



SAFEGUARDING AND CHILD PROTECTION POLICY

CONTENTS

1. Key contacts	<u>2</u>
2. Policy statement and principles	<u>3</u>
3. Safeguarding legislation and guidance	<u>5</u>
4. Child protection procedures	<u>6</u>
5. Prevent Duty and FGM	<u>12</u>
6. Roles & Responsibilities	<u>13</u>
7. Good practice guidelines and staff code of conduct	<u>16</u>
8. Abuse of trust	<u>17</u>
9. Children who may be particularly vulnerable	<u>17</u>
10. Missing boys	<u>17</u>
11. Helping boys to keep themselves safe	<u>18</u>
12. Support for those involved in a child protection issue	<u>18</u>
13. Complaints procedure	<u>18</u>
14. If about a colleague	<u>19</u>
15. Allegations against staff	<u>19</u>
16. Staff training	<u>19</u>
17. Safer recruitment	<u>20</u>
18. Site security	<u>21</u>
19. Third Party Use and off-site arrangements	<u>21</u>
20. Photography and images	<u>22</u>
21. e-safety	<u>22</u>
Appendix	
Information for parents	<u>22</u>
Allegations against staff	<u>23</u>

1. KEY CONTACTS

School Contacts	
Designated Safeguarding Lead (DSL)	Mr Andrew McGregor, Senior Tutor 07530 994659 (Mobile) 020 8872 8066 (Office)
Deputy Designated Safeguarding Lead (DDSL)	Mr Peter Bieneman, Senior Master and Director of Boarding 07980 987577 (Mobile) 020 8872 8136 (Office)
Level Three Trained	Mr Alastair Land, Deputy Head Master 020 8872 8039 (Office)
Nominated Safeguarding Governor	Mr Simon Doggart
Head Master	Mr Jim Hawkins 020 8872 8003 (Office)

Child and Family Services of the London Borough of Harrow	
Children's Access Team	The Golden Number 020 8901 2690
Emergency Duty Team	(24 hours) 020 8424 0999
Harrow Local Safeguarding Children Board	Second Floor, Civic Centre, Station Road, Harrow, Middlesex, HA1 2UL 020 8424 1147 lscb@harrow.gov.uk
Allegations Manager/LADO	Janice Miller Tel: 020 8736 6435 Paulette.Lewis@harrow.gov.uk

National Contacts	
ISI (Independent Schools Inspectorate)	CAP House, 9-12 Long Lane, London, EC1A 9HA 020 7600 0100 info@isi.net
Crimestoppers	0800 555 111
NSPCC	0800 800500
Childline	0800 1111
Kidscape Bullying Helpline	0207 730 3300
Samaritans	0845 790 9090
OFSTED	0300 123 4666
Children's Commissioner	(Anne Longfield) 0800 528 0731 advice.team@childrenscommissioner.gsi.gov.uk

2. POLICY STATEMENT AND PRINCIPLES

Key Points

- This policy applies to all pupils in the School. Any pupil under the age of 18 will be regarded as a child for the purpose of this policy;
- All staff have a responsibility for the implementation of this policy;
- Any concerns regarding safeguarding and/or child protection must be reported immediately to the Designated Safeguarding Lead (DSL) or in their absence to the Deputy Designated Safeguarding Lead (DDSL);
- If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care immediately;
- If a crime has been committed, it should be reported to the police;
- All staff must have read and act in accordance with Part One of the DfE Statutory Guidance *Keeping Children Safe in Education* July 2015 (KCSIE);
- All staff must know who the trained DSL and DDSL are;
- All safeguarding and child protection concerns must be treated in the utmost confidence;
- The DSL or DDSL must report all concerns in line with local authority thresholds to Children's Social Care; and
- Allegations of abuse in relation to adults must be dealt with in line with the associated policy.

Introduction

Harrow School recognises that it has a duty to ensure that safeguarding permeates all activities and functions and expects all staff, volunteers and other third parties to share its commitment to safeguarding and promoting the welfare of children. This policy therefore complements and supports a range of other policies (e.g. Complaints, Behaviour, Expeditions, Health and Safety, Drugs and Legal Highs, Physical Restraint etc.) When undertaking development or planning of any kind, the School will consider safeguarding aspects.

The School's safeguarding arrangements are inspected by the Independent Schools Inspectorate (ISI) under the judgements for the quality of pupil's personal development and the effectiveness of governance, leadership and management. The School will conform to the National Minimum Standards for Boarding Schools.

The School's core safeguarding principles are:

- the School's responsibility to safeguard and promote the welfare of children is of paramount importance;
- safeguarding children is everyone's responsibility. Everyone who comes into contact with children and families has a role to play in keeping children safe;
- safer children make more successful learners;
- representatives of the whole School community will be involved in safeguarding policy development and review; and
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

Terminology

Safeguarding and **promoting the welfare of children** refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

Child protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Members of **staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

Child includes everyone under the age of 18. However our duty to promote the welfare and health and safety applies to all students in our care whether they are under or over the age of 18.

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

Child Protection Statement

Harrow School fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all the boys. We endeavour to provide a safe and welcoming environment where boys are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that boys receive effective support, protection and justice.

The procedures contained in this policy apply to all staff and governors and are consistent with those of the Harrow LSCB (http://www.harrowlscb.co.uk/guidance_and_procedures.aspx).

Safeguarding in Harrow School

This includes

- ensuring pupil health and safety;
- referring concerns or allegations about a child to the Local Authority promptly;
- bullying;
- all forms of abuse;
- harassment and discrimination;
- use of physical intervention;
- meeting the needs of pupils with medical conditions;
- providing first aid;
- drug and substance misuse;
- educational visits;
- intimate care;
- internet safety;
- issues which may be specific to a local area or population, for example gang activity; and
- school security.

Policy Principles

- The welfare of the child is paramount;
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection;
- All members of staff have equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- Boys and staff involved in child protection issues will receive appropriate support.

Policy Aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities;
- To ensure consistent good practice;
- To demonstrate the School's commitment with regard to child protection to students, parents and other partners;
- To contribute to the School's portfolio of safeguarding policies.

The School's Commitment

The School adopts an open and accepting attitude towards boys as part of its responsibility for pastoral care. We hope that boys and parents will feel free to talk about any concerns and see the School as a safe place when there are difficulties. Boys' worries and fears will be taken seriously. Boys are encouraged to seek help from members of staff.

Harrow School will therefore:

- Establish and maintain an ethos where boys feel secure and are encouraged to talk, and are listened to;

- Ensure that boys know that there are adults in the School, whom they can approach if they are worried or are in difficulty;
- Include in the curriculum activities and opportunities, which equip boys with the skills needed to stay safe from abuse and will develop resilience and realistic attitudes to the responsibilities of adult life;
- Ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies;
- Operate safe recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with the boys;
- Ensure that all staff are aware of how and when to act on concerns that they have and work in a safe and appropriate manner at all times.

Confidentiality

Harrow recognises that all matters relating to child protection are highly confidential. The Head Master or the Designated Safeguarding Lead will share that information on a 'need to know, what and when' basis. Concerns about individuals should never be discussed elsewhere, inside or outside the School unless in confidential meetings for that purpose.

3. SAFEGUARDING LEGISLATION AND GUIDANCE:

- Section 94 of the Education and Skills Act 2008 requires the Secretary of State to prescribe standards for independent educational institutions to safeguard the welfare, health and safety of children. The relevant standards are set out in the Education (Independent School Standards) Regulations 2014 (the ISS Regulations 2014).
- The statutory guidance ['Keeping Children Safe in Education'](#) (DfE, July 2015) is issued under the ISS Regulations 2014, section 175 of the Education Act 2002 and the Education (Non-Maintained Special Schools) (England) Regulations 2011; and is applicable to all schools in England and Wales. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children. Unless otherwise stated, 'school' in this guidance means all schools, whether maintained, non-maintained or independent, including academies and free schools, alternative provision academies and pupil referral units. **All members of staff are required to have signed a document to confirm that they have read and understood at least Part One of this guidance.**
- The [Teacher Standards 2012](#) state that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- The statutory guidance [Working Together to Safeguard Children](#) (DfE, March 2015) covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of children. It also provides the framework for LSCBs to monitor the effectiveness of local services, including safeguarding arrangements in schools.
- [Prevent Duty Guidance 2015](#): With effect from 1st July 2015 all schools became subject to a duty under Section 26 of the Counter-Terrorism and Security Act 2015 in exercising their functions "to have due regard to the need to prevent people from being drawn into terrorism". The School recognises that "safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm".

The NSPCC estimates that over half a million children are abused in the UK each year. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event, and it can increasingly happen online. Due to their day-to-day contact with

pupils, members of staff in schools and colleges are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that members of school staff are alert to the signs of abuse and understand the procedures for reporting their concerns. The School will act on identified concerns and provide early help to prevent concerns from escalating.

4. CHILD PROTECTION PROCEDURES

Providing early help is more effective in promoting the welfare of children than reacting later. We are aware that all our members of staff have a responsibility in school to identify the symptoms and triggers of abuse and neglect, to share information and work together to provide children and young people with the help they need.

KCSIE states that: 'Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.'

Sometimes a single traumatic event may constitute significant harm, such as poisoning or a violent assault. However, more often it is a compilation of significant events, both acute and longstanding, which can change or damage a child's physical and psychological development. Some children have a family and/or social circumstances where their health and development are neglected. For them it is the corrosiveness of long-term neglect, emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm.

Recognising abuse

To ensure that our boys are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm (for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler). Abuse may be committed by adult men or women and by other children and young people.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

Physical abuse

Physical abuse is any form of threatened or actual violence which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

Emotional abuse

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

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

This form of abuse may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The above categories are identified by the NSPCC, and definitions have been taken from [Working Together to Safeguard Children \(DfE July 2015\)](#).

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our counter-bullying procedures. House Masters keep records of bullying-type behaviour, which are submitted termly to the DSL. The School's [Counter-Bullying Policy](#) is annually reviewed and published to all boys at the start of each academic year. The Living Together Survey completed by all boys offers valuable insight into any trends in bullying-type behaviour and provides a means of monitoring the effectiveness of our policy, procedures and recent pastoral initiatives. The subject of bullying is addressed at regular intervals via the Health Education Programme, Remove and Fifth Form Choices Programme as well as the Sixth Form Way of Life and Peer Mentoring Scheme. If the bullying is particularly serious, or the counter-bullying procedures are deemed to be ineffective, the Head Master and the DSL will consider implementing child protection procedures.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that members of staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL.

It is the responsibility of all staff to report any and all niggling worries or concerns over safeguarding and welfare. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol; or
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is therefore essential that staff report their concerns. Staff do not need 'absolute proof' that a boy is at risk but should act on any hunches or worries in the knowledge that they will be supported in their safeguarding role. Reports made in good faith will always be dealt with in accordance with the School's [Whistleblowing Policy](#), regardless of outcome.

Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Taking action

Any child, in any family, in any school could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".

Key points for staff to remember for taking action are:

- in an emergency take the action necessary to immediately help the child, for example, call 999;
- report your concern to the DSL as soon as possible;
- do not start your own investigation;
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- complete a record of concern; and
- seek support for yourself, if you are distressed.

If you are concerned about a boy's welfare

There will be occasions when a member of staff may suspect that a boy may be at risk, but have no 'real' evidence. The boy's behaviour may have changed, his actions may reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, the member of staff must try to give the boy an opportunity

to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a close friend or relative has died, a grandparent is very ill. It is fine for staff to ask the boy if they are OK or if they can help in any way.

Staff should report their concerns to the boy's House Master. If the boy does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the boy, if the member of staff remains concerned, they should discuss their concerns with the DSL.

If a boy discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a boy talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the boy know that they must pass the information on – staff are not allowed to keep secrets and must never promise to do so. The point at which they tell the boy this is a matter for professional judgement. If they jump in immediately, the student may think that they do not want to listen. If left until the very end of the conversation, the boy may feel that he has been misled into revealing more than he would have otherwise.

During their conversations with the boys members of staff will:

- allow them to speak freely;
- remain calm and not overreact – the boy may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me';
- not be afraid of silences – members of staff must remember how hard this must be for the boy;
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the student's parent(s) think about all this;
- at an appropriate time tell the boy that in order to help them, the member of staff must pass the information on;
- not automatically to offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the boy for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but could be interpreted by the boy to mean that they have done something wrong;
- tell the boy what will happen next. The boy may agree to go to see the DSL or his House Master. Otherwise let the boy know that someone will come to see them before the end of the day;
- report verbally to the DSL, even if the boy has promised to do it by themselves;
- write up their conversation as soon as possible on the record of concern form and hand it to the DSL; and
- seek support if they feel distressed.

Notifying parents

The School will normally seek to discuss any concerns about a boy with their parents. This must be handled sensitively. The DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the School believes that notifying parents could increase the risk to the student or exacerbate the problem, advice will first be sought from Harrow Children's Services or the police.

Referral to Harrow Children's Services

The School may contact statutory agencies to seek advice about concerns before making a referral.

The DSL will make a referral to Children's Social Care, if it is believed that a boy is 'suffering or is at risk of suffering

significant harm'. The boy (subject to his age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the boy or issues of confidentiality pertain. Contact must be made immediately with Harrow Children's Services: First Response by telephone and follow this with written confirmation on the appropriate Inter-Agency Referral Form within 24 hours. There may be need for a subsequent referral to the Children's Services local to the boy's home, when not resident at Harrow.

Where the child's situation does not appear to be subsequently improving, staff will press for re-consideration by Children's Social Care services. Concerns should always lead to help for the child at some point.

We will contribute to any assessment as required, providing information about the child and his family. We will send a suitably senior member of staff to contribute to any strategy discussion or child protection conference, and work together to safeguard any child from harm in the future.

We understand that there are no absolute criteria on which to rely when judging what constitutes 'significant harm'. Harm is defined as ill treatment or impairment of health and development which may include impairment suffered from seeing or hearing the ill treatment of another. We understand that our LSCB procedures require us to consider the severity of the ill-treatment, which may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements.

Children with sexually harmful behaviour

Staff will be sensitive to the nature of relationships within a boarding setting and respond accordingly. It is important to recognise the potential for abuse by peers. With regards pupil-on-pupil abuse staff will refer such abuse to an external agency where there is a risk of significant harm. Allegations of pupil-on-pupil abuse will be referred directly to Children's Social Care.

Staff will be aware of harm caused by bullying and will use the School's counter-bullying procedures where necessary. However, there will be occasions when a boy's behaviour warrants a response under child protection rather than counter-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex. The School will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Members of Staff, who become concerned about a boy's sexual behaviour, should speak to the DSL as soon as possible.

Sexual exploitation of children

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All members of staff are made aware of the indicators of sexual exploitation in their safeguarding training and any concerns should be reported immediately to the DSL.

Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the boy and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Members of staff should only discuss concerns with the DSL or a Deputy, the Head Master, Deputy Head or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following a number of highly publicised cases where senior leaders in schools failed to act upon concerns raised by staff, *'Keeping Children Safe in Education' (DfE, July 2015)* emphasises that any member of staff can contact their local Children's Services (here, Harrow Children's Services), if they are concerned about a child.

Child protection information will be stored and handled in line with Data Protection Act 1998 principles. Information is:

- processed for limited purposes;
- adequate, relevant and not excessive;
- accurate;
- kept no longer than necessary;
- processed in accordance with the data subject's rights; and
- secure.

Child Protection Records and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access, and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage. Child protection information will be stored separately from the boy's and the file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act. This means that students and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Head Master.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

The School's ['Confidentiality & Information Sharing Policy'](#) is available to parents and boys on request.

Reporting directly to child protection agencies

Members of staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with Harrow Children's Services or the NSPCC if:

the situation is an emergency and the Designated Safeguarding Lead, his deputy, the Head Master and the Chair of Governors are all unavailable;

they are convinced that a direct report is the only way to ensure the boy's safety; or

for any other reason they make a judgement that direct referral is in the best interests of the boy.

Children and families requiring additional support

As distinct from cases where a child has suffered or is likely to suffer significant harm, where children and families need support from agencies beyond our School, we will respond according to our LSCB procedures to ensure there is an inter-agency assessment, including use of the 'Common Assessment Framework' (CAF) or the 'Team around the Child' (TAC) approaches as appropriate. The CAF will help us to identify what the child needs to prevent the need for statutory assessment under the Children Act 1989. We will liaise closely with the LSCB, including acting as lead professional to co-ordinate support, with the agreement of the child and their parent/carer(s), and in accordance with local children's social care procedures.

5. PREVENT DUTY AND FGM

The Prevent Duty is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. The Prevent Duty Department of Education advice for schools and childcare providers, June 2015, states that, 'School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Members of Staff, who have concerns about a pupil, will make these concerns known to the DSL at the earliest opportunity. The DSL will then make a judgement as to whether or not it is appropriate to make a referral, through Harrow's Multi Agency Safeguarding Hub (MASH) to the **Channel programme**.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Signs of vulnerability:

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are number of signs that together increase the risk. Signs of vulnerability include:

- underachievement
- being in possession of extremist literature
- poverty
- social exclusion
- traumatic events
- global or national events
- religious conversion
- change in behaviour
- extremist influences
- conflict with family over lifestyle
- confused identify
- victim or witness to race or hate crimes
- rejection by peers, family, social groups or faith

Recognising Extremism:

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent)
- secretive behaviour
- online searches or sharing extremist messages or social profiles

- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Non-emergency advice for staff is available via DfE's telephone helpline 020 7340 7264 and by email at counter-extremism@education.gsi.gov.uk.

Female Genital Mutilation (FGM):

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures. FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

Members of staff recognise the possibility that a pupil may disclose information relating to a sibling or close friend who has suffered abuse in the form of FGM. Members of Staff are alert to the mandatory reporting requirement for suspected cases of FGM, which became a statutory duty from October 2015.

6. ROLES AND RESPONSIBILITIES

Professional expectations

Everyone who comes into contact with our children and their families has a role to play in safeguarding children. We place a high priority on identifying concerns early and provide help for children, to prevent concerns from escalating. We do this because we are acutely aware that we play a vital role in the wider safeguarding system for children. Together with our colleagues in the police, health and other children's services, we promote the welfare of children and protect them from harm.

All our staff are aware that [Teacher Standards 2012](#) states that teachers, including Heads, should safeguard children's well-being and maintain public trust in the teaching profession as part of their professional duties. These standards also apply to trainees, inductees and Newly Qualified Teachers and we fully adhere to these standards with rigour; applying our school disciplinary procedures, where appropriate, in cases of misconduct.

The Designated Safeguarding Lead (DSL)

- has the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff;
- receives updated child protection training at least every two years;
- acts as a source of support and expertise to the School community;
- encourages a culture of listening to boys and taking account of their wishes and feelings;
- is alert to the specific needs of children in need or those with Special Educational Needs;
- has a working knowledge of Harrow LSCB procedures;
- has been trained in the Prevent Duty and how to make referrals to Harrow's MASH (Multi-Agency Safeguarding Hub) or Channel;
- has an understanding of locally agreed processes for providing early help and intervention;
- keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from the boy's general file;
- immediately refers cases of suspected abuse to Harrow Children's Services or the Police as appropriate;
- where students leave the School, ensures the child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file;
- attends and/or contributes to child protection conferences;
- coordinates the School's contribution to child protection plans;
- develops effective links with relevant statutory and voluntary agencies including the Harrow LSCB;

- ensures that all staff sign to indicate that they have read and understood the Child Protection Policy;
- ensures that the Child Protection Policy is regularly reviewed and updated annually;
- liaises with the Nominated Governor and the Head Master as appropriate;
- ensures that a record of staff attendance at child protection training is kept;
- makes the Child Protection Policy available publicly, on the School's website or by other means;
- ensures parents are aware of the School's role in safeguarding and that referrals about suspected abuse and neglect may be made;
- in the Head Master's absence, ensures cases concerning a member of staff are referred appropriately to the Local Authority Designated Officer (LADO) and/or the Disclosure and Barring Service (DBS); and
- submits an annual report to the Governing Body about how the School's duties have been carried out. Any reported weaknesses will be rectified by the DSL without delay.

Deputy Designated Safeguarding Lead (DDSL)

- The DDSL must be appropriately trained in child protection at least every two years. In the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of the boys.
- the DDSL must have the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff.
- in the event of the long-term absence of the designated person, the DDSL will assume all of the functions as for the DSL, above.

The Governing Body

- will appoint a Governor for child protection who will undertake training in inter-agency working, in addition to basic child protection training;
- will ensure that the School has a Designated Safeguarding Lead (DSL), whose role is explicit in the role holder's job description;
- will ensure that the School has a child protection policy and procedures, including a staff code of conduct, that are consistent with LSCB and statutory requirements, reviewed annually and are signed off by the Chairman of Governors;
- will ensure that the School's child protection policy and procedures are made available publicly on the School's website or by other means;
- will ensure that the School has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head Master and allegations against other children;
- will ensure that the School follows safer recruitment procedures that include statutory checks on staff suitability to work with children;
- will ensure that the School develops a training strategy that ensures all staff, including the Head Master, receive information about the School's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated in line with any requirements of the LSCB.
- will ensure that the School makes all temporary staff and volunteers aware of the School's arrangements for child protection;
- will ensure that the School contributes to inter agency working and plans;
- will ensure that the School provides a coordinated offer of early help when additional needs of students are identified;
- will ensure that the School considers how students may be taught about safeguarding, including online, as part of a broad and balanced curriculum; and
- will address and rectify without delay any deficiencies or weaknesses in the School's child protection and safeguarding policy and procedures, which are brought to the attention of the Governing Body.

The Governing Body nominates a member (normally the Chair) to be responsible for liaising with the local authority and other agencies on strategic issues of child protection, and in the event of an allegation being made against the Head Master or a member of the Governing Body.

It is the responsibility of the Governing Body to ensure that the School's safeguarding, recruitment and managing allegations procedures are in accordance with the ISS Regulations and LSCB and national guidance.

The Head Master

- ensures that the Child Protection Policy and Safeguarding Procedures are implemented and followed by all staff;
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings;
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures;
- ensures that boys are provided with opportunities throughout the curriculum and in Health Education to learn about safeguarding, including keeping themselves safe online;
- liaises with the Local Authority Designated Officer (LADO) where an allegation is made against a member of staff or of the Governing Body; and
- ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.

The Pastoral Support Committee

- will include in its membership the DSL and his Deputy;
- will be chaired by the Deputy Head Master and also comprise the School Chaplains and School Counsellor/ Psychologist, who will review or raise Child Protection or Safeguarding issues as part of their work;
- will help to coordinate arrangements for the longer-term protection and support of each boy who has made allegations of abuse, or is alleged to have suffered from abuse, taking his wishes into account;
- will make arrangements where feasible for any boy who has been the subject of abuse to receive necessary counselling and support by agreement with his parents, where appropriate;
- will support any boy who is subject to a Child Protection Plan; and
- will ensure through a House Master that appropriate support and safeguards are in place together with a Care Plan.

Residential Boarding Staff (House Masters, Matrons and Assistant House Masters)

All residential staff, principally House Masters, Matrons and Assistant House Masters will be trained to Level II in multi-agency safeguarding procedures, including multi-agency working with Harrow LSCB.

Harrow recognises that, as a full boarding school, House Masters, Assistant House Masters and Matrons are likely to be on the frontline in terms of safeguarding and child protection.

House Masters, Assistant House Masters and Matrons will report all child protection and safeguarding concerns immediately to the DSL.

Harrow has a procedure for dealing with a lost or missing boy. A House Master or a duty member of the boarding staff is most likely to deal with such instances. The procedure is contained in the [House Masters'](#) and [Masters'](#) Handbooks.

Senior Boys in positions of responsibility

Senior boys who hold positions of responsibility over other boys (e.g. School or House Monitors) will be briefed on appropriate action to take should they have concerns or receive any allegations of abuse.

Peer Mentoring Training for boys in the Lower Sixth will be facilitated in Houses to enhance awareness and empower senior boys in carrying out their pastoral responsibilities.

School Doctors and Medical Centre Staff

The Medical Centre will hold copies of [Working together to Safeguard Children](#) (DfE March 2015) and [Keeping Children Safe in Education](#) (DfE July 2015) and have its own protocols for recognising and acting upon signs of

child abuse. These will include [RCN Safeguarding children and young people 2014](#).

Nurses will work in accordance with the [Nursing & Midwifery Council's Code of Conduct](#). They will liaise closely with the DSL and other members of the School's Safeguarding Team.

The School Doctor will have his own legal and contractual obligations to report the same, either to the Head Master or, if necessary, to Harrow Children and Family Services in accordance with the London Area Safeguarding Boards' procedures. Medical Centre staff will be invited to participate in any School INSET concerned with the welfare and protection of boys.

7. GOOD PRACTICE GUIDELINES AND STAFF CODE OF CONDUCT

To meet and maintain our responsibilities towards the boys we will agree standards of good practice, which will be published as professional guidelines in the relevant handbooks. These include guidelines on physical contact, use of reasonable force, visiting boys' rooms and other sensitive areas, language, searching and confiscation, when and where to meet boys, alcohol, social events, communications, use of sanctions, bullying and psychological abuse, favouritism, gifts and hospitality.

Members of staff are expected to follow the guidance given in the document '[Guidance for Safer Working Practice for Adults who Work with Children and Young People](#)' (DfE 2009) and [Working Together to Safeguard Children](#) (DfE March 2015).

Good practice includes:

- treating all boys with respect;
- setting a good example by conducting themselves appropriately;
- involving boys in decisions that affect them;
- encouraging positive, respectful and safe behaviour among boys;
- being a good listener;
- being alert to changes in boys' behaviour and to signs of abuse and neglect;
- recognising that challenging behaviour may be an indicator of unhappiness or abuse;
- reading and understanding the School's Child Protection Policy and guidance documents on wider safeguarding issues, including: Counter-Bullying, Behaviour, Expeditions, E-Safety, First Aid, Health & Safety, Confidentiality & Information-sharing, Drugs & Legal Highs;
- asking the boys' permission before initiating physical contact, physical support during PE, touching during music lessons for the purposes of demonstration or administering first aid;
- maintaining appropriate standards of conversation and interaction with and between boys and avoiding the use of sexualised or derogatory language;
- being aware that the personal and family circumstances and lifestyles of some boys may lead to an increased risk of abuse;
- applying the use of reasonable force only as a last resort and in compliance with the School policy on [Reasonable Force](#) and LSCB procedures;
- referring all concerns about a boy's safety and welfare to the DSL, or, if necessary directly to police or Harrow Children's Services;
- following the School's rules with regard to communication with boys and use of social media and online networking;
- following the School's policy on Screening and Searching students; and
- following the School's [Transport Policy](#).

8. ABUSE OF TRUST

All members of staff are aware that inappropriate behaviour towards boys is unacceptable and that their conduct towards the boys must be beyond reproach.

In addition, members of staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have any kind of sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the School staff and a boy under 18 would be a criminal offence, even if that student is over the age of consent.

9. CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

Some boys may be at an increased risk of abuse. It is important to understand that this increase in risk is more likely due to societal attitudes and assumptions, and failures to acknowledge boys' diverse circumstances, rather than the individual's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that our boys receive equal protection, we will give special consideration to boys who are:

- disabled or have special educational needs;
- young carers at home during Exeats and holidays;
- living in a domestic abuse situation;
- affected by parental substance misuse;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- live transient lifestyles;
- living in chaotic and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
- involved directly or indirectly in sexual exploitation; or who
- do not have English as a first language.

This list provides examples of particularly vulnerable groups but is not exhaustive.

10. MISSING BOYS

The School will follow its robust procedures for registration and attendance to ensure the safety of the boys and to carry out its duty of care. The School recognises that a child going missing from education could be a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. Therefore members of staff will respond promptly to absences and follow the School's [Missing Boy procedures](#) as appropriate. The DSL, through the House Masters, will monitor any unauthorised absence at the start or end of any leave period, and will be particularly cautious if a boy goes missing on repeated occasions.

The School recognises the duty to inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

The Governing Body recognises that it should put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

11. HELPING BOYS TO KEEP THEMSELVES SAFE

Boys are taught to understand and manage risk through numerous programmes (for example Counter-Bullying Workshops, Health Education, Choices Programme, *Way of Life* Programme, Peer Mentoring, lectures and seminars) and through all aspects of their life at the School. Boys are encouraged to think about risks they may encounter and to work out how such risks can be overcome. These discussions are empowering and enabling. They aim to promote sensible behaviour rather than fear or anxiety. Boys are taught how to conduct themselves in a safe and responsible manner. They are also regularly reminded about E-Safety and counter-bullying procedures. The School continually promotes an ethos of care and respect for others. Boys are encouraged to speak to a member of staff in confidence about any worries they may have.

The School conducts an annual *Living Together Survey*, which helps to inform our pastoral strategies as well as shedding light upon areas of concern or specific trends in behaviour. The boys' completed forms are collated and analysed independently. The Director of Boarding discusses findings with individual House Masters, who cascade back to their Houses. The Pastoral Support Committee analyses the data from a school-wide perspective. A statement of primary findings is provided by the Head Master to boys and members and staff collectively as well as the Governing Body.

12. SUPPORT FOR THOSE INVOLVED IN A CHILD PROTECTION ISSUE

Child abuse is devastating for the child. It can also result in distress and anxiety for staff who become involved.

The School will support boys, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person (normally the DSL) who will keep all parties informed and be the central point of contact;
- where a member of staff is the subject of an allegation made by a boy, separate (independent) link people will be nominated to avoid any conflict of interest and appropriate support provided for him or her;
- responding sympathetically to any request from boys or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of help lines, counselling or other avenues of external support;
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures; and
- cooperating fully with relevant statutory agencies.

13. COMPLAINTS PROCEDURE

The School's complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that does not initially reach the threshold for child protection action. Examples of poor practice include unfairly singling out a pupil or attempting to humiliate them, bullying or belittling a pupil or discriminating

against them in some way. Such complaints are managed by Heads of Department, House Masters, members of the Senior Management Team, and Governors.

Complaints from staff are dealt with under the School's Complaints and Disciplinary and Grievance procedures for the relevant contractor.

14. IF A MEMBER OF STAFF HAS CONCERNS ABOUT A COLLEAGUE

A member of staff who is concerned about the conduct of a colleague towards a boy is undoubtedly placed in a difficult situation. He or she may worry that they have misunderstood the situation and will wonder whether a report could jeopardise a colleague's career. However, all staff must remember that the welfare of the child is paramount. The School's [Whistleblowing Policy](#), which is available on the School's intranet, enables members of staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Head Master.

Complaints about the Head Master should be reported to the Chair of Governors.

Staff may also report their concerns directly to Harrow Children's Services or the police, if they believe direct reporting is necessary to secure action.

15. ALLEGATIONS AGAINST STAFF

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals can pose a serious risk to the boys and we must therefore act on every allegation. Members of staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

- Allegations against staff – including the DSL or DDSL – should be reported to the Head Master. If the Head Master is absent, allegations against all staff should be reported to the Chairman of Governors.
- Allegations against the Head Master or a member of the Governing Body should be reported to the Chairman of Governors.
- Staff may also report their concerns directly to police or Harrow Children's Services, if they believe direct reporting is necessary to secure action.

See Appendix 2 for full details of the School's policy for managing allegations against staff.

The full procedures and statutory guidance for dealing with allegations against staff can be found in '[Keeping Children Safe in Education](#)' (DfE, July 2015).

16. STAFF TRAINING

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

- New staff and governors will receive an explanation during their induction, which includes the School's child protection and safeguarding policy and procedures, reporting and recording arrangements, professional guidelines in the various staff handbooks, contact details for the DSL and a copy of Part One of KCSIE;
- All staff, including the Head Master and governors will receive training that is regularly updated, in line with advice from the LSCB and must read at least Part One of KCSIE;
- The DSL and DDSL will receive child protection training updated at least every two years, including training in inter-agency procedures;
- Temporary staff and volunteers in regulated activity will have regular child protection training;
- Visitors and visiting staff will be supervised by a member of the School staff at all times;
- All staff supplied by other bodies will be made aware of the School's procedures, policy and the contact details of the DSL and his deputies.

17. SAFER RECRUITMENT

The School endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in *'Keeping Children Safe in Education' (DfE, July 2015)* together with information provided by Harrow LSCB (see http://www.harrowlscb.co.uk/safer_recruitment.aspx) and the various procedures pertaining to contractors, PFI partners etc.

Safer recruitment means that all applicants will:

- complete an application form which includes their employment history;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children;
- provide evidence of identity and qualifications;
- be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role;
- include prohibition checks with the NCTL for teaching staff;
- provide evidence of their right to work in the UK; and
- be interviewed.

Safer recruitment also means that the School will ensure that:

- the candidate's mental and physical fitness to carry out their work responsibilities is verified;
- at least one member of each recruitment panel will have attended safer recruitment training;
- all new members of staff undergo an induction that includes familiarisation with the School's Child Protection and Safeguarding Policy and Procedures and identify their child protection training needs;
- all staff sign to confirm they have received a copy of the Child Protection and Safeguarding Policy and Procedures; and
- written confirmation is obtained from supply agencies that agency staff have been appropriately checked.

Full details of the School's recruitment procedures are to be found in the [Safer Recruitment Policy](#).

Volunteers

Volunteers, including governors, will undergo checks commensurate with their work in the School and contact with the boys.

Supervised volunteers

Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe

recruitment checks appropriate to their role, in accordance with the School's risk assessment process and statutory guidance.

Contractors

The School checks the identity of all contractors working on site and requests DBS checks where appropriate.

18. SITE SECURITY

Harrow School is an open site occupying nearly 400 acres across Harrow Hill. All members of the School's community are required to take responsibility for site security and remain vigilant about trespassers. The School's Security Department provides oversight of the site and can be contacted 24/7 in the event of an emergency.

Visitors to the School, including contractors, are required to sign in at one of the authorised locations, the main one being the Reception at 5 High Street (The Bursary). Subject to their position and purpose, visitors are escorted or given a lanyard, which confirms they have permission to be on site.

All visitors are expected to observe the School's safeguarding and health and safety regulations to ensure that boys in the School are kept safe.

Road Safety

The Head Master regularly reminds the School in Speech Room about the importance of Road Safety, especially when winter timetable begins and boys are travelling between lessons in the darkness.

The Deputy Head designates appropriate crossing points on High Street as well as permitted access routes to the town. House Masters reinforce the message to boys that they should show respect to drivers and other pedestrians. The Security Department supervise the main crossing places during key moments in the daily routine.

19. THIRD PARTY USE AND OFF-SITE ARRANGEMENTS

Procedure for third party users of the School facilities

The School's facilities, particularly sporting facilities, may be hired by Third Party Users (TPUs), including children's clubs and under these arrangements the School has no control over, and assumes no liability for the conduct of individuals from TPUs. However, the School will ensure, as far as it is able, that TPUs have appropriate child protection and safer recruitment procedures in place. TPUs are also made aware of the School ground areas which are out of bounds.

TPUs will be required to provide the School with a copy of the organisation's Child Protection Policy prior to approval being given for their use of the School's facilities and all TPUs providing activities, which involve children, will be required to sign a declaration to confirm that:

- the TPU has a child protection policy in place;
- safer recruitment procedures are followed for the TPU's staff and volunteers; and
- all staff and volunteers are appropriately trained in child protection and safeguarding procedures.

The Head Master or the DSL will be informed of any child protection allegation or incident which takes place on the School premises during use by that organisation.

Procedure for dealing with an allegation of abuse by an individual of an third party user using the School's facilities

If an allegation of abuse is made about an adult in a TPU, the organisation's Safeguarding Officer must notify the Head Master or the DSL on the same day as the incident occurred or the disclosure was made, or as soon as possible. The School expects the TPU to follow its own Child Protection Policy and the Head Master will require confirmation that appropriate action has been taken before further use of the School's facilities will be allowed.

External organisations who have responsibility for boys on another site

When our boys attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place, as outlined in the School's [Expeditions Policy](#).

Boys staying with host families

The School may sometimes make arrangements for boys to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the School follows the guidance in '[Keeping Children Safe in Education](#)' (DfE, [July 2015](#)). Annex C to ensure that hosting arrangements are as safe as possible.

20. PHOTOGRAPHY AND IMAGES

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect our boys we will:

- seek parental consent for photography of our students through the School's Terms & Conditions;
- demonstrate respect, care and caution when including photographs of boys in Newsletters, House Blogs and any other School publication; and
- encourage boys to tell us if they are worried about any photographs that are taken of them.

21. E-SAFETY

Our boys increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The Prevent Duty requires the School to safeguard vulnerable individuals from being radicalised or drawn into extremism through the internet or social media.

The School's e-safety policy is incorporated in the [Pupil ICT Acceptable Use Policy](#), and [Pupil ICT Acceptable Use Policy Wi-Fi Version](#), which can be found in The Bill Book and on the School's Intranet. This explains how we try to keep boys safe in School. Cyber-bullying and sexting by boys, via texts and emails, will be treated as seriously as any other bullying-type behaviour and will be managed through our counter-bullying procedures.

The following measures are in place to promote e-safety within the School:

- **ICT Acceptable Use Policy** - protects all parties by clearly stating what is acceptable and what is not. Boys are expected to sign up to this at the start of each academic year and before access can be given to the School's ICT facilities.
- **Induction and Education** - all boys are inducted in appropriate use of the School's ICT facilities and other aspects of this policy upon arrival. Subsequently Tutors remind boys at the start of each academic year about their obligations and code of conduct. This is reinforced by a presentation in Houses about E-Safety. Further information and advice is made available on the School's [Caring for each other](#) Intranet site.

- **Monitoring** -the School will exercise its right to monitor the use of computer systems, including the monitoring of internet use, interception of e-mails and the deletion of inappropriate materials at all times. In circumstances where the School believes unauthorised use of the computer system is, or may be taking place, or the system is, or may be, being used for unlawful purposes, the School reserves the right to inform appropriate authorities and provide documentary evidence. The computer network is owned by the School and may be used by boys to advance and extend their knowledge and understanding.

Members of Staff also receive advice regarding the use of social networking and electronic communication with boys, which follows the guidance given in the document '[Guidance for Safer Working Practice for Adults who Work with Children and Young People](#)' (DfE March 2009).

This means that staff should:

- ensure that personal social networking sites are set at private and boys are never listed as approved contacts
- never use or access social networking sites of boys;
- avoid giving their personal contact details to boys, including their mobile telephone number, except for specific safety purposes on expeditions;
- only use equipment e.g. mobile phones, provided by the School to communicate with boys;
- only make contact with boys for professional reasons and in accordance with the School's policy;
- recognise that text messaging should only be used as part of an agreed protocol and when other forms of communication are not possible; and
- not use internet or web-based communication channels to send personal messages to boys.

APPENDIX 1: INFORMATION FOR PARENTS

Child Protection: Safeguarding Students – Information for Parents

Harrow School aims to safeguard and promote the welfare of the boys in its care and protect them from serious harm. This applies to the boarding environment and all the activities the School undertakes. Staff and volunteers are vetted for their suitability to work with children prior to appointment. They receive training in safeguarding and child protection. They will report any concerns in accordance with official local safeguarding procedures. The School has a Child Protection and Safeguarding Policy, which is regularly reviewed and this is available on the School's website.

It is important for parents to be aware that:

- Staff and volunteers in the School have a duty to report concerns about a child, whether this means the child may be in need of additional support or help of some kind or whether it is thought that a child may have been abused or be at risk of harm. There are four categories of abuse: physical, sexual, emotional, neglect.
- In some cases the School is obliged to refer cases to Harrow Children's Services (or to the Children's Services local to that particular family), so that a boy's needs are assessed and to consider whether an investigation into possible child abuse is required. In many cases there will already have been discussions between the School and the parents of a boy, and the situation and concerns will not come as a surprise to the parents. However, parents may not be told that the School has referred their child to Harrow Children's Services (or the Children's Services local to that family) if it is thought that this might either put the boy at risk or it is in the best interests of the boy for the parents not to be told.
- Harrow Children's Services endeavours to carry out its enquiries in a sensitive fashion. It has to gather information and generally it can be open with parents about the steps being taken.
- If you think your son may have been abused you can contact Harrow Children's Services on 020 8901 2690 or call Children's Services in your local area. If you think the abuse may have happened in School (or during expeditions or extra-curricular activities), you should contact the DSL, who is Mr Andrew McGregor (Senior

Tutor). If the allegation of abuse involves a member of staff you should contact the Head Master directly, or if the Head Master himself is involved, the Chairman of the Governing Body should be contacted (details are available on the School's website).

- If members of the School's staff need to express concerns about a child or refer a child to Children's Social Care, it is understood that this can cause distress for the child's parents. It is important that all parties – parents and members of the School's staff – try to discuss these matters as calmly and sensibly as possible.
- School Monitors are given basic training in Child Protection at the start of the academic year. There is also a programme of Peer Mentoring available to members of the Lower Sixth.

APPENDIX 2: ALLEGATIONS AGAINST STAFF

Process for dealing with allegations against staff (including the Head Master), volunteers and others (including governors), who are in contact with boys in the School

(References to staff in this policy include all staff employed at Harrow School, part-time staff, contractors, volunteers and peripatetic staff)

Relevant DfE and LSCB guidance

- *Working Together to Safeguard Children 2015*
- *Keeping Children Safe in Education 2015*

Reporting concerns

It is essential that any allegation of abuse made against a teacher, another member of staff, member of the Governing Body or a volunteer at Harrow School is dealt with quickly, and in a fair and consistent way that provides effective protection for the child(ren) and at the same time supports the individual who is the subject of the allegation.

All staff and volunteers should know how to recognise and report concerns or allegations and should understand what to do if they have such concerns personally or hear an expression of such concerns or allegations against colleagues.

On hearing an allegation or concern about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided and inappropriate guarantees of confidentiality should not be given. Rather, the child should be told the matter will be referred in confidence to the appropriate people in positions of responsibility. An accurate written record should be made for this purpose.

All allegations, concerns or niggling worries about members of staff (including the DSL and DDSL) must be reported without delay to the Head Master. All allegations against the Head Master or a member of the Governing Body must be reported without delay to the Chairman of Governors. Following this, the Head Master or the Chairman of Governors (as appropriate) will notify the DSL (or if the DSL is the subject of the allegation the DDSL) and will report immediately to the LADO (see 2 below).

It is vital that expressions of concern that do not necessarily amount to 'allegations' are reported, particularly if there are repeated reports of such concerns and/or questionable conduct. It may be the concern you express has been raised by another party. If there are repeated reports of such concerns and/or questionable conduct, a pattern of unacceptable behaviour may be identified.

Allegations against an ex-member of staff no longer working at Harrow School should be referred to the police.

This procedure will be used in all cases in which there is an allegation or suspicion that a person working with or who is in contact with boys has:

- **behaved in a way that has harmed a child, or may have harmed a child;**
- **possibly committed a criminal offence against or related to a child; or**
- **behaved towards a child or children in a way that indicates she or he would pose a risk of harm if he or she worked closely with children.**

These criteria should be considered in the context of four categories of abuse (i.e. physical, sexual and emotional abuse and neglect – as described in section 4 of the Child Protection and Safeguarding Policy, above). These include concerns relating to inappropriate relationships between members of staff and boys; for example:

- Having a sexual relationship with a child if in a position of trust in respect of that child, even if consensual (ss. 16-19 Sexual Offences Act 2003);
- 'Grooming' (i.e. meeting a child aged under 16 with intent to commit a relevant offence (s.15 Sexual Offences Act 2003);
- Other 'grooming' behaviour rising to concerns of a broader safeguarding nature (e.g. inappropriate text/email messages or images, gifts, socialising etc.); or
- Possession of indecent photographs/pseudo-photographs/videos of children.

Staff, parents and members of the Governing Body are reminded not to investigate the matter themselves; not to make assumptions or offer alternative explanations for behaviours; or to promise confidentiality to the alleged victim(s).

The publication of material that may lead to the identification of a member of staff who is the subject of an allegation is prohibited by the Education Act 2011. 'Publication' includes verbal conversations or writing, including content placed on social media sites. Harrow School will comply with the provisions of the Act at all times.

Checklist of Immediate Reporting Actions

Procedure for Individual members of Staff/Volunteers/Other Adults

- Write a dated and timed note of what has been disclosed or noticed, said or done.
- Report immediately the information to the Head Master or in his absence the Deputy Head Master.
- Pass on the written record.
- If the suspicion or allegation of abuse is against the Designated Child Protection Officer, the information must be taken to the Head Master.
- The Chairman of Governors deals with allegations of abuse made against the Head Master, in liaison with the LADO.

Procedure for the Head Master

- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- Notify the Chairman of Governors and LADO on the same day.
- The Head Master may ask to clarify details or circumstances of the allegation, but this must not amount to an investigation.
- Copies of the documents concerning the allegation must be sent to the LADO (Local Authority Designated Officer) on the same day.
- Report to Harrow LSCB in relevant cases, on advice of the LADO.
- On-going involvement in cases: liaison with the LADO and co-operation with the investigating agencies as appropriate; consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.

Chairman of Governors (only relevant in case of an allegation against the Head Master)

- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- Notify the Local Authority Designated Officer (LADO) the same day.
- The Chairman of Governors may ask to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
- Copies of the documents concerning the allegation must be sent to the Local Authority Designated Officer on the same day.
- Report to Harrow LSCB in relevant cases, on Local Authority Designated Officer's advice; in cases concerning a Head Master, the report to Harrow LSCB may sometimes be undertaken by the LADO on behalf of the Chairman of Governors, following discussion.
- On-going involvement: liaison with the LADO and co-operation with the enquiries of investigating agencies as appropriate; consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.

How allegations will be managed

Initial action

Decisions about course of action would be taken on a case by case basis, bearing in mind the paramount importance of the safety of any child(ren) involved but also remembering that the member of staff, against whom an allegation has been made, has the right to remain anonymous and to expect any allegations to be investigated as expeditiously as possible. Any course of action would be subject to a risk assessment. Decisions would also follow the guidance of the LADO and/or police.

Upon receiving an allegation or concern about a staff member, the case manager (whether this be the Head Master or the Chairman of Governors) will immediately discuss the allegation with the LADO. The purpose of an initial discussion is for the LADO and the case manager to consider the nature, content and context of the allegation and agree a course of action. In the process of this liaison, the case manager and LADO will:

- share what information is available, both from the source of the allegation and also from Personnel files;
- identify what other information might be needed;
- consider whether the alleged perpetrator should continue working or remain in contact with the boys;
- consider whether suspension is appropriate advice to the School on this aspect;
- decide what information and/or advice is to be given to the Head Master (or Nominated Governor, if the allegation is about the Head Master), including whether the member of staff should be informed of the allegation at this stage; and
- decide what action is needed, and who needs to be involved and informed (including the DBS and/or Teaching Agency).

Strategy Meeting

If the parties involved in these discussions consider it necessary, a Strategy Meeting is arranged, usually by Social Services, which will involve representatives from the LADO, the police and the School (e.g. the Head Master, DSL or Chairman of Governors, as appropriate).

From the above discussions, there are three possible courses of action:

- It may be the subject of a police and/or joint police and Social Services investigation and possible action through the courts; or
- It may be the subject of a disciplinary investigation; or
- The matter may be remitted to the School to be dealt with.

The following definitions will be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;

- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

If Social Services and the police decide to take no action, the School will still need to consider what further investigation is necessary. If there is a case to answer, a disciplinary hearing will be called, which could lead to dismissal.

Case subject to police investigation

Where a criminal investigation has taken place and either (i) a trial has resulted, (ii) the investigation has been closed without charge or (iii) a decision has been taken not to prosecute a case after charge, the case manager will discuss with the LADO what, if any, further action is required as regards the member of staff concerned and the sharing of information obtained by the agencies involved in assisting any further action to be taken by the School.

Disciplinary investigation

Where a disciplinary investigation is required the investigation should be conducted in accordance with the School's Disciplinary Procedure.

Wherever possible the person will be given a full opportunity to answer the allegation and make representations about it. The process of investigating the allegation, and reaching a judgment about whether it is substantiated will continue, even if the person does not cooperate.

Suspension is never a default option and we will consider all other options before suspending a member of staff. We would only suspend someone if there was no reasonable alternative.

If the suspension concerned a member of staff living away from the immediate possibility of contact with boys, he or she could remain within their School accommodation but under carefully managed conditions and guidelines.

If the suspension concerned a member of staff normally resident in a boarding house, accommodation would be found for them elsewhere, if they did not have their own accommodation away from the Hill.

'Settlement agreements' (by which contract a person agrees to resign, the School agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference), will not be used in these cases. In any event, such an agreement would not prevent a thorough police investigation where that is appropriate.

Allegations against pupils

A boy against whom an allegation of a child protection nature has been made may be suspended from the School during the investigation. The School's policy on behaviour, discipline and sanctions will apply.

Pupil-on-pupil abuse will be referred to an external agency where there is a risk of significant harm. Allegations of pupil-on-pupil abuse will be referred to Children's Social Care.

The School will follow advice on the investigation of such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved, including the boy or boys accused of abuse.

If it is necessary for a boy to be interviewed by the Police or other authorities in relation to allegations of abuse, the School will ensure that, subject to advice from external agencies, parents are informed as soon as possible and that the boy is supported during the interview by an appropriate adult.

Supporting those involved

Our procedures will be managed with common sense and sound judgement throughout. Cases may not meet the criteria in 1 above, and indeed may not require either a police investigation or further enquiries by the Harrow LSCB. In such situations, we will resolve the matter as quickly as possible. Where more appropriate, we may use our School's Complaints Procedure instead.

As an employer, the School has a duty of care to its employees. We provide effective support for anyone facing an allegation and provide our staff member with a named contact if they are suspended. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that it is likely to be prejudicial to the gathering and presentation of evidence.

Rarely, some allegations may be so serious that we may need to ask for immediate intervention by Harrow LSCB and/or police. If this is the case, and we believe the above criteria are likely to be met, the DSL or Head Master will inform the LADO of such allegations immediately and keep the Chairman of Governors fully informed.

Parent/carer(s) of a child or children involved will be told about the allegation if appropriate as soon as possible, if they do not already know of it. They will also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution. However, where a strategy discussion is required, or police or Harrow LSCB need to be involved, this should not take place unless or until those agencies have been consulted and have agreed what information can be disclosed to the parent/carer(s). That includes the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parent/carer(s) of the child will be told the outcome.

Action upon conclusion of a case

The School will refer to the DBS (following consultation with the LADO) any person whom has been removed from working (paid or unpaid) in regulated activity, or would or might have been so removed had they not resigned or left of their own accord, and it believes the person may have harmed, attempted to harm, incited another to harm or put a child at risk of harm or if there is reason to believe the person may have committed one of a number of offences listed under the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. See KCSIE 2014 for a link to this list of offences. 'Removal from working' for these purposes will include dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation or voluntary withdrawal from any of the above.

In cases where it is decided on the conclusion of the case that a person who has been suspended can return to work, the School will consider how best to facilitate this. The School appreciates that most people would benefit from some help and support when returning to work after a very stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The School will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the School.

If an allegation is determined to be false, the case manager may refer the matter to children's social care to determine whether the boy concerned is in need of services, or may have been abused by someone else.

In the event that an allegation is shown to have been deliberately invented or malicious, the Head Master will consider whether any disciplinary action is appropriate against the boy who made it. This may include permanent exclusion from Harrow School.

A referral will be made to the National College for Teaching and Leadership (NCTL) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

The School will make a serious incident report to the Charity Commission at the appropriate time whenever the Commission's guidelines deem it appropriate to do so.

Abuse of Trust

All staff should be aware that the Sexual Offences Act 2003 makes it an offence for a person over 18 to have a sexual relationship with a child under 18 where the person is in a position of trust (e.g. teacher), even if the relationship is consensual.

Records

A central record of all allegations and concerns (and connected documents) against staff will be kept securely by the Head Master (or the Nominated Safeguarding Governor, if it involves the Head Master), separate from normal staff and boy records, and with access limited to officers who may be key workers for cases. The DSL and DDSL will always be kept informed of safeguarding and child protection matters, and will have access to all records. The only exception to this requirement for permanent recording is where allegations have been found to be malicious. In such cases, all records will be removed from staff personnel files.

The record of allegations may provide clarification in cases where a future DBS disclosure reveals information from the police about an allegation that did not result in a criminal conviction. It will also help to prevent unnecessary re-investigation if, as occasionally happens, an allegation re-surfaces after a period of time. The record will be retained at least until the member of staff involved has reached normal retirement age, or for a period of 10 years from the date of the allegation if that is longer.

An allegation which was proven to be false, unsubstantiated or malicious will not be included in references for staff.

Every effort will be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the boy(s), parent/carer(s) and the person about whom the allegation has been made (in cases when this would not place the boy at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries or manage related disciplinary processes.

Transfer of records

Where there have been concerns about a member of staff and he or she leaves the School to work elsewhere, the Head Master (or the DSL/ Nominated Safeguarding Governor if it involves the Head Master) will consider the question of passing the concerns to the new employer or authority.

The DSL, Nominated Safeguarding Governor or Head Master will pass allegations or concerns affecting a boy on to his next school, if applicable.

Monitoring and Evaluation

This policy will be reviewed annually by the DSL and revised in accordance with changing national requirements for independent schools. It will be shared with staff and made available on the School website.