



The
Henrietta Barnett
School
FOUNDED IN 1911

Safeguarding (Child Protection) Policy

For information on taking action on concerns about a student
see [section 17](#) of this policy

For guidance on procedures to follow in the event of a safeguarding issue
see [Appendix B](#) of this policy

SCHOOL CONTACTS

Designated Safeguarding Lead (DSL):

Claire Leek

Deputy Head

cleek@hbschool.org.uk

020 8458 8999

Deputy Designated Safeguarding Leads:

Senior Deputy: Kimberley Green (Well-being and Safeguarding Officer)

kgreen@hbschool.org.uk

Kat Stern, Head of Sixth Form (Pastoral) (ksfern@hbschool.org.uk)

Karmjit Regan (Head of KS4) kregan@hbschool.org.uk

Jess Rodwell (Head of KS4) jrodwell@hbschool.org.uk

David Southall (Head of Y9) dsouthall@hbschool.org.uk

Katie Fusi (Head of Y8) kfusi@hbschool.org.uk

Dan Supperstone (Head of Y7) dsupperstone@hbschool.org.uk

Designated Safeguarding Governor

Lisa Coffman

c/o clerktogovernors@hbschool.org.uk

Chair of Governors:

Lisa Coffman

c/o clerktogovernors@hbschool.org.uk

Policy last reviewed: September 2026

EXTERNAL CONTACTS/WEBSITES

Multi-Agency Safeguarding Hub (MASH) (for children in need and children at risk of harm):

Email: mash@barnet.gov

2 Bristol Avenue, Colindale, London NW9 4EW

Telephone: 020 8359 4066

<https://thebarnetscp.org.uk/bscp/p/professionals/reporting-a-concern-about-a-child>

Barnet Local Authority Designated Officer (LADO) (for allegations against staff or volunteers): <https://thebarnetscp.org.uk/bscp/p/professionals/early-help-for-children-families>

Early Help: <https://thebarnetscp.org.uk/bscp/p/professionals/early-help-for-children-families>

Contact details for advice and support about extremism

Barnet Prevent lead (Perryn Jasper): Perryn.jasper@barnet.gov.uk

Local police force: 101 (the non-emergency police number)

DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors : 020 7340 7264 and counter-extremism@education.gsi.gov.uk.

NOTE: these are details for Barnet. For students living outside Barnet, initial contact should be made to equivalent teams in borough of residence.

Ofsted

Email: enquiries@ofsted.gov.uk

Telephone: 0300 123 4234

Address: Piccadilly Gate, Store Street, Manchester, M1 2WD

Disclosure and Barring Service

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

Email: dbsdspatch@db.s.gsi.gov.uk

Address: DBS, PO Box 181, Darlington, DL1 9FA

Telephone: 01325 953795

Mandatory reporting of FGM to the police: call 101

NSPCC Inform website

<http://www.nspcc.org.uk/Inform>

Telephone: 0808 800 5000

Email: help@nspcc.org.uk

NSPCC Whistleblowing helpline

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Telephone: 0800 028 0285

Email: help@nspcc.org.uk

Office of the Children's Commissioner for England (OCC)

<https://www.childrenscommissioner.gov.uk/>

Email: advice.team@childrenscommissioner.gsi.gov.uk

or info.request@childrenscommissioner.gsi.gov.uk

Contents

[Statement of intent](#)

[Acronyms](#)

[Definitions](#)

1. [Legal framework](#)
2. [Roles and responsibilities](#)
3. [Multi-agency working](#)
4. [Early help](#)
5. [Abuse, neglect and exploitation](#)
6. [Specific safeguarding issues](#)
7. [Child-on-child abuse](#)
8. [Online safety](#)
9. [Context of safeguarding incidents](#)
10. [Equality Statement](#)
11. [Students potentially at greater risk of harm](#)
12. [Supporting students who are questioning their gender](#)
13. [Use of the school premises for non-school activities](#)
14. [Alternative provision](#)
15. [Work experience](#)
16. [Homestay exchange visits](#)
17. [Reasonable Force](#)
18. [Taking action on concerns about students](#)
19. [Managing referrals](#)
20. [Concerns about school safeguarding practices](#)
21. [Safeguarding concerns and allegations of harm made against staff](#)
22. [Communication and confidentiality](#)
23. [Safer recruitment](#)
24. [Single central record \(SCR\)](#)
25. [Training](#)
26. [Monitoring and review](#)

Appendices

- A. [Specific safeguarding issues](#)
- B. [Guidance for staff on procedures to follow in the event of a safeguarding issue](#)

Statement of intent

The Henrietta Barnett School (the School) is committed to safeguarding and promoting the physical, mental and emotional welfare of every student, both inside and outside of the school premises.

Safeguarding and promoting the welfare of children is:

- 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 impairment of children's mental and physical health or development
- making sure that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

[\(Keeping children safe in education 2026\)](#)

We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of students is at the forefront of all action taken. It is our intention to ensure that students are, and feel safe, and that the School is effective in identifying and responding to concerns regarding the safety and welfare of the students.

The school is committed to developing and maintaining a strong safeguarding culture where:

- Safeguarding is embedded in all policies and practice
- Students feel safe, heard and supported
- Staff are confident to raise and escalate concerns
- Leadership monitors safeguarding effectiveness continuously
- Learning from safeguarding incidents informs practice improvements

The school recognises the strengthened national expectation that safeguarding is explicitly **child-centred**, proactive and focused on the **early identification of need**. Staff understand that concerns must not be allowed to escalate and that timely intervention is essential.

The school adopts a **two-tier approach to early intervention**, recognising both:

- **Universal early help**, delivered within school systems; and
- **"Family Help"**, coordinated through multi-agency services where additional support is required.

Safeguarding practice reflects evolving risks including:

- misogyny and harmful online narratives
- artificial intelligence (AI), including deepfake content
- serious youth violence and weapon-related harm
- exploitation involving financial, criminal or sexual elements

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance and recognising that promoting and safeguarding children is everyone's responsibility.

It will be achieved by:

- Ensuring that members of the governing board, the Head and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching students how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any student that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the Head and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The School recognises that safeguarding is everyone's responsibility and requires a whole-school culture of vigilance, openness and professional curiosity. We ensure that the voices, wishes and lived experiences of students are central to all safeguarding arrangements and decision-making, and that students are supported to understand, report and manage risks in both offline and online environments, including emerging risks such as artificial intelligence (AI). The School aims to ensure that students are confident that they have someone they can turn to if they have a concern.

The DSL is Claire Leek (Deputy Head). In the absence of the DSL, child protection matters will be dealt with by one of the deputy DSLs.

**For information on taking action on concerns about a student
see [section 17](#) of this policy**

**For guidance on procedures to follow in the event of a safeguarding issue
see [Appendix B](#) of this policy**

Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
AI	Artificial Intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.

DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for students who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the student.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in

		institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LADO	Local Authority Designated Officer	The Local Authority Designated Officer is the person who should be notified when it has been alleged that a professional or volunteer who works with children has behaved in a way that has harmed a child, or may have harmed a child.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MASH	Multi agency safeguarding hub	The single point of contact for all professionals to report safeguarding concerns.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHCE	Personal, social, health and citizenship education	A non-statutory subject in which students learn about themselves, other people, rights, responsibilities and relationships.

RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all students. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to students with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.
WTSC	Working Together to Safeguard Children	Statutory guidance for settings where work and activities relate to children.

Definitions

For the purposes of this policy the following terms have the following meanings:

“children” and **“child”** refer to anyone under the age of 18.

“safeguarding and protecting 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
- Making sure 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.

“consent” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16. Sexual intercourse without consent is rape.

“sexual violence” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

“sexual harassment” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a student’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

“upskirting” refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including students and staff, of any gender can be a victim of upskirting.

“consensual and non-consensual self-generated intimate images and/or videos including those generated by AI eg deepfakes”, colloquially known as **“sexting”**, refers to the creation or sharing by students of sexually explicit content, including “indecent imagery”. For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

This content can be:

- created by the individual themselves
- created or manipulated using artificial intelligence (AI), including deepfake imagery

This behaviour is recognised as a safeguarding issue and may constitute criminal activity, although students will be supported as victims where appropriate.

“misogyny” is defined as behaviours or attitudes that display hatred, discrimination or prejudice towards women and girls. Misogyny is recognised as a contributing factor in **harmful sexual behaviour, online abuse, coercion and exploitation**, and forms part of safeguarding risk identification. **“Misandry”** is the hatred, dislike, or ingrained prejudice against boys or men. It functions as a form of sex-based discrimination and is considered the counterpart to misogyny.

The school implements procedures to counter and guard against misogyny and misandry, aware that this aligns with the expectations set out in Ofsted's school inspection framework and DfE guidance on promoting fundamental British values, and also has implications for the teaching of RSE.

“Artificial Intelligence (AI) safeguarding risks” are the potential risks to children arising from the use of AI technologies, including exposure to harmful content, manipulation, exploitation, deepfake content, and inappropriate interactions with AI systems

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

“physical abuse” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

“emotional abuse” is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they

say or how they communicate. It may include verbal abuse such as persistent criticism, belittling or name-calling. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

“sexual abuse” is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school’s policy and procedures for dealing with it.

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

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989 (and 2004 amendment)
- Sexual Offences Act 2003
- Crime and Policing Act 2026
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- Home Office (2023) 'The Prevent Duty Guidance: Guidance for specified authorities in England and Wales'
- DfE (2026) 'Working Together to Safeguard Children' (WTSC)
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2026) 'Keeping children safe in education'
- Working Together to Improve School Attendance 2026
- Meeting Digital and Technology Standards for Schools and Colleges 2022
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2022) 'Recruit teachers from overseas'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency guidance'

This policy operates in conjunction with other **school policies**, in particular the following:

- Allegations of Abuse Against Staff Policy
- Anti-bullying Policy
- Attendance Policy
- Behaviour Policy
- Code of Conduct for Staff
- Data Protection and Privacy Policy
- First Aid and Administering Medicines Policy
- Health and Safety Policy
- Online Safety Policy
- Positive Mental Health Policy
- Preventing Extremism and Radicalisation Policy
- PSHCE Policy
- Relationships and Sex Education Policy
- Safer Recruitment Policy
- Self-Harm Policy
- Special Educational Needs and Disabilities Policy
- Suicide Safer Policy
- Suspension and Exclusion Policy
- Whistleblowing Policy

2. Roles and responsibilities

All staff

All staff have a responsibility to:

- Read and understand Part One of KCSIE in full, regardless of role.

- Consider, at all times, what is in the best interests of the student.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which students can learn.
- Be prepared to identify students who may benefit from early help.
- Be aware of the School's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to MASH, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to MASH and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a student may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Promote dialogue and understanding, and ensure all students feel listened to and understood.
- Empower students and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes, and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put students at risk of harm.
- Be aware of behaviours that could potentially be a sign that a student may be at risk of harm.
- Understand how safeguarding incidents may present differently in different students.

- Use professional curiosity to explore and report signs of abuse, neglect and exploitation. This includes serious violence, including weapon possession or intent, misogynistic or harmful online behaviours and AI-generated or manipulated content.
- Be confident to challenge decisions and escalate concerns where necessary.
- Understand the importance of hearing and recording the child's voice.

All teaching staff have a responsibility to safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'. They also have a responsibility to report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

Section 24 and Appendix B of this policy outline in more detail how staff are supported to do this.

The DSL

The DSL is a member of the senior leadership team and takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. On occasion, such availability may be via phone or an online video call. When the DSL is absent, one or more of the Deputy DSLs will act as cover and emails will be redirected to ensure that safeguarding concerns are monitored and acted on without delay. A generic email (safeguarding@hbschool.org.uk) has also been set up to which the DSL and Senior Deputy DSL have access.

The DSL has a duty to undertake the role as described in KCSIE Annex B. This includes and is supplemented by the need to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
 - To MASH where abuse and neglect are suspected, and support staff who make referrals to MASH.

- To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child, and to the TRA, if there is consideration that the person is not suitable to undertake teaching work
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the Headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the Deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
 - Ensuring that the school knows which students have or had a social worker.
 - Understanding the academic progress and attainment of these students.
 - Maintaining a culture of high aspirations for these students.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these students reach their potential.
 - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these students are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a student's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared. Where there are concerns, it is expected that there

will be a conversation between the DSL and the DSL at the new school. The file must be transferred confidentially to the DSL and not included in general student transfer information. The school must obtain confirmation of receipt.

- Ensure each member of staff has access to and understands the School's Safeguarding (Child Protection) Policy and procedures – this will be discussed during the staff induction process.
- Undertake activities to verify staff understanding of safeguarding requirements.
- Work with the governing board to ensure the school's Safeguarding (Child Protection) Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the School's Safeguarding (Child Protection) Policy is available publicly on the School's website, and parents are aware that the School may make referrals for suspected cases of abuse or neglect, as well as the role the School plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and renew this training at least every two years, with at least annual updates.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties students may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within School, with other Schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping. Ensure that records of safeguarding-related meetings and discussions include
 - A summary of the discussions
 - The decisions taken
 - The rationale for such decisions, including any decision that the threshold has not been met for an external referral.

- Ensure that the lived experience and voice of the child inform all decision-making.
- Promote a culture where staff feel confident to escalate concerns or disagreements (professional challenge).
- Ensure safeguarding arrangements reflect emerging risks, including AI and online harms.
- Ensure that all staff understand the difference between early help, safeguarding concerns, and harm threshold cases.
- Ensure safeguarding systems reflect increased expectations around information sharing and multi-agency coordination and early identification and escalation.
- Undertake risk assessment where concerns relate to serious violence, including weapon possession or threats of harm and peer-on-peer escalation and conflict.
- Undertake a student risk assessment whenever a child with a safeguarding concern is admitted to the school and/or an existing student is added to the child protection register.
- Ensure appropriate consideration of, and staff understanding of, gender identity-related safeguarding issues and risks linked to AI-generated abuse or exploitation.
- Ensure enhanced information transfer when students move schools, including risks to others, harmful sexual behaviour concerns and serious violence indicators.
- Maintain an awareness of any student attendance issues which may also be a safeguarding concern.
- Ensure awareness of the updated CCE and CSE indicators and Operation Encompass duties.

The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Section 24 of this policy has information on how the DSL and deputy DSLs are supported to fulfil their role.

The governing board

The governing board has a duty to:

- Take strategic leadership responsibility for the School's safeguarding arrangements.
- Ensure that the School complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the School are effective and comply with the law at all times.
- Guarantee that the School contributes to multi-agency working in line with the statutory guidance '[Working Together to Safeguard Children](#)'.

- Confirm that the School's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the School's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that all staff, whether or not they work directly with children, read at least Part One of KCSIE.
- Ensure that all staff who work with children and all staff in management roles read Annex A, which provides further information on types of abuse.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions, thus ensuring access to a DSL or Deputy at all times.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place, allowing children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; ensure these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Headteacher or another governor.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the School's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that students are taught about safeguarding and how to keep themselves safe, including protection against dangers online (including when they are online at

home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

- Adhere to statutory responsibilities by ensuring that the School conducts pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support students to be themselves at school
- Ensure the School has clear systems and processes in place for identifying possible mental health problems in students, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers who do not have a DBS with barred list are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle students' allegations against other students.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of students and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for students to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the student premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.

- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the student's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for students who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head, where appropriate (see Section 20).

All governors will read Keeping Children Safe in Education in its entirety.

Section 24 of this policy has information on how governors are supported to fulfil their role.

The Head

The Head is responsible for the implementation of this policy, including:

- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.

3. Multi-agency working

The School contributes to multi-agency working as part of its statutory duty and works closely with the three local safeguarding partners which are, the local authority, the Integrated Care Board (previously known as clinical commissioning group) for an area within the local authority; and the chief officer of police for an area any part of which falls within the local authority area).

The Barnet Safeguarding Children Partnership leads the multi-agency safeguarding arrangements in Barnet. The Barnet safeguarding partners are the London Borough of Barnet, the North Central London Integrated Care Board and the Chief Officer of the Metropolitan Police.

The School is aware of and will follow the local safeguarding arrangements organised by the Barnet Safeguarding Children Partnership.

The School will work with MASH, the police, health services and other services to protect the welfare of its students, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the School will allow access for MASH from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The School also recognises the particular importance of inter-agency working in identifying and preventing CSE.

Safeguarding relies on strong, transparent and timely multi-agency working. Staff will actively contribute to inter-agency plans and will not allow concerns to be diluted or delayed. Where there is disagreement between professionals, the school will follow escalation procedures to ensure children's safety remains paramount.

Information sharing

The School recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet students' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the student being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

Staff will ensure that information sharing is timely, proportionate and child-centred, and that failure to share information is recognised as a potential safeguarding risk.

Staff must recognise that:

- failure to share information can itself be a safeguarding risk; where there is a safeguarding concern about a child, safeguarding requirements take precedence over considerations of GDPR

- effective safeguarding requires timely, proactive and coordinated information sharing

The School will ensure stronger alignment with multi-agency expectations and statutory frameworks.

Staff must be made aware of the statutory duty, introduced by The Crime and Policing Act 2026, for individuals working or volunteering with children to report sexual abuse to the police and children's social care when they become aware of it. Staff should also be made aware of what will happen next if they fail to report or attempt to deter and individual making a report under the mandatory reporting duty.

4. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. This includes universal services, community-based Early Help or the targeted early help level of Family Help. Any student may benefit from early help, but in particular, staff will be alert to the potential need for early help for a student who:

- Is disabled, has certain health conditions, or has specific additional needs
- Has SEND, regardless of whether they have a statutory EHC plan
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing or going missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- Is at risk of modern slavery, trafficking, or sexual 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 them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse
- Is misusing drugs or alcohol
- Is at risk of so-called HBA, such as FGM or forced marriage
- Is privately fostered
- Have been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of, or have been, permanently excluded from school, colleges and in Alternative Provision or a PRU.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to MASH for assessment for statutory services if the student's situation is not improving or is worsening.

Early help assessments will ensure that the child's views, wishes and feelings are clearly recorded and influence planning and decision-making.

5. Abuse, neglect and exploitation

All staff will be aware of the indicators of abuse, neglect and exploitation and understand that children can be at risk of harm inside and outside of school, inside and outside of home, and online.

Signs of abuse might include (but are not limited to) any of the following:

- Unexplainable or unusual injury or series of injuries
- Change in behaviour
- Drop in quality of work
- Loss or gain of weight
- Appearance of neglect
- Mental health problems.

Neglect or abuse, physical emotional or sexual, can have major long-term effects on all aspects of a child's health, development and wellbeing. Sustained abuse is likely to have a deep impact on the child's self-image and self-esteem, and on their future life. Harm may occur intentionally or unintentionally.

All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label. This includes concerns related to serious violence such as when a student is carrying or has access to a weapon and/or has expressed intent to seriously harm others. Staff will understand that multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside of these environments; this includes being aware that students can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a student being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure. The DSL will undertake a dynamic risk assessment and take appropriate action, including multi-agency referral where required.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

6. Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

[Appendix A](#) of this policy sets out details about specific safeguarding issues that students may experience and outlines specific actions that would be taken in relation to individual issues.

7. Child-on-child abuse (including harassment and violence)

For the purposes of this policy, **“child-on-child abuse”** is defined as abuse between children.

The school recognises that harmful sexual behaviour (HSB) exists on a continuum and requires a proportionate, risk-based response. All reports of HSB will be taken seriously, recorded appropriately, and responded to in line with this Policy and KCSIE guidance.

The School has a zero-tolerance approach to abuse, including child-on-child abuse.

All staff will be aware that child-on-child abuse can occur between students of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. Staff are aware of the times when children might be at highest risk throughout the day, such as immediately after school.

When identifying students at risk of potential harm or who have been harmed by their peers, staff members will look out for a number of indicators including, but not limited to, the following:

- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
- Lack of concentration and acting withdrawn
- Knowledge ahead of their age, e.g. sexual knowledge
- Use of explicit language
- Fear of abandonment
- Depression and low self-esteem
- Changes to their social group, e.g. spending time with older students, or social isolation
- Alcohol or substance misuse

All staff will understand the importance of challenging inappropriate behaviour between peers. 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 children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’
- Physical abuse and serious violence – this may include threats involving weapons and online elements which facilitate, threaten and/or encourage physical abuse
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse. This includes AI-generated sexualised content, including deepfakes.
- Misogyny, misandry and gender-based harm.
- Harassment and violence linked to online cultures.
- Causing someone to engage in sexual activity without consent
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos
- Upskirting
- Initiation and hazing-type violence and rituals, which can 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.

Staff will recognise that abuse may involve both victim and perpetrator vulnerability, and all cases will be treated as safeguarding concerns. All staff will be clear as to the School’s policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child’s own behaviour might indicate that something is wrong.

If the incident/allegation involves harmful sexual behaviours the safeguarding team will:

- Reassure the victim, ensuring that they feel safe in school
- Offer the student support through, onsite counselling, SEMH support or a referral to Early help/BICS

- Assess whether a MASH or Police referral is required
- Complete a risk assessment and ensure these are dynamic and regularly reviewed
- Consider context, power imbalance, and coercion
- Avoid normalising harmful behaviours
- Where appropriate, sanction the perpetrator in line with the behaviour and anti-bullying policy
- Refer the perpetrator for support through early help, safer schools' team or MASH

Concerns will be dealt with in accordance with this policy and other relevant School policies (including the Behaviour Policy, the Suspension and Exclusion Policy, the Anti-Bullying Policy and the Online Safety Policy) as well as relevant legislation and guidance.

All staff will speak to the DSL (or deputy) when they have any concerns about child-on-child abuse.

In particular, all staff should 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. It is important to explain that the law is in place to protect them rather than criminalise them, and this should be explained in a way that avoids alarming or distressing them.

Child-on-child sexual violence and harassment

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

Children, who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

Reports of sexual violence and harassment will be dealt with in accordance with Part Five of KSCIE.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Students will also be reassured that they will be taken seriously, be supported, and kept safe. Students are encouraged to raise concerns with a member of the safeguarding team either in person or via email (see names and contacts at the beginning of this policy and on display on posters throughout school) and can also email safeguarding@hbschool.org.uk.

8. Online safety

The School will adhere to the Online Safety Policy at all times.

Online safety 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, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- Contact: being subjected 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: personal 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.

The School teaches students about online risks and how to keep themselves and others safe online, in particular through the PSHCE curriculum and the assembly and tutorial programme. This also includes preventative education that prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobic and sexual violence and harassment.

The School uses various resources to help it understand and teach about online safety, including:

- Relationships Education, Relationships and Sex Education (RSE) and Health Education (July 2025)
- DfE advice for schools: teaching online safety in schools
- UK Council for Internet Safety (UKCIS) guidance: Education for a connected world

- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people
- The UKCIS external visitors' guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP education programme: Thinkuknow
- Public Health England: Every Mind Matters
- DfE guidance on Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support

All staff members will be made aware of:

- student attitudes and behaviours which may indicate they are at risk of potential harm online
- the procedure to follow when they have a concern regarding a student's online activity
- understanding AI-related safeguarding risks, including deepfake imagery and manipulated content used for coercion
- misogynistic influencers and ideologies and radicalisation linked to gender-based harm
- how to recognise online manipulation and exploitation patterns.
- the importance of teaching students to critically evaluate online content and recognise manipulation.

The School has filtering and monitoring systems in place, in accordance with the School's Online Safety Policy. The School will also ensure that it meets the [filtering and monitoring standards](#) published by the DfE. The School's requirements for filtering and monitoring also apply to the use of artificial intelligence (AI), in line with KCSIE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

The school recognises that technology, including AI, is a significant factor in safeguarding. Students may be exposed to or involved in risks such as:

- AI-generated and deepfake imagery or misleading and manipulated content
- Misogynistic content, including influencers and ideologies and radicalisation linked to gender-based harm
- Online grooming and exploitation
- Exposure to extremist material

Personal electronic devices

The use of personal electronic devices by staff and students is closely monitored by the School and governed by the Behaviour Policy, the Online Safety Policy and the Computer, Network and Internet Acceptable Usage Policies which are Appendices to the Online Safety Policy.

The School sets clear guidelines for the use of mobile phones for the whole School community, including the expectation that the School is a mobile phone-free environment by default. (In this context, reference to a mobile phone includes other smart technology with similar functionality to phones eg smart watches).

The sending of inappropriate messages or images personal electronic devices by students or staff is strictly prohibited.

Staff will report any concerns about students' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the School. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

Remote education

Guidance on appropriate ways of working online when remote learning is taking place, for example during a pandemic, is found in Appendix C of the School's Online Safety Policy.

Photographs and videos

Photographs and videos of students will be carefully planned before any activity with particular regard to consent and adhering to the School's Data Protection Policy, Online Safety Policy and Photography Policy.

Where photographs and videos may involve LAC students, adopted students, or students for whom there are security concerns, the Headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of students who are LAC or who have been adopted, liaise with the students' social workers, carers or adoptive parents to assess the needs and risks associated with the students.

Further information regarding the School's approach to online safety can be found in the Online Safety Policy.

Consensual and non-consensual sharing of indecent images and videos

Staff will be aware that consensual and non-consensual sharing of indecent images and/or videos (also known as “sexting” or youth-produced sexual images), including those generated using AI, should be treated as a safeguarding concern and may constitute child on child abuse (see paragraph 7 above).

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that students are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible.

If a staff member suspects a device may contain indecent images, including nude or semi-nude image of a child, they will

- not view the image (since this may make them vulnerable to allegations of viewing and sharing indecent images)
- not delete the images, since these may be needed as part of a future police investigation
- confiscate the device and report the incident to the DSL (or Senior Deputy DSL) immediately, who will decide what to do next.

If a member of staff has been unable to avoid viewing an indecent image on a student’s device, he/she must, for his/her own protection, immediately inform the DSL and Headteacher, with an explanation of the circumstances.

Further information on the search, screening and confiscation can be found in the Online Safety Policy and Behaviour Policy (in particular Appendix B). The School follows the [UKCIS guidance](#), Sharing nudes and semi-nudes, advice for education settings working with children and young people (2020).

9. Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of students’ behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The School will provide as much contextual information as possible when making referrals to MASH.

10. Equality Statement

In all matters, including Safeguarding, the School will also not unlawfully discriminate

against students because of their protected characteristics according to the Equality Act 2010, will always consider how they are supporting students with protected characteristics and will take positive action, where proportionate, to deal with the disadvantages that these students face.

11. Students potentially at greater risk of harm

The School recognises that some groups of students can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse, neglect or exploitation in these groups of students. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Students who need social workers

Students may need social workers due to safeguarding or welfare needs. These needs can leave students vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a student has a social worker in order to make decisions in the best interests of the student's safety, welfare, and educational outcomes.

Where a student needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision of pastoral or academic support.

Home-educated children

Parents may choose elective home education (EHE) for their children. Many home educated children have a positive learning experience. However, in some cases, EHE can mean that children are not in receipt of suitable education and are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the School will inform the LA of all deletions from the admissions register when a student is taken off roll.

Where a parent has expressed their intention to remove a student from School for EHE, the School, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the student has SEND, is vulnerable, and/or has a social worker.

LAC and PLAC

Children most commonly become looked after because of abuse, neglect and/or exploitation. Because of this, they can be at potentially greater risk in relation to

safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The School's DSL is also the designated lead for Looked After Children, and will have details of the child's social worker and virtual school head in the authority that looks after the child, and will liaise appropriately. This will be done with due regard to the Children and Social Work Act 2017. The DSL has a responsibility for promoting the educational achievement of LAC and PLAC, as well as children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Students with Special Educational Needs and Disabilities (SEND) or health issues

It is vital that all areas of safeguarding are considered with insight and care when dealing with children/young people with SEND or certain medical or physical health conditions as there may well be additional challenges to overcome.

It is important to be aware that additional barriers can exist when recognising child protection issues, including abuse, neglect and exploitation, in this group of children/young people.

These barriers can include:

- Assumptions that indications of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to peer group isolation or bullying than other children
- The potential for these children being disproportionately impacted by behaviours such as bullying without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- The need for intimate care or that these children are isolated from others,
- That these children are more likely to be dependent on adults for care, and
- That these children may have issues over cognitive understanding.

When reporting concerns or making referrals for such students, the above factors will always be taken into consideration. When managing a safeguarding issue relating to such students, the DSL will liaise with the School's SENCO, as well as the student's parents where appropriate, to ensure that the student's needs are met effectively.

An incident relating to the management of a student's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners. However, a safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

Young carers

The School recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing.

Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or the local authority and health service.

Students requiring mental health support

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

In addition to the groups of students above, students who may require special consideration include those who:

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are asylum seekers
- Are known to be living in difficult situations, for example temporary accommodation or where there are issues such as substance abuse or adult mental health problems or domestic abuse

Staff will consider how intersectionality (e.g. SEND, race, gender, identity, and socio-economic factors) may increase vulnerability and may affect how abuse is recognised and responded to.

Where a student is believed to be at immediate risk of harm, staff must:

- contact emergency services (999), or
- support urgent access to medical help

This reflects the strengthened expectation to treat mental health crises as safeguarding emergencies where appropriate.

Lesbian, Gay and Bisexual students

The fact that a student may be lesbian, gay or bisexual is not in itself an inherent risk factor for harm; however, staff will be aware that such students can be targeted by other individuals and face increased vulnerability both online and offline. Staff will also be aware that, in some cases, a student who is perceived by others to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as students who identify as lesbian, gay or bisexual.

Staff will also be aware that the risks to these students can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these students and provide a safe space for them to speak out and share any concerns they have and evaluate whether students require sensitive, case-by-case safeguarding responses.

Safeguarding decisions will prioritise welfare and safety and consider parental involvement unless this places the student at risk.

Arrangements relating to:

- Toilets
- Changing facilities
- Trips and overnight stays

will be managed safely and in line with current statutory expectations.

Children are not allowed to use toilets, showers and changing rooms designated for the opposite biological sex. If a gender-questioning child does not want to use the toilet, shower or changing facility designated for their biological sex, the school will consider whether it can provide an alternative toilet facility, without compromising single-sex toilet provision. The school will keep a clear record of these situations, communicate them appropriately and review them regularly.

See also below in relation to students who are questioning their gender.

12. Supporting students who are questioning their gender

The School is aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

The School will take a strong, proactive stance on all forms of bullying based on gender. See the School's Behaviour Policy for more detail. The School will ensure that children and their families are aware that, while the School will appropriately sanction any cases of bullying or

harassment, and take a strong stand against bullying, it must also be conscious of the rights of students and staff in relation to their religion or belief.

When supporting a student questioning their gender, the School will take into account the principle of taking a careful approach.

The DSL will lead in these cases.

Involving parents/carers in cases of students questioning their gender

Where a child who is questioning their gender asks for support from the school, the School will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a student at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a student or their parent/carer requests that the school makes changes or puts support in place to facilitate the student presenting as the opposite biological sex ("social transition"), the School will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the School and a child's parents/carers have been involved (as set out in [Keeping Children Safe in Education \(KCSIE\)](#)).

In making decisions about supporting social transition, the School will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the School's evaluation of the welfare and best interests of the child and other children. The School will make decisions in line with the following principles:

- The School has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their

gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered

- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The School will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition.

The School will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the School may need to review its original decision and will involve the DSL in doing so.

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

Where the governing board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep children safe. The School will refer to the DfE's [guidance](#) on keeping children safe in out-of-school settings in these circumstances.

Where the governing board provides the activities under the direct supervision or management of School staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the School on these matters where appropriate. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

If the School receives an allegation regarding an organisation or individual that has hired the school premises, the School should follow its usual safeguarding procedures and process for managing allegations, including informing the LADO.

Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs at the School, e.g. charities or companies, will work in collaboration with the School to effectively safeguard children and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of children. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to MASH or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

14. Alternative provision

The School will remain responsible for a student's welfare during their time at an alternative provider and ensure it is satisfied that the placement meets the student's needs. When placing a student with an alternative provider, the School will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff. School will arrange alternative provision in accordance with statutory guidance provided by the Department of Education: [Alternative provision](#) - DfE Statutory Guidance; and Education for children with health needs who cannot attend school.

15. Work experience

When a student is sent on work experience by the School, the School will ensure that the provider has appropriate safeguarding policies and procedures in place to protect children from harm.

The School will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Where the school has students from other educational establishments undertaking work experience at the school, an enhanced DBS check will be requested from the student's school or college if the student is over the age of 16. Where someone under the age of 18 undertakes work experience or a work placement at the school, the school has a safeguarding duty both towards that student and its own students.

16. Homestay exchange visits

School-arranged homestays in UK

Where the School is arranging for a visiting student to be provided with care and accommodation in the UK in the home of a family to which the student is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the School is the regulated activity provider therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

The School will liaise with partner schools to discuss and agree the arrangements in place for the visit. The School will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Students will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

Where a parent or student arranges their own homestay, this is a private arrangement and the School is not the regulated activity provider.

Private fostering

Private fostering is when a child under the age of 16 (or under 18 for a child with SEND) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity). The School has a mandatory duty to inform the Local Authority of any student in this situation to allow the LA to conduct any necessary checks.

17. Reasonable Force

There are circumstances when it is appropriate for staff in schools to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances'. The use of force may involve either passive physical contact, such as

standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom. There is guidance available at: <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>.

Reference should also be made the School's Use of Restrictive Interventions Policy.

18. Taking action on concerns about students

If a member of staff has any concern about a student's welfare, or a student has reported a safeguarding concern in relation to themselves or a peer, they will take action.

The concern should be logged on CPOMS and, depending on the seriousness of the concern, must be immediately reported to the DSL or deputy DSLs.

Staff will ensure that all concerns are:

- Clearly recorded
- Include the child's voice
- Reflect professional judgement and rationale

Children are referred to the local authority when there is evidence of, or a likelihood of, significant harm, as defined to include any of the four types of abuse set out above or accident or injury that is sufficiently serious to adversely affect progress and enjoyment of life. Harm is defined as the ill treatment or impairment of health and/or development as compared to what could be reasonably expected of a similar child. 'Significant harm' is a professional judgement and is at the core of child protection.

If a student is in immediate danger, a referral will be made to MASH and/or the police immediately. If a student has committed a crime, such as sexual violence, the police will be notified without delay.

Staff will be aware that students may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a student. Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the [Communication and confidentiality](#) section of this policy. **A brief summary of this procedure, and further guidance for staff, is contained in Appendix B of this Policy.**

Further [guidance](#) from the London Safeguarding Partnership can be a helpful tool to assist with assessment, planning and decision making when considering the needs of children and their safeguarding needs.

Where the DSL is not available to discuss the concern, staff members will contact the deputy DSLs with the matter. If a referral to the LA is made about a student by anyone other than the DSL, the DSL will be informed as soon as possible.

If a referral to the LA is made, the LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the student. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the student.

If early help is appropriate, the case will be kept under constant review. If the student's situation does not improve, a referral to social services will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely.

Where there are safeguarding concerns, the School will endeavour to take the student's wishes and feelings into account when determining what action to take and what services to provide. Systems are in place and are well promoted, for children to report abuse confidently, knowing their concerns will be treated seriously and knowing they can safely express their views and give feedback. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the student feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

19. Managing referrals

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to MASH or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the students involved. The DSL will work closely with the police to ensure the School does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a student has been harmed or is in immediate danger or at risk of harm and a referral is made to the LA, the referrer will be notified by the LA of the action that will be

taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The School will not wait for the start or outcome of an investigation before protecting the victim and other students: this applies to criminal investigations as well as those made by MASH. Where MASH decide that a statutory investigation is not appropriate, the School will consider referring the incident again if it is believed that the student is at risk of harm. Where MASH decide that a statutory investigation is not appropriate and the School agrees with this decision, the School will consider the use of other support mechanisms, such as early help and pastoral support.

The school will not delay action while awaiting further information where there is a risk of harm. Immediate safeguarding concerns will always take precedence.

At all stages of the reporting and referral process, the student will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the student or others at potential risk of harm. The School will work closely with parents to ensure that the student, as well as their family, understands the arrangements in place, such as in-School interventions, is effectively supported, and knows where they can access additional support.

20. Concerns about school safeguarding practices

Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime. Any concerns regarding the safeguarding practices at the School will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

21. Safeguarding concerns and allegations of abuse made against staff

All allegations of harm made against staff, including supply staff, trainee teachers, volunteers and contractors will be managed in line with the School's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff. The School will ensure all allegations against staff, including those who are not employees of the School, are dealt with appropriately and that the School liaises with the relevant parties including, where applicable, the LADO. The role of the LADO is set out in more detail in the Allegations of Abuse Against Staff Policy.

The School will share safeguarding responsibilities with third party organisations in cases where there is an allegation against an individual from a third-party agency. The School remains responsible for gathering the facts and managing the safeguarding process while

working closely with the employment agency or business, which will usually lead on any disciplinary action.

When managing allegations against staff, the School will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”, as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- doesn't meet the threshold of harm or is not considered serious enough for the School to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:

- being over friendly with children
- having favourites
- adults taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

The School promotes a culture where low-level concerns are:

- Reported openly
- Recorded consistently
- Used to identify patterns of behaviour.

22. Communication and confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with School data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the School will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the School will do all it can to protect the anonymity of the students involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a student, staff members will not promise the student confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects students from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the students involved. Discussions with parents will not take place where they could potentially put a student at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the School will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a student is leaving the School, the DSL will consider whether it is appropriate to share any information with the student's new provider, in addition to the child protection file, that will allow the new provider to support the student and arrange appropriate support for their arrival.

23. Safer recruitment

The School's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the School at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The governing board will ensure that the School conducts appropriate pre-employment checks for all prospective staff (defined below), including for internal candidates and candidates who have lived or worked outside the UK.

The DfE defines as staff any person working at the school, whether:

- under a contract of employment [this covers every employee, no matter what sort of work they do];
- under a contract for services [this covers self-employed people arranged and/or paid direct by the school; it does not include those in a contract for services with others, subject to the exception immediately below];
- otherwise than under a contract [this covers self-employed people who are arranged by the school for the purposes of the school but, for example, paid direct by parents, such as some peripatetic teachers and therapists; it does not include, for example, private employees of parents permitted to enter school by agreement];

The definition does not include agency supply staff or volunteers.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, contractors and self-employed workers.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Referral to the DBS

The School will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or

they are suspended. The School will also refer to the DBS anyone who applies for a position at the School and is clearly ineligible to work with children. The School will also refer to the TRA anyone who is dismissed or has left the School where there is consideration that, the person is not suitable to undertake teaching work.

24. Single central record (SCR)

The School keeps an SCR which records all staff (defined above), including agency and third-party supply staff, regular volunteers and teacher trainees on salaried routes, who work at the School.

All members of the proprietor body are also recorded on the SCR.

The following information (when required) is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- At least two references
- A check for unexplained gaps in employment history
- A self-declaration of medical fitness
- A check of any qualifications required by the post or relevant qualifications declared by the candidate
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK including
 - Overseas criminal records check
 - Letter of professional standing if a person has undertaken teaching work outside the UK and will be undertaking teaching work at the school
- A Prohibition from Management (also known as a Section 128) check for governors in all schools
- A Prohibition from Management (Section 128) check for those in management positions (ie. Headteacher, SLT and Academic Heads of Department)

For agency and third-party supply staff, the School will also record the date on which written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the School would perform on any individual working in the School or who will be providing education on the School's behalf, including through online delivery).

The School is aware that self-employed people are not able to make an application directly to the DBS on their own account. When employing the services of self-employed workers and contractors, the school will consider obtaining the DBS check on their behalf, and

recording this information on the SCR. If a self-employed person can obtain a DBS (for example, through his or her professional association) this can be accepted by the School. However, the School must see the certificate and verify that it is at the right level (ie. enhanced with barred list) and whether it contains any information on convictions to be evaluated.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. For volunteers, it is a requirement to undertake a risk assessment to determine and record which recruitment checks are needed in relation to the role being undertaken, including assessment of whether a volunteer should be subject to an enhanced DBS check. The risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The School is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR to an archived version once they no longer work at the School. This will take place at the end of the term when the person leaves. Schools may be expected to provide evidence of good practice over time. For this reason, it is accepted practice to retain information in the archive for a reasonable period of time, for example, until the conclusion of the school inspection following a person's departure.

25. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated on an annual basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Safeguarding (Child Protection) Policy
- The Online Safety Policy
- The Staff Code of Conduct
- Part one of 'Keeping children safe in education' (KCSIE) and Annex A
- The Behaviour Policy
- The School Suspension and Exclusion Policy
- The Allegations of Abuse Against Staff Policy
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.
- The Whistleblowing Policy

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually in line with KCSIE. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming terrorists or supporting terrorism and to challenge extremist ideas.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the School.

The expectation is that SLT will be familiar with all sections of KCSIE as part of their annual safeguarding update and all members of SLT will have Safer Recruitment training as part of their induction.

The DSL and deputy DSLs will undergo advanced safeguarding training, and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and MASH referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to multi-agency partners.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, students with SEND and/or relevant health conditions, and young carers. Being a young carer can impact attendance, attainment, behaviour and wellbeing. As in other areas of safeguarding, early identification is key to making sure young carers receive support at the right time from the right services.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by students with SEND

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

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

Specialist training will be undertaken as appropriate, including in relation to safer recruitment, online safety, Prevent duty and child-on-child abuse awareness.

The DSL will be responsible for ensuring that all staff receive appropriate training and that records are up-to-date.

26. Monitoring and review

This policy is reviewed at least annually by the DSL and the Head and presented for approval to the governing body. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

This policy was reviewed in September 2026.

The next scheduled review date for this policy is September 2027.

Appendix A: Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that students may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

1. [Domestic abuse](#)
2. [Homelessness](#)
3. [Child abduction and community safety incidents](#)
4. [Children absent from education](#)
5. [Child criminal exploitation \(CCE\)](#)
6. [Cyber-crime](#)
7. [Child sexual exploitation \(CSE\)](#)
8. [Modern slavery](#)
9. [‘Honour-based’ Abuse](#)
10. [Radicalisation](#)
11. [Students with family members in prison](#)
12. [Students required to give evidence in court](#)
13. [Mental health](#)
14. [Serious violence](#)
15. [Visitors](#)

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, **“domestic abuse”** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. **“Abusive behaviour”** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. It does not matter whether the behaviour consists of a single incident or a course of conduct. **“Personally connected”** includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The School will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. They may experience

domestic abuse in their own relationships (teenage relationship abuse). All of these can have a detrimental and long-term impact on their own health, well-being, development and ability to learn. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

[Operation Encompass](#) operates in all police forces in England and helps police and schools work together to provide emotional and practical help for children. When the police are called to an incident of domestic abuse, where there are children in the household who have experienced the incident, the police will inform the school before the child(ren) arrives at school the following day. This does not replace statutory safeguarding procedures. Operation Encompass also provides advice for all staff members who may be concerned about children who have experienced domestic abuse. The Operation Encompass helpline is 0204 513 9990 (8am – 1pm Mon-Fri).

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to MASH where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to MASH will be made as necessary where concerns are raised.

Children absent from education

A student who is absent from school, particularly repeatedly and/or for unexplainable or prolonged periods, can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The School will ensure that the response to students persistently being absent from education supports identifying such abuse and helps prevent the risk of them becoming a child missing from education in the future. Staff will monitor students that are absent from the School, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures.

The School will follow the DfE's [guidance](#) on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

The School will inform the LA of any student who fails to attend regularly or has been absent without the School's permission for a continuous period of 10 school days or more. Any student who goes missing or leaves without the School knowing which school they are transferring to, must be reported to the Local Authority. The School follows the procedures set out by the Local Authority, based on the DfE statutory guidance for Local Authorities September 2016, [Children Missing Education](#) (CME).

The School holds more than one emergency contact number for each child giving additional options to make contact with a responsible adult when a child absent from education is also identified as a welfare and/or safeguarding concern.

For further information regarding the School's procedures in relation to attendance, see the Attendance Policy.

Child abduction and community safety incidents

For the purposes of this policy, **"child abduction"** is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the School that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with students.

Students will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation (CCE)

For the purposes of this policy, **"child criminal exploitation"** is defined as a form of abuse where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

This type of harm can be committed or facilitated by an organised network or gang and children may identify as part of one of these groups.

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.
- Cuckooing
- Causing internal concealment of item for criminal purpose

CCE does not always involve physical contact; it can also occur through the use of technology. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

The School will recognise that students involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The School will also recognise that students of any gender are at risk of CCE though the experience of girls who are criminally exploited can be very different to that of boys. Boys and girls being criminally exploited may be at higher risk of sexual exploitation.

School staff will be aware of the indicators that a student is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

County lines

For the purposes of this policy, **"county lines"** refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, School staff will be aware of the specific indicators that a student may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.

- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a student may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this policy, **"cyber-crime"** is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff and at least one governor undertake at least annual cyber security training and will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring students to the National Crime Agency's Cyber Choices programme.

Since April 2025, the school has a statutory duty to report any cyber attack to the National Cyber Security Centre (NCSC).

Child sexual exploitation (CSE)

For the purposes of this policy, **"child sexual exploitation"** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something

the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

The School will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the student's immediate knowledge, e.g. through others sharing videos or images of them on social media. CSE does not always involve physical contact; it can also occur through the use of technology. The School will recognise that CSE can affect any student who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes students aged 16 and above who can legally consent to sexual activity. The School will also recognise that students may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a student is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the School's Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The School will cooperate as needed.

Modern slavery

For the purposes of this policy, "**modern slavery**" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a student may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

‘Honour-based’ Abuse

So-called ‘honour-based’ abuse (HBA), involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

FGM

For the purposes of this policy, **“FGM”** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. It falls within the definition of HBA.

All staff will be alert to the possibility of a student being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with MASH and/or the police. The School’s procedures relating to managing cases of FGM and protecting students will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), all staff who undertake teaching work are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a student under the age of 18. Failing to report such cases may result in disciplinary action. Staff will not examine students, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the staff member has a good reason not to, they should also consider and discuss any such case with the DSL and involve MASH as appropriate.

Where there is a suspected or at-risk case, or if the individual is over the age of 18, the above provisions do not apply. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that students may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the student. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a student may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The student coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHCE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the student:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent

that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA. They can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The School will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the student, including expediting arrangements for the procedure.

Forced marriage

In forced marriage, one or both spouses do not give full and free consent to the marriage and violence, threats or other forms of coercion are used. Threats can be physical or emotional and psychological. A lack of full and free consent can include where a person cannot consent (if they have learning disabilities, for example). Some perpetrators used perceived cultural practices to coerce a person into marriage.

The UK Government regards forced marriage as an abuse of human rights and a form of domestic abuse, and where it affects children and young people, child abuse. It is a criminal offence. It can happen to both women and men, although many of the reported cases involve young women and students aged between 16 and 25. To address the increasing scale and extent of forced marriage, the UK Government established the Forced Marriage Unit (FMU) in 2005. Forced marriage of any person, regardless of gender, age, disability, ethnic origin or sexual orientation, is unacceptable.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Staff who have any concerns regarding a student who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or Head and local safeguarding procedures will be followed – this could include referral to MASH, the police or the Forced Marriage Unit. The DSL or Head will ensure the student is spoken to privately

about these concerns and further action taken as appropriate. Students will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the student's family or those with influence in the community, without the express consent of the student, as this will alert them to the concerns and may place the student in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among students.

Radicalisation

For the purposes of this policy, "**radicalisation**" refers to the process of a person legitimising support for, or use of terrorist violence.

For the purposes of this policy, "**extremism**" refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, "**terrorism**" refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting students from the risk of radicalisation is part of the School's wider safeguarding duties. The School will assess the risk of students being radicalised and drawn into extremism and/or terrorism or support of terrorism. Staff will be alert to changes in students' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify students who may be susceptible to radicalisation into terrorism and act appropriately, which may include contacting the DSL or making a Prevent referral. The School will work with local safeguarding arrangements as appropriate.

The School will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the student's parents, unless the School has reason to believe that the child would be placed at risk as a result.

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people becoming terrorists or supporting terrorism", known as "**the Prevent duty**". The Prevent duty will form part of the School's wider safeguarding obligations. The DSL will undertake Prevent awareness training

to be able to provide advice and support to other staff on how to protect students against the risk of radicalisation. Further details are provided in the School's Preventing Extremism and Radicalisation Policy. The school is required, as part of its Prevent Duty, to create and maintain a Prevent Risk Assessment.

Students with family members in prison

Students with a family member in prison will be offered pastoral support as necessary. They will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Students required to give evidence in court

Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Students will be provided with the relevant age appropriate booklet (either for [5-11 year olds](#) or for [12-17 year olds](#)) and allowed the opportunity to discuss questions and concerns.

Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff must be aware of how mental health concerns intersect with safeguarding duties, particularly around risks including self-harm, eating disorders and suicidal ideation. The early identification of risk and targeted support is essential. Staff must take immediate action, including informing the DSL, when a child discloses harm, including harm related to mental health.

Staff will not attempt to make a diagnosis of mental health problems – the School will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify students whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how students' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a student that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs. Examples of mental health problems that may develop into a safeguarding concern include self-harm, suicidal ideation and risk of suicide. Staff are trained to be aware that they are well placed to recognise potential warning signs, including significant changes in behaviour, difficulty sleeping and physical signs of self-harm.

The School will access a range of advice to help them identify students in need of additional mental health support, including working with external agencies.

Where a student is believed to be at immediate risk of harm, staff must:

- contact emergency services (999), or
- support urgent access to medical help

This reflects the strengthened expectation to treat mental health crises as safeguarding emergencies where appropriate.

From a perspective of preventing poor mental health and taking steps to avoid mental health situations from deteriorating, schools have a key role to play in:

- promoting good mental wellbeing and preventing the onset of mental illness
- observing students and identifying early those who may be experiencing or at risk of developing mental health problems
- making sure early targeted support is provided
- liaising with and referring to specialist services where needed.

Serious violence

Staff should be aware of the indicators which may signal a student is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a student's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a student may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL. This includes concerns where a student is carrying or has access to a weapon and/or has expressed intent to seriously harm others.

Visitors

All visitors report to the Main Reception on arrival. The procedure for checking identity and/or Disclosure and Barring Service Enhance Certificates (DBS Certificates) as required is set out in the School's Safer Recruitment Policy. Any irregular or one-off visitors without DBS will be accompanied at all times.

The School recognises the role that external agencies and speakers can play in enhancing the learning experiences of our students. Further details on how such speakers are positively vetted to ensure that their messages are consistent with, and not in opposition to, the School's values and ethos are set out in the School's Preventing Extremism and Radicalisation Policy.

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Appendix B: Guidance for staff on procedures to follow in the event of a safeguarding issue

The following is some additional guidance for staff to follow when they have concerns about a student. This is a brief summary and should be considered in the context of the Policy as a whole.

1. If you consider a child is suffering or likely to suffer significant harm, or is in immediate danger.

If you consider a student is suffering or likely to suffer significant harm or is in immediate danger then a referral should be made to children's social care and/or the police immediately.

You should tell the DSL (or deputy DSL) as soon as possible. Do not wait until the end of the day. If in exceptional circumstances, the DSL (or deputy DSL) is not available, this should not delay appropriate action being taken and you should speak to a member of the senior leadership team and/or take advice from the local authority MASH team. A referral can be made by anyone. If a referral is made about a student by anyone other than the DSL, the DSL must be informed as soon as possible.

Record all actions and decisions on CPOMS.

Referrals are made to the local authority in which the student lives.

For referrals to Barnet:

- Barnet MASH Team: 020 8359 4066 (Mon to Thurs 9-5.15; Friday 9-5)
- Barnet Advice line: 020 8359 4336 (Monday-Friday (11am-12pm)
- Outside of these hours, you should report any concerns that need an immediate response to the emergency duty team (020 8359 2000)

2. If a child makes a disclosure to you

Remain calm and listen. Allow them to talk freely.

Reassure them that they have done the right thing in telling you. Do not suggest that they should have told you sooner.

At this stage you only need to find out enough information to make a decision whether a referral is needed. If you need to ask questions these should be just to clarify what the student is saying. It is very important that questions are open-ended and not leading, for example by asking Tell, Explain, Describe (TED) questions such as:

- Please **tell** me how it happened?

- Could you **explain** that a bit more?
- Can you **describe** that?

If you are the first person a student discloses to, this means you are very important to that particular student. Your supportive response will encourage the child to make further disclosures. You should be calm and reassuring, but cannot give a guarantee of confidentiality. You should explain that you need pass the information on to the DSL who will be able to ensure that the correct next steps are taken.

Reassure the student that they are being taken seriously and that they will be supported and kept safe. They should never be given the impression that they are creating a problem by reporting abuse (including sexual violence or sexual harassment), nor should they be made to feel ashamed for making a report.

Examples of things you can say:

- I am taking what you are saying very seriously.
- You are not to blame.
- I understand this is very difficult to talk about.
- You are being very brave.
- I cannot promise to keep this to myself.
- I will need to seek support to make sure you are safe and continue to be supported.

Be aware that children/young people rarely lie about abuse, rarely tell, and on average tell four adults before being 'heard'.

Barriers to making referrals tend to be:

- Fear of exposing the child to further abuse;
- Fear of breaking up the family;
- Fear of over-reacting;
- Believing the child is fantasising or lying;
- Being persuaded by a child's retraction;
- Allowing a temporary improvement to distract from the reality of abuse.

When you hear an allegation of abuse you can, without intending to, take on the child's pain and fear. Remain calm and listen, putting these feelings to one side.

Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and /or they may not recognise their experience as harmful. They may feel embarrassed, humiliated or may be being threatened.

You must make an accurate record of the conversation. It is sometimes helpful to write down phrases whilst the student is talking, but if this is not possible it is most important to record exactly what was said immediately after the meeting. Stick to the facts; do not add your own judgement of what was said. Ensure notes are timed, dated and signed. In addition, any evidence of abuse that is revealed will need to be preserved. This might include emails, text messages, content on computers. These must be passed on immediately to the DSL or to the Deputy DSL.

A written record will be kept of all concerns. It will include; a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome. The School will ensure that lessons are learned from each case reported, not only from those which are concluded and found to be substantiated.

3. Allegations of harm made against a member of staff

If a student makes an allegation of harm made against staff (including supply staff, volunteers and contractors), then it must be reported to the Head (or to the Chair of Governors if the complaint is against the Head) in accordance with the Allegations of Abuse Against Staff policy.

4. Consensual or non-consensual sharing of nude or semi-nude images or videos

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images or videos, you must report it to the DSL immediately.

You must not:

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

You should explain that you need to report the incident and reassure the student they will receive support and help.