Hampton Court House

Keeping Children Safe Policy

Hampton Court House School will publish our safeguarding and child protection policy on our website. Hard copies will be available on request from the school office.

Approved by:	Governing Body
Status:	Statutory
Review cycle:	Annual (or sooner if required)
Last reviewed:	26th August 2026
Date of next review:	August 2027

achieving for children

Kingston and Richmond Safeguarding Children Partnership

Contents

Contents 1

1. Introduction and policy aims 2

2. Definitions 2

3. Key personnel 4

4. Safeguarding Reporting Summary 6

5. The law (legislation) and statutory guidance 9

6. Roles and responsibilities 10

7. Recognising abuse, neglect and exploitation 13

8. Managing safeguarding concerns about a child 14

   Identifying a child who may be in need of support or protection 14

   Responding to concerns about a child's welfare 15

   Child-on-child abuse, including harassment and violence 18

9. Specific safeguarding considerations 25

10. Online safety and the use of smart devices 30

11. Adults who work with children or at our school 33

   Safer recruitment 33

   Concerns or allegations about adults in our school 34

12. Whistleblowing 35

13. Site safety 36

14. Training 36

15. Teaching and learning 37

16. Reviewing our safeguarding processes 37

17. Linked policies 38

18. Relevant Statutory and Non-Statutory Advice. 38

Appendix A: flowchart for responding to concerns about a child 41

1. Introduction and policy aims

Hampton Court House School (HCH) has a duty to keep children safe. This includes how we protect children from harm and how we respond when we suspect or confirm that a child is being harmed. Children are at the centre of everything we do at HCH. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. Adults in our school know that keeping children safe is everybody's responsibility and that all children regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion, and home circumstances have equal rights to protection and opportunities.
This policy applies to all pupils on roll, including children in the Early Years Foundation Stage, and to all staff, volunteers and contractors wherever they are working with or near HCH pupils, including on educational visits, residential trips and other off-site activities.

We aim to:

- do all we can to prevent children from coming to harm
- provide quality training to our staff so they are able to recognise potential signs of abuse, neglect and exploitation, understand what their responsibilities are and how they should respond when they identify a concern
- communicate transparently and honestly when there is a concern about a child with all those involved, including parents, other children and staff, where it is safe and appropriate to do so
- share information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time

2. Definitions

Safeguarding means the process for protecting children from harm and abuse, whether that is within or outside the home or online. This includes:

- providing help and support to meet the needs of children as soon as problems emerge
- taking action to ensure that children have the best outcomes
- making sure that the way children grow up is consistent with providing safe and acceptable care
- preventing barriers to children's mental and physical health or the way they develop

Child protection means the processes carried out to protect children who have been

identified as suffering or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, and in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, governors, supply staff and self-employed staff.

Safeguarding team is used here to refer to the designated safeguarding lead (DSL) and deputy DSL(s) as a whole. The DSL is the member of the senior leadership team who has the lead responsibility for safeguarding and child protection (including online safety).

Child means anyone under the age of 18.

Parent means birth parents or other adults who are in a parenting role, for example guardians, step-parents, foster carers and adoptive parents.

Statutory means that we have to follow what has been decided or is controlled by the law and government guidance.

The local safeguarding children partnership has three safeguarding partners:

1. the chief officer of police for an area falling within the local authority (police)
2. the local authority (children's services), and
3. the Integrated Care Board for an area within the local authority (health)

In Kingston and Richmond, the local safeguarding children partnership (KRSCP) considers education as the fourth safeguarding partner. Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them. Our safeguarding arrangements are guided by and align with the KRSCP's local arrangements and London Child Protection Procedures and Practice Guidance, sometimes referred to as local safeguarding arrangements in this policy.

3. Key personnel

Key individuals and agencies

Designated safeguarding lead (DSL)	Amy Burgess (Vice Principal Pastoral) acb@hchnet.co.uk 07927585200
Deputy DSLs	Imogen Stone ist@hchnet.co.uk Emma Trimmer etr@hchnet.co.uk Jack Ginger jgi@hchnet.co.uk Janak Odedra jvo@hchnet.co.uk Tessa Bartholomew tba@hchnet.co.uk Talat Khan thk@hchnet.co.uk
Designated teacher for children looked after	Amy Burgess
Designated teacher for young carers	Amy Burgess
SENCO	Talat Khan
Chair of governors	Tim Fish tim.fish@dukeseducation.com
Safeguarding Governor	Rachael Friend Rachael.friend@dukeseducation.com
Local authority children's services	**Kingston and Richmond** Website: Single Point of Access (SPA) Telephone: 020 8547 5008 Out of hours (emergency): 020 8770 5000 **Surrey Children's Single Point of**

	Access (C-SPA) Website: https://surreyscp.org.uk/ Telephone: 0300 470 9100 Out of hours (emergency): 01483 517898 Email: cspa@surreycc.gov.uk
Kingston and Richmond's local authority designated officer (LADO) service	Email: LADO@achievingforchildren.org.uk Telephone: 07774 332675 Online: LADO referral form
Kingston and Richmond Safeguarding Children's Partnership (KRSCP)	Email: lscb-support@kingrichlscb.org.uk
Advice Lines for Parents / Carers / Pupils	
Childline	0800 1111
NSPCC	0808 800 5000
Ofsted's Whistle-blower Hotline	0300 123 3155
Forced Marriage Unit	020 7008 0151 fmu@fco.gov.uk

Our organisation does work with social care, the police, health services and other services, as and where appropriate, in accordance with our statutory responsibility, to promote the welfare of children and protect them from harm.

Please remember **anyone** can make a referral directly to children's social care, the Local Authority Designated Officer or police if they believe that a child is at risk or may be at risk of significant harm.

Referrals to the police will be made immediately if our staff know or suspect that a crime has been committed.

Our staff do not require parental consent to make such a referral to external statutory agencies.

If a direct referral is made by a member of staff, the DSL should also be informed as soon as possible or in their absence the Principal or our safeguarding governor.

4. Safeguarding Reporting Summary

In all circumstances, no investigation will take place by anyone at HCH until advice has been sought from the Children's Social Care Team or the LADO, who will advise the school on next steps to take.

If You suspect or know that a Child is or may be at risk of Harm
Immediate referral to Children's Social Care through the DSL as below – or direct referral if needed.

↓

Designated Safeguarding Lead **DSL**
Amy Burgess
If the DSL unavailable

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Deputy Designated Safeguarding Lead 1 **DDSL – EYFS / Prep Lower**
Imogen Stone or Emma Trimmer

↓

Deputy Designated Safeguarding Lead 2 **DDSL – Prep Upper / Senior Lower**
Jack Ginger

↓

Deputy Designated Safeguarding Lead 3 **DDSL – Senior Upper**
Janak Odedra
Deputy Designated Safeguarding Lead 3 **DDSL – Sixth Form**
Tessa Bartholomew
Deputy Designated Safeguarding Lead 3 **DDSL – Special Educational Needs**
Talat Khan

↓

IF DSL and DDSLs are ALL unavailable
Direct Referral without delay

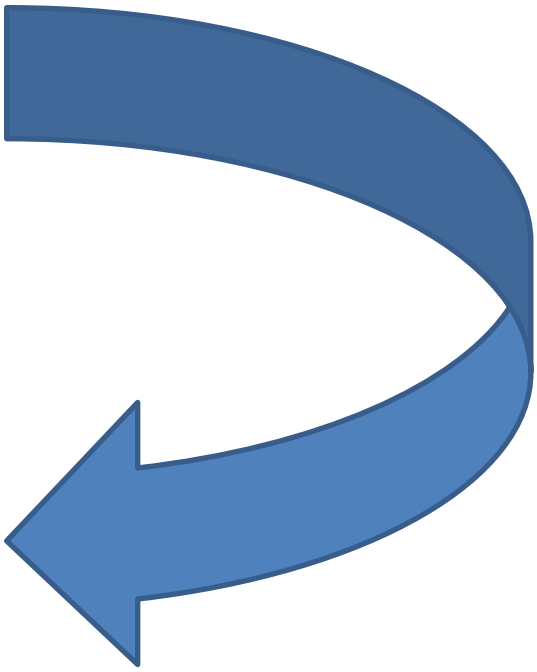
↓

London Borough of Kingston and Richmond **Children's Social Care Team**	
Telephone:	020 8547 5008
Website:	**Single Point of Access (SPA)**

If you suspect or know that a crime may / has been committed

DSL
Amy Burgess
Mobile: 07927585200
Email: acb@hchnet.co.uk

THE POLICE
Direct if DSL is not available
Mobile: 07827763149
Email: michael.lewis2@met.police.uk

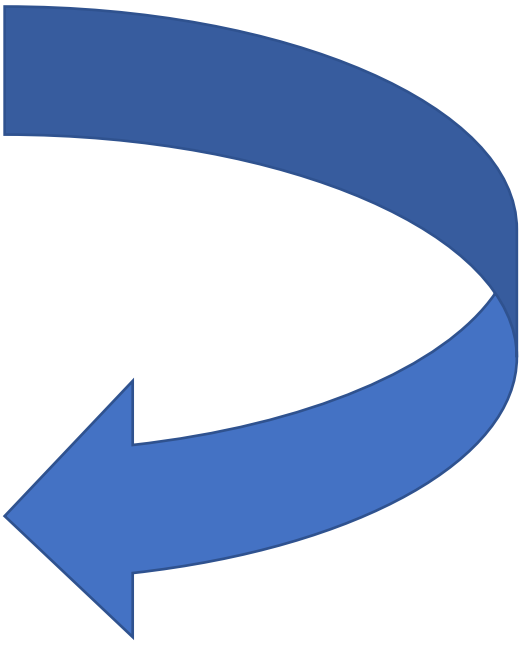


THE LADO can also be contacted if unable to get through to the POLICE

Concerned about the behaviour of a member of STAFF, volunteer or visitor including the DSL/ DDSLs (Without informing them)

Principal
Katherine Vintiner
Email: kvi@hchnet.co.uk

THE LADO
Direct if the Principal not available
Mobile: 07774 332 675
Email: lado@achievingforchildren.org.uk



Advice from LADO to either follow safeguarding procedures or schools own low level concerns policy.

The Principal must be informed of the referral as soon as possible after it has occurred if they have been unavailable or the safeguarding governor

Concerned about the behaviour of SUPPLY STAFF,

Contractor
(Without informing them)

↓

Principal
Katherine Vintiner
Email: kvi@hchnet.co.uk

↓

THE LADO **Direct if the Principal not available**
Mobile: 07774 332 675
Email: lado@achievingforchildren.org.uk

The Principal will also contact the proprietor of the Supply Agency or Contractor, after advice from the LADO

Advice from LADO to either follow safeguarding procedures or our own low-level concerns policy

Concerned about the behaviour of Principal
(Without informing them)

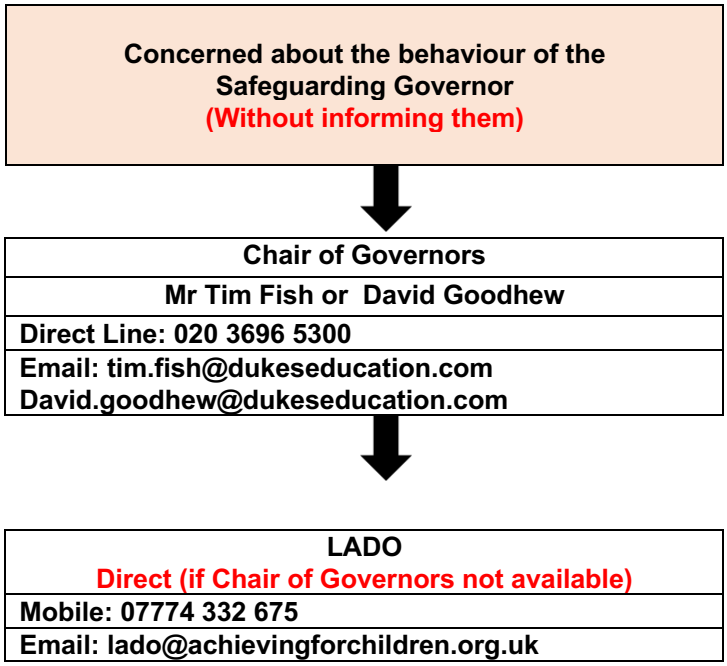
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Chair of Governors **If Safeguarding Governor not available**
Mr Tim Fish or David Goodhew
Direct Line: 020 3696 5300
Email: tim.fish@dukeseducation.com or David.goodhew@dukeseducation.com

↓

LADO
Mobile: 07774 332 675
Email: lado@achievingforchildren.org.uk

If the Chair of Governors is not available then **David Goodhew -** Managing Director can be contacted in their role as **Deputy Vice Chair of Governors**.



In all cases, staff and parents are advised that phone contact will be the first point of communication to report any concerns.
Email communication is only to provide further detail if required and will not be used to believe any concern has been passed on.
If the person is not directly contacted and is unable to be found, then staff / parents will need to make further contact with key personnel on the flow charts or Children's Social Care Team and / or LADO directly.

If the Chair of Governors is not available then **David Goodhew -** Managing Director can be contacted in their role as **Deputy Vice Chair of Governors**.

5. The law (legislation) and statutory guidance

Among other things, the Education (Independent School Standards) Regulations 2014 places a duty on schools to keep children safe and promote their welfare. This policy is

informed by statutory guidance and legislation including but not limited to the Keeping children safe in education statutory guidance (KCSIE), Statutory framework for the early years foundation stage (EYFS), Working Together to Safeguard Children statutory guidance and Prevent duty guidance.

6. Roles and responsibilities

Everybody in our school has a responsibility for safeguarding, but some staff members have specific safeguarding roles. An overview is listed below, but it is not exhaustive.

The Governing Board

The board is responsible for ensuring that:

- safeguarding and the child's best interests, wishes and feelings, are considered in everything the school does
- the school is promoting an inclusive, anti-discriminatory culture where discriminatory behaviour is recognised, challenged and addressed as part of its safeguarding responsibilities
- there is a whole school approach to safeguarding that everyone is involved in and online safety is a theme throughout
- school policies, procedures and training follow the law and align with the local safeguarding children partnership's arrangements
- the school's leadership team is held to account for the impact and success of the school's safeguarding arrangements
- a safeguarding self-audit is submitted to the KRSCP annually that is reviewed by the board
- they appoint a DSL with the appropriate skills and experience who is given the additional time, funding, training, resources and support needed for the role
- they appoint a designated teacher for looked after children
- they appoint an experienced governor to take leadership responsibility for safeguarding on behalf of the board
- all staff have the relevant skills, training and awareness to keep pupils safe
- all governors receive appropriate safeguarding training at induction, which is regularly updated, and have read the full KCSIE guidance
- they monitor how the school is supporting its pupils with regard to their protected characteristics
- there are effective and robust safer recruitment practices in place

- the school works with external agencies to safeguard children and promote their welfare by sharing information and taking appropriate action in a timely manner
- child protection files are maintained as set out in Annex B of KCSIE
- there are procedures for preventing, reporting and managing safeguarding concerns about adults who work or volunteer at our school
- children are taught how to keep themselves and others safe, including online
- strong IT systems are in place, including filtering and monitoring systems that limit children's exposure to online risks from the school's IT system and cyber security systems that protect children's personal information
- arrangements are in place to keep children safe when the site is being hired/let

The safeguarding link governor – Rachael Friend

- acts as the board's safeguarding specialist
- has received the appropriate training to equip them with the skills to identify if there are areas of weakness in our safeguarding arrangements and drive improvement
- regularly visits the school, meets with the safeguarding team and collects evidence to test and assure the board that our safeguarding policies and procedures effectively keep children safe

The Principal – Katherine Vintiner

- has day-to-day responsibility for the school, which includes responsibility for safeguarding
- is a member of the safeguarding team meeting regularly with the DSL to keep on top of safeguarding issues and enquiries
- ensures there is a well-equipped safeguarding team to cover the DSL's responsibilities if the DSL is absent or unavailable
- makes sure that staff are recruited safely and receive a good induction and training
- becomes the 'case manager' when a staff member's behaviour raises concerns about their suitability to work with children and keep them safe
- ensures the school's safeguarding policies and procedures are understood and followed by all staff
- works with the DSL to create a culture of openness and regular opportunities for pupils, parents and staff to share their views and shape how the school keeps pupils and staff safe
- updates the board on how well we are keeping children safe, what safeguarding

issues children are facing and how we are addressing concerning trends

- enforces a mobile phone-free environment for pupils by default
- addresses issues with site security and develops the school's response to critical incidents and external threats to the school

The designated safeguarding lead (DSL) – Amy Burgess

- is always available during school hours for staff to discuss any safeguarding concerns and is the point of contact for safeguarding partners
- arranges appropriate cover for any out of hours/out of term activities
- links with KRSCP to keep up to date with the local safeguarding arrangements and training offer, and attends the termly KRSCP DSL forum
- refers safeguarding concerns to appropriate and relevant external agencies in line with data protection laws, supporting staff who make referrals directly
- develops staff's expertise, provides them with advice and support and may consult with them and wider professionals when deciding whether to make a referral
- keeps the Principal informed of safeguarding issues
- works with the Principal to promote the educational outcomes for children who have involvement from safeguarding partners and reduce the increased risk of harm to vulnerable children
- works with the 'case manager' and LADO for child protection concerns that involve a staff member
- contributes to the assessment of children, including taking part and/or supporting staff to take part in strategy discussions and meetings between multiple agencies
- works together with families who may be facing challenging circumstances and makes the school's parent community aware of our duty to make a referral to children's services when a child is at risk of or has experienced harm
- encourages a culture of listening to children, taking into account their wishes and feelings when any plans or measures are put in place to protect them
- makes sure child protection files are kept up to date and transferred appropriately
- works with the board to review this policy annually, submit an annual self-audit to KRSCP and review the effectiveness of the school's safeguarding arrangements
- making sure that adults who work in or for the school have an adequate safeguarding induction and regular safeguarding training, including an understanding of this policy and wider local safeguarding procedures

- is aware of the requirement for a child who is questioned by the police to have an appropriate adult present and will help ensure suitable arrangements are made in accordance with the Police and Criminal Evidence Act (PACE) Code C

A deputy designated safeguarding lead(s) – Imogen Stone, Emma Trimmer, Jack Ginger, Janak Odedra, Tessa Bartholomew, Talat Khan

- supports the DSL with their role and will deputise on the DSL's responsibilities if they are unavailable or absent

More details of the DSL's and deputy DSL's responsibilities can be found throughout this policy, in Annex B of KCSIE and their job descriptions.

All school staff

- know it is everybody's responsibility to create a culture and provide a safe environment for children to learn and speak out about their concerns
- will attend regular training and are expected to request additional training so they understand how to keep children safe and identify when they may be unsafe
- will follow the school's procedures for reporting safeguarding concerns quickly and confidentially asking for support from the DSL if they are unsure
- will, where necessary, refer or support a referral of safeguarding or child protection concerns to external agencies, such as the police, children's services or the LADO

IT provider

- maintains the school's filtering and monitoring systems
- provides filtering and monitoring reports to the senior leadership team
- completes actions in response to concerns, incidents or checks to the system

7. Recognising abuse, neglect and exploitation

All staff must be alert to indicators that a child may be experiencing abuse, neglect or exploitation. Safeguarding concerns rarely fit one definition, and different forms of harm may overlap or occur both online and offline. Staff must maintain professional curiosity and report any concern to the DSL or a deputy, even where they are unsure whether it meets a particular threshold.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm, including fabricating or deliberately inducing illness.

Emotional abuse is the persistent emotional maltreatment of a child that causes serious and adverse effects on their emotional development. It may include persistent criticism, belittling, silencing, inappropriate expectations, bullying, exploitation or making a child feel frightened, worthless or unloved.

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child understands what is happening. It may involve physical contact or non-contact activity, including grooming, sexual images and abuse facilitated online. Sexual abuse may be committed by adults or other children.

Neglect is the persistent failure to meet a child's basic physical or psychological needs, likely to seriously impair their health or development. It may include failing to provide adequate food, clothing, shelter, supervision, medical care, emotional care or protection from harm.

Further definitions, indicators and information about specific safeguarding issues are contained in Part One of KCSIE, which all staff must read, and are reinforced through induction, safeguarding training and regular updates.

8. Managing safeguarding concerns about a child

Identifying a child who may be in need of support or protection

It is essential that children can tell us how they are feeling and know we will take their concerns seriously. We aim to create an environment full of 'reachable moments' that encourages children to feel safe enough to open up about their concerns. Hampton Court House School has systems in place for children to confidently report abuse. Children are regularly reminded of these systems, including through the curriculum, assemblies and posters around the school site. Children can confidently report any worries they have by:

- speaking to a safe adult
- emailing safeguarding@hchnet.co.uk
- using the 'Speak Up' boxes around the site
- using the Microsoft Form link shared with all students
- regular safeguarding questionnaires

HCH knows that disclosing harm requires immense courage, making a positive first interaction with a safe adult crucial. Staff are trained to handle disclosures sensitively and non-judgementally. They will reassure the child that they have done the right thing, while explaining they cannot promise secrecy if it impacts their safety or wellbeing as information must be shared with those who can help. Staff know the importance of sharing any information that might help build a picture of what is happening for a child, no matter how small the concern may seem, only involving those who need to be involved.

Disclosures are only one method used to identify children who may be in need of support or protection. Staff are trained to stay alert to other indicators like shifts in behaviour, attendance, or physical and emotional wellbeing. Monitoring behaviour and presentation is particularly vital for pre-verbal children or those with communication differences for us to understand their lived experience. We adopt a safeguarding-first approach to behaviour concerns, considering if the child is communicating an unmet need or whether they are experiencing harm.

Staff recognise that neglect and other forms of harm can occur in families from every social and economic background. Apparent affluence, high attainment or parental status will never prevent staff from exercising professional curiosity or reporting a concern.

Responding to concerns about a child's welfare

Staff know the importance of identifying and sharing concerns as soon as a problem becomes visible so we can provide support to families to reduce the chance of a problem getting worse. We are aware any child may benefit from early help, but staff who work directly with children will be particularly alert to circumstances that potentially increase the need for early help.

Staff will follow this policy if they have a concern about a child, speaking to a member of the safeguarding team as soon as is practically possible. We clearly advertise the names of the DSL and deputy DSLs around the school. A member of the safeguarding team should always be available for staff to discuss safeguarding concerns. We will have cover arrangements in place if the DSL is unavailable due to illness, leave or other circumstances. Our confidential shared safeguarding inbox that is only accessible to the safeguarding team makes sure there is no delay in receiving, monitoring or acting upon safeguarding concerns.

Staff will record a written account of their concern on CPOMS. The DSL will decide on the appropriate course of action based on locally-set thresholds and with guidance from the neglect toolkit where neglect is suspected. The options available to them include arranging community-based early help support, requesting targeted early help level support from the local authority's Family Help service, or making a referral to statutory children's services for child in need (CIN) or child protection support. The police will also be contacted if necessary. We have a duty to share information and work together with relevant external agencies to ensure a child's safety and welfare.
The school may take the lead in organising non-school services to provide early help support for the family. Early help support will be kept under constant review. We will consider making a referral to children's services if the child's situation doesn't appear to be improving or is worsening, however we will continue to provide support and contribute to assessments and plans organised by children's services.

If we believe that a family needs targeted early help to meet multiple and/or complex needs we will recommend to the family that they accept support from the local authority's Family Help team where a qualified lead practitioner will put a plan in place to support the family. Early help services require the family's consent to receive support and their services.

We will make an immediate referral to children's services, and if appropriate the police, where we believe a child is suffering, or is likely to suffer from harm. The safeguarding team will seek advice from children's services whenever they are unsure if the threshold for a referral has been met. If a referral is needed then a member of the safeguarding team should make it. Referrals concerning an individual child will normally be made to the local authority in which the child lives, using that authority's procedures; advice may also

be sought from Kingston and Richmond children's services where appropriate. The police will notify the school of any domestic abuse incidents they attend that concern a pupil under the Operation Encompass duty.

We will call the police on 999 if we believe an individual is in immediate danger. The school will also inform the police if we become aware that a crime has been committed. We are aware that children can be criminalised for actions they take whilst under coercion, such as actions they take while being exploited, abused or trafficked. We will treat these children as victims recognising that they are also vulnerable and experiencing abuse. Staff will report concerns about a child carrying or using a weapon (or expressing intent to do so) to the safeguarding team who will assess the risk, take appropriate action and, depending on the risk, put a safety and support plan in place. HCH will follow the local School Related Weapons or Potential Weapons Incidents Protocol.

If in exceptional circumstances the DSL is unavailable for staff to report a concern, staff will not delay taking appropriate action. Instead, they will inform another member of the senior leadership team (SLT) or themselves seek advice from children's services. Anyone, including children, can make a referral. If for whatever reason a staff member thinks a referral to children's services is appropriate but hasn't been made, they will consult with them and make a referral themselves. In these circumstances, any action taken by that staff member will be shared with the safeguarding team as soon as is practically possible.

If after a referral, we are dissatisfied with the response from our safeguarding partners and/or the child's situation does not appear to be improving, the referrer will press for re-consideration to ensure their concerns have been addressed and, most importantly, the child receives the support they need. The safeguarding team will use the local resolving professional differences procedure where necessary. The safeguarding team meets regularly to monitor children who we are concerned about to make sure each child's situation is improving in good time, and the right support is in place to meet their needs and address our concerns.

We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. We ask our staff to approach our safeguarding team if they need any support during or following a safeguarding incident.

Confidentiality and information sharing

Personal information about children and their families will be processed fairly, lawfully, and securely. Data protection laws tell us how to protect personal data and give us legal powers to share information to keep children safe and promote their welfare. Staff receive regular data protection training where we make them aware of their duty to receive and share safeguarding information confidentially. This means only with professionals who need to know to keep the child safe, such as the DSL, children's services or the police.

We'll share important information as soon as possible whether that's within the school or with outside partners, such as children's services, so we can quickly get the right support sorted out. We work transparently with parents wherever possible, informing them of our

duty to share information and refer suspected abuse or neglect to external agencies. While we seek consent from parents when safe and appropriate, we will share information without consent if necessary to safeguard a child, such as when obtaining consent is impossible, cannot reasonably be expected, would place the child at risk or could compromise an investigation. Decisions to share or withhold information, and the reasons for them, will be recorded.

Record keeping

The DSL is responsible for keeping detailed, accurate and secure written records of safeguarding concerns, discussions, decisions, the rationale for decisions and outcomes, including where a referral is not made. Records will be clear, factual and contemporaneous wherever possible. They will distinguish between what was observed or disclosed, professional opinion and information obtained from another person or historical source. Safeguarding concerns and referrals are kept separately from the main pupil file, with access limited to those who need it.

When a child leaves HCH, the DSL will transfer the safeguarding file securely and separately from the main pupil file, within five days for an in-year transfer or within five days of the start of a new term. The file will be accompanied by a clear, structured summary of relevant concerns, risks, protective factors, actions and current support. Confirmation of receipt will be obtained and retained. Where appropriate, information will be shared before the child transfers so the receiving setting can assess risk and have support in place from the outset.

When a child joins HCH, the DSL or another appropriately trained member of the safeguarding team will promptly review the safeguarding information received. HCH will seek clarification or missing information from the previous setting where necessary and will use the information to provide appropriate support, not to disadvantage or stigmatise the child. Relevant staff will be informed on a need-to-know basis. If HCH is the last school the child attends, the safeguarding file will be retained securely until their 26th birthday and then disposed of securely.

If a child has experienced or is at risk of female genital mutilation

Female genital mutilation (FGM) involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as ‘cutting' or female ‘circumcision’. FGM is illegal in England. As with other safeguarding concerns, staff will speak to the safeguarding team if they suspect that FGM has been carried out on a child or believe that the child is at risk of FGM. If a teacher (i.e. an individual who is employed or engaged to carry out teaching work in our school) comes to know in the course of their work that a child has experienced FGM they must directly report it to the police. Failure to do so will result in disciplinary sanctions.

Concerns about extremism and radicalisation

HCH complies with the Prevent duty, a legal requirement that obligates agencies including schools to prevent people from becoming terrorists or supporting terrorism. We recognise our role in protecting individuals from extremist ideologies and intervening early

to prevent radicalisation. The school undertakes a Prevent duty risk assessment to assess the risk of children being drawn into terrorism, including online, which is informed by the local profile and context.

Protecting children from extremism and being drawn into terrorism is treated the same as any other safeguarding harm. Staff will be alert to changes in a child's behaviour which could indicate that a child may be in need of help or protection. They will report any concerns in line with the school's safeguarding procedures detailed above.

The DSL will follow the local Prevent referral pathway where they become aware of a Prevent concern. They may first seek advice from the local council's Prevent lead and children's services. If appropriate, they will make a referral to the police Prevent team who will consider with other agencies whether the child would best be supported under the Channel programme. The DSL will report knowledge of online material promoting terrorism or extremism via the Government's service.

Kingston Prevent referral pathway

Pupils will be provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views. We are responsible for the content and messaging delivered to our pupils. We will ensure that any external speakers, resource materials, or learning tools do not undermine core British values, which include democracy, individual liberty, the rule of law, and mutual respect and tolerance for those with different faiths and beliefs. Promoting these values helps us defend children against extremist ideologies while building a more united and harmonious community.

Concerns about mental health

If staff are concerned that a child's mental health is also a safeguarding concern, they will speak to a member of the safeguarding team as per this policy. We will consider whether support from the Child and Adolescent Mental Health Service (CAMHS) is necessary. If we feel that a child is in danger, we will call 999 or arrange for the child to be taken to A&E immediately by a parent or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, we will seek advice from NHS 111 online or call 111 and select the mental health option.

Child-on-child abuse, including harassment and violence

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen at school, outside of school or online. Staff are made aware of the important role we have to play in preventing child-on-child abuse and responding when we believe a child may be at risk. For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys the instigators, but we make it clear to pupils that all child-on-child abuse is unacceptable behaviour, we will take it seriously and how they can report to us that they have experienced or witnessed it.

HCH has a zero-tolerance approach to child-on-child abuse. We do not downplay inappropriate or abusive behaviour as 'banter', 'just having a laugh', 'part of growing up'

or ‘boys being boys’. Staff are trained to challenge such behaviour. They recognise that the absence of reports does not mean abuse is not happening and maintain an attitude of ‘it could happen here’.

Examples of child-on-child abuse can include, but are not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents
- abuse between children in an intimate relationship (teenage relationship abuse)
- physical assault and harm (including when a child encourages or threatens physical abuse online) or the threat of harm with a weapon
- harmful sexual behaviour, including misogyny/misandry, sexual violence and sexual harassment (such as sexual comments, jokes and online sexual harassment)
- sharing or making of nude and semi-nude images and/or videos including those generated using AI (deepfakes)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals

Child-on-child abuse is preventable. HCH puts measures in place to minimise the risk of child-on-child abuse, including

- ensuring staff are thoroughly trained to recognise the signs that a child is or may be experiencing it, challenge inappropriate behaviour between children and follow the school’s procedures for reporting and responding to it
- creating opportunities in and beyond the curriculum to teach children how to keep themselves and others safe, including how to respect each other, deal with conflict and how they can confidently report inappropriate or abusive behaviour
- having a transparent behaviour policy that makes clear our expectations for behaviour and mutual respect, as well as the procedures for responding to unacceptable or abusive behaviour

- regularly analysing safeguarding data on child-on-child incidents to identify emerging risks and trends for pupils, particularly children with protected characteristics, taking action to make the school site safer
- being particularly alert to when children might be at highest risk around the school day (for example immediately after school)
- offering regular opportunities to gather feedback from pupils and their parents about what more we can do to make our school a safer environment for them

Responding to allegations of child-on-child abuse

Staff will report concerns or confirmed incidents of child-on-child abuse using the school's safeguarding reporting and recording procedures described above. The DSL will determine the best course of action from the available options ranging from internal management of the concern to making a referral to children's services and/or the police. We will inform the police if a criminal offence is committed. The police take a welfare approach to children under the criminal age of responsibility who are alleged to have caused harm. The DSL will work closely with the police to ensure the decisions the school makes to protect children and about discipline does not impact the criminal process.

Records will be kept of all concerns, how they were investigated and any outcomes reached on the child's safeguarding file. The DSL will contact the parents of children involved at the earliest opportunity so long as it is appropriate to do so. Where the DSL, children's services and/or the police decide the concern should be handled by the school internally, we will thoroughly investigate the concern following our behaviour policy and safeguarding processes.

If a safeguarding risk is established, the DSL will assess the necessity of a safety plan or risk assessment in consultation with the external agencies involved. Individual safety plans will be subject to regular monitoring and will include input from both the pupil concerned and their parents. The course of action taken by the school for each child will be discussed solely with that child's parents.

The assessment will consider the needs and safety of the child affected, the child alleged to have displayed the behaviour, any siblings or other directly involved children, and the wider school community. It will also consider whether the incident forms part of a wider pattern, an intimate relationship or other extra-familial harm.
Child-on-child abuse is a safeguarding issue for both children who display the behaviour and children who are affected by it. Support will be offered to every child affected by an incident, including witnesses, and will be proportionate to their age, developmental stage, individual needs and the nature and impact of the behaviour.

The Designated Safeguarding Lead (DSL), or a deputy, will coordinate an individual response following discussion with the child and, where appropriate, their parents or carers. Support may include:

- a named trusted adult and regular pastoral check-ins;

- a safety and support plan, including arrangements for lessons, unstructured times, changing areas, school transport and online contact;
- access to the school's pastoral, medical, counselling, SEND or wellbeing support;
- reasonable adjustments to support attendance, learning and emotional wellbeing;
- referral to external services, including children's social care, health services, the police or specialist harmful-behaviour services, where appropriate; and
- regular review of the support and risk-management arrangements.

For a child who has experienced or been affected by the behaviour, the priority will be their immediate and continuing safety, emotional wellbeing and ability to participate in school life without being disadvantaged. Their wishes and feelings will be considered when decisions are made, although the School may need to take action that is necessary to safeguard them or others. The child will be reassured that they are being taken seriously, that they are not responsible for the behaviour and that they will be protected from retaliation, intimidation or further contact that may cause harm.

For a child alleged to have displayed, or found to have displayed, harmful behaviour, support will focus on safeguarding, understanding the factors contributing to the behaviour, developing insight, taking appropriate responsibility and preventing recurrence. This may include an individual risk and needs assessment, a named adult, targeted pastoral or therapeutic intervention, work on consent, boundaries, healthy relationships, emotional regulation or online behaviour, and referral to specialist services. The School will consider whether the child may themselves have experienced abuse, exploitation, trauma or other unmet needs.

Safeguarding support for a child who has displayed harmful behaviour is separate from any disciplinary response under the Behaviour Policy. Appropriate and proportionate consequences may be applied, but support will not be withheld as a punishment. Arrangements will be managed carefully so that supporting the child who displayed the behaviour does not compromise the safety, wishes or wellbeing of the child affected. Restorative work or mediation will only be considered where it is assessed as safe, appropriate and genuinely voluntary for the child affected.

Harmful sexual behaviour, including harassment and/or sexual violence

Harmful sexual behaviour exists on a continuum (see diagram below). Our safeguarding team will have a good understanding of harmful sexual behaviour to inform how they respond to concerns, support staff training and work with the PSHE/RSE lead to plan the aspects of the curriculum aimed at preventing harmful sexual behaviour. We will always consider harmful sexual behaviour in a safeguarding context. Staff are made aware of the importance of addressing the early signs of inappropriate sexual behaviour, including misogyny, to prevent it escalating into sexual violence and/or sexual harassment.

Hackett continuum of sexual behaviour tool

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected Socially acceptable Consensual, mutual, reciprocal Shared decision making	Single instances of inappropriate sexual behaviour Socially acceptable behaviour within peer group Context for behaviour may be inappropriate Generally consensual and reciprocal	Problematic and concerning behaviours Developmentally unusual and socially unexpected No overt elements of victimisation Consent issues may be unclear May lack reciprocity or equal power May include levels of compulsivity	Victimising intent or outcome Includes misuse of power Coercion and force to ensure victim compliance Intrusive Informed consent lacking, or not able to be freely given by victim May include elements of expressive violence	Physically violent sexual abuse Highly intrusive Instrumental violence which is physiologically and/ or sexually arousing to the perpetrator Sadism

HCH knows that sexual violence and sexual harassment can happen between two children of any age or sex, online or in person. It can occur also through a group of children to a single child or towards another group of children. We will not dismiss sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”, because this can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in the worst case scenario normalise abuse and stop children from coming forward to report it.

Responding to allegations

When responding to harmful sexual behaviour, including sexual harassment and sexual violence, HCH follows the guidance set out in Part Five of KCSIE. We treat incidents that occur online or outside the school setting with the same gravity as in-school incidents. All incidents are responded to using the thresholds set out in the Hackett tool, drawing upon the DSL’s professional judgement and following local safeguarding procedures:

Hackett Inappropriate: Manage internally using the behaviour policy and pastoral support.

Hackett Problematic: Early help response used for non-violent harmful sexual behaviour to prevent escalation.

Hackett Abusive: Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.

Hackett Violent: Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the When to call the police guidance.

Handling cases of harmful sexual behaviour is highly complex. Where appropriate, the DSL will seek the advice of the police and/or children's services to decide next steps and what information can be disclosed to others, in particular the child alleged to have caused harm, their parents and staff. The DSL will also consider which specialist services are best placed to support the children involved.

When assessing incidents of harmful sexual behaviour, we will take into account the ages and developmental stages of the children involved. Any power imbalance between children, such as differences in age, maturity, social status and if any of the children have a disability or learning difficulty, will be taken into account. We will consider whether immediate measures need to be put in place to support and protect the children impacted by harmful sexual behaviour, including witnesses and the child who displayed harmful sexual behaviour.

An immediate risk and needs assessment will be carried out and recorded following a report of sexual violence and on a case by case basis for reports of sexual harassment. The DSL will regularly review the assessment, using it to inform ongoing safeguarding decisions. At all times, we will be actively considering the risks posed to all pupils and staff, and put adequate measures in place to protect them and keep them safe. Our risk assessment will support and be informed by risk assessments carried out by other professionals involved.

Our staff know to reassure any child who reports they have been a victim of sexual violence or sexual harassment that they will be taken seriously, supported and kept safe. We will further reassure those affected that the law exists to protect children, not criminalise them. Experiencing sexual violence and sexual harassment will, in all likelihood, negatively affect a child's educational attainment and be worsened if the child who caused the abuse attends the same school. We will work hard to minimise the impact on their educational outcomes. Wherever possible, the child, if they wish, will be able to continue in their normal routine. Our priority will be to make the child's daily experience as normal as possible, so that our school is a safe space for them.

HCH recognises that children who display harmful sexual behaviour may have experienced their own abuse and trauma. At the same time as considering disciplinary action, we will provide the child with, or find, the right support to stop them from re-offending and address any underlying trauma that may be causing their behaviour. In all scenarios, decisions and actions are regularly reviewed and relevant policies are updated to reflect lessons learnt.

Balancing confidentiality requests with safeguarding duties

The DSL will give the child affected by harmful sexual behaviour as much control as reasonably possible regarding how an investigation will be progressed and what support they are offered. If the child asks for confidentiality and opposes a referral being made to external services, the DSL will assess the situation case-by-case, balancing their wishes against the school's duty to protect them and others. A referral should be made to children's services if a child has suffered harm, faces a risk of harm, or is in immediate danger. Additionally, reports involving crimes such as rape, sexual assault, or assault by penetration should be reported to the police. Decisions to refer against the child's wishes will be handled with care.

If an allegation of sexual harassment or sexual violence enters the criminal justice system, the DSL will have a general understanding of the criminal process, witness support, and the importance of anonymity requirements. Every reasonable effort will be made to safeguard the anonymity of all children involved in a report. This includes evaluating what information staff members need to know and establishing appropriate support. The school will also consider the role of social media in spreading rumours and potentially exposing a child's identity.

Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person making the allegation needs support or may have been abused by someone else, and this was a cry for help. If so, a referral to local authority children's services may be appropriate. If a report is proven to be deliberately false or malicious, we will consider taking action against the individual in line with our behaviour policy.

Concerns about the sharing or making of nudes or semi-nudes

For the purposes of this policy, 'sharing or making nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves or taken or created by another person. Images may be digitally altered or wholly generated using artificial intelligence, usually referred to as 'deepfakes'.

Our staff will be trained to carefully handle and manage reports of these incidents. Staff reserve the right to confiscate a device in the possession of a child if they have concerns that the device is involved in the sharing or making of nudes or semi-nudes. This is consistent with the Searching, screening and confiscation: advice for schools guidance. Staff will not view, download, forward or delete illegal images of a child. Staff will be aware of what to do when viewing an image is unavoidable.

Incidents will require a proportionate safeguarding response, regardless of whether they are consensual or not, that considers any elements of coercion, exploitation or vulnerability. The DSL will first hold an urgent meeting to establish, among other things, the level of risk to the children involved, if a referral is needed in line with our safeguarding

procedures, whether there is a need to view the image to safeguard the child and whether action should be taken to delete or remove the image. The review meeting will likely include the staff member(s) who heard the disclosure and the wider safeguarding team.

The decision to view and delete imagery will be based on the professional judgement of the safeguarding team, guidance from the police (where necessary) and in line with the government's Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance.

The DSL will make an immediate referral to the police and children's services if:

- the incident involves an adult
- there is reason to believe that a child or young person has been coerced, blackmailed or groomed or there are concerns about their capacity to consent (for example, owing to special educational needs)
- what they know about the image suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent
- the images involves sexual acts and any child in the images or videos is under 13
- they have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example if they are presenting as suicidal or self-harming
- they become aware of a computer-generated explicit image of a child

It will not always be necessary to involve the police or children's services. In these cases, the DSL will be confident that they have enough information to assess the risk to any child involved and that the risks can be managed within our school's pastoral support, behaviour procedures and, if appropriate, the local network of support. We may escalate the concern to safeguarding agencies later on as a result of becoming aware of further information or wider concerns.

Discrimination

We recognise that discrimination is a harm in its own right. It can cause trauma and negatively impact a child's welfare, wellbeing, sense of belonging and safety. Some pupils face greater risks of harm or bullying from issues like sexual violence or homophobic, biphobic, transphobic, faith- or race-based discrimination. Children may also be targeted due to their perceived or actual LGBTQ+ identity. We have a duty to protect individuals from and eliminate unlawful discrimination, harassment and victimisation. We prioritise fostering good relations between those who share protected characteristics and those who do not, ensuring equal opportunities for everyone.

This is part of the school's duty to promote an inclusive, anti-discriminatory culture as part of our safeguarding responsibilities. This duty is a priority when making policies and decisions that impact our school community. HCH works hard to foster a sense of belonging for all pupils, creating opportunities to celebrate diversity through our

curriculum and wider school activities. We know that taking timely action helps prevent concerns from escalating into bullying.

We aim to provide a safe, open space for our community to share concerns. Discrimination is firmly addressed under our safeguarding procedures and behaviour policy, and may involve referrals to children's services and/or the police. We will communicate with parents in line with this policy. Support and check-ins will be offered to the pupil who has been targeted. We challenge discriminatory attitudes, making it clear this behaviour is unacceptable. Pupils who discriminate against others face clear consequences and receive the support and education they need to reduce the risk of this behaviour happening again. We report all discrimination incidents, including those not involving children, to the local authority termly.

9. Specific safeguarding considerations

Certain children are at a higher risk of experiencing abuse, whether online or offline, and may face further obstacles in identifying or reporting it. For this reason, there are some circumstances we give a specific safeguarding focus to.

Children who need a social worker

HCH recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm and face additional barriers to attendance, learning, mental health and behaviour. Children may need a social worker to help the family address safeguarding risks or welfare needs. Children's services will tell the school if a pupil has a social worker. This helps us to make decisions in the child's best interest, such as how we adjust our response to unauthorised absence or the child missing education. We will work with the social worker, the child, and their family when deciding on the extra help we can provide in school to support the child's welfare.

Children looked after and previously looked after

Staff will have the skills and knowledge to keep children looked after and previously looked after safe. We will give appropriate staff the information they need in relation to a looked after child, for example their legal status, who has parental responsibility, who is not permitted to have contact, who is not permitted to know where the child is being educated and the level of decision-making power the local authority has given the carer.

The school's designated teacher for children looked after, Amy Burgess, has the training and experience to understand the unique needs of these children and how they can best be supported to have the same opportunities as their peers. This will include the designated teacher working closely with AfC's Virtual School accessing the training and forums on offer. The designated teacher will also work closely with the children's services and Virtual School involved to put funding to best use to improve the child's educational outcomes. The designated governor for children looked after is Rachael Friend.

Kinship carers are family or friends who step up, often during an unexpected crisis, to care for a child when their parents aren't able to. We encourage kinship carers of pupils to make the school aware of their caring arrangement so we can establish whether there is any support we can offer or seek advice for.

Private fostering occurs when a child under 16 (or 18 if disabled) is cared for by someone other than a parent or close relative for 28+ days. By law, those arranging this care must notify children's services as soon as possible. If they haven't, the school has a duty to inform children's services, though we also encourage parents to report it.

Young carers

HCH is alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, academic achievements, behaviour and wellbeing. We aim to identify young carers early so we make sure young carers receive the right support at the right time by the right services. This may include additional support from safeguarding partners, including the local authority and health services.

Children requiring mental health support

We have an important role to play in supporting the mental health and wellbeing of our pupils. Supporting mental wellbeing is a high priority for our school. Measures include a strong pastoral and PSHE programme, regular opportunities for pupils to discuss their wellbeing, access to trusted adults and age-appropriate wellbeing support, and early identification of pupils who may require additional help. Staff are trained to recognise and respond to emerging concerns, with referrals made to internal or external specialist services where appropriate. The school's Mental Health Lead, Tessa Bartholomew, has developed a whole-school approach to mental health and wellbeing that aims to build resilience among pupils and ensure that children receive the right support and advice. Our staff are aware that mental health problems can develop into safeguarding concerns and can also be an indicator that a child is experiencing or at risk of experiencing harm. Staff are well placed to observe children day-to-day and identify early those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff are aware that only appropriately trained professionals should attempt to diagnose a mental health problem.

Children with special educational needs, disabilities and health issues

Our SENCO and DSL work closely together to safeguard children who have special educational needs and disabilities (SEND), particularly when there is a report of abuse. HCH makes sure that staff are aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges, both online and offline, such as:

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

- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand what is happening to them is abuse
- the need for intimate care or that these children are isolated from others, and that these children are more likely to be dependent on adults for care
- issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so

We will consider additional pastoral support for these children and ensure we put appropriate measures in place to best support communication. We will make a referral to children's services where an incident highlights that a child might be at increased risk of harm because of their medical condition, for example if the child is repeatedly sent to school without essential medication. Usually, we expect a child's reported medical needs to be verified by UK medical professionals.

Children who are absent from education

HCH recognises issues with attendance can be a warning sign to a range of safeguarding issues and/or worsen existing safeguarding concerns. The school's attendance procedures assist the safeguarding team with identifying and responding to children persistently absent or missing from education, acting early to prevent absent children from becoming a child missing education in the future.

Where a parent expresses their intention to educate their child at home (also known as elected home education), we will work together with the parent and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly important for children who have SEND, a social worker and/or other vulnerabilities.

Other specific safeguarding issues

Staff receive training to recognise and respond to a broad range of safeguarding issues, including domestic abuse; child sexual and criminal exploitation; county lines and gang involvement; financial exploitation; trafficking and modern slavery; forced marriage and so-called 'honour'-based abuse; homelessness; fabricated or induced illness; child-to-parent or caregiver abuse; children affected by parental imprisonment; and harm occurring beyond the family home or school.
Any concern will be reported to the safeguarding team and managed through the procedures in this policy. The DSL will seek advice and make referrals to children's services, the police or specialist services as appropriate, including the National Referral Mechanism where trafficking or modern slavery may be involved.

Children who are gender questioning

This section applies where a child or their parent has requested that the school make changes or put support in place in order to facilitate the child presenting as the opposite biological sex ("social transition"). The KCSIE guidance states what our responsibilities

are in this area and what we should consider when making decisions about a request, particularly in relation to single-sex sport and spaces and residential accommodation. We will keep a clear record of our decision-making.

Safeguarding in sport and extracurricular activities

HCH applies the same safeguarding standards to PE, sport, fixtures, clubs, trips and externally provided coaching as it does to other school activities. Coaches and instructors must be appropriately checked, inducted into HCH safeguarding procedures and Staff Code of Conduct, and must report concerns to the DSL. Supervision, one-to-one coaching, communication with pupils, travel, collection arrangements and use of photography or recording devices will be risk assessed. Adults must not communicate privately with pupils through personal accounts or devices.

Participation and grouping decisions will take account of pupils' age, development, safety, privacy and dignity, alongside HCH's duties under equality and human rights law and current statutory guidance. Any individual adjustment will be risk assessed, recorded, communicated to relevant staff on a need-to-know basis and reviewed.

Changing rooms and showers

Changing and shower arrangements will protect every pupil's safety, privacy and dignity. Personal phones, cameras and other imaging or sharing devices must not be used in these areas. Staff supervision will be proportionate and risk assessed, with adults avoiding unnecessary entry and announcing themselves before entering wherever practicable. Pupils will not be required to undress in front of pupils of the opposite sex. Where an alternative arrangement is needed, HCH will consider a fully enclosed space or use of facilities at a different time; the arrangement will be recorded, shared only with relevant staff and reviewed regularly.

Supporting pupils with medical conditions and allergies

HCH will support pupils with medical conditions and allergies in accordance with individual healthcare plans and the School's medical and allergy procedures. Relevant information, medication and emergency arrangements will be accessible to trained staff, including during trips, sport and off-site activities. An isolated error or medical incident is not automatically a safeguarding matter, but staff must inform the DSL where it indicates that a child may be at increased risk of neglect, abuse or exploitation, including where essential information or medication is repeatedly not provided. The DSL will assess whether family help, children's social care or another safeguarding response is required.

HCH will balance the impact of agreeing the child's request against the impact of refusing their request, taking into account all the relevant factors. We will use our judgment about whether supporting social transition is in the child's best interests and the best interests of other children. We will do this by working together with the child and the child's parents (unless the latter is unsafe to do so), considering clinical evidence or advice and involving the DSL. The DSL will also be involved in cases where a child has socially transitioned but staff and school friends are unaware. We will offer in-school support and signpost to community-based organisations where appropriate or requested.

10. Online safety and the use of smart devices

This section is a summary of the core aspects of HCH's separate online safety policy that sets out our whole school approach, including the use of smart technology (e.g. mobile phones and smart glasses). HCH understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety and the four main categories (4Cs) of online risk when making decisions for our school:

Content: exposure to illegal, inappropriate or harmful content, for example pornography, discrimination, self-harm, suicide, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this, for example peer to peer pressure, and adults posing as children with the intention to groom or exploit children for sexual, criminal, financial or other purposes.

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

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

We have online safety processes in place that aim to protect children and set clear expectations for the acceptable use of technologies and how we will respond to online safety incidents. We fulfil our aims by:

- making sure our whole school approach is reflected in all relevant policies
- regularly training staff on online safeguarding risks and how to protect children
- making sure children, staff and parents sign an accessible acceptable use agreement that covers our expectations for how they should use the school's IT systems and the consequences for not following the agreement
- educating children to learn how to keep themselves safe when online, what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety
- engaging parents with keeping children safe online and making parents, children and staff aware that staff can search an electronic device they have confiscated
- ensuring appropriate filtering and monitoring systems are in place on the school's network and devices

Technology and risks and harms associated with it evolve and change rapidly. We will

carry out an annual review of the school's approach to online safety, supported by an annual risk assessment that considers and reflects the risks our pupils may face. The school's staff code of conduct and online safety policy details acceptable use of technologies.

Mobile phones and smart technology (including smart devices)

Our school is a mobile phone-free environment meaning children will not have access to their mobile phone (or other smart technology with similar functions) throughout the school day, including during lessons, the time between lessons and breaktimes. There are special circumstances where there are exceptions to this rule, such as if a child requires their mobile phone to monitor a medical need. Staff and visitors are expected to not use personal devices around children. All pupils who bring mobile phones to school are required to use a Yondr pouch to prevent access in accordance with the school's Mobile Phone Policy.

Within the Early Years setting, personal mobile phones, smartwatches and other personal devices with imaging or sharing capabilities are not permitted in areas accessed by children. Staff must switch off or silence their personal devices on arrival and store them securely in the designated locked storage within the staffroom for the duration of the working day. Devices may only be accessed during authorised breaks in areas where no children are present. Visitors and other adults must not use personal devices within the Early Years setting and will be directed to an appropriate secure storage location where necessary. Only school-owned and authorised devices may be used to photograph or record children, in accordance with the school's data protection, photography and safeguarding procedures.

Media recordings, including audio, images and videos

We will only take images, videos or recordings of children if we have the child's and parent's consent. We will make sure the child is appropriately dressed. All children are encouraged to tell us if they are worried about any media that has been taken of them. We make careful decisions about how and where we publish images, videos and recordings of children online, recognising the increasing risk that individuals can use artificial intelligence to manipulate the image to cause harm.

Filtering and monitoring systems

Meeting digital and technology standards in schools and collegesOur school has strong and effective filtering and monitoring systems in place to help limit children's exposure to online risks from our school's IT systems. In line with the DfE's Meeting digital and technology standards in schools and colleges guidance, we will make sure that, among other things:

- we assign a member of the senior leadership team and a governor to oversee filtering and monitoring arrangements and ensure that appropriate systems are in place to meet these standards
- the effectiveness of our filtering and monitoring systems is reviewed at least

annually, and more frequently where there is a significant change or issue, led by the designated SLT member responsible for filtering and monitoring, with support from the DSL and our IT support/provider

- we check that filtering works across all internet-connected devices and a record is kept of these checks
- the systems are effective for the number of and age range of our children and consider children who are potentially at greater risk of harm
- specific staff have assigned roles and responsibilities to manage these systems
- staff and pupils know about the systems in place and how to raise concerns
- when we block online content it does not impact teaching and learning
- we have monitoring strategies in place that meet our school's safeguarding needs

Generative artificial intelligence

Generative artificial intelligence (Gen AI) refers to artificial intelligence that creates new content (e.g. text, code and images). Our school is aware that using Gen AI can be hugely beneficial, but also harmful if used inappropriately. We will use the Department for Education's advice and guidance on using Gen AI in education to ensure we integrate Gen AI tools safely and with children's best interests at the centre. Safeguarding concerns that arise through an individual's use of artificial intelligence will be responded to in line with our safeguarding policies. Our school's approach to using Gen AI is detailed in our online safety policy that can be found on the school's website.

Only approved generative AI systems may be used for educational purposes. Staff and pupils must not enter confidential or identifiable information about a child into a generative AI system unless its use has been expressly authorised and appropriate data-protection safeguards are in place. AI-generated explicit imagery, deepfakes, manipulation, bullying or other AI-related safeguarding concerns must be reported to the DSL without delay.

Remote education

We will stay in regular contact with the parent of a pupil being taught remotely, making sure they are aware of:

- the importance of children being safe online and offering advice on how to do so
- what systems our school uses to filter and monitor online use
- what their child is being asked to do online, including the sites they will be asked to access and who from the school their child will be interacting with online

Information security and access management

We understand that cyber security is a safeguarding issue, particularly because we hold

sensitive data about pupils and staff. We will take measures to help keep personal information safe, ensuring we have appropriate cyber security systems in place to help protect against cybercrime (i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly). We will follow the government's Cyber security standards guidance. Our systems are reviewed regularly to keep up with the constant changes to cybercrime technologies.

11. Adults who work with children or at our school

Safer recruitment

HCH expects all staff, volunteers and third parties who spend time at our school to share our commitment to keeping children safe. We have tight and robust recruitment procedures in place to deter, identify and prevent people who are unsuitable to work with children from securing employment or volunteering opportunities at our school. We will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. All offers of employment are conditional upon the successful completion of pre-employment vetting checks that are listed in Part Three of KCSIE.

We require written confirmation from third-party and supply staff agencies that they have completed appropriate safer recruitment checks on their employees. We will always check the individual's identification. We will also check the suitability and identification of external visitors and individuals or organisations wishing to hire our site. The Principal makes the decision on whether a visitor needs to be supervised or escorted.

We will make sure safeguarding arrangements are in place to keep children safe when activities or services that take place on our site are not provided by our school or under the direct supervision or management of our staff, regardless of whether the children attending are pupils at our school or not. We will end our agreement with the individual or provider if they fail to follow the safeguarding requirements listed in the agreement.

See our separate safer recruitment and lettings policies for full details of these processes.

Extended school and off-site arrangements

We continue to be responsible for the safety and wellbeing of pupils who attend an alternative provision. We know that children who attend alternative provisions often have complex needs and we are aware of the additional risk of harm that these children may be vulnerable to. We will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the provision, i.e. checks that we would otherwise perform on our own staff.

We follow the statutory guidance for alternative provision and Achieving for Children's alternative provision policy. The written agreement between the school and the provider will be clear that the provider must inform us of any arrangements that may put the child at risk and where the child is at all times during school hours (including addresses). We will regularly review the placement to satisfy ourselves that it can meet the child's needs.

We will carry out an immediate review of the placement if safeguarding concerns arise and reserve the right to end the arrangement if concerns are not adequately addressed.

Where extended school activities are provided and managed by the school, our own safeguarding policies and procedures apply. When our children attend off-site activities, including work experience placements, we will ensure that effective safeguarding arrangements and thorough risk assessments are in place.

Concerns or allegations about adults in our school

HCH remains vigilant beyond recruitment and vetting. These procedures apply to concerns about any adult working in or on behalf of HCH, including employees, governors, volunteers, supply staff, trainee teachers, contractors and visiting professionals. Concerns will be considered under either the harm-threshold procedure or the low-level concerns procedure; if there is uncertainty, the Principal will consult the Local Authority Designated Officer (LADO).

Allegations that may meet the harm threshold

The harm threshold is met where an adult may have behaved in a way that has harmed, or may have harmed, a child; possibly committed a criminal offence against or related to a child; behaved towards a child in a way indicating they may pose a risk of harm; or behaved, or may have behaved, in a way indicating they may not be suitable to work with children. This includes transferable risks arising from conduct outside school.

Any such concern must be reported immediately to the Principal, who will act as case manager. A concern about the Principal must be reported to the Chair of Governors, without first informing the Principal. Where reporting to either person would create a conflict of interest, the concern must be reported directly to the LADO. The case manager will contact the LADO without delay and within one working day, before investigating the allegation or approaching the adult concerned, unless the LADO advises otherwise.

The case manager and LADO will agree the immediate action required, how facts will be established, who should be informed and by whom, and whether children's social care or the police should be involved. HCH will preserve evidence, make a written record of decisions and reasons, and ensure that any investigation does not compromise a statutory or criminal investigation.

Suspension will not be an automatic response. The Principal or Chair of Governors, in consultation with the LADO, will undertake a risk assessment and consider alternatives such as redeployment, additional supervision or removing specified duties. HCH will safeguard the child, provide appropriate support to the child and their family, and maintain appropriate support for the adult. Confidentiality will be maintained and information shared only with those who need to know, subject to statutory restrictions on publication.

At the conclusion of the case, the outcome will be recorded as substantiated, malicious, false, unsubstantiated or unfounded. Records will be retained and references prepared in

accordance with KCSIE. Where the legal criteria are met, HCH will make a prompt referral to the Disclosure and Barring Service, including where the person resigns or would have been removed from regulated activity had they remained. Misconduct by a teacher will also be considered for referral to the Teaching Regulation Agency.

Supply staff, trainee teachers and adults employed by another organisation

HCH and the relevant agency, employer or initial teacher training provider share safeguarding responsibilities. HCH will notify them promptly, take the lead in gathering facts and managing the safeguarding process with the LADO, while the employer or provider will normally lead any employment or disciplinary process. HCH will not simply stop using a person because of a safeguarding concern without establishing the facts and consulting the LADO. Decisions about removal from duties or suspension will be made jointly as appropriate, with the safety of children as the priority.

Low-level concerns

A low-level concern is any concern, however small and even where it causes only a sense of unease or a 'nagging doubt', that an adult may have acted inconsistently with the Staff Code of Conduct, including outside work, but the behaviour does not appear to meet the harm threshold. Examples include being over-friendly or showing favouritism, using inappropriate or intimidating language, taking photographs on a personal device, communicating outside agreed channels, or being alone with a child in a secluded area without a legitimate reason.

Staff must report low-level concerns about others, and are encouraged to self-refer where their own conduct could have been misinterpreted, to the Principal as soon as possible. Concerns about the Principal must be reported to the Chair of Governors. The Principal is the final decision-maker and may consult the DSL and/or LADO. A person reporting in good faith will not suffer detriment and is protected by HCH's Whistleblowing Policy.

The Principal will obtain sufficient information to understand the concern, including speaking with the person raising it, the adult concerned and any witnesses where appropriate. A written record will include the concern and context, evidence gathered, the categorisation and decision, action taken, reasons, and the reporter's name unless anonymity must be respected as far as reasonably possible. Records will be confidential, secure and reviewed for patterns. Concerns about supply or third-party staff will also be shared with their employer so patterns across settings can be identified.

Where a pattern emerges, HCH will consider disciplinary action, training, supervision or changes to policy and practice. If the pattern or new information may meet the harm threshold, the matter will be referred to the LADO. Full supporting arrangements are set out in HCH's Low-Level Concerns Policy and Staff Code of Conduct.

12. Whistleblowing

All staff, including those working in the Early Years, are expected to raise concerns about poor or unsafe practice or possible failures in HCH's safeguarding arrangements.

Concerns should normally be reported promptly to the Principal or another member of the senior leadership team; concerns about the Principal should be reported to the Chair of Governors. Reports will be acknowledged, recorded, considered impartially and escalated to the LADO, children's social care, police or another appropriate body where required. The person raising the concern will be protected from detriment when acting honestly and in good faith, although confidentiality cannot be promised where information must be shared to safeguard a child or investigate wrongdoing.

There are other options available where staff feel unable to raise a concern with the senior leadership team or feel that their genuine safeguarding concerns are not being addressed. For example, they can make contact with the NSPCC via their whistleblowing advice line on 0800 028 0285 or email (help@nspcc.org.uk). HCH has a separate Whistleblowing Policy, available to staff and on request from the school office, which sets out the full procedure.

13. Site safety

The school has security measures and response plans in place to keep the site secure and help protect children, staff, volunteers and visitors from external threats to the school. School leaders will organise for regular drills, both with and without pupil involvement, to ensure staff are best prepared to manage a critical incident. We will regularly seek the views of pupils, parents and staff to find out if there are areas of the school site where children feel unsafe or at risk of harm.

A member of the senior leadership team will make the police aware if we have information of concern about the local area that could affect pupils' safety. If we are concerned about areas where gangs or anti-social behaviour are present, we will also inform the local authority's contextual safeguarding team.

14. Training

Staff build up expertise by managing safeguarding concerns on a daily basis, therefore staff have the opportunity to contribute to and shape staff training and this policy. All staff receive core safeguarding and child protection training (including online safety) at induction that is minimally updated every two years or sooner if required. The training provided covers what staff should know as set out in the KCSIE and EYFS statutory guidance. In addition, staff receive regular safeguarding updates (for example, via email, e-bulletins and staff meetings) so they have the information they need to keep children safe, as required and at least annually. Staff sign to confirm they have read and understood Part One of the latest version of KCSIE. Some staff members will be expected to attend additional safeguarding training specific to their roles.

Whole staff training is delivered by the DSL, with additional courses provided to all staff via EduCare. The DSL is supported by the Safeguarding Governor, Dukes DSL Development Days, the borough's DSL Forums and Level 3 training and refresher every two years.

Among other things, staff who may support children in early years will be trained to understand acceptable staff ratios, the role of key persons, safer sleep and eating arrangements, appropriate food preparation and management of allergies.

All governors receive safeguarding and child protection (including online) training at induction that prepares them for testing and challenging the school's procedures and policies making sure they are working as they should be. Their training will be regularly updated. The Safeguarding Governor will refresh their knowledge more regularly and receive additional training so they are equipped for their role and stay alert to changes to the safeguarding context. This is provided by Dukes Education.

The safeguarding team will attend regular training to prepare and assist them in leading the school's safeguarding response and strategy. The board will ensure that the training undertaken complies with Annex B of KCSIE and Annex C of EYFS statutory guidance. Additional training or research may be required as local and school-specific safeguarding issues arise. The safeguarding team will attend level 3 multi-agency local safeguarding training and Prevent awareness training within 12 weeks of starting the role that they will refresh every two years.

We make sure that staff provided by external agencies and third parties, for example supply teachers and contracted staff (including catering staff) are aware of this policy, our school's safeguarding procedures, and have received appropriate safeguarding training.

15. Teaching and learning

At HCH, we recognise how important it is that we teach and role-model to children how to keep themselves and others safe. Our relationships, sex and health education policy sets out how we do that, making sure the 'keeping safe' curriculum is woven through all aspects of school life and it meets the needs of all children. This curriculum will have flexibility so we can adapt it to cover specific safeguarding issues that arise during the school year. We will vet the external visitors we plan to use to deliver any of this subject's content to ensure they are suitable for our school and align with our safeguarding expectations. They will follow this policy when managing any disclosures of harm made when delivering this subject.

16. Reviewing our safeguarding processes

At HCH, we regularly review the success of what we are doing to keep children safe. This includes reflecting on what we can learn from safeguarding concerns and incidents taking any action needed to improve our practice. The impact of safeguarding policies, systems and processes is kept under continual review. We are open to challenge and actively seek opportunities to learn how we can improve. For example, we

- regularly seek and listen to the views and experiences of pupils, staff and parents
- utilise safeguarding monitoring visits from governors
- report the impact of our safeguarding arrangements to the board

- undergo external safeguarding reviews
- submit an annual self-audit to the KRSCP
- seek external expert advice to help us make decisions
- review the effectiveness of staff training

17. Linked policies

This policy is only one of a range of documents that set out what our safeguarding responsibilities are and how we carry them out. This policy is complemented by and should be read alongside the following policies:

Acceptable use of IT (Pupils)	
Acceptable use of IT (Staff)	
Anti-Bullying Policy (Pupils)	
Behaviour and Discipline Policy (Pupils)	
Children Missing in Education policy – Children who are absent Policy	
Code of Conduct (Staff)	
E-Safety / Online Safety Policy	
Health, safety, and security policy (Staff)	
Lone Working policy (Staff)	
Low Level Concerns Policy (Staff)	
Physical Restraint Policy (Staff)	
Safer Recruitment policy (Staff)	
Trips and Visits Policy (Staff)	
Whistleblowing Policy (Staff)	

18. Relevant Statutory and Non-Statutory Advice.

This policy is written with regards to both the advice below and in Appendix 1, section 28 of this policy:

Keeping Children Safe in Education (KCSIE), DfE,	Keeping children safe in education 2026 (comes into

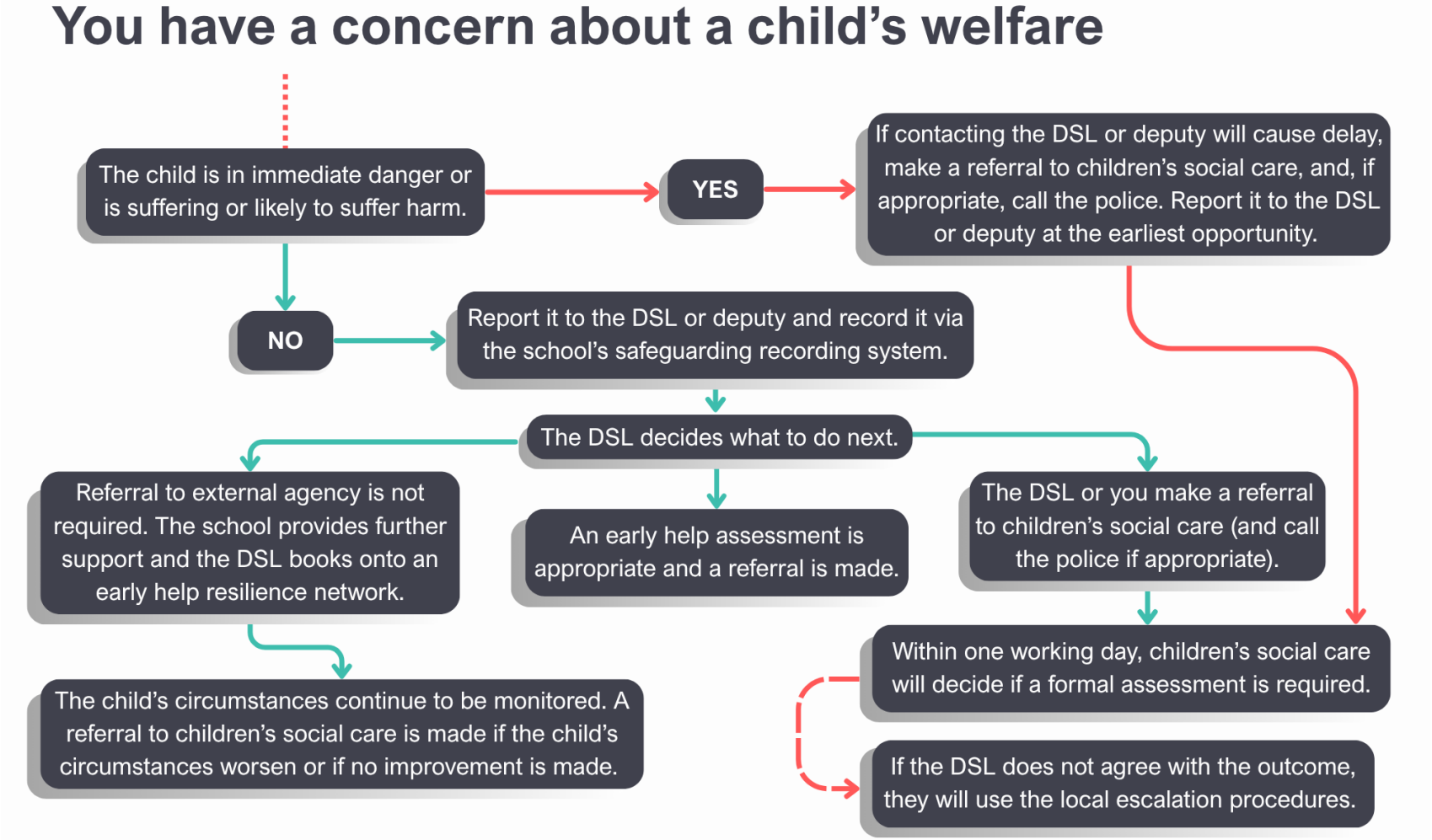
September 2026	force from 1 September 2026)
The SEN Code of Practice 2015	SEND_Code_of_Practice_January_2015.pdf
Disqualification Under the Childcare Act 2006 – updated **August 2018**	Disqualification under the Childcare Act 2006 - GOV.UK
Working Together to Safeguarding Children Updated **March 2026**	Working together to safeguard children 2026
DfE: Working Together to Improve School Attendance **July 2026 Now statutory guidance.**	Working together to improve school attendance: July 2026
DfE statutory guidance 'Children missing education – **Updated Sept 2025** for Local Authorities and other groups supporting children's attendance.	Children missing education: statutory guidance for local authorities and schools - GOV.UK
The Independent School Standards (England) Regulations, DfE, 2014**. Updated April 2026**	Independent school standards guidance
The Independent School Standards (Wales) Regulations, 2024**.**	https://www.gov.wales/independent-schools-registration-and-operational-guidance-html
The National Minimum Standards for Boarding, DfE **updated 2022.**	https://www.gov.uk/government/publications/boarding-schools-national-minimum-standards
EYFS Framework **July 2026** for 1st Sept 2026 implementation.	EYFS statutory framework for group and school-based providers
DfE Guidance *What to do if you're worried a child is being abused* **(March 2015)**	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
Relationships, Sex and Health Education **Updated July 25 for 1st Sept 2026 implementation**	Relationships Education, Relationships and Sex Education and Health Education guidance

Prevent Duty England and Wales 2015 **– Updated March 2024** Safeguarding Learners Vulnerable to Radicalisation **Sept 2023**	Prevent duty guidance: for England and Wales (accessible) - GOV.UK **DfE Guidance** https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty
Martyn's Law – Terrorism (Protection of Buildings) Act 2025 **Martyn's Law – Home Office Fact Sheet**	Martyn's Law: the SIA's new regulatory role - GOV.UK Terrorism (Protection of Premises) Act 2025: factsheets - GOV.UK
DfE Meeting the Digital Standards 2025	Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK Plan technology for your school - GOV.UK
Allergy Safety in Schools Statutory Guidance – **July 2026**	Allergy safety in schools statutory guidance
DfE Teaching online safety in schools guidance 2023	Teaching online safety in schools - GOV.UK
DfE Plan technology for your school – **updated 13th**	https://www.gov.uk/guidance/plan-technology-for-your-school

Nov 2025	
Dfe Meeting Digital and Technology Standards in Schools and Colleges – Cyber-Security Standard – **June 2026**	Meeting digital and technology standards in schools and colleges - Cyber security: core standard - Guidance - GOV.UK
NSPCC E-Safety Guidance for Schools **Updated April 2026**	Online safety (e-safety) and schools | NSPCC Learning
Sharing nudes and semi-nudes: advice for education settings working with children and young people, **Updated March 2024** (Non-statutory advice) **UCIS Guidance**	Sharing nudes and semi-nudes: how to respond to an incident (overview) (publishing.service.gov.uk)
Guidance that any child investigated by the police whether in or out of school should have an appropriate adult with them. **Updated December 2023**	https://www.gov.uk/government/publications/pace-code-c-2019
DfE Guidance – Teachers Misconduct - The prohibition of Teachers – **Feb 2022** *Advice on factors relating to decisions leading to the prohibition of teachers from the teaching profession* *Website for reporting a teacher*	Teacher misconduct: the prohibition of teachers (publishing.service.gov.uk) Report serious teacher misconduct - GOV.UK
DfE Guidance - After-school clubs, community activities, and tuition Safeguarding guidance for providers – **Feb 2026**	After-school clubs, community activities, and tuition - Safeguarding guidance for providers
Alternative Provision – Guide for Local Authorities and schools Feb **2025**	Arranging Alternative Provision - guide for LAs and schools

Appendix A: flowchart for responding to concerns about a child

If staff have concerns about a child's welfare, they must act on them immediately by following the procedures below.



In cases which also involve a concern or allegation against a staff member, refer to the full policy.