes in the UK where exchange Students are going to be hosted have a satisfactory DBS check, including Barred List check completed for the primary carer, before the exchange takes place
- Ensure that sufficient relevant staff are trained in safer recruitment processes and at least one person involved in the recruitment process has completed safer recruitment training in accordance with statutory guidance.
- Provide an induction for all new staff, governors and volunteers that includes safeguarding and child protection policy and procedures, the code of conduct, whistleblowing, and the role of the DSL.

11 The EYFS (Early Years Foundation Stage)

The practitioner responsible for safeguarding in the Early Years setting at the Boys' School is Mrs Michelle Best, Head for the Prep and Pre-Prep and DDSL.

The practitioner responsible for safeguarding in the Early Years setting at the Girls' School is Mrs Claire Brown, Head of the Junior School and Whole School DSL. .

The Schools follow the EYFS statutory framework for group and school-based providers and KCSIE (September 2026).

- **Safeguarding Leads**: The named practitioners above are trained to Level 3 DSL standard and have lead responsibility for safeguarding in the EYFS (See Section 3 – The Designated Safeguarding Lead and other Key Staff; Appendix B – Role of the DSL).
- **Safer Recruitment and Suitability**: Safeguarding in the EYFS is underpinned by Section 10 – The Appointment of Staff and the Recruitment of Volunteers). All EYFS staff, trainees and volunteers are subject to appropriate suitability checks (including enhanced DBS and barred list), in line with KCSIE Part 3. No individual will have unsupervised access to children until all checks are complete
- **Absence monitoring & emergency contacts:** In line with the EYFS, the School holds at least two emergency contact details for each child where possible and follows up promptly on any unexplained absences (see Section 7.6 – Children Absent from Education).
- **Whistleblowing:** All EYFS staff (including trainees and volunteers) are reminded of, and have access to, the School's Whistleblowing Policy (see Section 9.3 - Whistleblowing) and know how to raise concerns about poor or unsafe practice.

- **Use of cameras and mobile devices:** Only a School-owned camera or mobile device may be used to capture images in the EYFS setting. Images must be downloaded promptly to the School's secure network and deleted from the device. Printed photographs are used only in the School setting or for promotional material unless Parents have withdrawn consent in writing. Staff, Parents, visitors and Students may not use personal devices with imaging/sharing capability to photograph children at any School event. Personal devices must not be used for calls or messages while children are present. On School trips, only the School camera may be used; volunteers are briefed beforehand. (See Section 7.13 – Online Safety; Related policies listed at Section 1.3: Online Safety and Mobile Phone Policy, Acceptable Use Policy-Staff.).
- **First Aid:** At least one person with a current full Paediatric First Aid (PFA) certificate is on the premises at all times when children are present and accompanies children on outings. All new starters working in an EYFS setting are to complete a PFA course (from a provider approved by the School) by the end of the first half term. PFA certificates must be renewed every three years, with refresher training monitored to ensure continuous compliance (see Section 5.1 – Medical, Health and Safety).
- **Food hygiene:** At least one person with a valid food hygiene certificate is always present when food is prepared. All new starters working in an EYFS setting will be required to obtain a food hygiene certificate (arranged by the DDSL in Prep/Junior School) by the end of their first half term (see Section 5.1 – Medical, Health and Safety).
- **Training & induction:** All EYFS staff receive induction and ongoing training in safeguarding and child protection, including safer recruitment, whistleblowing, staff behaviour/code of conduct and online safety (including expectations around filtering and monitoring), to ensure compliance with both EYFS and KCSIE. Training is kept current and embedded into practice in line with the EYFS training criteria.
- **Intimate care:** Where children require assistance with toileting or nappy changing, staff follow clear procedures that balance the child's dignity and privacy with safeguarding. Any concerns are reported immediately to the DSL/DDSL.

12 Use of School Premises for Non-School Activities

Where the School hires or rents out its facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) appropriate arrangements are put in place to keep children safe. When services or activities are provided under the direct supervision or management of school staff, our arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The School will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The School will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping Children Safe in Out-Of-School Settings details the safeguarding arrangements that schools should expect these providers to have in place. See Appendix C for more detail.

12.1 Alternative Provision

In line with KCSIE (2026), where a school places a pupil with an alternative provision provider, the School continues to be responsible for the safeguarding of that pupil and must be satisfied that the placement meets that pupil's educational, safeguarding and welfare needs. The School will obtain written confirmation that all appropriate safeguarding and safer recruitment checks have been completed on individuals working at their provision. The School will ensure that relevant safeguarding, welfare, SEND and risk information is shared with the alternative provider so that appropriate support and protective measures can be put in place from the outset. This includes written confirmation that the alternative provider will inform us of any arrangements that may put the child at risk (i.e. staff changes), so that we can ensure that appropriate safeguarding checks have been carried out on new staff. The School should always know where a pupil is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the pupil may attend. The School will monitor attendance, engagement and welfare information relating to pupils placed in alternative provision and will follow up concerns promptly. The School should regularly review (at least half termly) the alternative provision placements they make and should review and potentially terminate any placements where safeguarding concerns arise.

13 Confidentiality and Information Sharing/Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should include a clear, comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome.

The School (through the DSL) will keep all child protection records confidential and secure, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School recognises that data protection legislation, including the UK GDPR and the Data Protection Act 2018, is not a barrier to sharing information where there are legitimate safeguarding concerns. The School will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under the statutory requirements of The Children Act 1989. Information will be shared lawfully, proportionately and without unnecessary delay where this is necessary to protect a child.

In accordance with Working Together to Safeguard Children (March 2026) the School recognises that effective sharing of information between professionals and agencies is essential for effective identification, assessment and service provision. While Student consent to share information will in all normal circumstances be sought, the School recognises that fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. The child's views will be taken into account where possible, but the DSL and the Head will discuss each case where information might need to be shared with another agency and, if necessary, refer to Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers (2025) or seek legal advice. In line with its obligations, the School will pass on child protection records and any relevant safeguarding information necessary to understand and manage risk to the child, and where appropriate to others, securely and without delay when a child or young person changes School. Records will be transferred confidentially via My Concern or another

secure method, and receipt will be obtained. A copy may be kept until safe delivery at the new School and the copy will then be destroyed. The DSL will ensure that all relevant safeguarding information is provided to the receiving setting to support continuity of safeguarding and welfare arrangements for the child. Where appropriate, discussions will take place between DSLs to facilitate a smooth transfer of information. Reasonable steps will be taken to ensure similar records are obtained from feeder schools and EYFS providers.

When the School is unsure of the Student's next educational setting, it will fulfil its duty to inform the Local Authority that the Student may be missing in education.

Appendix A – Procedure for Dealing with Allegations Against Staff

Section one: Allegations that may meet the harm threshold

The School has procedures for dealing with allegations against staff, governors and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures will be used where the member of staff or volunteer 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
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of School and is known as transferable risk.

For allegations that do not meet the harm threshold, staff should follow the guidance in the **Low-Level Concerns Policy**.

1. Allegations against Staff

The LADO should be informed of all allegations that come to the School's attention and appear to meet the criteria. Where an allegation or complaint is made against the DSL or any other member of staff or a volunteer, the matter should be reported immediately to the Head. Where a member of staff works across both Schools, they should contact the appropriate Head, and if unsure, should contact the Executive Principal.

Where appropriate, the Head will consult with the DSL and all allegations will be discussed with the LADO before further action is taken. When an allegation is made, there are two aspects to consider. The first is looking after the welfare of the child, and if the allegation is about the welfare of a child, then children's social care and as appropriate the police should be contacted directly. The second is investigating and supporting the person subject to the allegation.

2. Allegations against the Head, Executive Principal or Chair of Governors

Where an allegation is made about the Head of Prep or Junior Schools, this should be referred to the respective Head.

Where an allegation is made against the Head, this should be referred to the Executive Principal without first notifying the Head. The Executive Principal will inform the Chair of the Governing Body, Mr Julian Gregory, or in his absence the Vice Chair, Ms Henrietta Afolami.

Where an allegation is made against the Executive Principal, the person receiving the allegation should immediately inform the Chair of the Governing Body, Mr Julian Gregory, or in his absence the Vice Chair, Ms Henrietta Afolami, without first notifying the Executive Principal.

Similarly, if an allegation is made against the Chair of Governors the allegation should be reported to the LADO. Again, any such allegations will be discussed with the LADO before further action is taken.

3. Allegations against Supply Teachers

In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency. The school will ensure that any such allegation is dealt with properly, and in no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts, liaising with the local authority to determine a suitable outcome and appropriate information sharing. The School will fully involve agencies in any enquiries from the LADO, police and/or children's services, but understands that, as the organisation with direct access to Students and other School staff, it is likely that it will usually take the lead in any investigation involving a supply teacher.

4. Disclosure of Information

The Head will inform the accused person of the allegation as soon as possible after the LADO has been consulted. The Parents of the child involved will be informed of the allegation as soon as possible if they do not already know of it. Where the LADO advises that a strategy discussion is needed, or the police or the local authority's social care services need to be involved, the Head should not inform the accused or Parents until these agencies have been consulted and it has been agreed what information can be disclosed. The Parents should be kept informed of the progress of the case, only in relation to their child – no information can be shared regarding the staff member, and Parents should be made aware of the requirement to maintain confidentiality and avoid unwanted publicity whilst investigations are in progress.

5. Support

A School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, guided by the LADO and the police where necessary. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available for the individual, as appropriate. The colleague should be advised to contact their trade union representative or a colleague for support, and employers should provide access to counselling or medical advice where appropriate.

6. Action to be taken against the Accused

Where an investigation by the police or the local authority children's social care services is unnecessary, the LADO will discuss the steps to be taken with the Head or case manager (or the Chair of Governors where the allegation is against the Head). The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to summary dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake a further investigation to determine the appropriate action. If so, the LADO will discuss with the Head how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances, it may be appropriate to appoint an independent investigator as advised by the Hertfordshire Safeguarding Children Board.

7. Suspension

Suspension must not be an automatic response to an allegation and should only be considered in a case where:

- there is cause to suspect a child or other children at the School is or are at risk of significant harm or
- the allegation is so serious that it might be grounds for dismissal.

The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated, unfounded or malicious must be considered. It may be that the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment.

8. Criminal Proceedings

The School will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable. Wherever possible the School should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process.

9. Return to Work

If it is decided that the person who has been suspended should return to work, the School should consider how to facilitate this, for example, a phased return may be appropriate and/or the provision of a mentor to provide assistance in the short term. The School should also consider how to manage the contact with the child who made the allegation.

10. Ceasing to Use Staff

If the School ceases to use the services of a member of staff (or a governor or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors within one month. Where the individual is involved with teaching, the TRA will also be notified if the issue is unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

11. Resignation

If a member of staff (or a governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School. Resignation will not prevent a detailed report being made to the Disclosure and Barring Service within one month in appropriate circumstances. Where the individual is involved with teaching, the TRA will also be notified if the issue is unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

12. Timescales

All allegations must be dealt with as a priority. Where it is clear immediately that the allegation is unfounded or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not

require formal disciplinary action, the Head should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, it should be held within 15 working days.

13. Unfounded or Malicious Allegations

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager should consider whether the child and /or the person who has made the allegation is in need of help or may have been abused by someone else. In such circumstances, a referral to local authority children's social care may be appropriate.

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

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

Whether or not the person making the allegation is a Student or Parents (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

14. Record Keeping

Details of an allegation will be recorded on the employee's file and retained at least until the employee reaches the normal pension age or for a period of ten years from the date of the allegation, if this is longer, unless the allegation was found to have been malicious or false, in which case it will be removed from the employee's records. Other than where allegations are false, malicious, unsubstantiated, or unfounded the outcome should be made clear when providing references to prospective employers. This is particularly important where the person moves into another position involving working with children.

15. Non Recent Allegations

Where an adult makes an allegation to the School that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child should be reported to the LADO in line with local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with local authority social care and the police. Abuse can be reported no matter how long ago it happened.

Section Two: Concerns and or allegations that do not meet the harm threshold

(see Low-Level Concerns Policy for more detail).

Appendix B - Role of the Designated Safeguarding Lead

Governing bodies and proprietors should ensure an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy Designated Safeguarding Leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

DSL Availability and Cover Arrangements

During term time the designated safeguarding lead,(DSL)or appropriately trained deputy DSL, will always be available during school hours to discuss safeguarding concerns. Whilst the DSL or Deputy DSL would ordinarily be available in person, the School will determine what constitutes availability and, in exceptional circumstances, whether availability via phone and or Teams or other such media is appropriate.

The School maintains appropriate safeguarding cover arrangements to ensure that safeguarding concerns can be received, reviewed and acted upon without delay, including during the absence of the DSL. This includes shared safeguarding systems, dedicated safeguarding email addresses and authorised access arrangements for Deputy DSLs.

It is a matter for individual schools to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co-ordinators (SENCOs), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, 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 at school or college. This includes:
    - ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations 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, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

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.

They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice set out here.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part-time staff
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should also undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to

specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing family help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers, recognising that caring responsibilities may impact a child's wellbeing, attendance, educational outcomes and need for additional support.
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses, and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out here. Therefore, the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018, the Data (Use and Access) Act 2025 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

Appendix C – Safeguarding Procedure for Commercial Lettings

The School has procedures in place to ensure we can provide a safe environment and positive experience for all users. These procedures for Commercial hiring reflect the Schools' current safeguarding procedures and incorporate Commercial operations and use.

The School is committed to ensuring that users of our facilities and venues are safe and strives to maintain this with regular reviews, staff training and encouraging an environment of openness and vigilance. Our systems and processes fully support and promote safeguarding, which must take priority over profit. We carry out relevant checks to ensure that safer recruitment practices and safeguarding policies and procedures are adhered to or are challenged. All Commercial Hirers that involve adults working with young people agree to follow a code of conduct that promotes safe working practices and makes responsibilities and expectations clear, including the understanding that anyone can make a referral. Finally, the Commercial team works in partnership with external hirers to safeguard and promote the welfare of all users of the facilities ensuring they adhere to all safeguarding best practices.

1. Deputy Designated Safeguarding Leads

The Commercial team are Level 3 DSL trained and will continue to keep their training relevant and up to date. The trained Commercial Deputy DSLs will be the main point of contact for any such safeguarding matters raised by Hirers during the holiday periods in the school year. The Commercial team are expected to help and support with referrals made by the Hirer DSL and will know how to get in touch with the DSL teams at the Boys/Girls' Schools to ensure they are made aware. The DSL team will seek advice and liaise where necessary with relevant agencies. During term time the Designated Safeguarding Lead (or a deputy) should always be available (during School hours) for staff in the Commercial Team to discuss any safeguarding concerns. Out of these hours, the Commercial Team should always be available or have an adequate rota in place to enable them to contact a DSL.

2. Procedure for Commercial Hirers

Contractually each hirer must adhere to the following statements:

- You shall comply with our safeguarding policy.
- You shall provide us with the names of all Hirer Staff before they attend the Premises.
- It is a condition of the Agreement that you shall provide the School with written confirmation that the following checks have been completed on each of the Hirer Staff before the Facilities Hire can commence:
    - verification of identity against an official document containing a photograph of the individual;
    - that a satisfactory enhanced disclosure from the Disclosure and Barring Service (DBS) has been obtained;
    - that a check of the Children's Barred List has been completed and that the individual is not barred from working with children; and
    - such other checks as are specified by Us from time to time in order for us to comply with Our statutory or regulatory obligations.

- You shall provide us the original enhanced DBS certificate for each of the Hirer Staff before they can attend the Premises so that we may determine whether the Hirer Staff are suitable to attend the Premises. The School does not retain copies of DBS certificates and will handle any certificate information in line with the DBS Code of Practice (including a maximum 6-month retention where exceptionally required).

- You undertake and agree to immediately notify us if:
    - any of the Hirer Staff are or become barred from working with children or adults;
    - any of the Hirer Staff are the subject of a referral to the DBS or any successor body;
    - any of the Hirer Staff are released under investigation, arrested, charged, cautioned or convicted of any criminal offence, the circumstances of which could have an impact on the welfare of children or adults;
    - any of the Hirer Staff receive a police caution, reprimand or warning, the circumstances of which could have an impact on the welfare of children or adults;
    - there is a formal child protection investigation of any of the Hirer Staff or any member of their household;
    - You become aware of any circumstances relating to any of the Hirer Staff that may be reasonably be considered to pose a safeguarding risk to children or adults; or
    - there is any change in the circumstances of any of the Hirer Staff that affects their right to work in the UK.

- If we determine that any member of Hirer Staff is unsuitable to attend the Premises for any reason we may in our ultimate discretion exclude that person from the Premises and prevent their future attendance at the Premises.
- All Visitors who are not Hirer Staff must not have unsupervised access to children or vulnerable adults.
- You shall not raise or gather funds for any external organisation or cause.
- Any breach of our contractual safeguarding agreement shall be considered to be a material breach of the Agreement with the School and shall result in immediate termination.
- Where the Hirer uses the School's IT systems or network/devices, the Hirer and Hirer Staff must sign and comply with the School's Acceptable Use Policy; activity is subject to the School's filtering and monitoring (see Section 7.13 – Online Safety). The Hirer must not attempt to bypass technical controls.
- Where the Hirer uses their own devices/network on site, the Hirer will implement appropriate online safety controls suitable for children and ensure staff supervision prevents exposure to harmful content.
- The Hirer will ensure Prevent awareness/training appropriate to their activity and will escalate any concerns to the trained Commercial DDSL and, where appropriate, to the local Prevent/Channel panel.
- Where EYFS aged children attend a camp or childcare setting, the Hirer must adhere to EYFS regulations (see Section 11 – The EYFS (Early Years Foundation Stage).
- This Appendix should be read with Section 12 – Use of School Premises for Non-School Activities (including safeguarding requirements in hire/transfer-of-control agreements).

3. Referrals and record keeping

Any Hirer working with young children has completed and signed a declaration indicating the designated DSL and the organisation's safeguarding protocols. The Hirer's DSL will be expected to liaise without delay with the trained Commercial DDSL who will notify the School DSL and the Head on any safeguarding matters that occur on the School site. The Hirer is responsible for managing referrals and/or seeking advice from any relevant agency. They are responsible for ensuring accurate records are kept and shared accordingly so that the Commercial team have awareness as soon as possible of any safeguarding or child protection

issues and will retain records within the relevant hirer file. The Commercial team are here to support and guide where necessary and to notify the Executive Principal and respective Heads.

4. Holding and sharing information

Any Hirer working with young children should ensure they keep adequate records of any concern, allegation or referral. Using their discretion, they should inform schools, colleges, agencies and practitioners where necessary. The Hirer is responsible for ensuring any transferring of records is carried out safely and securely.

5. Allegations and Low-Level Concerns (Hirer Staff)

Any allegation that meets the harm threshold about Hirer Staff will be reported immediately to the trained Commercial DDSL, who will notify the School DSL or the Head to deal with it as per the Low Level Concern Policy (see Section 9.2) and Whistleblowing Policy (see Section 9.3).

The School reserves the right to inspect safeguarding documentation, verify compliance with this Appendix and Section 12 – Use of School Premises for Non-School Activities, and conduct spot checks during the period of hire.