



# Safeguarding & Child Protection Policy

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## Ethos statement

1. Safeguarding and promoting the welfare of learners is everyone's responsibility. Everyone who comes into contact with learners and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interest of the child.
2. We recognise the moral and statutory responsibility placed on all staff to safeguard and promote the welfare of all learners. We aim to provide a safe and welcoming environment in which learners can learn, underpinned by a culture of openness where both learners and adults feel secure, are able to raise concerns and believe they are being listened to, and that appropriate action will be taken to keep them safe.
3. This document has been adapted from the Harrow Safeguarding Children Board's Model Safeguarding Policy for Schools

## Safeguarding Team Contacts at HHS

<b>Role:</b>	<b>Name:</b>	<b>Contact details:</b>
Designated Safeguarding Lead (DSL)	Matt Jukes	mjukes.310@harrowhigh.com
Alternate DSLs	Rachel Tucker	rtucker19.310@harrowhigh.com
	Lisa Campbell	lcampbell8.310@harrowhigh.com
Named safeguarding governor	Richard Hayward	office@harrowhigh.com
Chair of Governors	Keith Foster	office@harrowhigh.com
Headteacher (for concerns / allegations about staff)	Paul Gamble	pgamble.310@harrowhigh.com
School online safety Lead	Matt Jukes	mjukes.310@harrowhigh.com
Designated teacher for Children in Care and children previously in care (CiC)	Constantin Preda	cpreda.310@harrowhigh.com
Senior Mental Health Lead	Matt Jukes	mjukes.310@harrowhigh.com
Prevent Lead	Matt Jukes	mjukes.310@harrowhigh.com

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## 1. Introduction

The governing body<sup>1</sup> recognises the need to ensure that it complies with its duties under legislation and this policy has regard to statutory guidance, Keeping Children Safe in Education (KCSiE), Working Together to Safeguard Children and locally agreed inter-agency procedures put in place by Harrow Safeguarding Children's Board.

This policy will be reviewed annually, as a minimum, and will be made available publicly via the school website or on request.

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 outside 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
- Taking action to enable all children to have the best outcomes

To us at Harrow High 'Children' / 'Learners' includes everyone on roll at Harrow High School as a learner, so includes all Sixth Formers until they leave us to go to their next phase of education or employment.

### 'A child centred and coordinated approach to safeguarding'

This policy is for all staff, parents, governors, volunteers, supply staff and contractors and the wider school community. It forms part of the child protection and safeguarding arrangements for our school and is one of a suite of policies and procedures which encompass the safeguarding responsibilities of the school. In particular, this policy should be read in conjunction with the school's Code of Conduct/Staff Behaviour Policy (including Acceptable Use of ICT), Safer Recruitment Policy, Online Safety Policy, Behaviour for Learning Policy, Anti-Bullying Policy, the school's guidance on low-level concerns and Part Five of KCSiE, copies of which will be provided to all staff on induction.

The aims of this policy are to:

- Provide staff with a framework to promote and safeguard the wellbeing of learners and young people, and ensure that all staff understand and meet their statutory responsibilities;
- Ensure consistent good practice across the school.

The governing body expects that all staff will have read and understand this child protection and safeguarding policy and their responsibility to implement it. Staff working directly with learners **must**, as a minimum, have read and understand [Part One of KCSiE](#) and [Annex B](#). Governors/the proprietor will ensure that they and senior leaders have read and understand [Parts One and Two of KCSiE](#). The governing body will ensure that those staff

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<sup>1</sup> In maintained schools the governing body is responsible for ensuring their functions are exercised with a view to safeguarding and promoting the welfare of children in accordance with section 175 of the Education Act 2002, for pupil referral units it is the management committee, in independent schools, including academies and free schools, and 16-19 academies, this duty sits with the proprietor (in the case of academies the proprietor will be the academy trust). References to the governing body throughout this policy framework includes management committees.

who do not work directly with children have read either Part One or Annex A of KCSiE<sup>2</sup> together with Annex B. There may be some staff whom the governing body require they read additional sections<sup>3</sup>.

The governing body will ensure that arrangements are in place for all staff members to receive appropriate safeguarding and child protection training which is regularly updated. The governing body will ensure that all governors and trustees receive appropriate safeguarding and child protection training (including online) at induction which is regularly updated.

Compliance with the policy will be monitored by the Headteacher, designated safeguarding lead (DSL) and named safeguarding governor.

## 2. Statutory framework

Section 175 of the Education Act 2002 (as amended) in the case of maintained schools and learner referral units<sup>4</sup>, Section 157 of the Education Act 2002 (as amended) and the Education (Independent School Standards) Regulations 2014 for independent schools (including academies and free schools), the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) for post 16 education providers, place a statutory duty on governing bodies and proprietors to have policies and procedures in place that safeguard and promote the welfare of learners and young people who are learners of the school which must have regard to any guidance given by the Secretary of State.

In accordance with statutory guidance, Working Together to Safeguard Children 2023, local safeguarding arrangements must be established for every local authority area by the three safeguarding partners (Local Authority, Police and Integrated Care Boards). All three partners have equal and joint responsibility for a range of roles and statutory functions including developing local safeguarding policy and procedures and scrutinising local arrangements. In Harrow, all schools have been named by the Harrow Safeguarding Children's Board (HSCB) as relevant agencies, this means staff in schools must work in accordance with the multi-agency procedures developed by the HSCB which can be found on their website at: [HSCB](#)

## 3. Key roles and responsibilities

### Governing Body

The governing body has a strategic leadership responsibility for the school's safeguarding arrangements and must ensure that they comply with their duties under legislation. The governing body has a legal responsibility to make sure that there are appropriate policies and procedures in place, which have regard to statutory guidance, in order for appropriate action to be taken in a timely manner to safeguard and promote learners and young people's welfare. The governing body will also ensure that the policy is made available to parents and carers by publishing this on the school website or in writing if requested.

<sup>2</sup> Annex A of KCSiE is a condensed version of Part One of KCSiE. Whilst it is a matter for schools, based on their assessment, HSCB take the view that it should only be those staff that do not have regular direct contact with learners in school, e.g. cleaners who come in out of school hours, who are expected to only read the condensed version of Part One of KCSiE.

<sup>3</sup> Colleagues involved in safer recruitment administration including the maintenance of the single central record should also read Part Three of KCSE.

<sup>4</sup> Section 175, Education Act 2002 – for management committees of pupil referral units, this is by virtue of regulation 3 and paragraph 19A of Schedule 1 to the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007

The governing body will ensure they facilitate a whole school approach to safeguarding. This means involving everyone in the school and ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, and that all systems, processes and policies are transparent, clear and easy to understand and operate with the best interests of the child at their heart.

The governing body will ensure that where there is a safeguarding concern school leaders will make sure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems will be in place that are well promoted, easily understood and easily accessible for learners to confidently report any form of abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The governing body will ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children and that the school's safeguarding arrangements take into account the procedures and practice of the locally agreed multi-agency safeguarding arrangements in place.

The governing body will ensure that, as a minimum, the following policies are in place to enable appropriate action to be taken to safeguard and promote the welfare of learners and young people as appropriate:

- child-on-child abuse
- online safety,
- behaviour, including measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- special educational needs and disability
- supporting learners in school with medical conditions
- staff code of conduct/behaviour policy (which should also include the procedures that will be followed to address low-level concerns and allegations made against staff, and acceptable use of IT, including the use of mobile devices and communications, including the use of social media.)
- procedure for responding to learners who go missing from education, particularly on repeat occasions.
- safer recruitment

It is the responsibility of the governing body to ensure that staff and volunteers are properly vetted to make sure they are safe to work with the learners who attend our school and that the school has procedures for appropriately managing safeguarding allegations made against, or low level concerns involving, members of staff (including the headteacher, supply teachers, contractors, and volunteer helpers).

The governing body will ensure that there is a named governor for safeguarding, a Designated Safeguarding Lead (DSL) who is a senior member of the leadership team and has lead responsibility for safeguarding and child protection, and a designated teacher to promote the educational achievement of learners who are looked after, or previously looked after, and will ensure that these people have the appropriate training.

The governing body will have regard to their obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty).<sup>5</sup>

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Set out in paragraphs 83-93 of KCSiE

The governing body will inform London Borough of Harrow Council and the HSCB annually about the discharge of their safeguarding duties by completing the safeguarding self-assessment audit.

### **Designated Safeguarding Lead (DSL)**

The DSL will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place). This will be made explicit in the role-holder's job description. (The broad areas of responsibility and activities related to the role of the DSL are set out in Annex C of KCSiE).

The DSL will have the appropriate status, authority, time, funding, training, resources and support they need to carry out the duties of the post effectively.

The DSL and any alternate DSLs will provide advice and support to staff in school and will liaise with the local authority and work with other agencies in line with Working Together to Safeguard Children. The DSL will decide upon the most appropriate course of action and whether the concerns should be referred to Children's Social Care – refer to [Harrow Thresholds Guidance](#).

During term time, the DSL and/or an alternate will always be available during school hours for staff to discuss any safeguarding concerns. The DSL will make arrangements for adequate and appropriate cover arrangements for any out of hours/out of term time activities.

The DSL will undergo training to provide them with the knowledge and skills to carry out the role and is expected to update their knowledge and skills at regular intervals to allow them to keep up with developments relevant to their role.

The DSL will liaise with the headteacher to inform them of issues and in particular ongoing enquiries under section 47 of the Children Act 1989 and police investigations.<sup>6</sup>

### **Headteacher**

The headteacher will ensure that the policies and procedures adopted by the governing body are fully implemented and that sufficient resources, time and training are provided to enable staff members to discharge their safeguarding responsibilities and contribute effectively to a whole school approach to safeguarding.

The headteacher will be responsible for ensuring a culture of safety and ongoing vigilance that fosters the belief that 'it could happen here'.

### **All staff**

All staff have a responsibility to provide a safe environment in which learners can learn.

All staff working directly with learners must read and ensure they understand at least Part One of KCSiE. Those staff that do not work directly with learners must read and ensure they also understand Part One of KCSiE.<sup>7</sup>

<sup>6</sup> See LA explanatory note on the requirements around children having an appropriate adult [here](#)

<sup>7</sup> Whilst it is a matter for schools, based on their assessment, HSCB take the view that it should only be those staff that do not have regular contact with learners in school, e.g. cleaners who come in out of school hours, who are expected to only read the condensed version of Part One of KCSiE.

All staff must ensure they are familiar with the systems within school which support safeguarding, including the child protection and safeguarding policy, the code of conduct/staff behaviour policy, the behaviour policy, the safeguarding response to learners who go missing from education, and the role of the DSL (including the identity of the DSL and any deputies). These will be explained to all staff on induction.

All staff should be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of learners who may be in need of help or protection. All staff should maintain a belief that 'it could happen here' where safeguarding is concerned and if staff have any concerns about a child's welfare they must act on them immediately.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should know what to do if a child tells them he/she is being abused, neglected or exploited, and/or is otherwise at risk of involvement in criminal activity, such as knife crime, or involved in county lines drug dealing.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) along with the role they might be expected to play in such assessments.

All staff should be aware of, and understand their role within the [early help process](#) for all services, at both a Local Authority and school or college level. This includes providing support as soon as a problem emerges, liaising with the DSL, and sharing information with other professionals in order to support early identification and assessment, focussing on providing interventions to avoid escalation of worries and needs (see Section 12: Information Sharing). In some cases, staff may be asked to act as the lead professional in undertaking an early help assessment.

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (SEN) (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- is at risk of modern slavery, trafficking or sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and/or domestic abuse
- is misusing alcohol and other drugs themselves

- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation (FGM) or forced marriage
- is a privately fostered child

Knowing what to look out for is vital to the early identification of abuse, neglect and exploitation and specific safeguarding issues such as child criminal exploitation and child sexual exploitation. If staff are unsure, they should always speak to the DSL (or deputy). If in exceptional circumstances the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from children's social care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible. Details of the school's safeguarding team are on the front of this policy.

#### **4. Induction & Training**

The governing body will ensure that all staff receive appropriate safeguarding and child protection training (including online safety, which amongst other things includes an understanding of the expectations, applicable role and responsibilities in relation to filtering and monitoring) which is regularly updated and in line with advice from the HSCB. In addition, all staff members will receive regular safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and up to date knowledge of emerging and evolving safeguarding issues to safeguard learners effectively.

All new staff members will undergo safeguarding and child protection training at induction. This will include training on the school's safeguarding and child protection policy, online safety, the code of conduct/staff behaviour policy, low-levels concerns guidance, the behaviour policy, the safeguarding response to learners who are absent from education, and the role of the designated safeguarding lead. Copies of the school's policies, procedures and Part One of KCSiE (or Annex A for those staff who do not work directly with learners)<sup>8</sup> will be provided to new staff at induction.

The governing body will ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

The Headteacher will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly.

In considering safeguarding training arrangements the governing body will also have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment, and require teachers to have a clear understanding of the needs of all learners.

#### **5. Recognising concerns - signs and indicators of abuse.**

All staff should be aware of indicators of abuse, neglect and exploitation so that staff are able to identify cases of learners who may be in need of help or protection. Staff should be aware that learners can be at risk of harm

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<sup>8</sup> Dependent on school stance on the condensed version of KCSiE. Whilst it is a matter for schools, based on their assessment, HSCB take the view that it should only be those staff that do not have regular contact with learners in school, e.g. cleaners who come in out of school hours, who are expected to only read the condensed version of Part One of KCSiE.

inside and outside of school, inside and outside of home and online. Staff should exercise **professional curiosity** and know what to look for as this is vital for the early identification of abuse or neglect.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff should consider whether learners might be at risk of abuse or exploitation in situations outside their families – harms take a variety of different forms and learners can be vulnerable to multiple harms including sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and recognise that learners are at risk of abuse and other risks online as well as face to face. In many cases abuse will take place concurrently both online and offline. Learners can also abuse other learners online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL before they leave at the end of the school day.

### Indicators of abuse and neglect

**Abuse** is defined as 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 learners of all forms of domestic abuse, including where they see, hear or experience its effects. Learners may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

The following indicators listed under the categories of abuse are not an exhaustive list:

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**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 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 learners. 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 learners frequently to feel frightened or in danger, or the exploitation or

corruption of learners. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person 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, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving learners in looking at, or in the production of, sexual images, watching sexual activities, encouraging learners to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other learners. The sexual abuse of learners by other learners is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and of the school's policy and procedures for dealing with it. (See section 7: Specific safeguarding issues)

**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 a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. (Source: Keeping Children Safe in Education)

## 6. Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put learners at risk of harm. Behaviours linked to issues such as of drug taking and/or alcohol abuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines) and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that learners are at risk. Other safeguarding issues all staff should be aware of include:

### Child-on-child abuse

All staff should be aware that learners can abuse other learners (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand that even if there are no reports in school it does not mean it's not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL (or deputy) who will record these using MyConcern.

It is essential that all staff understand the importance of challenging inappropriate behaviours between learners, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for learners and in worst case scenarios a culture that normalises abuse leading to learners accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between learners (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos<sup>9</sup> (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

All staff should be clear about the school's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

### Early help

In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. The designated safeguarding leads (and the deputies) understand that the local early help process is through a MASH referral clearly labelled as an Early Help referral.

### Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in 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. CSE and CCE can affect learners, both male and female and can include learners who have been moved (commonly referred to as trafficking) for the purpose of exploitation. The Children's Society Guidance [here](#).

### Child Criminal Exploitation (CCE)

Some specific forms of CCE can include learners being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Learners can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons

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<sup>9</sup> UKCIS guidance: Sharing nudes and semi-nudes advice for education settings.

such as knives or begin to carry a knife for a sense of protection from harm from others. As learners involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older learners), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Further indicators are in Appendix A

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving learners in the production of sexual images, forcing learners to look at sexual images or watch sexual activities, encouraging learners to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some learners may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Further indicators are in Appendix A

### **Domestic Abuse**

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

Further indicators are in Appendix A

### **Female Genital Mutilation (FGM)**

Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers<sup>10</sup>. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Further indicators are in Appendix A

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<sup>10</sup> Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, 'teacher' means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England)

## Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe learners 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.

Staff can access a range of advice to help them identify learners in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the school's policy, and speaking to the DSL or a deputy.

Further indicators are in Appendix A

## Serious violence

All staff should be aware of the indicators which may signal that learners are at risk from, or involved with, serious violent crime. 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 unexplained injuries. Unexplained gifts or new possessions could also indicate that learners have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Further indicators are in Appendix A

## 7. Learners potentially at greater risk of harm

The governing body recognises that whilst all learners should be protected there are some groups of learners who are potentially at greater risk of harm and, in some cases, these learners may find it difficult to communicate what is happening to them.

### Alternative Provision

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

The school recognises that the cohort of learners in alternative provision often have complex needs and is aware of the additional risk of harm our learners may be vulnerable to. Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

The school will have regard to the following statutory guidance:

[Alternative provision – DfE Statutory Guidance](#), and  
[Education for children with health needs who cannot attend school – DfE Statutory Guidance](#)

### **Learners who need a social worker (Child in Need and Child Protection Plans)**

Learners may need a social worker due to complex safeguarding or welfare needs. Learners may need this help due to abuse, neglect and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

The governing body expects that the Local Authority will share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both LAs and schools to safeguard and promote the welfare of learners.

Where learners need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **Children Absent from Education**

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some learners are particularly at risk. These include learners who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

It is important that the school's procedures for unauthorised absence and for dealing with learners who are absent from education are followed, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation, including sexual exploitation, and to help prevent the risks of going missing in future. This includes when problems are first emerging but also where learners are already known to LA children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where absence from education may increase known safeguarding risks within the family or in the community. As such, all staff should be aware of the school's unauthorised absence procedures and Children Missing Education procedures. This will be monitored and actioned through the year team. This includes informing the LA if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the LA, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

Further information and support includes:

- Schools' duties regarding learners missing education, including information schools must provide to the LA when removing a child from the school roll at standard and non-standard transition points can be found in the DfE's statutory guidance: [Children Missing Education](#).
- General information and advice for schools can be found in the Government's [Missing Children and Adults Strategy](#).
- further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges](#)
- guidance for schools concerning learners who are absent from education [Working Together To Improve School Attendance](#)

### **Elective Home Education**

Many home education children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will work together with the LA and other key professionals to coordinate a meeting with parents/carers where possible.

Ideally this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. Where a child has an Education, Health and Care plan in place the LA will need to review the plan, working closely with parents and carers.

Further information and guidance [here](#)

### **Learners requiring mental health support**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The governing body will ensure there is a clear system and process in place for identifying possible mental health problems, including routes to escalate, and a clear referral and accountability system. Staff concerns will be fed through the safeguarding team and triaged by the school counsellor. Learners will then be allocated additional support according to their needs.

Staff can access further advice in a DfE guidance documents [Preventing and tackling bullying](#) and [mental health and behaviour in schools](#) which set out how staff can help prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of learners.

The school's senior mental health lead is the DSL.

### Children Looked After and Previously Looked After Children.

The most common reason for learners becoming looked after is as a result of abuse and/or neglect. The governing body will ensure staff have the skills, knowledge and understanding to keep Children Looked After safe.

The governing body will ensure there are arrangements in place so that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

Appropriate staff will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after the child. The DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child. The role of the virtual head has been extended to include responsibility for promoting the educational achievement of children in kinship care.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. The governing body recognises that when dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these learners, who are a particularly vulnerable group.

For learners who are care leavers, the DSL should have details of the LA Personal Advisor appointed to guide and support the care leaver and liaise with them as necessary regarding any issues of concern.

### Learners with SEN and disabilities, or health issues

These learners can face additional safeguarding challenges, both online and offline.

Staff should avoid making assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the child's disability or medical condition without further exploration.

Staff should also be aware that these learners may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners. Similarly, staff should be aware of the potential for learners with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing signs or being able to communicate how they are feeling.

Staff also need to be mindful of learners' cognitive understanding, for example, whether they are able to understand the difference between fact and fiction in online content and the consequences of repeating the content/behaviours in school.

As such, any reports of abuse involving learners with SEND will require close liaison with the DSL and SENCO.

Further information can be found in the DfE's:

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#).
- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service ([councilfordisabledchildren.org.uk](http://councilfordisabledchildren.org.uk))

- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

### Learners who are lesbian, gay, bisexual, or gender questioning

The school acknowledges that a child or young person may be lesbian, gay, bisexual, or gender questioning is not in itself an inherent risk factor for harm. However, learners that are lesbian, gay, bisexual, or gender questioning can be targeted by other learners. In some cases, a learner who is perceived to be lesbian, gay, bisexual, or gender questioning (whether they are or not) can be just as vulnerable as learners who are.

Risks can be compounded where learners lack a trusted adult with whom they can be open. Staff should therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

## 8. Opportunities to teach safeguarding

The governing body will ensure that learners are taught about how to keep themselves and others safe, including online.

The governing body recognises that effective education should be tailored to the specific needs and vulnerabilities of individual learners, including learners who are victims of abuse, and learners with SEND.

Relevant topics will be included within Relationships and Sex Education (also known as Sex and Relationship Education) and through Health Education within the Personal Development curriculum, having regard to statutory guidance [here](#).

Preventative education is most effective in the context of a whole-school approach that prepares learners and young people for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

The governing body expects that the school's values and standards should be upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. This whole-school approach will be fully inclusive and developed to be age and stage of development appropriate, and will tackle (in age-appropriate stages) issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise and abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and FGM, and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.

The school will ensure that there are appropriate filters and monitoring systems in place to safeguard learners and young people from potentially harmful and inappropriate online material.

## 9. Online safety and filtering and monitoring

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, radicalisation and sexual predation and technology often provides the platform that facilitates such harm.

The governing body has had due regard to the additional information and support set out in KCSiE and ensures that the school has a whole school approach to online safety, and has a clear policy on use of communications technology in school. Online safety will be a running and interrelated theme when devising and implementing policies and procedures. This will include considering how online safety is reflected in all relevant policies and whilst planning the curriculum, any teacher training, the role of the DSL and any parental engagement.

It is essential that learners are safeguarded from potentially harmful and inappropriate online material. The school adopts a whole school approach to online safety to protect and educate learners and staff in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns as appropriate.

Online safety issues can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, or radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories;
- **Contact:** being exposed to harmful online interaction with other users, for example, peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images, and online bullying); and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If staff feel that either they or learners are at risk this should be reported to the Anti-Phishing Working Group (<https://apwg.org>).

The governing body will ensure that an annual review is undertaken of the school's approach to online safety including the school's filtering and monitoring provision, supported by an annual risk assessment that considers and reflects the risks learners face online. Schools can use the DfE's [plan technology for your school service](#) to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

The review should include a member of the senior leadership team, the DSL, the IT service provider and a governor. The school should ensure they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on cyber security including considerations can be found at [Cyber security training for school staff - NCSC.GOV.UK](#). In addition, schools and colleges should consider taking appropriate action to meet the Cyber security standards for schools and

colleges which were developed to help them improve their resilience against cyber-attacks. DfE Guidance [here](#).

The school's online safety policy outlines the appropriate filtering and monitoring which take place on school devices and school networks. It also outlines the expectations, applicable roles and responsibilities in relation filtering and monitoring. Guidance on AI in education [here](#).

School staff can access resources, information and support as set out in Annex B of KCSiE. Adapted factsheet from Key on F&M issued to staff.

The school has a clear policy on the use of mobile and smart technology, which allows learners to bring in mobile phones but they should not be seen or heard. The school understands that many learners have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some learners, whilst at school can sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. Any incidents of this will be treated as Child on Child abuse or part of malicious communications. School devices are monitored even if they are taken home by staff or learners and any infractions are followed up.

## 10. Procedures

If staff notice any indicators of abuse/neglect or signs that a child or young person may be experiencing a safeguarding issue they should record their concerns on the school's safeguarding management system or on a school recording form for safeguarding concerns and pass it to the DSL without delay either in person or via an email to the safeguarding team.

### What to do if you are concerned.

If a child makes an allegation or disclosure of abuse against an adult or other child or young person, it is important that you:

- Stay calm and listen carefully;
- Accept what is being said;
- Allow the learner to talk freely – do not interrupt or put words in the learner's mouth;
- Only ask questions when necessary to clarify, do not investigate or ask leading questions;
- Reassure the child, but don't make promises which it might not be possible to keep;
- Do not promise to keep secrets or confidentiality;
- Emphasise that it was the right thing to tell someone;
- Reassure them that what has happened is not their fault;
- Do not criticise the perpetrator;
- Explain what has to be done next and who has to be told;
- Pass the information to the DSL or alternate without delay
- Make a written record when requested, which should be signed and include the time, date and your position in school; Do not include your opinion without stating it is your opinion;
- Consider seeking support for yourself and discuss this with the DSL as dealing with a disclosure can be distressing.

When a record of a safeguarding concern is passed to the DSL, the DSL will record the time and date the record of concern was received. The DSL will assess the concern and, taking into account any other safeguarding information known about the child/young person, consider whether it suggests that the threshold of significant harm, or risk of significant harm, has been reached or may be a child in need. If the DSL is unsure whether the threshold has been met, they will contact the MASH Golden Number for advice (0208 901 2690). Where appropriate, the DSL will complete and submit the MASH referral form [here](#)<sup>11</sup>.

Where the DSL believes that a child or young person may be at imminent and significant risk of harm they should call The Golden Number immediately and then complete the MASH Referral.

Where a safeguarding concern does not meet the threshold for completion of a MASH Referral, the DSL should record how this decision has been reached and should consider whether additional needs of the child have been identified that might be met by a coordinated offer of early help including the school or college's local early help offer.

School staff might be required to contribute to multi-agency plans to provide additional support to learners. This might include attendance at child protection conferences or core group meetings. The school is committed to providing as much relevant up to date information about the child as possible, including submitting reports for child protection conferences in advance of the meeting in accordance with HSCB procedures and timescales.

Where reasonably possible, the school is committed to obtaining more than one emergency contact number for each learner.

School staff must ensure that they are aware of the procedure to follow when a child goes missing from education. This will take the form of a referral to the relevant Local Authority if it requires reporting and escalating for concerns about child-on-child abuse, including child on child sexual violence and sexual harassment.

## 11. Information sharing, record keeping and confidentiality

Information sharing is vital in safeguarding children by identifying and tackling all forms of abuse, neglect and exploitation, and in promoting learners' welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, the school understands that it is critical to recognise the importance of information sharing between professionals and local agencies and will contribute to multi-agency working in line with Working Together to Safeguard Children. Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, and to keep the information they hold safe and secure, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping learners safe. Staff will have regard to the Government guidance: [Information sharing: advice for practitioners providing safeguarding](#)

<sup>11</sup> N.B. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police, although the DSL should also be made aware.

[services to children, young people, parents and carers](#), which supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the DSL or a deputy.

Well-kept records are essential to good child protection practice. All concerns, discussions and decisions made and the rationale for those decisions should be recorded in writing. This includes instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc. If in doubt about recording requirements, staff should discuss with the DSL.

The school recognises that confidentiality should be maintained in respect of all matters relating to child protection. Information on individual child protection cases may be shared by the DSL or alternate DSL with other relevant members of staff. This will be on a 'need to know' basis and where it is in the child's best interests to do so.

A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents/carers or learners), or promise a child to keep a secret which might compromise the child's safety or wellbeing.

As well as allowing for information sharing, in circumstances where it is warranted because it would put a child at risk of serious harm, the DPA 2018 and the GDPR allow schools to withhold information. This may be particularly relevant where a child is affected by domestic abuse perpetrated by a parent or carer, is in a refuge or another form of emergency accommodation, and the serious harm test is met.

Ordinarily, the school will always undertake to share its intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation.

The General Data Protection Regulation and the Data Protection Act 2018 states that, the school has the authority to share information with the Local Authority "in the exercise of our official duties without seeking consent".

The "**public task basis**" as described in the legislation allows authorities to use data when they can demonstrate that the processing is to perform tasks that are set by national law. This means parental consent is not necessary for the obtaining and sharing of information

"Between agencies when that information is for child protection or safeguarding purposes or for an assessment of a child or children's needs.

**"Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law."

The school will have regard to the HSCB Guidance on the Transfer of a Child Protection /or Safeguarding File to another Education Setting. When a child leaves the school, the DSL will ensure their child protection file is transferred to the new school as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). The file will be transferred separately from the main learner file, ensuring secure transit, and confirmation of receipt should be obtained. For further guidance [here](#).

## 12. Managing allegations made against teachers, including supply teachers, other staff, volunteers and contractors

Any allegation against a member of staff (including supply staff) or volunteer, as described below, must be reported to the **headteacher** without delay, unless the Headteacher is the subject of the allegation - when the **chair of governors** must be informed, or the Vice-Chair in his/her absence, without notifying the Headteacher first.

The school will follow the HSCP [Managing Allegations against staff and volunteers](#) if a safeguarding concern or allegation is raised against an adult in a position of trust.

An allegation that may meet the harm threshold is any information which indicates that a member of staff /volunteer may have:

- 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; or
- behaved towards a child or children in a way that indicates he/she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This applies to any child the member of staff, supply teacher, volunteer or contractor has contact with in their personal, professional or community life. It also applies regardless of whether the alleged abuse took place in our school.

Concerns that do not meet the harm threshold will be dealt with in accordance with the school's policy for managing low-level concerns. See school statement on managing low level concerns.

If any member of staff has concerns that a colleague, supply teacher, volunteer or contractor might pose a risk to learners, it is their duty to report these to the headteacher. Where the concerns or allegations are about the headteacher, these should be referred to the Chair of Governors.

The headteacher/Chair of Governors should report the concern to the Local Authority Designated Officer (LADO) within one working day. The referral should be made via MASH using the MASH referral form.

## 13. Use of school premises for non-school activities

The governing body will ensure that where school facilities/premises are hired or rented out to organisations or individuals, sports associations or service providers to run community or extra-curricular activities appropriate arrangements are in place to keep learners safe.

The governing body will seek assurance that the body concerned has appropriate child protection and safeguarding policies and procedures in place, including inspecting these as needed. Arrangements will also be put in place for the body hiring or renting the school facilities or premises to liaise with the school on these matters where appropriate.

These arrangements will apply regardless of whether or not the children who attend any of these services or activities are learners on the school roll.

Where a lease or hire agreement is entered into the governing body will ensure safeguarding requirements are included as a condition of use and occupation of the premises; this will make clear that any failure to comply would lead to termination of the agreement. The guidance on [Keeping](#)

[children safe in](#) out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

## 14. Whistleblowing

The governing body recognises that learners cannot be expected to raise concerns in an environment where staff fail to do so. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider school community) raises a concern about danger or illegality that affects others, for example, learners in the school or members of the public.

The governing body would wish for everyone in the school community to feel able to report any child protection/safeguarding concerns through existing procedures within school, including the whistleblowing procedure adopted by governors. However, for members of staff who do not feel able to raise such concerns internally, there is a NSPCC whistleblowing helpline. Staff can call 0800 028 0285 (line available from 8.00am to 8.00pm, Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## 15. Useful Contacts:

<b>Harrow Children's Social Care &amp; Multi-agency Safeguarding Hub (MASH)</b>	<b>'Golden Number': 020 8901 2690</b> Emergency Duty Team: weekends, bank holidays and between 5pm-9am during the week: <b>020 8424 0999</b>
<b>Police</b>	<b>101 or for emergency: 999</b>
<b>FGM - Mandatory reporting</b>	<b>Police on 101</b>
<b>Local Authority Designated Officer for Allegations against staff (LADO)</b>	Initial referrals via <b>MASH/Golden Number</b> above. LADO: Rosalind South Tel: 07871 987254. <a href="mailto:Lado@harrow.gov.uk">Lado@harrow.gov.uk</a>
<b>Children and Young People with Disabilities 0-25 years</b>	<b>020 8966 6481</b>
<b>Local multi-agency procedures, guidance and Training: Harrow Strategic Safeguarding Partnership</b>	<a href="http://www.harrowscb.co.uk/">www.harrowscb.co.uk/</a>
<b>NSPCC</b>	<b>0800 800 5000</b>
<b>Report Abuse in Education NSPCC Helpline</b>	<b>0800 136 663</b>
<b>Childline</b>	<b>0800 1111</b>
<b>Government's Whistle-blowing Service via NSPCC Report Line</b>	<b>0800 028 0285</b>
<b>Forced Marriage Unit</b>	<b>Tel: 020 7008 0151</b> From overseas: +44(0)20 7008 0151 (Mon-Fri 9am-5pm) Out of hours: 020 7008 1500 (ask for Global Response Centre) Email: <a href="mailto:fmufco.gov.uk">fmufco.gov.uk</a>
<b>Support and Advice about Extremism DfE helpline (non-emergency advice for staff and governors)</b>	<b>Tel: 020 7340 7264</b> Email: <a href="mailto:counterextremism@education.gsi.gov.uk">counterextremism@education.gsi.gov.uk</a>
<b>Disclosure and Barring Service</b>	<b>Tel: 03000 200 190</b> Email: <a href="mailto:customerservices@db.gov.uk">customerservices@db.gov.uk</a>
<b>Teaching Regulation Authority</b>	<b>Tel: 020 7593 5392</b> Email: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>

## Appendix A - Further Information – Safeguarding Children in Specific Circumstances

### Attendance (including admissions interviews)

Through our attendance protocol we promote to learners and parents the importance of ensuring that learners attend regularly. We also ensure any absence is checked if a child is not in school without explanation. This is either by direct contact with parents or by sending a text message. Absence within school time is only authorised when it is in response to exceptional circumstances. The following statement appears in school documents "Harrow High School is only responsible for children between the hours of 8.15am and 3.50pm unless the children are at an organised school activity supervised by school staff. Outside of these hours, children are the responsibility of their parents. We ask that parents ensure their child arrives punctually at school but not before the published hours."

See our full policy on this matter.

### Adult /Child Ratio

We ensure the adult /child ratio is sufficient to safeguard the learners in all situations. In class, we employ LSAs to maintain ratios based on level of need.

When learners are out on school activities or trips, we adhere to DfE, LA and Transport for London guidance on staff/learner ratios of at least 1 staff to 10 learners; this can vary however, depending on the length of the trip, nature of the activities being undertaken and the level of support required by the learners attending. Advice and a full risk assessment is undertaken by the school's EVC before any educational visit occurs.

### Anti-Bullying (part of Child On Child Abuse)

See comments above on page 18 also our specific policy on this matter.

### Behaviour and Punctuality for Learning

This policy is aimed at ensuring all learners are kind to each other in all situations on the way in and from school as well as during the school day. Having positive behaviour enables learners to enjoy school free from issues relating to peer on peer abuse. Parts of our Behaviour and Punctuality for Learning Policy is displayed in areas of the school, in the Information for Parents booklet and in full on the school website. All learners are reminded regularly through assemblies, class teaching and individual reminders about the Behaviour and Punctuality for Learning Policy. Parents and learners are told about the rules at induction interviews and encouraged to support their children in keeping them.

Further details are found in the full policy.

### Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. There may also be community safety incidents within the vicinity of the school which can raise concerns amongst children and parents.

Opportunities for learners to develop their confidence and abilities around keeping themselves are embedded into the school curriculum.

## Children and the court system

Guidance is available for when children are required to give evidence in **criminal courts** [5-11 year olds](#) and [12-17 year olds](#).

Making arrangements for children via the **family courts** following separation can be stressful and entrench conflict in families. The Ministry of Justice has a useful online guidance [Get help with child arrangements](#) (also known as contact, access or custody).

## Children with a family member in prison

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#) (National Information Centre on Children of Offenders) provides information to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Child Sexual Exploitation and Child Criminal Exploitation 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 or young person under the age of 18 into sexual or criminal activity. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or increased status of the perpetrator or facilitator.

Child Sexual Exploitation and Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Like all forms of abuse exploitation:

- a) can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- b) can still be abuse even if the sexual activity appears consensual
- c) can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- d) can take place in person or via technology, or a combination of both
- e) can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- f) may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posting on social media)
- g) can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- h) is typified by some form of power imbalance in favour of those perpetrating the abuse

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.

Some of the following signs may be indicators of Child Criminal Exploitation:

- a) children who appear with unexplained gifts or new possessions
- b) children who associate with other young people involved in exploitation
- c) children who suffer from changes in emotional well-being
- d) children who misuse drugs and alcohol
- e) children who go missing for periods of time or regularly come home late
- f) children who regularly miss school or education or do not take part in education.

The above Child Criminal Exploitation indicators can also be indicators of Child Sexual Exploitation, as can:

- a) children who have older boyfriends or girlfriends;
- b) children who suffer from sexually transmitted infections or become pregnant.

Our school will support the multi-agency activity to combat these crimes and help to divert and support any young learners affected by CSE. We will follow the HSCB protocol for identifying and managing cases of CSE and promote the use of the HSCB's [SAFEGUARD Risk Assessment Tool](#) Identification tool in our child protection training.

Harrow SCB advice for Learners: [Harrowscb Children young people cse](#)

Centre of Expertise on Child Sexual Abuse guidance [here](#)

### **Children Missing Education or Missing from Home and Care**

A child going missing from education, particularly repeatedly, is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation.

Staff should follow the School's procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risks of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. The School's procedures are set out in the Attendance Policy and Missing Child Protocol. The Designated Safeguarding Lead will monitor unauthorised absence particularly where children go missing on repeated occasions.

Harrow High School will fulfil its statutory duty in notifying the local authority when removing a learner's name from the admission's register outside of the normal transition points. We will make reasonable enquiries to establish the whereabouts of the child jointly with the local authority before deleting their name from the register. We will also notify the local authority within five days of adding a learner's name at a non-standard transition point.

When one of our learners goes missing from home or care we will contribute to the police and local authority's efforts to identify and locate the child

Harrow Borough guidance: [here](#)

For further DfE guidance see [Children missing Education](#).

### **Cybercrime**

Cybercrime is a criminal activity committed using computers and/or the internet. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cybercrime.

If there are concerns about a student in this area then the DSL will consider referring them to the [Cyber Choices](#) programme.

## Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children can also be victims, and perpetrators in their own relationships. Extra-familial harms can include sexual harassment and domestic abuse in their own intimate relationships (teenage relationships).

### Operation Encompass

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the Designated Safeguarding Lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.

The Domestic Abuse Bill 2020 sought to improve awareness and understanding of coercive control offence and review effectiveness of offence. The Bill also recognises the devastating impact that domestic abuse can have on children exposed to it in their own home. Part 1 of the Bill provides that a child who sees or hears, or experiences the effects of, domestic abuse and is related to the person

being abused or the perpetrator is also to be regarded as a victim of domestic abuse. This will help to ensure that locally commissioned services consider and address the needs of children affected by domestic abuse.

Our school recognises the immediate and long term impact of domestic abuse on a child's development and emotional wellbeing. All staff will remain vigilant to identify the signs so that early help and protective action can be instigated where appropriate. We endeavour to provide the child with a safe and caring environment at school to help mitigate the impact of home-life stresses.

All notifications of domestic abuse will be managed in accordance with [government guidance on domestic violence and abuse](#) reporting.

Any notifications received from the police/MASH of domestic abuse incidents, will be promptly reviewed by our DSL. This will enable our school to respond appropriately to the impact on the child/young person and to share any additional information with MASH to assist in the overall identification and assessment of risk

### **Drugs Education and Substance Misuse**

We aim to equip learners with the knowledge, understanding and skills that enable them to make the sort of choices that lead to a healthy lifestyle. Our teaching about drugs has the primary objective of helping learners to become more confident and responsible young people. We teach learners about the dangers to health posed by taking inappropriate drugs and the importance of taking medicines as prescribed by health professionals. We aim to equip them with the social skills that enable them to make informed moral and social decisions in relation to drugs in society. The school operates a no smoking policy anywhere on the school premises in line with legislation.

We recognise our responsibilities in the following regards;

a) **Learners:** We recognise the clear role our school has to play in preventing drug misuse as part of our pastoral responsibilities. We will provide age appropriate information on drugs and alcohol and tackle problem behaviour, working with local partners to prevent drug or alcohol misuse. For further guidance refer to [Dfe and ACPO Drug Advice for schools](#). (ACPO has changed to the National Police Chiefs' Council).

b) **Parental Substance Misuse:** Substance misuse (drugs or alcohol) may impact on parental capacity and can significantly exacerbate other concerns such as domestic violence or mental health issues. We will remain vigilant in identifying and supporting learners and their families facing such issues, and work in collaboration with other agencies where necessary to prevent significant harm.

### **Equality**

This covers all issues relating to equality whether of gender, ethnicity, culture, religion, educational difference or any other form of diversity. Derogatory comments are challenged and adults explain why the comment is unacceptable. Serious incidents are reported to the Headteacher and logged. We seek to celebrate Harrow High's diverse community and workforce and support learners with protected characteristics.

Further guidance is set out in the full Equalities Policy.

### **Female Genital Mutilation (FGM)**

FGM comprises all non- medical 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.

'All procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons' - WHO

In our school we recognise that whilst there is not necessarily an intention to harm a girl through FGM, the practice has serious short and long term medical and psychological implications. We are committed to work with families, partner agencies to promote understanding and safeguard learners who may be at risk of this practice.

We aim to work sensitively with community groups where this may be a cultural belief and practice, however we will act to safeguard and promote our learners welfare where required and will fulfil our duties under the [Female Genital Mutilation Act 2003](#) (as inserted by section 74 of the *Serious Crime Act 2015*). This places a statutory duty upon teachers along with regulated health and social care professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18.

Where it is suspected that a girl is at risk of FGM being undertaken then normal child protection procedures must be followed. Only a direct disclosure by the victim or potential victim should result in a 999 call and then informing the DSL.

Information on when and how to make a report can be found in the government's [Multi-agency statutory guidance on female genital mutilation](#) and [Mandatory reporting of female genital mutilation - procedural information](#)

Further advice from HSCB: [FGM duty](#)

### **Fire Drills including Lock Down Drills**

We undertake regular fire drills so that learners and all adults working at the school know what to do in the case of a fire emergency. Rooms have the fire escape routes clearly labelled. Nominated staff take on responsibilities to check that their areas are cleared and feed this back to the member of staff in charge, normally the Head Teacher or Acting Head Teacher.

Lock Down Drills are for emergencies whereby the safety of learners requires them to be locked into classrooms with staff and hidden from intruders on the school site or a dangerous animal. Lock Down Drills have been practised by staff and learners only to ensure they know what to do.

### **First Aid and Administration of Medication**

There is a fully trained dedicated Welfare Assistant in post to provide first aid assistance and welfare provision for learners injured or feeling unwell. A number of other staff are also trained and designated as First Aiders in the school to provide additional cover as necessary. Where a child is considered to be too unwell to remain in school, contact will be made with the designated adult and arrangements put in place for their collection.

The school ensures all staff understand their duty of care to children and young people in the event of an emergency. An ambulance will always be called if there is concern that the accident may be more serious or if there is significant concern over the learner's health or welfare.

It is the aim of the school to help parents of learners with medical conditions feel secure in the care their children receive at this school. This is achieved by good communication within school and consultation with parents and health professionals\support agencies involved in learners' health care.

Medication will only be administered to learners providing it is fully authorised by their parent/carer, clearly labeled with the learner's personal details and the dosage and supplied in the original packaging. First aid procedures are detailed in the Health and Safety suite of policies.

### **Forced Marriage**

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Forcing someone into marriage is a criminal offence in the UK. A lack of consent can be where a person does not consent or where they cannot consent e.g. if they have learning disabilities. There can also be links to Honour Based Abuse.

Our school recognises that it has an important role in safeguarding children from forced marriage by educating learners about the law and their rights and in identifying signs of risk. Further information can be found in [Government Guidance on Forced Marriage](#)

The Forced Marriage Unit has published [multi-agency statutory guidance](#) with pages 19-21 focusing on the role of schools and colleges. The Unit can be contacted for advice or information on 020 7008 0151 or email: [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk)

### **Gangs and Youth Violence / Serious Violence (including County Lines)**

Schools are increasingly recognised as places where early warning signs can be spotted that younger children may be at risk of getting involved in gangs, youth violence or serious violent crime. Crucial preventive work can be done at this stage to prevent negative behaviour from escalating and becoming entrenched. We recognise that even low levels of youth violence can have a disproportionate impact on a learner or the wider school/community environment. We will therefore, support children in developing safeguarding skills to prevent involvement in risky behaviours, and where serious concerns arise we will work collaboratively with our partner agencies to help prevent escalation of harm. For further information refer to government guidance on [advice to schools on gangs and youth violence](#). and [Preventing serious violence: a multi-agency approach](#).

Support for young people affected by gang association can be obtained via [Safer London](#)

At Harrow High School we take this very seriously and will engage parents/carers at early stages to make sure they are aware that their child is at risk of getting involved in gangs or other negative group behaviours. We will use any outside agency to assist us in this including the police, Trident and Social Services.

Further guidance from Harrow Borough: [here](#)

**County Lines:** this is a geographically widespread form of criminal activity involving drug networks or gangs that groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural or seaside areas. Missing episodes can be an important identifying factor, where the victim may have been trafficked for these purposes. In close working relationship with our local MASH a referral to the **National Referral Mechanism** will be considered for any such concerns. Further advice can be obtained from Home Office guidance [Criminal exploitation of children and vulnerable adults - county lines](#)

### Health & Safety

Our Health and Safety policy is updated regularly and the relevant information shared with all stakeholders. The ethos of the school is that health and safety is everyone's shared responsibility and any risks or hazards are reported immediately. We are constantly vigilant. Each term there is a fire drill that practices efficient evacuation from the buildings.

Risk assessments are undertaken in all areas of the curriculum and to cover all risks identified in school. In order to ensure safety at lunchtime our learners are not allowed to leave the school site and staff are on duty at strategic places and engage with learners. Risk assessments are also undertaken before learners are taken off site for all locations to be visited.

There is also a critical incident plan that details what all staff should do in the case of emergencies.

### Healthy Living

Through our curriculum and our assemblies we actively promote healthy lifestyle choices to the learners. They are also taught about making healthy choices in food through Science and Food Technology teaching. Our caterers actively encourage healthy choices at lunchtime and meet the current legislation on nutritional standards.

As an academy with a background of being a sports college, the learners are taught the importance of physical exercise through having up to three hours of structured physical exercise offered within a week, and an emphasis on the importance and value of physical activity outside of the school day. The school has an extensive programme for extracurricular sporting activities to attract a wide range of learners.

Healthy eating, physical activity and emotional health are promoted to ensure an holistic approach to learners' wellbeing.

### Homelessness

Our staff will alert the DSL of families becoming or at risk of becoming homeless, so that the DSL can refer to housing services at the earliest opportunity. Indicators for the risk of homelessness can include debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Duties introduced under *The Homelessness Reduction Act 2017* shift focus to early intervention, for further information see: [Homeless Reduction Act Factsheets](#).

### Homestay - Children staying with host families

Pupils may, as part of their learning experience, stay for short periods with a host family (homestay) e.g. as part of a foreign exchange visit or sports tour. We will ensure the suitability of the adults in their respective families who will be responsible for the visiting child during the stay. See the school's *Safer Recruitment Policy* for further details on our specific duties.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (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 HBA are abused (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 HBA, or already having suffered HBA.

### **Intimate Care**

Some job responsibilities necessitate intimate physical contact with children on a regular basis, e.g. providing intimate care for children with disabilities or in the provision of medical care. The nature, circumstances and context of such contact should comply with professional codes of practice or guidance and/or be part of a formally agreed plan, which is regularly reviewed. The additional vulnerabilities that may arise from a physical or learning disability should be taken into account and be recorded as part of an agreed care plan. The emotional responses of any child to intimate care should be carefully and sensitively observed, and where necessary, any concerns passed to Standards & Achievement Leader and parents/carers.

Intimate care should ordinarily only be provided in accordance with a health care plan. Should it become necessary to provide emergency intimate care, parents must be consulted beforehand. Should they be unavailable, the DSL must be consulted.

All children have a right to safety, privacy and dignity when contact of a physical or intimate nature is required and depending on their abilities, age and maturity should be encouraged to act as independently as possible.

The views of the child should be actively sought, wherever possible, when drawing up and reviewing formal arrangements. As with all individual arrangements for intimate care needs, agreements between the child, parents/carers and the organisation must be negotiated and recorded.

### **Keeping training up to date**

The Designated Safeguarding Lead, the Deputy Designated Safeguarding Lead and the Head teacher are trained up to Level 3. The Designated Safeguarding Lead attends the termly HSCB meetings to keep this training topped up throughout the year.

The Designated Safeguarding Lead ensures that the whole staff (including Governors) receive Level 1 training annually at the start of the academic year. Any new staff are given the same training when they arrive to ensure all staff have the appropriate training.

The Safeguarding Governor attends training appropriate for their position to level 3.

Any further training is also arranged. Most SALs and ASALs have been trained to Level 3 to allow them better understanding of the safeguarding elements in their role as pastoral leaders. This helps with a better coverage of contextual safeguarding throughout the school.

### **Learner Voice**

The learners are encouraged to understand the importance of being able to form opinions and make judgments by having an elected School Council. They are encouraged to respond to suggestions and to seek ways to improve their school. They are aware that they can influence what is happening in school and to do so having sought the opinions of their peers. The School Council meets monthly and has 2 elected representatives from each year. A representative of the School Council meets regularly with SLT to discuss issues and progress. Learners participate in the recruitment of the school's teaching staff.

Learners are also encouraged through the anti-bullying policy to speak out about bullying and anything that they are concerned about within school or contextually.

### **Meeting the Needs of Individual Learners**

Many learners, at all levels of ability, will at some time need extra help to reach their full potential. Our Inclusion Team consists of teachers, mentors and teaching assistants with specialist skills and experience in meeting the needs of learners who require additional support. The Team also supports bilingual learners at all stages of acquisition of English.

The majority of learners needing support receive it during their lessons. Occasionally there is focused, individual or small group work in specialist rooms with specialist leaders.

We have additional services available to support the welfare of our learners. These include an Inclusion Panel, the pastoral team (SAL and ASAL) and Connexions Personal Advisers. All external members of these services are DBS cleared.

### **Mental Health**

**Learners:** Our school seeks to promote positive mental health in our learners and to identify and address those with less severe problems at an early stage and build their resilience. We are also committed to identifying and supporting learners with more severe needs and to help make appropriate referrals to specialist agencies such as Child and Adolescent Mental Health Services (CAMHS) where necessary.

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe pupils 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.

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 that is also a safeguarding concern, they must immediately speak to the DSL or a deputy DSL.

The Department for Education has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol.

**Parental Mental Health:** We recognise that some parents with mental health issues may experience difficulties at times with their parenting responsibilities. We are committed to supporting such families and will endeavour to identify those who would benefit from early help from local services and work with them to avoid any adverse impact on their children. For further guidance refer to the NSPCC [Parental mental health](#)

### Notice Boards/Website

The school has a display board for learners so they can easily access information about safeguarding. Information may also be accessed via the school's website or Harrow Safeguarding Children Board's website <https://harrowsafeguarding.org.uk/scp/>

### Physical Intervention/ Positive Intervention

It is the school's policy to promote a safe and productive workplace and educational environment for its employees and learners.

Our school's policy on physical intervention and positive handling by staff is set out separately. It complies with the [DfE's guidance on use of reasonable force](#). This policy states that staff may only use reasonable force, meaning no more force than is needed to prevent learners from hurting themselves or others, from damaging property, or from causing disorder. It is always unlawful to use force as a punishment.

Headteachers and other authorised trained staff can use such forces as is reasonable in the circumstances to conduct a search for the following prohibited items: knives and weapons, alcohol, illegal drugs, stolen items, cigarettes and tobacco, fireworks, pornographic images, mobile phones or any article that has been or is likely to be used to commit an offence, cause personal injury or damage property.

If the use of force is necessary, reasonable adjustments for disabled children and children with special educational needs will be made.

Any use of force or restraint should be recorded and signed by a witness. The parent/carer will be informed of the incident.

Further Harrow SCB guidance: [here](#)

## Preventing Violent Extremism and Radicalisation

Our school recognises that protecting children from the risk of radicalisation is a part of our wider safeguarding duty to protect children from significant harm. Some young people may be more vulnerable to being groomed and this fact can be exploited by extremists. The internet and use of social media have become major factors in the radicalisation of young people and our school's E-safety policy and curriculum embeds understanding of these particular risks.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. It can happen in many different ways and settings. The School and its staff have a duty to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). [Protecting children from radicalisation: the Prevent Duty](#) provides guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

The Government's Counter Extremism Strategy defines 'Extremism' as: "the vocal or active opposition to our fundamental values, including, democracy, the rule of law, individual liberty and the mutual respect and tolerance for those of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist."

Through our Personal Development curriculum the school seeks to promote an understanding of and commitment to fundamental British values such as democracy, the rule of law, individual liberty, tolerance and respect for other people. Pupils are able to discuss sensitive topics, including terrorism and extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Prevent duty is not intended to limit discussion of these issues and the School and its staff should be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgment in identifying children who might be at risk of radicalisation and act proportionately. Staff are encouraged to discuss their concerns with the Designated Safeguarding Lead who can advise on assessing the level of risk to identify the most appropriate referral, which could include making a referral to the Channel programme or Children's Social Care.

Our school will help to identify young people at risk and work with local partnership arrangements including the **Channel Programme** to help support and divert any young people from associated harm: Click here for further guidance [Channel Duty Guidance](#). Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an

individual might be vulnerable to radicalisation. It is a voluntary process which allows the individual to withdraw from the programme at any time.

All staff are encouraged to familiarise themselves with the government's website [www.educateagainsthate.com](http://www.educateagainsthate.com). The website is designed to equip school leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people.

The School has a risk assessment process in place for considering and protecting children at risk of radicalisation and extremism. The risk assessment takes into consideration that the internet and use of social media have become major factors in the radicalisation of young people and our school's E-safety policy and curriculum embeds understanding of these particular risks.

Further HSCB advice and guidance: [here](#)

### **Private Fostering**

We recognise the importance of identifying children in Private Fostering arrangements so that their needs can be fully assessed by the local authority. At Harrow High School we will confirm the status of every learner's care arrangements on admission (or when a learner's care arrangements change) and notify the local authority of any known or suspected Private Fostering arrangement. We will support any subsequent assessment and remain alert to any additional needs that children placed away from their immediate families might face. Click here for information on what constitutes [private fostering](#) and here for details of [The Children's Act 1989: private fostering](#).

### **Road Safety and School Travel**

The learners are taught about staying safe on the roads through Personal Development and other relevant organisations, such as the police. The school also has in place a School Travel Plan Action Plan which has resulted in additional safety measures being put in place to improve road safety. Staff are on duty, at the school gate and road crossings, at the start of the day and the end of the school day to monitor learners' access and egress from site.

### **Safer Recruitment**

The Headteacher, Deputy Headteacher, School Business Manager and two Governors have successfully completed the NCSL Safer Recruitment Training Programme and the school's Recruitment Policy ensures that relevant guidance is adhered to in relation to the recruitment and selection of staff. All staff are subject to a Disclosure & Barring check and List 99 check form prior to starting work at the school. The enhanced DBS reference number is placed on their file, recorded both in Sims and on the Single Central file. Volunteers complete a DBS check or are monitored by permanent members of staff.

New staff are inducted into safeguarding practices. Newly appointed staff are assigned a mentor for the induction period. It is the responsibility of the mentors/line managers to familiarise new staff with procedures and policy which affect the health and safety of all at school but especially the learners.

Supply staff, visitors and volunteer staff are provided with a booklet containing essential information.

## Security

There is CCTV in operation at every entry point onto the school site and in every building. All visitors to the school have to sign in/out at Reception and will be challenged by staff if they do not display a visitors' ID badge in line with our Visitor Protocol.

The school also has emergency procedures established in case of a security breach. Staff can be alerted via two-way radios. Site staff have attended lone-worker training.

The school has cashless catering to reduce the need for learners to carry money in school. Entrances to the school, ICT suites, and science labs are controlled by electronic locks. Staff are required to wear their smartcards as a form of identification.

The school has a timetable identifying staff on Learning Walk and High Visibility to support behavior management and help maintain a calm and safe environment.

## Sex and Relationship Education

Learners are taught about the physical development of and respect for their own bodies, about relationship issues and to have respect for the views of other people. Adults respond honestly to learner's questions, and use correct terminology. This continues into the sixth form.

The majority of sex education is taught as part of our Personal Development programme. New statutory guidance for Relationships education, relationships and sex education (RSE) and health education came into force in September 2020.

Parents may withdraw their children following a written request and discussion with the Headteacher.

## Special Educational Needs and Disabilities (SEND)

Our school is committed to ensure that children with disabilities or special educational needs have exactly the same human rights to be safe from abuse and neglect, to be protected from harm and achieve the same outcomes as non-disabled children. We recognise that disabled children do however require additional action because they can experience greater vulnerability as a result of negative attitudes and because they may have additional needs relating to physical, sensory, cognitive and/or communication impairments.

This understanding is incorporated into our staff training, so that we all remain vigilant to identifying the additional vulnerabilities for these children in our care and provide the appropriate level and type of pastoral support.

Staff should bear in mind that additional difficulties may exist when recognising abuse and neglect in children with special educational needs and/or disabilities. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration, that children with special educational needs and/or disabilities can be disproportionately impacted by, for example, bullying without outwardly showing any signs, and there can be communication barriers in overcoming these difficulties.

Due to the different relationship that trusted adults may have with people with disabilities ie trust, intimate care, feeding there is a reliance on the integrity of the adult and an assumption they will treat the client appropriately, this may lead to confusion and vulnerability and the potential for exploitation as some people are predatory and some clients are unquestioningly trusting.

Some people with disabilities have low self-esteem and possibly no or small peer groups; they are prone to befriending and grooming or coaxing them into situations that may lead to exploitation due to their vulnerability and naivety.

People that work with clients with disabilities are often overworked given challenging tasks that can lead to compassion fatigue which in itself can result in the abuse of power and a toxic environment as seen in certain Care homes and children's homes, in the last few years.

### **Trafficking and Modern Day Slavery**

Harrow High School will remain alert for children trafficked into the country who may be registered at our school for a term or longer, before being moved to another part of the UK or abroad. We will bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, Traveler or migrant families – who collectively go missing from school. For further government guidance refer to [Safeguarding Children who may have been trafficked practice guidance](#).

### **Trips**

Off-site trips are always risk assessed and conform to our Trip Policy to ensure that learners are safely guided to and from their trips and suitably looked after whilst at the trip location.

### **Use of Photographs/Video**

Parents are informed that photographs and videos of children may sometimes be used in school publications, displays in school and marketing literature. Parents have the right to refuse permission for their children to be involved in the above.

The school makes every reasonable effort to minimise risk by following appropriate guidelines and by securing parental consent.

Full details are in ICT policy.

### **Working out of normal hours protocol**

Staff should always ensure their own safety by informing the site staff if they are working after normal hours. Staff should also always sign in during holidays or weekends at reception 'tapping in' as normal.

When working with learners, especially after school hours, staff should ensure that doors remain open and other staff members are aware that they are working with learners. It is advisable not to work on a one to one basis with learners, particularly after school.

For weekend and holiday interventions staff should escort learners off site when the session ends.

## Working with others agencies (e.g. Police, INGNITE, WISH, The Priory, The Jubilee Academy)

Our commitment to ensure learners are safe in every possible way means that we will always work with outside agencies over and above expectations to refer child protection and welfare concerns to Social Services. We acknowledge the PACE Code C 2019 detailing the need for an appropriate adult while a student is being questioned or detained by the police. Appropriate adults will be members of staff at the very least but will preferably be parents/carers or a social worker.

Some examples of ways in which we have done this over the years are detailed below;

- Serious Incident Group created by HHS to improve partnership across Harrow between schools, Police, Council, Social Services, YOT, Colleges and Harrow Businesses. The group meets monthly to share information and has systems set up to provide for a speedy flow of information in case of situations where learners may be at risk of harm. This allows for great Contextual Safeguarding for our learners and those across the borough.
- Trident – Anti Gang Assemblies
- Safe School's Officers – Online safety and Sexting assemblies and any others from their menu
- Diary of a Bad Man – Preventing Violent Extremism assembly
- Ben Kinsella Trust for Anti Knife Crime
- St Giles Trust for anti Gang and Youth Violence Education
- DSL Safeguarding assemblies – Level 1 delivery similar to the annual training for staff
- DSL & SALs – various assemblies on anti-bullying, anti-gangs and anti-social behaviour
- Parental meetings raising concerns of possible gang type behaviour including viewing CCTV from Harrow town centre provided by the police in order to prevent crimes from happening and forms part of HHS early support.
- IGNITE mentoring for one2one or group sessions
- WISH centre support for learners who have self-harmed
- Close liaison with The Jubilee Academy and The Helix for out placed learners
- Liaison with The Priory for learners who are in their care to ensure their studies there are linked to courses run by HHS for when they return to the school.
- FGM training received by whole staff on INSET
- WRAP training received by a selected group, who represented all faculties
- Links with Young Harrow Foundation for signposting to other external agencies / charities
- Working with the school nurse to support learners health
- Brooke and other charities for SRE

## Young carers

With so many adult responsibilities, young carers often miss out on opportunities that other children and young people have. We in schools are uniquely placed to identify and respond to concerns and 'triggers' where children and young people may require additional help as carers. We will aim to respond early with our own pastoral support and where appropriate seeking help from local authority support services for young carers. Regular Young Carer groups meet and undertake activities to support them.

## Appendix B Record of concern about a child/young person's safety and welfare

Initial referral date: \_\_\_\_ / \_\_\_\_ / 20\_\_\_\_

Learner: \_\_\_\_\_

1<sup>st</sup> disclosure to whom? \_\_\_\_\_

DoB: \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_

Form: \_\_\_\_\_

Address: \_\_\_\_\_

Type of referral: CP / PVE / FGM

Child already known to Social Care: Y / N

### DSL Safeguarding Summary Form

MRJ aware: Y/N PG aware: Y/N

Disclosure made to: \_\_\_\_\_

Lead member of staff: \_\_\_\_\_

**Brief summary of concern**

Date: \_\_\_\_\_

Date: \_\_\_\_\_

Account of the concern: (what was said, observed, reported and by whom?)

Additional Information: (your opinion, context of concern/disclosure)

Staff response: (what did staff do/say following the concern/disclosure?)

**Initial actions taken agreed**

MASH number called: Date: \_\_\_\_\_ Time: \_\_\_\_\_

\_\_\_\_\_

Involvement of LADO - N / Y – Date: \_\_\_\_\_ Time: \_\_\_\_\_

**Course of case / investigation (add extra sheets for telephone call records / copies of emails)**

\_\_\_\_\_

**Conclusion of HHS involvement / Actions forward**

\_\_\_\_\_

Added to MyConcern - \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Lead Staff signature: \_\_\_\_\_ Lead staff code: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / 20\_\_\_\_

## Appendix 3 (continued)

### Checklist for DSL (to be printed on back of DSL Safeguarding Summary Form)

✓	Check these . . .
✓	Child clearly identified
✓	Name, designation and signature of the person completing the record populated?
✓	Date and time of any incidents or when a concern was observed?
✓	Date and time of written record?
✓	Distinguish between fact, opinion and hearsay
✓	Concern described in sufficient detail, i.e. no further clarification necessary?
✓	Child's own words used? (Swear words, insults, or intimate vocabulary should be written down verbatim.)
✓	Record free of jargon?
✓	Written in a professional manner without stereotyping or discrimination?
✓	The record includes an attached completed body map (if relevant) to show any visible injuries

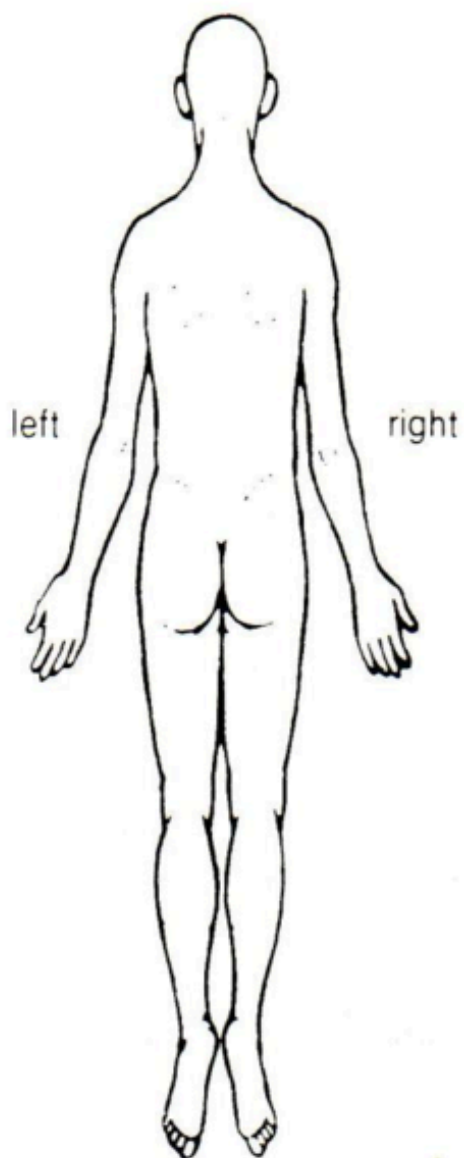
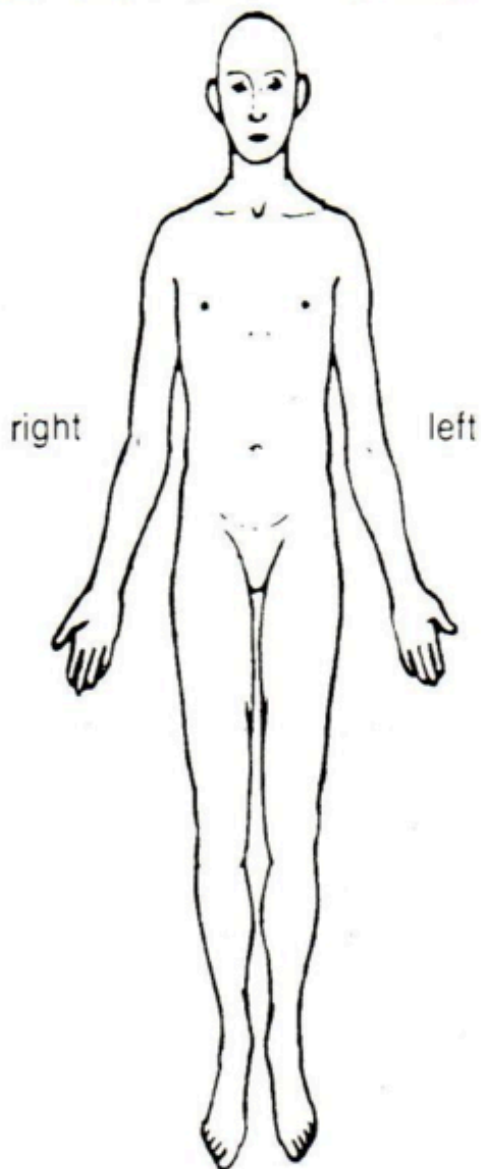
### Appendix B cont. - Body Map for Injuries

(This must be completed at time of observation)

Name of learner: ..... Date of Birth: .....

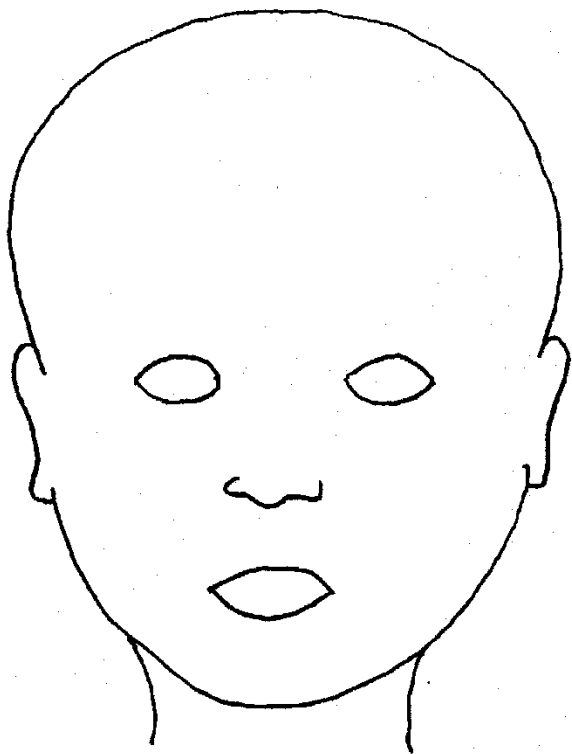
Name of Staff: ..... Job title: .....

Date and time of observation: .....

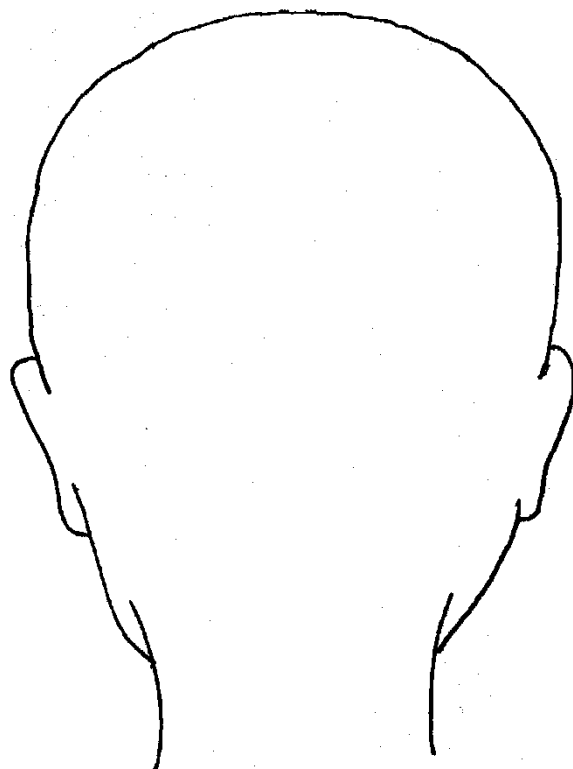


Name of learner: .....

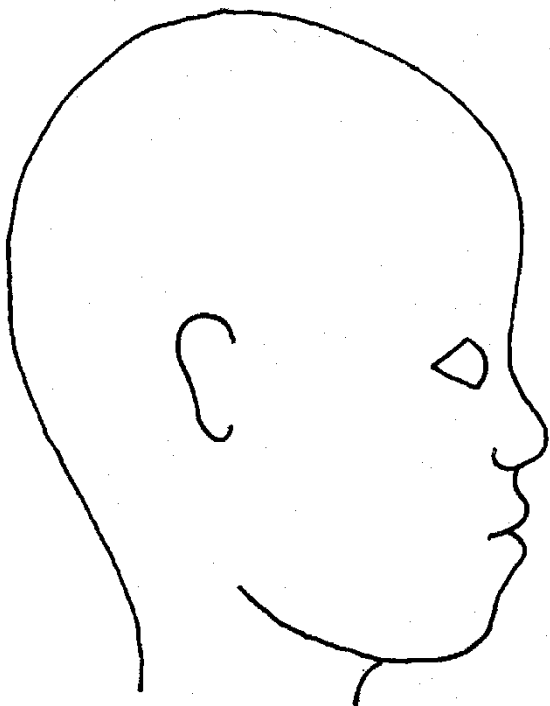
Date and time of observation: .....



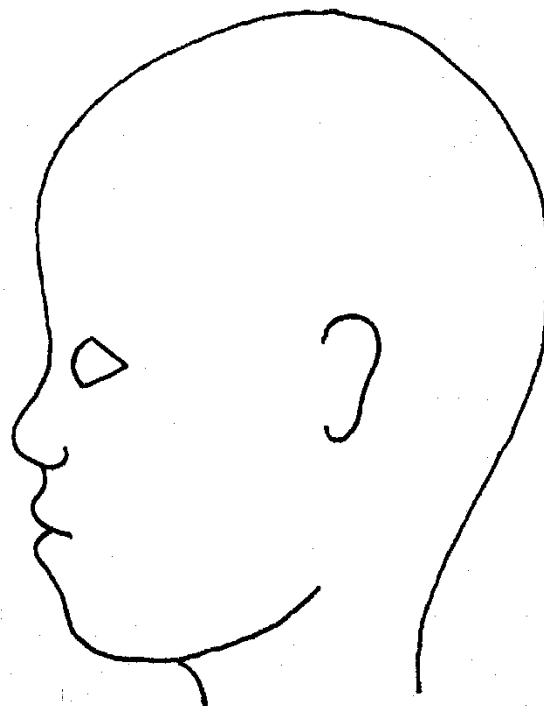
FRONT



BACK



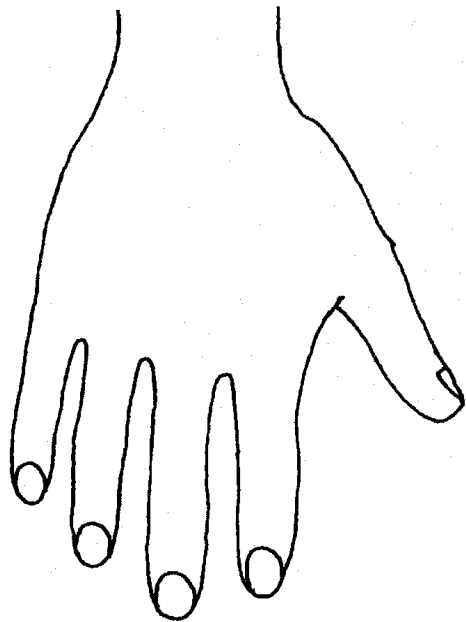
RIGHT



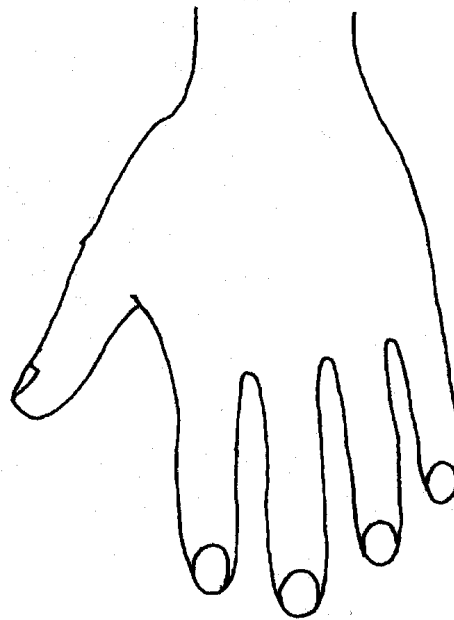
LEFT

Name of learner: .....

Date and time of observation: .....

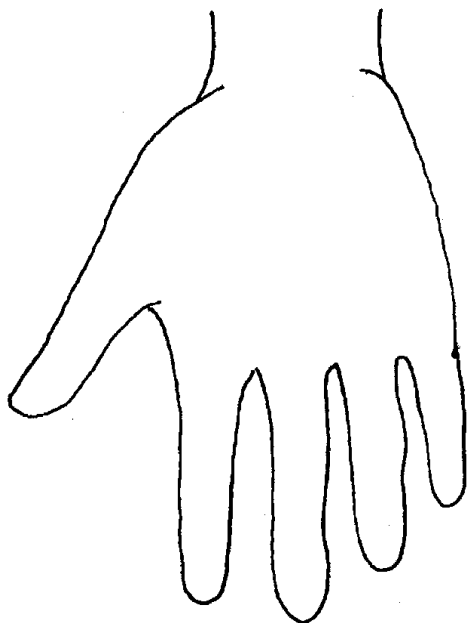


R



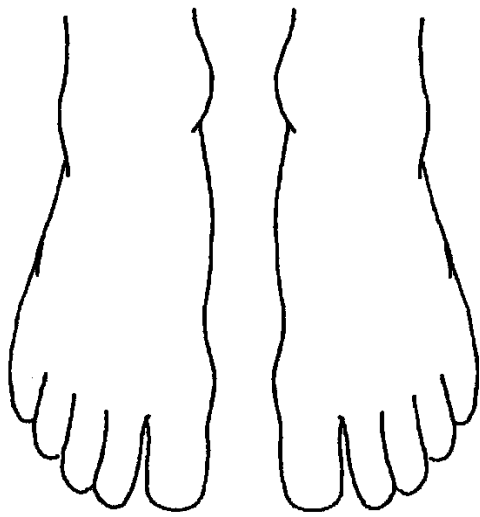
L

BACK

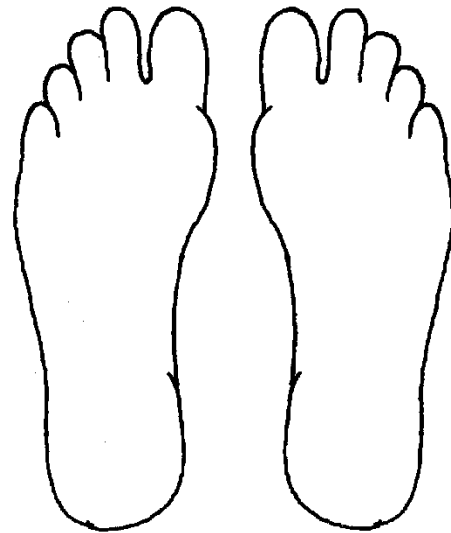


Name of learner: .....

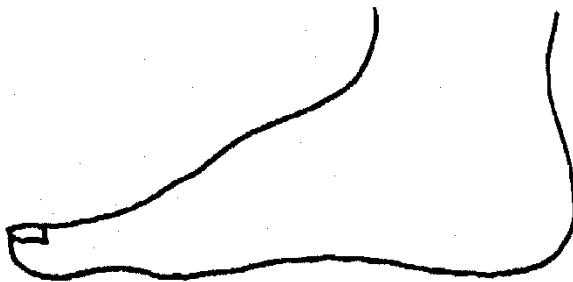
Date and time of observation: .....



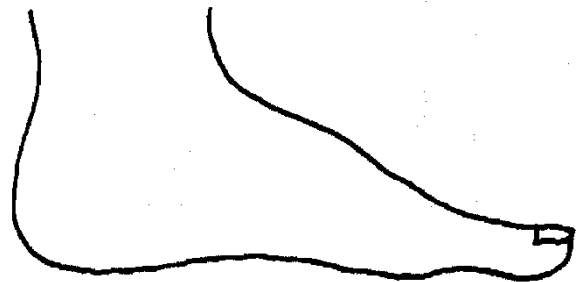
R TOP L



R BOTTOM L



R



L

INNER



R



L

OUTER

Name, Signature and Job .....

## Appendix C - Suspected Indecent Imagery Protocol

'Indecent' is not defined in legislation. For most purposes, if imagery (moving or still) contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation, then it will be considered indecent. Indecent images may also include overtly sexual images of young people in their underwear.

### Confiscate it

### Close it down

### Report it

#### ALL STAFF

If the imagery has been shared across a **personal mobile device**:

Always..

- Confiscate and secure the device(s)
- Inform any DSL

Never...

- View the imagery (if viewed accidentally always report this)
- Send, share or save the image anywhere
- Allow students to do any of the above once you know about the imagery
- Delete the imagery unless directed to do so by the DSL

If the imagery has been shared across a **school network, a website or a social network**:

Always..

- Block the network to all users and isolate the imagery
- Inform the DSL

Never...

- Send or print the image
- Move the material from one place to another
- View the image outside of the protocols in your safeguarding and child protection policies and procedures.
- Delete the imagery unless directed to do so by the DSL

Additionally never..

- Search a mobile device even in response to an allegation or disclosure if this is likely to cause additional stress to the student/young person UNLESS there is clear evidence to suggest that there is an immediate problem
- Print out any material for evidence
- Move any material from one storage device to another

#### DSL ACTIONS

The DSL will conduct the investigations after they have been made aware of the concern. Full notes will be kept in a learner safeguarding file. The purpose of the investigation is to:

- Identify, without looking, what the image contains and whether anyone else has been involved.
- Find out who has seen or shared the image and how further distribution can be prevented.

They will involve parents, social services or the police where necessary

The DSL may immediately refer to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- You have reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

## Appendix D – Useful local Social Service contact details

### Harrow Social Services

Children's Services MASH team	020 8901 2690 (option 3)
Children Missing from Education	020 8901 2690 (option 2)
Children with Disabilities Team	020 8966 6481
Children's Services Complaints	020 8424 1578
Emergency Duty Team (Out of Hours)	020 8424 0999
Local Authority Designated Officer	07871 987254
Local Safeguarding Children Board	020 8424 1147 / 8736 6939

### Barnet Social Services

Barnet MASH	020 8359 4066
Barnet MASH (Out of Hours)	020 8359 2000

### Brent Social Services

Brent Family Front Door	020 8937 4300
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### Ealing Social Services

Children's Social Care	020 8825 8000
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### Hillingdon Social Services

Hillingdon MASH	01895 556 633
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### Hertfordshire Social Services

Children's Services	0300 123 4043
Herts Consultation line	01438 737511