

# Child Protection Policy



**Hockerill**  
Anglo-European College  
**SAFEGUARDING**

# Child Protection Policy

Governor Committee: **Full Governors**

Author: **Mr A Mackenzie**

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## CHILD PROTECTION

This policy has been adapted from the Hertfordshire County Council Children's Services Child Protection School Liaison Service, Quality Assurance Improvement and Practice Model Child Protection Policy for Schools (Reference CSF0034 24-25 Version 1)

This policy is available on the School website, in the staff common room or staff desktop and upon request from the School Office.

### Policy Review

Hertfordshire Child Protection School Liaison Service will update their Model Policy in line with changes to Keeping Children Safe in Education.

The Child Protection Policy at Hockerill Anglo-European College is in line with the quality and standards expected from Hertfordshire Safeguarding Children Partnership (HSCP) and will be monitored by the Trustees.

At Hockerill Anglo-European College this policy will be reviewed in full by the Trustees annually or when new legislation requires changes.

The policy was reviewed and agreed by the Trustees in August/September 2024

It is due for review in August 2025.

Mr David Woods  
(Principal)



Signature

Date **September 2024**

Mr John Stenhouse  
(Chair of Trustees)



Signature

Date **September 2024**

Mr Sam Carroll  
(Designated Safeguarding Lead)



Signature

Date **September 2024**

Throughout this policy document reference may be made to the Designated Safeguarding Lead (DSL) – this includes the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads.

Within this policy Hockerill Anglo-European College will be called the ‘School’ or ‘school’ rather than Hockerill Anglo-European College or ‘College’.

School Governors will be called Trustees.

Furthermore, any references to ‘staff’ within this policy includes all volunteers and contractors as well as staff employed by the school.

As an education setting the school is responsible for ensuring that all students attending are protected from harm.

The school uses the definition of ‘pupil’, (but uses the term ‘student’) as defined under the Education Act 1996: (1)In this Act “pupil” means a person for whom education is being provided at a school, other than— (a) a person who has attained the age of 19 for whom further education is being provided, or (b) a person for whom part-time education suitable to the requirements of persons of any age over compulsory school age is being provided.

Any references to ‘child’, ‘children’, ‘young person’ within this policy are considered to be our students and the ‘pupil’ definition (above) covers them.

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## 1. MISSION STATEMENT

Inspiring knowledgeable, enquiring, caring global citizens through excellence in education.

## 2. HOCKERILL EQUALITY STATEMENT

The Trustees and staff at Hockerill Anglo-European College are committed to providing a safe and happy learning environment, promoting equality and diversity and ensuring the well-being of all members of the community. It is their clear intention to promote good behaviour and to exercise their responsibilities in ensuring the safeguarding and welfare of all students and staff within the community.

## 3. SAFEGUARDING POLICY STATEMENT

A whole-school, child-centred approach is fundamental to all aspects of everyday life at Hockerill Anglo-European College. At Hockerill Anglo-European College we strive to create a culture which enables students to express their wishes, feelings, and talk about anything that is of importance to them. We believe that every student deserves to receive an education within an environment that feels safe to learn and develop. We want our students, staff, parents and carers to have confidence and trust in our goals and know that collaborative working is fundamental to create and maintain a child-centred approach to safeguarding.

In practice this means keeping the child at the centre of decision making in our partnership working with children and their families. As stated in Children Acts 1989 and 2004, the welfare of children is paramount and that they are best looked after within their families, with their parents playing a full part in their lives.

We are also committed to ensuring that we work with agencies, including the Local Authority, to access support and targeted interventions for families when we consider that a child is, or may be, at risk of harm.

We hope that parents and carers appreciate our statutory duty to offer early help support and, depending on the gravity of the situation, protect children in need and who have suffered or otherwise likely to suffer significant harm. The core objective of early help support is to prevent any student from being harmed or placed at risk of harm and therefore halt any escalation where possible.

As a boarding school we have additional factors to consider regarding safeguarding and the need for us to be alert to signs of abuse in boarding and this includes being alert to the possibility of child-on-child issues (including abuse) and the extra vulnerabilities of SEND children. Our Child Protection Policy is a whole school approach to all aspects of children's lives here, both in school and boarding, and we ensure all staff are equally aware and trained. Hockerill Anglo-European College is a member of the Boarding Schools Association (BSA) and is signed up to the BSA Commitment to Care Charter (see Appendix 1).

This policy outlines the commitment to our legal duties to safeguard children, the responsibilities for all our staff and the specific roles and responsibilities for our key Designated Safeguarding Leads and Trustees.

#### 4. IMPORTANT SAFEGUARDING CONTACTS

The Trustees ensure that an appropriate senior member of staff is appointed to the role of Designated Safeguarding Lead.

During term time the Designated Safeguarding Lead and / or deputies (or the Principal) will always be available (during School hours) for staff to discuss any safeguarding concerns.

For issues arising outside of school hours / academic time (including weekends) staff should refer to this policy, the 'Staff Safeguarding and Flowchart Poster' (Appendix 2), or the safeguarding page published in the staff planner, which include contact details for the 'on duty' Senior Leadership Team member who will be one of the following:

- Mr David Woods (Principal)
- Mr Sam Carroll (Director of Boarding / Designated Safeguarding Lead)
- Mr Jonathan Ellams (Assistant Principal / Deputy Designated Safeguarding Lead)
- Mrs Alison Lumby (Assistant Principal)
- Mr Alasdair Mackenzie (Vice Principal / Deputy Designated Safeguarding Lead)

Contact details are also available within the 'Key Safeguarding Documents' folder within the 'Staff Briefing Team'.

During holiday time an email to [safeguarding@hockerill.com](mailto:safeguarding@hockerill.com) will be responded to by a DSL during working hours. Staff should contact the Police directly if they believe a child is at risk of immediate significant harm.

The 'Staff Safeguarding and Flowchart Poster' is displayed in all staff facing areas within the school. The 'Student Safeguarding Poster' (Appendix 3) is displayed in all student facing areas of the school.

<b>Key School Safeguarding Contacts</b>			
<b>Safeguarding Responsibility</b>	<b>Name</b>	<b>Job Title</b>	<b>Email</b>
Designated Safeguarding Lead	Sam Carroll	<u>Assistant Principal (Director of Boarding)</u>	<a href="mailto:carrolls@hockerill.com">carrolls@hockerill.com</a>
Deputy Designated Safeguarding Leads	<u>Jonathan Ellams</u>	<u>Assistant Principal</u>	<a href="mailto:ellamsj@hockerill.com">ellamsj@hockerill.com</a>
	<u>Alasdair Mackenzie</u>	<u>Vice Principal</u>	<a href="mailto:mackenziea@hockerill.com">mackenziea@hockerill.com</a>
	Clare Mackinlay	Deputy Designated Safeguarding Lead and Pastoral Manager	<a href="mailto:mackinlayc@hockerill.com">mackinlayc@hockerill.com</a>
	Lucy Tinnirello	Head of Student Health and Wellbeing	<a href="mailto:tinnirellol@hockerill.com">tinnirellol@hockerill.com</a>
Designated Teacher for Children Looked After (DT for CLA)	Tanya Panayiotou	Director of Inclusion	<a href="mailto:panayiotout@hockerill.com">panayiotout@hockerill.com</a>
Special Educational Needs and Disabilities	Tanya Panayiotou	Director of Inclusion	<a href="mailto:panayiotout@hockerill.com">panayiotout@hockerill.com</a>

Coordinator (SENDCo)			
Mental Health Lead	Lucy Tinnirello	Head of Student Health and Wellbeing	<a href="mailto:tinnirellol@hockerill.com">tinnirellol@hockerill.com</a>
Prevent Lead	Sam Carroll	<u>Assistant Principal (Director of Boarding)</u>	<a href="mailto:carrolls@hockerill.com">carrolls@hockerill.com</a>
Chair of Trustees	John Stenhouse		<a href="mailto:stenhousej@hockerill.com">stenhousej@hockerill.com</a>
Joint Vice Chair of Trustees	Stephen Beach Chris Dunne		<a href="mailto:beachs@hockerill.com">beachs@hockerill.com</a> <a href="mailto:dunnec@hockerill.com">dunnec@hockerill.com</a>
Link Safeguarding Trustee	Marie Roberts		<a href="mailto:robertsm@hockerill.com">robertsm@hockerill.com</a>

Key Out of School Safeguarding Contacts		
Organisation / Role	Name	Contact details
Local Authority Designated Officer (LADO)	Duty LADO	<a href="mailto:LADO.Referral@hertfordshire.gov.uk">LADO.Referral@hertfordshire.gov.uk</a> <a href="#">lado_referral_form.docx (live.com)</a> <i>Strictly for professionals use only</i>
Hertfordshire County Council Children's Social Care	Customer Service Centre	Children's Services includes SOOHS (Out of Hours Service-Children's Services) – 0300 123 4043
Families First	Families First website information for parents, carers and professionals.	<a href="#">Families First (hertfordshire.gov.uk)</a>
NSPCC Helpline	N/A	Call: <a href="tel:08088005000">0808 800 5000</a> Email <a href="mailto:help@NSPCC.org.uk">help@NSPCC.org.uk</a> .
Police	N/A	Emergency 999, non-emergency 101
Prevent	Prevent referrals  Parent guidance  Advice line for members of the public  Channel helpline	Prevent Referrals – <a href="mailto:prevent@herts.police.uk">prevent@herts.police.uk</a> <a href="#">Prevent National Referral Form 2024</a>  <a href="#">Parents' Booklet (educateagainsthate.com)</a>  <a href="#">ACT Early   Prevent radicalisation</a> 0800 011 3764  020 7340 7264

## 5. SCHOOL SAFEGUARDING POLICIES

This policy is one of a suite of Hockerill safeguarding policies, all of which are in place to protect and promote the welfare of our students.

- Attendance
- Behaviour
- Child Protection
- Complaints
- Countering Bullying
- Curriculum
- First aid
- Health and Safety
- Online Safety
- Out of College Trips and Procedures
- Safer Recruitment
- Special Educational Needs and Disability
- Staff Code of Conduct
- Substance Use and Misuse
- Supporting Students with Medical Conditions
- Whistle Blowing

## 6. LEGISLATION AND GUIDANCE

This policy is based on the Department for Education's (DfE's) statutory guidance.

- [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/keeping-children-safe-in-education) (KCSIE) which sets out the legal duties that all schools and colleges in England must follow to safeguard and promote the welfare of children under the age of 18.
- Section 175 of the [Education Act 2002](https://www.gov.uk/government/legislation/education-act-2002), places a duty on schools and Local Authorities to safeguard and promote the welfare of pupils.
- [The School Staffing \(England\) Regulations 2009](https://www.gov.uk/government/legislation/the-school-staffing-regulations-2009), which sets out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.
- [Maintained schools governance guide - 7. Compliance - Guidance - GOV.UK \(www.gov.uk\) \(2024\)](https://www.gov.uk/government/consultations/maintained-schools-governance-guide-7-compliance-guidance) provides guidance for governing bodies on how to meet their legal and regulatory responsibilities with regards to compliance. It covers various aspects of compliance, including education, funding and finances, health and safety, inspections, political impartiality, protecting and sharing information, safeguarding and pupil welfare, pupil behaviour, school admissions, school attendance, schools causing concern, school complaints, length of school day and year, opening, closing or making organisation changes to a school, managing school premises, control and community use of school premises, school uniform, staffing and performance management, and whistleblowing.

This guidance is a reference document for those involved in local-authority-maintained school governance. It brings together essential information from a range of sources on the governing body's roles and legal responsibilities.

This policy is also based on the following legislation for:

## Academies

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- [Academy trust governance guide - 7. Compliance - Guidance - GOV.UK \(www.gov.uk\)](#) provides guidance for boards on how to meet their legal and regulatory responsibilities with regards to compliance. It covers various aspects of compliance, including admissions, attendance, complaints, education, funding and finances, health and safety, inspections, political impartiality, protecting and sharing information, safeguarding and pupil welfare, pupil behaviour, schools causing concern, school day and school year, management of academy premises, control and community use of academy premises, school uniform, staffing, and whistleblowing.

This guidance is a reference document for those involved in trust governance. It provides essential information from a range of sources on the trust board's roles and legal responsibilities. The Academy Trust Handbook (ATH) and our funding agreement have more information on contractual requirements.

## All schools

- [Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- [Working together to safeguard children - GOV.UK \(www.gov.uk\)](#) DfE guidance outlines what organisations and agencies must and should do to help, protect and promote the welfare of all children and young people under the age of 18 in England
- [Hertfordshire Safeguarding Children Partnership | Hertfordshire County Hertfordshire Safeguarding Children Partnership \(HSCP\)](#) The three partners (Hertfordshire County Council, Police and Health) have a joint and equal duty to ensure multi-agency safeguarding arrangements are in place at a local level, and organisations and agencies are clear about how they will work together to safeguard children and promote their welfare of children
- [Serious Crime Act 2015](#), Female Genital Mutilation Act 2003 which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty, Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#). All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism"

- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils regarding these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- Escalation of Concerns and Professional Disagreements about Decisions, including Convening an ICPC [4.5.3 Escalation of Concerns and Professional Disagreements about Decisions, including Convening an ICPC \(proceduresonline.com\)](#)
- [Information sharing advice for safeguarding practitioners](#) produced by the DfE, outlines the importance of sharing information about children, young people, and their families in order to safeguard children. It provides clarity on when and how information can be shared legally and professionally to achieve improved outcomes. It also includes the "Seven Golden Rules for Sharing Information", which provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm. It is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being.

As a boarding school, we have additional responsibilities including ensuring our school is compliant with the [DfE's National Minimum Standards for Boarding](#).

## 7. DEFINITIONS SAFEGUARDING AND CHILD PROTECTION

All our staff at Hockerill Anglo European-College expected to be familiar with the wide range of policies and procedures we have to keep our children safe and promote their wellbeing at all times.

**Safeguarding** as defined in Keeping Children Safe in Education (2024), means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Working Together to Safeguard Children (2023) further extends this definition to include:

- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

**Child/ren:** The legal definition of a child in the UK includes everyone under the age of 18 (see Hockerill definition of 'pupil' on page 2).

'**Early Help**' is a term used in Hertfordshire that refers to a wide range of interventions offered by various organisations and partner agencies, as well as services within the County Council and beyond. The primary early help service in Hertfordshire is known as "[Families First](#)" which is in place to help professionals and families find early help and information as soon as problems emerge to prevent issues from getting worse. Support and interventions under the Families First umbrella can help coordinate additional support to that which is available from a family's usual support network as well as more targeted and short pieces of interventions.

**Families First Assessments (FFA)** are used by practitioners who work with children, young people, parents, and carers where it is considered that the child/family would benefit from early help support. It is used to identify needs, and to organise the right support and services to address those needs at an early stage. The FFA process allows different agencies and services to share information and work together in a coordinated way.

For families with children under 18 (25 if they have a learning need or disability), Families First can help with issues such as parenting, mental and physical health problems, drug or alcohol dependency, domestic abuse, school-related concerns, debt problems, and risk of becoming homeless.

**The [Continuum of Need](#)** is a guidance document that sets out the 'Levels of Need' experienced by children, young people, and families in Hertfordshire. It provides clarity and support to partners working with them and at what level they should be leading on early support. The Continuum of Need document aims to prevent the unnecessary escalation of issues or problems by seeking early intervention. It helps ensure that the right response is given, by the right services, at the right time. The document also provides guidance on the levels of need and service response and about how the thresholds affect the type of referrals accepted by Children's Safeguarding & Specialist Services, which is positioned at level 3/4 and statutory duties.

The Hertfordshire Safeguarding Children Partnership (HSCP) uses the Continuum of Need to agree on how the relevant organisations in Hertfordshire will cooperate to safeguard and promote the welfare of children and ensure effectiveness.

**Child in Need:** Under the Children Act 1989, local authorities are under a general duty to provide services for children in need for the purposes of safeguarding and promoting their welfare. A child in need is defined under section 17 of the Children Act 1989 as a child who is unlikely to achieve or

maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services, or a child who is disabled. To fulfil this duty, practitioners undertake assessments of the needs of individual children, giving due regard to a child's age and understanding when determining what, if any, services to provide.

**Child Protection:** Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child who lives or is found in their area is suffering or is likely to suffer significant harm, it has a duty to make such enquiries as it considers necessary to decide whether to take any action to safeguard or promote the child's welfare. Such enquiries, supported by other organisations and agencies, as appropriate, should be initiated where there are concerns about all forms of abuse, neglect, and exploitation whether this is taking place in person or online, inside or outside of the child's home. There may be a need for immediate protection whilst an assessment or enquiries are carried out. Schools are required to cooperate with children's social care when carrying their inquiries and therefore we have a duty to share information when requested to do so.

**Significant Harm** is the threshold for a child protection response to support and or protect children. Harm is defined in the Children Act 1989 as the ill-treatment of a child or the impairment of their health or development. This can include harm caused by seeing someone else being mistreated, for example by witnessing domestic abuse. The phrase 'significant harm' was introduced by the Children Act 1989. The Act does not define 'significant'. The question of whether or not harm is 'significant' relates to its impact on a child's health or development.

**The Gateway** is the 'front door' to Hertfordshire's social care. The Gateway Service receives contacts and referrals (queries via calls or emails) from partner agencies and members of the public for support from Early Help and Children's Social Care. Contacts are received via the Customer Service Centre, where there are current safeguarding concerns that require an immediate response. It provides a single response to all new contacts that require an initial multi-agency approach. Contacts that present as meeting a threshold for immediate response bypass the Gateway and are screened and transferred directly to the Joint Child Protection Investigation Team, area Assessment Teams or 0-25 Teams (statutory services).

The multi-agency Gateway operates to the principle that every family (child/young person and their parent/carer) has the right:

- To be told when a professional is worried about the safety or wellbeing of their child by that professional
- To have their consent obtained when someone wishes to make a request for support on their behalf
- To be front and centre of the plan to keep their child safe and well.

**Multi Agency Safeguarding Hub (MASH)** is a partnership of Children's Services, that comprise Health, Police, and Probation. Advisory support is provided by Independent Domestic Violence Advocates and satellite partners, these agencies work together to identify the need of children and their families and signpost to the appropriate agency or resources where threshold is met.

The main aim of a MASH is to improve the quality of information sharing when making decisions between agencies at the earliest opportunity.

**MASH** is co-located, within the Gateway are two pods and one Early Help pod.

**Abuse** is all forms of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children maybe abused by an adult or adults or by another child or children.

**Neglect** is a form of abuse and 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. Section 9 provides the full definition.

**Exploitation** is a risk to children and young people that takes place outside of their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

NB the terms abuse, neglect, and exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

**Children Looked After:** A child is 'looked after' (in care) if they are in the care of the Local Authority for more than 24 hours. Children can be in care by agreement with parents or by order of a court. The placement providing the care can be a connected person to the child or a Local Authority approved foster carer.

**Kinship Care** refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends. The government in England has launched a [Kinship Care Strategy](#) to improve kinship carers' financial stability, education, training, and partnership with local authorities and other agencies.

These arrangements can be known as either family and friends care or private fostering.

- **Family and Friends Carers:** If you're a grandparent, aunt, uncle, brother, sister, or family friend looking after a child who can't be cared for by their birth parents, you're known as a family and friends carer. Sometimes these carers will be given Parental Responsibility for the children through a Child Arrangements or Special Guardianship Order.
- **Private Fostering:** You're a private foster carer if you're not a close relative and you're looking after a child who's under 16 (or under 18 if they're disabled) for more than 28 days in a row.

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children and their parents and carers) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis

## 8. EQUALITY STATEMENT – CHILDREN WITH PROTECTED CHARACTERISTICS

Some children are at greater risk of harm, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. At Hockerill Anglo-European College, we are committed to anti-discriminatory practice and ensuring that all children are provided with the same protection regardless of any additional needs, barriers or protected characteristics they may have. As stated in the Equality Act 2010, we recognise the protected characteristics that may be applicable to our pupils:

- Age
- Disability
- Gender reassignment
- Marriage and Civil Partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

All staff understand the importance of recognising that a child may benefit from Early Help intervention, and it is integral to our whole school approach to look and listen out particularly for children:

- Who have a special educational need and/or disabilities (SEND) or health conditions
- Who are a young carer
- Who could experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see Section 11)
- Who have ongoing unexplainable and/or persistent absences from education
- Whose parent/carer has expressed an intention to remove them from school to be provided with elective home education (EHE).

### **Children with Special Educational Needs and Disabilities (SEND)**

We know who our students are with special educational needs, disabilities, or additional health needs and recognise that they may face additional barriers, that can include:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's impairment without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- Assumptions that children with SEND can be disproportionately impacted by things like bullying - without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- Reluctance to challenge carers (professionals may over-empathise with carers because of the perceived stress of caring for a disabled child)
- Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased
- A disabled child's understanding of abuse
- Lack of choice/participation

## Children Looked After (CLA)

The most common reason for a child to become looked after is as a result of abuse and/or neglect. We therefore ensure that the appropriate arrangements are in place to support these children and keep them safe from further harm. This includes:

- Appointment of a Designated Teacher (DT) for CLA
- Appropriate staff made aware of a child's looked after status
- Ensure that necessary staff have the skills, knowledge and understanding of the child's needs
- Ensure the child's record contains a clear understanding of their legal status and care arrangements, including the levels of authority delegated to their carer and contact arrangements with birth parents or those with parental responsibility
- Keep contact details of the child's social worker, carer(s) and name and contact details of the virtual school head for DT to liaise with

## Children with a Social Worker (CWASW)

Virtual School Heads have a responsibility for the strategic oversight of the educational attendance, attainment, and progress of:

- **Children looked-after,**
- **Children previously looked-after;** and
- **Children with a social worker** – defined as any child who has been assessed as being in need under section 17 of the Children Act 1989 and currently has a social worker; it also includes those who have been assessed as needing, or previously needing, a social worker within the past 6 years due to safeguarding or welfare reasons.

In line with [Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK \(www.gov.uk\)](http://www.gov.uk) this has been extended to include:

- **Children who have previously had a social worker** – the cohort of children with a social worker and those who have previously had a social worker who are aged from 0 to 18; and
- **Children in kinship care arrangements** - this means any friend or family member, who is not a child's parent but raising them for a significant amount of the time, either as a temporary or permanent arrangement

In offering advice and information to workforces that have relationships with children with social workers, virtual school heads identify and engage with all key professionals in Hertfordshire and beyond, helping them to understand the role they have in improving outcomes for CWASW e.g. DSL and deputies, social workers, headteachers, governors, special educational needs co-ordinators, mental health leads, other Local Authority partners, including Designated Social Care Officers for SEND.

Hockerill Anglo-European College ensures that the Designated Teacher has the appropriate training, so they are able to take the leadership of this crucial area of our safeguarding arrangements in collaboration with our Designated Safeguarding Lead which includes:

- Working closely with virtual school heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans

- Collaborating with the virtual school heads to also promote the educational achievement of previously looked after children.

## 9. ROLES AND RESPONSIBILITIES OF ALL STAFF AND SENIOR LEADERS

### **Role and Responsibilities of the Whole School**

Safeguarding is **everyone's** responsibility at Hockerill Anglo-European College. This policy applies to all staff including permanent, temporary and supply, volunteers, trustees and contractors. It also applies to the safeguarding arrangements for extended school and off-site activities.

Hockerill Anglo-European College plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour Policy
- Countering Bullying Policy
- Pastoral support for students
- Planned programme of Relationships, Sex and Health Education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice, and equality
  - Body confidence and self-esteem
  - How to recognise an abusive relationship (including coercive and controlling behaviour)
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable.

### **Role and Responsibilities of all staff (permanent, temporary and supply), volunteers and contractors**

All staff:

- Who work directly with children will be required to read Part One and Annex B of [Keeping Children Safe in Education](#), and the reviewed version of this guidance at least annually.
- Who do not work directly with children are required to read at least Annex A of [Keeping Children Safe in Education](#), and the reviewed version of this guidance at least annually.
- Translated versions of Part One Keeping Children Safe in Education can be found at [Keeping Children Safe in Education Part 1 Translations | LGFL for staff, volunteers, parents and carers](#) whose first language may not be English, should they wish to use this
- Sign confirmation that they have read the expected sections according to their role, have understood the content and their roles and responsibilities in our whole school approach to safeguarding
- Demonstrate their understanding of the content of Keeping Children Safe in Education through online assessment and regular checking from the Designated Safeguarding Leads

- Promote and raise awareness about the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Contribute to creating a culture for pupils who are lesbian, gay, bisexual, or gender questioning to speak out and share their concerns
- Contribute to creating a culture for any child defined as having a protected characteristic to speak out and share their concerns (see Section 8).

All staff will be aware of:

- The school's safeguarding arrangements and systems which is explained to staff as part of their induction and annual update training. As part of staff induction new staff/volunteers are given access to copies of the school's key safeguarding and child protection documents, including:
  - Child Protection Policy
  - Keeping Children Safe in Education
  - Staff Code of Conduct
  - The role and identity of the Designated Safeguarding Lead (DSL) and deputies
  - Behaviour Policy
  - Online Safety Policy, including ICT Acceptable Use Agreement
  - Attendance Policy, including our expected safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- The signs of vulnerabilities to look out for in students who may benefit from Early Help support, we explain to staff the Early Help process for children and their families and what their role is in this to support DSLs in ensuring children and their families receive support as soon as problems emerge
- The importance of Families First Assessments and how they can help identify emerging difficulties and therefore how sharing information, including with other practitioners, can support early identification and assessment
- What to do if they identify a safeguarding issue or a student tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The process for recording and sharing information internally to DSLs and on children's safeguarding records
- The process of making referrals to the Local Authority Children's Social Care and/or Police where required and the statutory processes that may follow
- The signs of specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines) [See Annex B Keeping Children Safe in Education](#)
- How to support and speak to students when they may share their worries or make disclosures of abuse, neglect or exploitation and contribute to creating a culture where students feel able to speak with the relevant safeguarding leads
- The importance of reassuring students that they are being taken seriously and that they will be supported and kept safe

- The importance of supporting families and providing a culture of support to encourage parents to seek support and engage with our school and professionals when issues emerge or become a concern
- Students can be at risk of harm inside the home (familial harm) and outside of their home (extra familial harms) and that any form of harm can happen directly or online
- The fact that students who are (or who are perceived to be) lesbian, gay, bisexual (LGBTQ+) can be targeted by other students
- What to look for to identify students who need help or protection in accordance with statutory procures under the children act section 17 (child in need) and section 47 (significant harm).

### **Role and Responsibilities of the Designated Safeguarding Lead (DSL)**

Our DSL team includes a member/s of the senior leadership team. We also have Deputy DSLs (DDSL) within the staffing group. Whilst one of the DSLs is referred to the 'lead' and will coordinate the DSL team, they are all trained at the same level to ensure that at all times one or more of them are available to carry out all of their designated functions in safeguarding.

- The DSL takes lead responsibility for the school's child protection and wider safeguarding arrangements. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- Whilst all staff are part of the safeguarding culture, it is the role of the DSL to receive information, review and make decisions about any necessary further considerations or actions needed to respond to any safeguarding matters that arise.
- The DSL will act as the main contact in the school when a student and their family are receiving support from the school, external agencies and statutory services.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. See Section 4.
- In the event that non-urgent matters arise out of school hours, staff should see Section 4 and/or the Staff Safeguarding Poster.
- If the school's DSL and deputies are not available or cannot be reached, staff should contact the Principal.
- A DSL will be available whilst school activities are taking place during holiday periods, such as, overseas visits and trips. This DSL availability is only in place to provide support for trip leaders and students who are participating. The school does not provide general DSL cover throughout the holidays. DSLs, key pastoral leaders and the school office provides out of office e-mail responses which state clearly the contacts those with a safeguarding concern should pursue.

### **The DSL will be given the time, funding, training, resources and support to:**

- Provide advice and support to other staff on student welfare and child protection matters
- Take part in and/or lead early help support which may include a Families First Assessment and thereafter attend/chair Team Around the Child meetings
- Take part in strategy discussions organised by the Local Authority's Children's Social Care and inter-agency meetings and/or support other staff to do so when required
- Contribute to the assessment of children (when a child may have suffered harm or is at risk of harm)

- Refer suspected cases, as appropriate, to the relevant body (Local Authority Children’s Social Care, Channel Programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly
- Have a good understanding of behaviours that may impact on a student’s engagement and learning that may require consideration through safety/support planning, this includes the impact on themselves but also to other students
- Have a good understanding of harmful behaviours that may require risk management, safety planning and/or support in school, this includes those presented by children within the setting, their parents/carer or associated adults where necessary
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Assist the Principal to review and respond to low-level concerns that may arise regarding staff
- Share information and/or take part in statutory processes that involve reviewing and analysing of safeguarding practice and policies. This can include meetings held by Hertfordshire Safeguarding Children’s Partnership in response to significant safeguarding incidences, child death and/or where a safeguarding practice review is required to determine learning and practice analysis.

#### **The DSL will also:**

- Keep the Principal informed of any issues, the conversations with students and their families, universal services and referrals to external agencies and statutory services
- Liaise with universal, targeted and statutory agencies, Local Authority workers (Children’s Services and other key practitioners) when there are safeguarding concerns as appropriate (includes early help and child protection)
- Share information about incidences of sexual violence and sexual harassment with statutory colleagues such as Police and Children’s Social Care colleagues in order to prepare and implement the school’s policies
- Be confident about what local specialist support is available to support all students involved (including victims and alleged perpetrators) in sexual violence and sexual harassment
- Be aware that children are entitled to have an ‘Appropriate Adult’ to support and help them in Police investigations or if there is threshold met for them to be searched.

The full responsibilities of the DSL and deputy(s) are set out in their job description, see [Annex C KCSiE](#).

#### **Role and Responsibilities of the Trustees**

The Trustees have a strategic role within the leadership and management team and must ensure that all staff comply with legislation and local guidance at all times.

- The Trustees will:
  - Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development for the setting
  - Evaluate and approve this policy along with other policies related to safeguarding at each review, ensuring they comply with the law, and hold the Principal to account for their implementation

- Evaluate and approve recommendations/action plans identified through quality assurance activity that the Principal/DSL undertakes to review safeguarding practice through audits and annual/termly governing reports to ensure that they have regular oversight and hold the principal accountable for the practice improvement
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link trustee to monitor the effectiveness of the school's safeguarding arrangements including policies and their implementation, in conjunction with the full Trustee body. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety according to their roles, and that such training is regularly updated and is in line with statutory guidance and Hertfordshire Safeguarding Children's Partnership
- Ensure that all Trustees:
  - Read Keeping Children Safe in Education in its entirety, and review compliance of this task at least annually
  - Sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance
  - Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

The Governing Body will make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has effective procedures to manage any safeguarding concerns (no matter how small) that arise. This includes those related to student welfare concerns, low level concerns and allegations made against staff
- That this policy reflects those students with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities on the school site (regardless of whether or not the students who attend these services/activities are children on the school roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed

- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The Chair of Trustees will act as the 'case manager' in the event that an allegation is made against the Principal. where appropriate (see Section 14 Managing Concerns and Allegations)
- Section 16 (Training) of this policy has information on how trustees are supported to fulfil their role, also see Part two KCSiE 2024

### **Role and Responsibilities of the Principal**

The Principal will:

- Implement this policy and ensure that all staff:
  - Are informed of our school's systems which support safeguarding, including reading and understanding this policy, as part of their induction
  - Follow the procedures included in this policy, what they should know and do in relation to information sharing and referrals of cases of suspected abuse and neglect
- Make this policy available to parents/carers, professionals and the community to ensure there is transparency and clear expectations about the school's duty to safeguarding and promote the welfare of students and the arrangements for responding to students presenting with needs that may require early help or support to protect them
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Act as the 'case manager' representing the school in the event of an allegation of abuse made against another member of staff where appropriate
- Managing cases where there are low-level concerns regarding the conduct of staff, or oversee delegation to the DSL

### **Role and Responsibilities of the Designated Teacher**

The Designated Teacher takes leadership of promoting the educational attainment of Children With a Social Worker which includes:

- Working closely with Virtual School Heads to ensure that funding is best used to support the student's educational achievement and development needs that are identified in their Personal Education Plans
- To carry out their duties in line with [Designated teacher for looked-after and previously looked-after children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/designated-teacher-for-looked-after-and-previously-looked-after-children) and extended duties as outlined [Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/promoting-the-education-of-children-with-a-social-worker-and-children-in-kinship-care-arrangements-virtual-school-head-role-extension)
- Working closely with the DSL for those students who are supported by a Child in Need or Child Protection Plan to ensure support for the education attainment of these students is appropriately entwined with safeguarding processes.

## 10. WORKING WITH FAMILIES

Alongside Keeping Children Safe in Education Hockerill Anglo-European College adopts the fundamental principle of ***working in a child-centred approach within a whole family focus*** as promoted in Working Together to Safeguard Children 2023.

This principle is underpinned by the findings and recommendations within the Government's 2023 publication [Stable Homes, Built on Love](#) in response to the recommendations of the Independent Review of Children's Social Care. The strategy sets out how children's social care is to be committed to supporting every child to grow up in a safe, stable and loving home. For most children this means growing up within their family. The strategy also emphasises the importance of having stronger expectations of support through early help and family networks.

At Hockerill Anglo-European College, our principles align to the above. We endeavour to work in partnership and collaboration with students and their families so that they are supported from an early stage by being a part of and leading the conversations about change and aims for their children. We are keen to support families in a strength and solution-based approach, encouraging motivation and confidence to improve their own agency to make safe and positive decisions for themselves and their children.

### **Our principles include, but are not limited to:**

- Promoting effective partnership working with parents and carers e.g. build strong, positive, trusting, and co-operative relationships by:
  - Approaching families and their wider family networks and communities with empathy, respect, compassion, and creativity
  - Avoiding reinforcing family shame, suffering, and blame
  - Making efforts to understand the impact of the parental trauma influencing the dynamics and experiences of the family
  - Using strength-based approaches, working with parents and carers to identify what is working well and how their strengths could support them to effect positive change
  - Ensuring we work sensitively with parents, carers, and students, to identify and understand the impact of adversity and trauma in their lives; seeking to understand how adversity and trauma might manifest and affect student's and parent's engagement and use their expertise to adapt their response with care and compassion
  - Adapting our responses to meet the diverse needs of parents and carers, including fathers and male carers, and the specific challenges being faced, including parents and carers of disabled students, and where harm is outside the home
  - Ensuring we understand the family's background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support
  - Being alert and recognising where parents or carers may not be acting in the best interest of the student or where students may be experiencing abuse, neglect, and exploitation as a result of actions by parents, carers, or other individuals in their lives. Practitioners use their skills and expertise to adapt their response to secure engagement
  - Being mindful of negative stereotypes when making decisions which might lead to false assumptions.
- Communicating effectively verbally and non-verbally by:
  - Communicating with respect, being clear, curious and inclusive; adapting to parent's and carer's needs
  - Providing materials to students, parents, carers, and families which are jargon free, developmentally appropriate and in a format that is easily understood

- Ensuring any materials, such as minutes or reports, capture the school's contribution but also those from the students, parents and carers which must include their views and wishes
- Supporting families to access support to translate information where English is not their first language. Our school will access interpreters where needed including British Sign Language.
- Empowering our parents and carers to participate in decision-making to help, support and protect students by:
  - Creating a safe culture which is an open and accepting forum free from discriminatory or prejudicial judgements
  - Ensuring the open culture is one which still provides reflection and challenge where the information has the potential to be a risk or influencing factor which may impact on a student's safety and wellbeing
  - Asking families for their perspective on a situation or issue that arises, ensuring we consider their point of view and factor this in when thinking about support
  - Promote families' rights to support through use of advocates, family members or a supporter
  - Ensuring parents and carers are fully aware of who will attend meetings and discussions, if the student will be invited to participate, and the format of the meeting or discussion
  - Giving parents and carers adequate preparation at every stage, relevant information, a safe and appropriate environment for participation, and suitable access arrangements
  - Signposting parents and carers to sources of help and support available locally or through the Local Authority
  - Provide opportunities for feedback and review to ensure acknowledgement of positive progress but also reviewing and discussion of any new or increasing issues to readapt a family's plans
  - Being transparent about our concerns and why we may need to request support from an outside agency; and the potential actions should our concerns increase for the students
  - Helping parents and carers to understand what the issues are and how these impact on the student, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes
  - Providing information about different types of support, what it involves and expects from parents and carers so they can make an informed choice and decision about which support pathways will be more helpful and effective for them

## 11. CONFIDENTIALITY AND SHARING INFORMATION

Trusted relationships are at the heart of working with students and their families at Hockerill Anglo-European College. We strive to uphold good practice and work in partnership with students and families, communicating effectively and listening well so that we have sufficient information to understand and be able to meet their needs.

An open culture is imperative when deciding whether to share information and it is important to get the lawful basis right. The legal framework can appear complex, and a lack of clarity can lead practitioners to assume, incorrectly, that no information can be shared because consent has not been provided. The school understands the lawful basis in which our DSLs can share information with other people, agencies and organisations about the children and families we are supporting.

In line with our principles of working with families outlined above, we strive to be transparent, open and clear when we need to discuss any information or concerns that worry us about a student's

wellbeing. If we feel that we need to share information, we will explain how information will be shared or used so that families can make an informed choice about whether to consent.

If we feel that we need to share information with services due to concerns about a student's safety or welfare to provide the family with specific support, we will be upfront, transparent and honest about our concerns and the ways in which such services could help the family. We will endeavour to support and encourage the family to consent and engage with such support. We believe that this collaborative approach will support students to have the confidence to speak up and share their views as well as encouraging parents and carers of students at our school to have a willingness to engage with services that provide support.

If we have a concern about a student's safety and have decided to share information to protect them from a risk of harm, we will endeavour to gain cooperation and understanding from parents and carers. We will strive where possible to always gain consent and where we believe our concerns have increased and warrant the sharing of information to statutory services such as Police and Children's Social Care, we will have made efforts to discuss, explore and provide support to address these with families in a collaborative way beforehand; concerns should not be a surprise to families unless in situations where a one off or unprecedented incident occurs.

However, for a small number of students, seeking parental consent is not always possible and may place a student or others at risk of harm, for example:

- The student would be placed at increased risk of significant harm through the action of gaining this consent
- There would be an impact on a criminal investigation
- A delay in making the referral would impact on the immediate safety of the student.

In situations where our professional or legal duty is exercised to share certain information in the absence of consent, we will inform them as soon as possible if it is safe and appropriate to do so. We will be clear about what we have shared, with whom, the reasons why and how the information will be used.

In any situation where a student or their parent/carer object to consent or particular information sharing and we decide that it is proportionate to do so, a clear rationale, outlining our decisions and the reasons why, will be recorded on the student's file.

In situations where there are allegations of child-on-child abuse, we will notify the parents or carers of all the students involved. If a student or group of students have suffered significant harm or are considered at risk of harm either directly or online, we will have a duty to consider making a referral to Children's Social Care and the Police if a crime has been committed. The process for this can be found in Section 12 and our principles for information sharing and consent will apply, unless we have a legal obligation to report the incident.

In addition to sharing information, our DSLs will endeavour to arrange a meeting with the parents and carers of all students to share information about the incident, plan safety strategies and/or risk management plans. Our DSLs will endeavour to keep families up to date and provide reassurance on any measures being taken, whilst respecting the privacy of each individual student involved.

The [Data Protection Act \(DPA\) 2018](#) does not prevent or limit the sharing of information for the purposes of keeping children safe. Hockerill Anglo-European College recognises that timely information sharing is essential for effective safeguarding. Whilst we promote collaboration and partnership with

our families, fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of students when required.

The following principles apply to Hockerill Anglo-European College's confidentiality agreement:

- Timely information sharing is essential to effective safeguarding.
- The Data Protection Act (DPA) 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a student that they will not tell anyone about a report of abuse, as this may not be in the student's best interests
- If a victim asks the school not to tell anyone about sexual violence or sexual harassment:
  - Even if a victim doesn't consent to sharing information, staff may still lawfully share it if there is another legal basis under the Data Protection Act that applies
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other students
  - The DSL should consider the following points:
    - Parents or carers should normally be informed (unless this would put the student at greater risk)
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to Children's Social Care where the child resides
    - Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the Police remains.
- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Do all they reasonably can to protect the anonymity of any students involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
  - Have regard for the Government's publication [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/information-sharing-advice-for-safeguarding-practitioners) includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information with all relevant parties.

If staff are in any doubt about sharing information, they can seek advice from the Principal, a DSL or a member of the senior leadership team.

## 12. RECOGNISE AND RESPOND TO ABUSE, NEGLECT AND EXPLOITATION

### **Abuse, Neglect and Exploitation**

All staff are aware of what Abuse, Neglect and Exploitation is and have an understanding of the different types of indicators as outlined in Appendix 4 (Indicators of Abuse) which could suggest a student is suffering or likely to suffer harm.

We encourage staff to be professionally curious about what to look out for as this is vital for the early identification of Abuse, Neglect and Exploitation so that we are able to identify students who may be in need of help or protection at the earliest opportunity.

### **Abuse**

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

Staff are aware that students may be abused by an adult or adults or by another student or students.

### **Physical Abuse**

Physical abuse is a form of abuse which may involve:

- Hitting
- Shaking
- Throwing
- Poisoning
- Burning or scalding
- Drowning
- Suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. This is known as Fabricated Induced Illness (FII).

### **Emotional Abuse**

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

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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 from participating in normal social interaction
- A child seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying)

- Causing a child to feel frightened or in danger
- 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. It can be difficult to recognise emotional abuse and children may not always realise they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.

### **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- **Physical contact**

Including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing

- **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

- **Online abuse**

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse, as can other children.

### **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 caregivers)
- Ensure access to appropriate medical care or treatment.

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

### **Exploitation**

Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimisation, oppression or ill-treatment.

Staff are aware that there are several types of child exploitation, including, but not limited to:

- **Child Sexual Exploitation (CSE)**

This is a type of sexual abuse where children are sexually exploited for money, power, or status. It can involve contact and non-contact activities and can occur without the child's immediate recognition; this is due to their grooming by the abuser.

- **Child Labour Exploitation**

This involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential, and dignity.

- **Child Trafficking**

Children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.

- **Child Criminal Exploitation (CCE)**

This is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing.

### **Safeguarding Issues and Specific Forms of Abuse**

Staff understand that children can be at risk of abuse or exploitation in situations outside their families. They are aware that extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), drug taking and/or alcohol misuse, criminal exploitation, child sexual exploitation, serious youth violence, county lines, radicalisation, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) and can put children in danger.

Staff are aware that Extra Familial Harms can present online, in a child's environment/neighbourhood, school and any place/space that children occupy or access such as:

- Child abduction
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Children and the Court system
- Children absent from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalisation
- The Prevent Duty
- Channel
- Sexual violence and Sexual harassment between children in schools
- Serious Violence

- FGM and the mandatory reporting duty for teachers
- Forced marriage.

### **Child-on-Child Abuse**

At Hockerill Anglo-European College we know that children can cause harm to other children. As a school we have a zero acceptance of child-on-child abuse and create a culture of keeping an open mind and attitude that “it could happen here”. Staff are aware that even if no reports are being made in the school, it does not mean it is not happening.

Staff understand that it is important to challenge inappropriate behaviours between students that are abusive in nature, and we have clear expectations that incidents are not downplayed or suggested to be jovial or part of growing up as this can lead to a culture of unacceptable behaviours and unsafe environments for students.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

### **Domestic Abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. They may also experience it within their own intimate relationships.

Staff understand that these experiences can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

Staff are aware that domestic abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse and that anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

## Female Genital Mutilation (FGM)

Keeping Children Safe in Education (2024) explains that FGM includes ‘*all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.*’

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Teachers are aware of their mandatory reporting duty and the requirement to immediately contact the Police if they are:

- Informed by a girl under 18 that an act of FGM has been carried out on her
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 (and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth).

The duty for teachers above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, teachers know they must report to the DSL who will follow local safeguarding procedures.

The members of staff who are not teachers, are aware that if they suspect a child is at risk or that FGM has been carried out, they should report this to the DSL immediately.

## Prevent and Concerns about Extremism

Hockerill Anglo-European College is aware of its duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of the school’s functions, to have “*due regard to the need to prevent people from becoming terrorists or supporting terrorism*”. This duty is known as the Prevent duty.

The Prevent duty is one of the school’s wider safeguarding obligations. The DSLs and senior leaders are aware of the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210, which are specifically concerned with education.

Staff are aware that children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of the school’s safeguarding approach.

**Extremism** is the vocal or active opposition to the school’s fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to Children’s Services [website](#). or [Channel](#), the Government’s programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and governors can call to raise concerns about extremism for a pupil. In non-emergency situations DSLs can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

### **Concerns about Mental Health**

Mental health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Poor or deteriorating mental health can also be a safeguarding concern in its own right. Staff know to be alert to behavioural signs that suggest a child may be experiencing mental health or be at risk of developing one.

If a staff member has a concern about a child's mental health, no matter the level of the child's emotional difficulties, they must speak to a pastoral leader or a DSL who will evaluate if the child is at risk of immediate harm, and if so, will escalate to the appropriate level of support which includes speaking to the school lead for Mental Health.

If a child is experiencing low moods, low self-esteem and general anxiety, the school's pastoral leader and/or mental health lead will be able to provide some advice about some self-accessed support through relevant approved wellbeing websites and apps. If however, the child is presenting with a concerning level of low mood and anxiety for a period of time then the mental health lead in partnership with the DSL will discuss with the child and their parents/carer to explore options of support.

If someone is experiencing suicidal thoughts but they do not need physical input from A&E then consideration will be given to accessing support from the SPA/Crisis team. If a referral for targeted mental health support is required, then a referral through SPA will be made.

If, however, a child/young person is at immediate risk the school will recommend they need to be sent to A&E or dial 999.

### **Concerns about Child-on-Child Abuse**

In most circumstances, incidences of students hurting other students will be dealt with under the school's Behaviour Policy and/or Countering Bullying Policy. Our Child Protection Policy will apply to all incidents that raise safeguarding concerns where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the school at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

If a student makes an allegation of abuse against another student:

- Staff will respond to the allegation in line with the school's published procedures for responding to safeguarding and child protection concerns (see Section 14)

- The DSL will assess and consider the relevant next steps which may include, speaking with the student and parents, accessing relevant consultation lines provided to schools by the Local Authority, making a request for support to Children’s Services as well as the Police if the allegation involves a potential criminal offence or the Child and Adolescent Mental Health Service (CAMHS), if appropriate
- The DSL will consider whether a risk assessment or a safety and support plan would be beneficial for any students involved, including the victim(s), the student(s) against whom the allegation has been made and any others affected, with a named person they can talk to if needed. This should include consideration of all aspects and areas of the school environment and beyond, for example off-site activities and school transport
- The DSL will speak to the student and their parent/s or carers to share the concerns, gain their views and consent to liaise with other agencies if there are any identified risks and unmet needs
- If the incident is a criminal offence school have a duty to report this and thereafter work closely with the Police (and other agencies as required) while protecting students and/or taking any measures to manage risk. For incidences which involve significant harm and/or a potential criminal offence, the DSL will endeavour to gain consent but may override this should not gaining consent increase the risk to a student
- The DSLs are committed to ensuring that where concerns are raised about child-on-child abuse, incidences are taken seriously and dealt with fairly. DSLs will consider all information available to them and ensure that any action or decision is proportionate for all students involved, and that such decisions do not disproportionately impact on their access to education, although at times some restrictions or adaptations may be required to manage identified risk.

### **Creating a Culture Where Children Feel Safe in School and Minimising the Risk of All Forms of Abuse**

We recognise the importance of taking proactive action to minimise the risk of any form of abuse, neglect and exploitation irrespective of from whom and where this comes from, including child-on-child abuse. Creating a supportive environment where students can feel confident in reporting incidents is key to the safeguarding culture at Hockerill Anglo-European College.

We expect all staff to:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure the curriculum helps to educate students about appropriate behaviour and consent
- Ensure students are able to easily and confidently report abuse using our reporting systems. This could include speaking directly with a member of staff or reporting electronically by email or through the ‘Report a Concern’ process.
- Reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems in the school or elsewhere that could be addressed by us updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with our safeguarding partners

- Support students who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, and alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms (adults close to the child and family) and any necessary support for siblings following a report of sexual violence and/or harassment.

Staff are trained to understand:

- How to recognise the signs of child-on-child abuse, and know how to identify it and respond to reports
- Even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an open mind and attitude of “it could happen here”
- If they have any concerns about a student’s welfare, they should act on them immediately rather than wait to be told; and always speak to the DSL should they be unclear
- Students may not always make a direct disclosure and therefore they must be aware that:
  - Students can show signs or act in ways they hope adults will notice and react to; it may be that their difficulties emerge from behaviour when they do not have the language to express themselves
  - A friend of the student may share information to a staff member or make comments; professionally curiosity is key, do not fear exploring the information and asking open ended questions
  - Staff overhear a conversation between students
  - A student’s behaviour may change suddenly with no clear reason or precipitating event that might offer some explanation
  - Some students can face additional barriers to telling someone, for example they have a disability, special educational need, age gender, ethnicity and/or sexual orientation etc.
  - One student’s concerning/abusive behaviour towards another could be an indicator of that student having been harmed themselves.

### **If a Student makes a Disclosure to a Member of Staff or Volunteer**

All staff are aware they should always be prepared as students can disclose spontaneously to anyone anywhere.

Hockerill Anglo-European College is situated within the County of Hertfordshire which has a rich and diverse population. We cannot, and do not, assume that all students and their families have the ability, understanding, language and resilience to convey any difficulties they may experience. It is key to our school ethos to recognise the needs of students and their families and to recognise and provide support where English may not be their first language and/or the children or family members have special educational needs; and without doing so may impede their ability to represent their voice, wishes and feelings.

All staff know that we place the voice of students at the centre of everything we do and endeavour to place their best interests at heart. We ensure we know who our students are, staff are encouraged to be curious by speaking and listening to students whilst respecting any protected characteristics. We

hope our students have confidence and trust in our staff, believing they will be taken seriously and be supported with their issues or concerns sensitively.

Staff also know that students may not always feel ready or know how to tell someone that they are being abused, neglected or exploited and do not always recognise their experiences as harmful.

We listen to students by:

- Showing patience regardless of a student's age as we know they can find it hard to find the words to express themselves
- Encouraging students to tell their story in their own words
- Avoiding the use of leading questions or suggesting what may have happened, instead we maintain genuine curiosity, and only ask open-ended questions / prompts.

We reassure students by:

- Making sure a student does not feel they are in trouble and that they have done the right thing in speaking to staff
- We let a student know it is not their fault as children are often made to feel blame by those harming them
- Never promising confidentiality and being transparent about our obligations to share information if we are concerned that they are at risk of harm
- Helping students to understand how we plan to support them and their family and let them know what action we will need to take next to support them.

### **Recording Concerns**

Staff know that reporting concerns is a procedural requirement when safeguarding and promoting the welfare of students. Staff are clear that they must:

- Speak with a DSL or Pastoral Leader as soon as possible where the concern involves a concern about the welfare of a student. The DSL must be informed immediately if there is a disclosure or concern that a student is at risk of harm.
- Follow the guidance or advice given by the DSL or Pastoral Leader
- Complete a 'Record of Concern' email and send to the DSL or Pastoral Leader, ensuring that the record is as detailed as possible, is factual, does not contain assumptions or personal judgement and captures the student's account in their own words

Staff are aware that child protection information is confidential and should be shared with the DSL only who may hold additional information about the student and their family, and therefore can form a view on its significance and whether any action is required. Staff will not share information amongst themselves and will not share the information outside of the formal reporting process unless asked to by the DSL. This ensures that information is shared without delay enabling the DSL to carry out any necessary functions of their role whilst upholding confidentiality for the student and their family.

### **What School Staff should do if they have Concerns about a Child**

Hockerill Anglo-European College is committed to ensuring that all students feel safe and comfortable to share and report any concerns and/or allegations about their personal experiences at home, in the

community, online or regarding a member of staff or other children in the school. As outlined above, all our staff are clear on the importance of listening to and supporting students when making disclosures, and the need to reassure them.

Staff are aware that students can share information with anyone in our school but there are clear reporting processes when such information sharing raises concern about their welfare. Students may talk about worries and anxieties around friendships and school life which they need to support with but on other occasions they may share information about their family life which indicates that the students and their family may be in need of help and/or fear or experiences which cause staff to be concerned about whether they have been harmed or are at risk of being harmed. Where such situation arises, our staff are clear on the reporting processes.

Any member of staff, trustees and visitors at Hockerill Anglo-European College who have a concern about a student's welfare should:

- Maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the student. Never promise a child confidentiality
- Reassure the student they have done nothing wrong and if appropriate explain to them how they will be supported and who you will need to share information with
- Record what the student or others have disclosed using their language - or describe what you have seen or suspect and your rationale for this. Also ensure you make a note of any injuries observed or described by the student (*if it is the latter two*)
- Consider if the student needs medical attention and if so, prioritise ensuring they receive this
- Never delay reporting your concerns about the welfare of a student and always act immediately by reporting/speaking to the DSL

The DSL will:

- Use Hertfordshire threshold guidance to initially assess the concerns raised and consider the impact on the student's welfare and safety. They will also review the student's record in order to establish if there have been any previous concerns (records help to establish relevant history and risk factors for example even if a concern appears low level on the surface, a series of incidents can highlight patterns of ongoing abuse and neglect.) The DSL will use the Continuum of Need to support their analysis and rationale for any decision
- DSL or deputy will speak to the student to verify their wishes and feelings, contact the student's parents or carers to either inform them of the concerns and also to gauge their view (it will be at the discretion of the DSL team to carefully consider if this action may place a child at further risk, e.g. if the student has disclosed abuse and neglect caused in the family home)
- If the student has not suffered significant harm as defined by the Children Act, the DSL may also decide to seek advice through the range of Hertfordshire departmental non Child Protection advice lines. The purpose of these are to support DSLs to consider the best options to engage students and their families with an offer of early help support, preventing escalation where possible but also request for support via Children's Services where necessary. Examples of this are managing any support for the student internally via the school's own pastoral support processes and/or undertaking a Families First Assessment
- If it is immediately apparent that a student has suffered significant harm or is at risk of harm e.g. suffered abuse, neglect and/or exploitation, the DSL will make a referral to Children's Social Care to

request support at the earliest opportunity; consent will be gained where appropriate. If there has been a crime committed within the circumstances of the abuse, they will also report this to the Police.

### **What will the Local Authority Children's Social Care do?**

Within one working day of a referral being made, a social worker should acknowledge its receipt to the DSL and make a decision about the next steps and the type of response that is required. This will include determining whether:

- The student requires immediate protection and urgent action is required
- Any services are required by the student and family and what type of services
- The student is in need and should be assessed under section 17 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process
- There is reasonable cause to suspect the student is suffering, or likely to suffer, significant harm, and whether enquiries must be made, and the student assessed under section 47 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process
- Further specialist assessments are required to help the Local Authority to decide what further action to take
- The DSL should follow up if this information is not forthcoming.

Anyone working/volunteering with children can make a referral, if in an emergency staff are unable to locate or do not have time to inform DSL of a serious concern, the following process must be followed without delay.

### **Making a Referral to Children's Services and/or Requesting Support**

Professional referrals are made using the online referral form located on Hertfordshire Safeguarding Children Partnership [website](#). (consent is needed from parents and carers, unless to do so may place a child at risk).

If someone is in danger or a crime has also been committed call the Police on 999.

Out of hours (17:30-08:00 and weekends) call 0300 123 4043.

Members of the public (non-school staff), parents, carers, children and young people can call Children's Services at any time of the day or night on 0300 123 4043.

This link provides leaflet for parents and carers [HSCP Family Leaflet \(hertfordshire.gov.uk\)](https://www.hertfordshire.gov.uk/hscp-family-leaflet)

## **What Children and Young People need to Know and do to Report Safeguarding Concerns (Abuse, Neglect and Exploitation)**

At Hockerill Anglo-European College we cultivate a culture of openness and transparency and want to make it clear to all our students that we are available at any time to listen to them and will always take their concerns seriously, however small they may consider them to be.

Our pledge is:

- We will ensure we provide students with an opportunity to talk and share concerns
- We will listen without judgement and endeavour to respect your wishes and feelings
- We want students to feel safe and we will be honest about our duty to prioritise their wellbeing and longer term safety. Depending on the circumstances, we cannot offer students total confidentiality. We understand that this may create uncertainty, but we are confident that often when matters are dealt with as they emerge the longer-term prospects can be much improved for students and their family
- Whilst respecting a student's wishes and feelings, if they have suffered significant harm or are at risk of harm we will need to share this information so that the student and their family can be offered the right support. We will be clear on what information needs to be shared, with whom and how it might be used
- When the concerns suggest students may benefit from early help support this may include considering support to their parents and carers with matters that will improve their situation
- We will ensure students have a member of staff who they can approach to support them if they are feeling vulnerable and experiencing difficulties
- Students' education and welfare is important to us and we want to reassure them that their experience at school remains positive and that they feel safe.

What Students can do to Report Concerns:

- Students can speak to any member of staff of their choice. Students can report concerns electronically, by email or through 'Report a Concern'. The 'Student Safeguarding Poster' is displayed in all student facing areas of the school. Staff receiving concerns will discuss the concern with a Pastoral Leader or DSL

If a student is being abused, neglected or exploited they can call Children's Services at any time of the day or night on **0300 123 4043**.

If students are in immediate danger and/or think a crime has/is being committed, they can call the Police on **999**.

You can contact the NSPCC Helpline by calling 0808 800 5000 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **Risk Management and Safety Planning**

The DSLs will take the lead role in managing any proposed risk by the alleged perpetrator(s) and will provide support at the same time, it is not our intention to villainise students, but it is everyone's responsibility to uphold the Behaviour Policy and standards within the school to maintain a safe environment. Such assessments or plans will be robust but sensitive to the individual needs of the students to ensure any identified risk is managed as effectively as possible whilst also supporting them to continue accessing a satisfactory level of education.

Risk management strategies can be put in place while other investigations are ongoing, e.g. by the Police. Although another agency such as the Police or Children's Services is or has investigated an incident, it is our duty at Hockerill Anglo-European College to ensure we identify and implement our own assessment and management of the concerns, informed by the needs of the school and the students we care for and the advice and outcomes of those agency's actions. This is to ensure that all students and staff are supported and always protected. We will consider these matters on a case-by-case basis, considering whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the Police and/or Children's Services to determine this
- There are circumstances that make it unreasonable or inappropriate for us to reach our own view about what happened while an independent investigation is ongoing.

### **13. ONLINE SAFETY AND FILTERING**

We recognise the importance of safeguarding students from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, the school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff and trustees
- Protect and educate the whole school community to be safe and responsibly use technology, including mobile and smart technology
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in Keeping Children Safe in Education 2024:

**Content** – being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

**Contact** – being subjected to harmful online interaction with other users, for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – online behaviour that increases the likelihood of, or causes harm, for example: making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

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

To meet our aims and address the risks above, we will educate students about online safety as part of the curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- Ensuring students know not to meet up with a person they have met online without a safe adult
- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they're a witness rather than a victim.

We will also:

- Train staff, as part of their induction, on how to keep themselves safe online as well as students, in line with the school's Online Safety Policy This needs to include issues for example: cyber-bullying, the risks of online radicalisation, and the roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year
- Educate parents/carers about online safety including signposting useful resources and inviting them to attend presentations. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their personal mobile phone and cameras, (see Staff Code of Conduct)
- Ensure that all students, parents/carers (of Year 7 & 8 students), staff, and trustees sign the Acceptable Use Agreement which includes expectations for the use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, students and parents/carers are aware that appropriate staff designated by the Principal, have the power to search student's phones, as set out in the DfE's guidance on searching, screening and confiscation if there is a concern regarding a student's safety or a crime in which case the Police will be contacted
- Put in place robust filtering and monitoring systems to limit student's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

## 14. MANAGING SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF

Staff should refer to the school's Low Level Concerns Guidance which is available through the school's Staff Portal.

Section 11 of the 2004 Children's Act places an expectation on the school to have a clear policy in line with HSCP for dealing with allegations against staff who work with children. All staff based within the school will be considered to be in either a position of trust or working with children.

A 'position of trust' is one in which a teacher or other member of staff is in a position of power or influence over a child, by virtue of the work or nature of activity being undertaken. [The Sexual Offences Act 2003 \(ss.16-24\)](#) and/or [Crown Prosecution Service Website](#) sets out detailed definitions and a range of criminal offences associated with abuse of such a position.

A person aged 18 or over is said to be in a position of trust in relation to students at the school if they:

- Look after children at the school/college. "Looking after" is defined as being regularly involved in caring for, training, supervising or being in sole charge of such persons
- Are a professional who has power and authority in a child's life and may have a key influence on their future
- Are such a person who will have regular contact with the child and may be acting in *loco parentis*.

The Police, Crime, Sentences and Court Act (August 2022) extended the roles which fall into the definition of 'Position of Trust' within the Sexual Offences Act (2003). The new legislation makes it an offence for anyone who coaches, teaches, trains, supervises or instructs a child under 18, on a regular basis, in a sport or a religion to engage in inappropriate relationships with those children/young people.

On receipt of any information which raises a concern about any staff, the Principal, or Chair of Trustees, will consider whether the information suggests it is the following:

- **Allegation**

An allegation is a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The threshold for an allegation that is considered by the LADO is wider than those in which there is reasonable cause to suspect a child is suffering, or likely to suffer, harm. The LADO threshold is, in respect of all people working or volunteering with children in a position of trust, where they have:

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

Any information or concern which meets the above threshold should be referred to the LADO service prior to the school taking any action.

- **Concern about the Quality of Care/Practice**

This is an accusation, not of a child protection nature, that the care/practice provided to a child does not meet the standards expected and is about the level of value provided by any care/practice resource, as determined by some measurement. As with quality in other fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose.

These types of concerns should be addressed internally using performance management processes.

- **Complaint**

This is a statement that something is unsatisfactory or unacceptable. A concern may be defined as ‘an expression of worry or doubt over an issue considered to be important for which reassurances are sought’. A complaint therefore can be defined as ‘an expression of dissatisfaction however made, about actions taken or a lack of action’.

These issues must be addressed through internal complaints policy and procedures.

**The two levels of Concerns and Allegations are:**

<p><b>1. Concerns/Allegations that may MEET the harm threshold.</b></p> <p><b>An allegation may relate to a person who works with children who has:</b></p> <ul style="list-style-type: none"> <li>• behaved in a way that has harmed a child or may have harmed a child. (<b>Harm threshold</b>)</li> <li>• possibly committed a criminal offence against or related to a child; (<b>criminal threshold</b>)</li> <li>• behaved towards a child or children in a way that indicates they may pose a risk of harm to children, (<b>suitability threshold</b>)</li> <li>• behaved or may have behaved in a way that indicates they may not be suitable to work with children (<b>transferable risk threshold</b>).</li> </ul>	<p><b>2. Concerns/Allegations that DO NOT meet the harm threshold.</b></p> <p><b>Behaviours that are inconsistent with school's staff code of conduct and other associated policies, or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO), therefore Low-Level Concerns (LLC) e.g.</b></p> <ul style="list-style-type: none"> <li>• being over friendly with children</li> <li>• having favourites</li> <li>• taking photographs of children on their mobile phone, contrary to school policy</li> <li>• engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or</li> <li>• humiliating children.</li> </ul>
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When concerns/allegations meet the harm threshold Hockerill Anglo-European College is required to comply with both Part Four of KCSiE and also Hertfordshire Safeguarding Children Partnership procedures manual section [5.1.5 Managing Allegations Against Adults Who Work With Children and Young People \(proceduresonline.com\)](#)

All staff at Hockerill Anglo-European College are required to immediately report any concern about the behaviour and/or conduct of adults working/volunteering towards a child to leadership and management. This includes reporting adults who are providing out of school activities/leasing of Hockerill Anglo-European College’s facilities.

It is important for staff or any person associated with Hockerill Anglo-European College to know who to report concerns to:

- An allegation against a member of staff must be reported to the Principal
- An allegation against the Principal must be reported to the Chair of Trustees

See Appendix 5 (Reporting Safeguarding Concerns Against an Adult)

## What Happens Next

The Principal/Chair of Trustees may undertake initial inquiries to gather key information. They will assess whether the allegation meets the LADO threshold, if it does they will make a referral to LADO giving consideration to our Staff Code of Conduct and guidance on managing allegations, as well as [5.1.5 HSCP procedures](#). If necessary, they will complete a LADO referral within one working day.

If the allegation does not meet the harm threshold for LADO, the Principal/Chair of Trustees will follow the school's Low Level Concerns Guidance.

## Role of LADO

- **Case Management**

Overseeing the process and ensuring it is working, not to investigate

- **Consultation**

Providing advice and guidance to employers and voluntary organisations

- **Monitoring**

The progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process

- **Liaison**

With the Police, Children's Services and other partner agencies (managers of the subject of allegation)

## Role of School's Case Manager, includes:

- Clarifying facts of the concerns/allegation (not investigate) before contacting the LADO
- Taking part in Strategy Meetings to liaise with other partner agencies
- Undertaking internal planned inquiries/fact finding
- Taking part to review the progress of the case in which there is a Police Officer investigation
- Operating a thorough disciplinary process when appropriate
- Ensuring a properly managed conclusion and outcome to process

## LADO Principles and Response

- **Timeliness**

Any allegation of abuse must be dealt with fairly, quickly and consistently in accordance with the safeguarding and child protection procedures, this is best practice to provide immediate safety for child/ren, and make safe arrangements for the person who is the subject of the allegation. It is crucial that employers make a referral to LADO within one working day.

- **Objectivity**

It is not permissible for a member of staff to conduct (though their involvement may still be required) an enquiry about suspicion or allegation of abuse with respect to a:

- Relative
- Friend
- Colleague, supervisor/supervisee or someone who has worked with her/him previously in any of these capacities

If, following the conclusion of child protection processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of students or other vulnerable witnesses.

- **Confidentiality**

Information about an allegation must be restricted to those who have a need to know in order to:

- Protect children
- Facilitate enquiries
- Avoid victimisation
- Safeguard the rights of the person about whom the allegation has been made and others who might be affected
- Manage disciplinary/complaints aspects
- A media strategy should be developed with no improper or inadvertent releases of information to the media, in accordance with the Association of Chief Police Officers (ACPO) guidance (now known as [The National Police Chiefs' Council \(NPCC\)](#))

- **Support**

Parents/carers of students involved should be:

- Informed of the allegation as soon as possible, provided provision of information and advice at that stage does not impede the enquiry, disciplinary or investigative processes, and may need to be told immediately, e.g. a student requires medical treatment
- Helped to understand the process involved and kept informed about the progress of the case
- Told that there has been an enquiry or disciplinary process (but no detail is to be provided in relation to any internal HR processes)
- When necessary, helped to understand the outcomes reached (but see above proviso in relation to the provision of advice)
- The employer should keep the subject of the allegation informed of progress in the case and arrange to provide appropriate support (via Occupational Health or equivalent). If the person is suspended, (s)he should be kept informed of development in the workplace and if a member of a Trades Union or professional association.

- **Monitoring**

- The LADO should monitor the progress of cases either fortnightly or monthly depending on its complexity either via review Strategy Discussions or by liaising with Police and/or Children's Services colleagues, or employer as appropriate. The Designated Officer should keep records to ensure that every case is dealt with without undue delay.

If the Strategy Discussion/initial evaluation have decided that a Police investigation is required, the Police Joint Child Protection Investigation Team (JCPIT) should also set a target date for reviewing the progress of its investigation and consulting the Crown Prosecution Service (CPS) to consider

whether to charge the individual/continue to investigate/close the investigation. Whenever possible that review should take place within four weeks of the decision to initiate a criminal investigation.

If the investigation is to continue, dates for subsequent reviews, ideally at fortnightly (at most monthly) intervals, should be set at the meeting.

- **Target Timescales**

It is in everyone's interest for cases to be dealt with as quickly as possible, consistent with a fair and thorough investigation. Timescales (which are not performance indicators) will depend on nature, seriousness, and complexity of allegation(s) though in general (based upon data about allegations against education staff):

- 80% of cases should be resolved within one month
- 90% within three months

All but the most exceptional should be completed within twelve months (it is unlikely cases requiring a criminal prosecution or complex Police investigation can be completed in less than three months).

### **Concerns that DO NOT meet the Harm Threshold - Low-Level Concerns (LLC)**

Schools must have a policy in place which outlines the relevant processes and procedures for dealing with concerns raised to them that do not meet the LADO threshold, these concerns are referred to as low-level concerns. The term low-level does not seek to minimise the seriousness of any concerns, the term low-level indicates that it is a concern that is lower than the LADO threshold, but they are still practice concerns that need to be considered with a safeguarding lens and require suitable action through internal procedures of the school. It is important these are managed robustly as a repeated low-level concern or a pattern of concerns which may not meet the LADO threshold individually may together indicate a concern about the person's suitability and potential risk to children in the capacity of their role.

At Hockerill Anglo-European College, the Principal manages Low Level Concerns using the school's internal process (see Low Level Concerns Guidance), if we consider a member of staff has breached the school's code of conduct, depending on the seriousness and impact on a student, we will also liaise with HR services:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level safeguarding concerns
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping identify any weakness in the school's safeguarding system.

The school's Low-Level Concerns Guidance is a reflection and extension of Hockerill Anglo-European College's Staff Code of Conduct.

Concerns may arise from a range of scenarios, e.g. suspicion; complaint or disclosure made by a student, parent or other adult within or outside of the organisation or as a result of vetting checks undertaken.

All staff should know that in line with the school's culture we encourage staff to have the confidence and trust to confide in leadership if they have concerns about adults working or volunteering with children.

We share information responsibly and understand this is on a need-to-know basis

We apply the protocols for recording and storing information confidentially.

We encourage an open and transparent culture, to identify concerning, problematic or inappropriate behaviour early so that we are able to minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and in accordance with the ethos and values of the institution.

If the school is uncertain of threshold criteria for either LADO referral or Low Level Concerns, consultation will take place with HR and the LADO. At Hockerill Anglo-European College we have clear codes of conduct and processes in place to deal with any concerns or allegations which do not meet the LADO threshold. Such concerns may arise from suspicion, complaint, safeguarding concerns, or allegation from another member of staff, disclosure made by a child, parent or another outside of the school or pre-employment vetting checks.

### **After-School Clubs, Community Activities and Tuition: Safeguarding Guidance for Providers**

Hockerill Anglo-European College has a legal duty of care to ensure maintenance of a safe environment its students. If the school receives an allegation or concern relating to an incident that has happened when an outside individual or organisation are using the school's premises, we will ensure that we follow our school's safeguarding and child protection procedures, which includes reporting allegations to the LADO, Children's Social Care and Police if a crime has been committed.

It is the role of Hockerill Anglo-European College's trustees to ensure any organisation that hires the school premises is compliant with the guidance set out in [After-school clubs, community activities and tuition: safeguarding guidance for providers – GOV.UK \(www.gov.uk\)](#) In particular we have embedded within our lease agreement with external organisations the standards and expectations for them to provide evidence and assurance of their safeguarding and child protection procedures.

### **Other Complaints**

If any of the school's stakeholders are not satisfied with any aspects of how we implement and comply with safeguarding policies and procedures, the school Complaints Policy can be found on the school website.

### **Whistleblowing**

At Hockerill Anglo-European College, we strive to create a culture of openness, trust and transparency to encourage all staff to confidentially share any concerns they have about poor or unsafe practice, concerns or allegations against staff or the school's safeguarding practice and arrangements so they can be addressed appropriately.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding procedures and arrangements.

Examples where Whistleblowing may apply:

- Student's or staff member's health and safety are being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Attempts to cover up the above, or any other wrongdoing that is in the public/school interest

Concerns should be reported to the Principal/ and if concerns are about the Principal, they should be reported to the Chair of the Board of Trustees.

Concerns should be taken seriously and investigated, and confidentiality respected.

If, for any reason, there are difficulties with following the above procedure, a person can whistle blow directly to Children's Social Care on 0300 123 4043 and/or the Police on 999, or to the NSPCC Whistleblowing Helpline 0800 028 0285 [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## 15. RECORD KEEPING

Hockerill Anglo-European College will hold records confidentially, safely, securely and in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, will be recorded in writing. If a person is in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached, and the outcome

Concerns and referrals will be kept in a separate child protection file for each student (either paper recorded or electronically).

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to know/access them.

Safeguarding records relating to an individual student will be retained for the student until they reach their 25th birthday or 31st birthday if there is an EHCP in place (Information Records Management Society 2022). [eBook: Ultimate Guide to Electronic Records Management | Laserfiche](#)

Safeguarding records which contain information about allegations of sexual abuse were being retained for the Independent Inquiry into Child Sexual Abuse (IICSA). This has now concluded and the Home Office sent a letter to schools advising that files no longer needed to be kept indefinitely. However, the recommendations from the inquiry have stated:

*Recommendation 17: Access to records The UK government should direct the Information Commissioner's Office to introduce a code of practice on keeping and accessing records which relate to child sexual abuse. The code should require records about child sexual abuse and allegations of child sexual abuse to be kept for 75 years, with appropriate review periods.*

The school will follow the Recommendation 17.

### **Receiving in and Transferring Student Records to Other Education Provision**

If a student for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main student file.

To allow the new school to have support in place when the student arrives, this should be within:

- **5 days** for an in-year transfer, or
- **The first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the wellbeing and safety of the student.

### **Retention, Archiving and Destruction of Records**

For records that are not transferred to another school, for example the student leaves the country or is going to be home educated, we have:

- A clear retention policy
- Secure and appropriate system to archive with restricted access
- We have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

Storage, retention, and destruction of our child protection files is also made clear in our data management policy.

## **16. SAFEGUARDING TRAINING AND DEVELOPMENT**

All staff receive approved safeguarding and child protection training (including online safety) so that everyone understands the expectations, applicable to their role and responsibilities. We ensure that all staff and volunteers' continuous professional development (CPD) is maintained and keep a record of this. In addition to statutory training all staff receive regular updates and CPD via email, e-bulletins, and staff meetings.

At Hockerill Anglo-European College we access training in line with our statutory requirements in Keeping Children Safe in Education, local expectations set out by Hertfordshire Safeguarding Children Partnership and recommendations of good practice by HCC's Child Protection School Liaison Service.

An overview of our training is as follows:

## **Staff Induction**

All new staff are provided with training which enables them to fulfil their child protection and safeguarding responsibilities. This includes familiarisation with key school documents, including:

- Child Protection Policy
- Attendance Policy
- Behaviour Policy
- Countering Bullying Policy
- Staff Code of Conduct
- Identity and roles of the DSLs
- Keeping Children Safe in Education

## **Safeguarding Training for All Staff**

All staff receive annual updates delivered by DSLs and external providers where necessary. Content includes updates to Keeping Children Safe in Education and school policies, as well as online safety, Prevent and contextual safeguarding. As part of the annual update, all staff are reminded of the processes that the school uses to report concerns about students and adults.

Throughout an academic year, the DSLs provide all staff with relevant updates as changes occur to keep abreast of our whole school approach to safeguarding. This supports staff to fulfil their role as set out in Part One of Keeping Children Safe in Education. These updates may be provided through email, e-bulletin, links to online training and staff meetings.

## **DSLs**

DSLs will undertake child protection and safeguarding training at least every two years. In addition, they update their knowledge and skills at regular intervals through regular e-bulletins and training courses, as well as by meeting other DSLs and the CPSLO.

## **Trustees**

All Trustees receive training about child protection, including online safety and Prevent at induction and throughout their tenure. This ensures that Trustees have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge. Training enables Trustees to review and approve policies effectively and also allows them to act as a 'case manager' in the event that an allegation of abuse is made against the Principal.

## **Safer Recruitment**

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education and is in line with HCSP procedures. See the Safer Recruitment Policy for more details.

## 17. QUALITY ASSURANCE, IMPROVEMENT AND PRACTICE

Hockerill Anglo-European College endeavours at all times to provide an education and learning where students feel safe and are kept safe by all staff. One way we review and monitor our practice is through auditing: it is important that we are aware of the level of our school's compliance to key guidance, such as KSCiE. We want to be open, transparent and reassure ourselves and our stakeholders, including regulators, what we are proud of and what we need to strengthen to meet our own ambitions for standards. It is therefore standard practice that we factor in on-going auditing schedule objectivity and scrutiny by our Board of Trustees and all Senior Leadership, students and their parents and carers.

We also commission other scrutineers to help us seek reassurance of our practice, e.g. Herts for Learning Education, School Effective Advisors, the Local Authority Child Protection School Liaison Service and Judicium Education, who act as the interface between education and Hertfordshire Social Care and provide support and advice when required.

This policy will be reviewed **annually**. At every review, it will be approved by our full Board of Trustees.

# Commitment to Care Charter

**BSA schools are committed to the highest duty of care and safeguarding**

Keeping pupils safe, secure and cared for are the main priorities for members

**Everyone working in a BSA school will raise any concerns immediately**

'Everyone' includes all full or part-time staff, volunteers, governors and contractors. It also means pupils, such as prefects in boarding houses. 'Immediately' is without hesitation or delay, and 'abuse' is any suspicion, belief or evidence of physical, emotional, sexual or discriminatory abuse by an adult against a pupil or by a pupil against another pupil.

**BSA schools will follow all statutory safeguarding guidance and laws and report concerns to the relevant authority and the BSA**

Follow all 'safeguarding guidance and laws' means that all policies and procedures, including a school's guidelines for reporting, must comply with any applicable rules and expectations<sup>1</sup>, and in relation to any requirement to report to the police where necessary. 'Report concerns to the relevant authority' means to follow those guidelines and, if an unsatisfactory response is received, to escalate the concern. Report 'to the BSA' means to inform the BSA that a referral has been made, but without disclosing any details by which a case or an

individual can be identified.

**BSA schools will support any present pupils affected by abuse and those who report concerns, and offer support to past pupils**

'Support' means to provide open, honest communication, provide counselling or similar services or referral to them. 'Offer of support' means referral to other organisations (e.g. the police for past pupils), counselling or similar services. Support will be given if there is no conflict of interest or legal restriction.

**BSA will support member schools which responsibly follow the Charter**

The BSA will support member schools to help them to follow the Charter. Member schools are expected to endorse the Charter clearly and strongly. The Safeguarding Governor is expected to have a clear oversight of safeguarding procedures and practice. BSA will review any instances where the Charter has not been responsibly followed (especially where cases and allegations have not been reported to the BSA as soon as it is permissible to do so) and consider any appropriate action.

<sup>1</sup>For member schools in England, this includes, but is not limited to, statutory guidance set out in Keeping Children Safe in Education (as updated from time to time). In other UK regions and internationally, this includes any relevant guidance or legislation applicable in the territory concerned.

Staff Safeguarding and Flow Chart Poster

# SAFEGUARDING



OUR DESIGNATED SAFEGUARDING LEADS (DSLs) ARE



**Samuel Carroll**  
Assistant Principal  
Designated  
Safeguarding Lead



**Jonathan Ellams**  
Assistant Principal  
Deputy Designated  
Safeguarding Lead



**Alasdair Mackenzie**  
Vice Principal  
Deputy Designated  
Safeguarding Lead

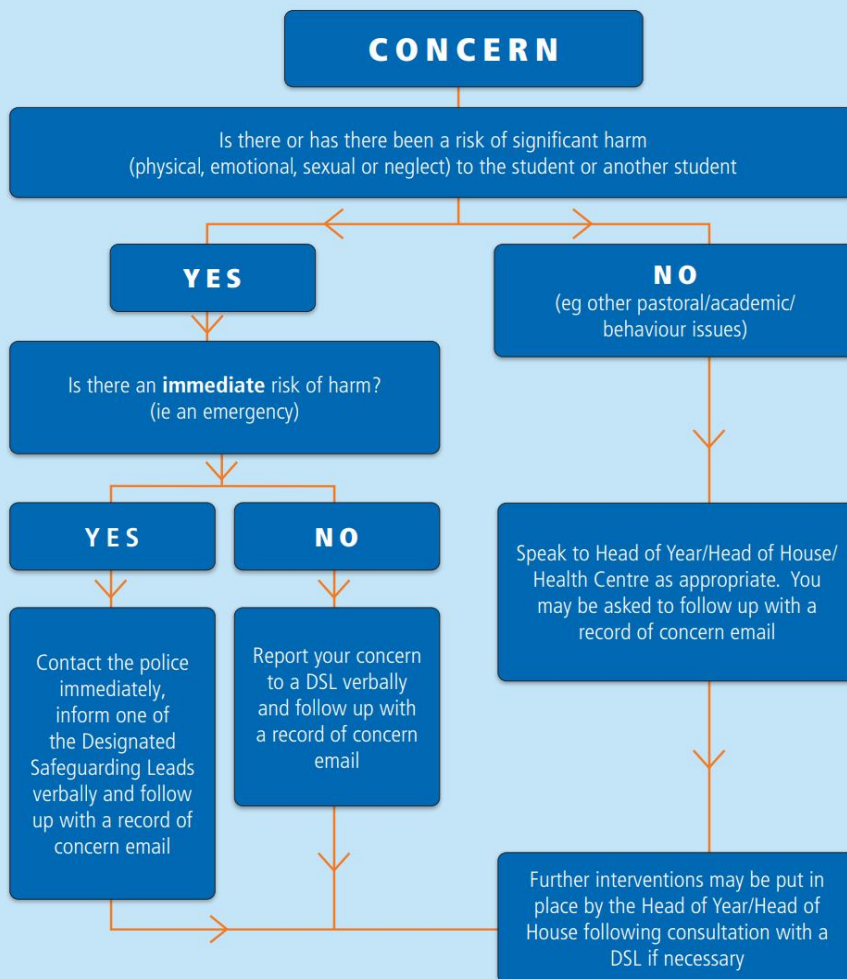


**Clare Mackinlay**  
Pastoral Manager  
Deputy Designated  
Safeguarding Lead



**Lucy Tinnirello**  
Head of Student  
Health and Wellbeing  
Deputy Designated  
Safeguarding Lead

As a Hockerill staff member you are responsible for safeguarding and promoting the welfare of children. All staff are expected to know how to respond if a student approaches you with a welfare concern.



**When responding to a disclosure**

- Do not promise confidentiality
- Reassure the student that they are being taken seriously and will be supported and kept safe
- Reassure the student that you are there to help
- Listen without interrupting and do not ask leading questions
- Explain the next steps
- Make a written record of events using the student's own words

**SLT on Call**

(Term Time, including evenings and weekends)

**07872 698389**

**During Holidays**

- Child at risk of immediate harm/emergency - **Call 999**

- Hertfordshire Children's Services

**0300 123 4043**

Ensure you are familiar with the College's Child Protection Policy and Keeping Children Safe in Education

Student Safeguarding Poster

# SAFEGUARDING



**Mr Carroll**  
Assistant Principal  
Designated  
Safeguarding Lead



**Mr Ellams**  
Assistant Principal  
Deputy Designated  
Safeguarding Lead



**Mr Mackenzie**  
Vice Principal  
Deputy Designated  
Safeguarding Lead



**Mrs Mackinlay**  
Pastoral Manager  
Deputy Designated  
Safeguarding Lead



**Sister Tinnirello**  
Head of Student  
Health and Wellbeing  
Deputy Designated  
Safeguarding Lead

Our Students have a right to be cared for and protected. This is **everyone's responsibility**. As a member of the Hockerill community you have a duty to act when you have a concern about your own or someone else's welfare.

## SEE something

### Possible causes of concern

- Physical signs of harm
- Hearing something worrying that has happened
- Changes in a person's behaviour, presentation or appearance
- A person in emotional distress
- An awareness that someone's behaviour is putting themselves or others at risk
- Someone may disclose something to you

### Remember harm to a child can be caused by

- Another young person
- A family member
- A friend
- A member of staff
- A stranger
- Themselves

## SAY something

You must report your concerns to a member of staff as soon as possible, even if you are not sure about the full extent of the situation.

**DO NOT WAIT** - delays in reporting could cause greater harm.

You can inform a DSL of any concern or any other member of staff if you would feel more comfortable.

If your concern is about a member of staff, you should report this directly to the Principal. If your concern is about the Principal, you should inform the Chair of Governors (email [chairofgovernors@hockerill.com](mailto:chairofgovernors@hockerill.com)).

Alternatively, use the QR code (below) to report your concern, with the option to do so anonymously.

**If you think someone is in immediate danger and needs urgent help, you must call the police on 999**



if you **SEE** something, **SAY** something



APPENDIX 4

**Indicators of Abuse**

Indicators of Physical Abuse	Indicators of Emotional Abuse
<p><b>Bruises:</b></p> <ul style="list-style-type: none"> <li>• Commonly on the head but also on the ear, neck or soft areas (abdomen, back and buttocks)</li> <li>• Defensive wounds commonly on the forearm, upper arm, back of the leg, hands or feet</li> <li>• Clusters of bruises on the upper arm, outside of the thigh or on the body</li> <li>• Bruises with dots of blood under the skin</li> <li>• A bruised scalp and swollen eyes from hair being pulled violently</li> <li>• Bruises in the shape of a hand or object</li> <li>• Bruises on non-mobile babies.</li> </ul> <p><b>Burns or scalds:</b></p> <ul style="list-style-type: none"> <li>• Can be from hot liquids, hot objects, flames, chemicals, or electricity</li> <li>• These may be on the hands, back, shoulders or buttocks. Scalds in particular may be on lower limbs, both arms and/or both legs</li> <li>• A clear edge to the burn or scald</li> <li>• Sometimes in the shape of an implement, for example, a circular cigarette burn</li> <li>• Multiple burns or scalds.</li> </ul> <p><b>Bite marks:</b></p> <ul style="list-style-type: none"> <li>• Usually oval or circular in shape</li> <li>• Visible wounds, indentations or bruising from individual teeth.</li> </ul> <p><b>Fractures or broken bones:</b></p> <ul style="list-style-type: none"> <li>• Fractures to the ribs or the leg bones in babies</li> <li>• Multiple fractures or breaks at different stages of healing</li> <li>• Risks and vulnerability factors</li> <li>• Physical abuse can happen in any family, but babies and children who have a disability are at a higher risk of suffering physical abuse (Jones et al, 2012).</li> </ul>	<ul style="list-style-type: none"> <li>• Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person</li> <li>• Not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate</li> <li>• 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 from participating in normal social interaction</li> <li>• A child seeing or hearing the ill-treatment of another</li> <li>• Serious bullying (including cyberbullying)</li> <li>• Causing a child to feel frightened or in danger</li> <li>• Exploitation or corruption of children.</li> <li>• Lack confidence</li> <li>• Struggle to control strong emotions</li> <li>• Struggle to make or maintain relationships</li> <li>• Display behaviour that is inappropriate to their stage of development (for example not being able to play, developing language late or using language you may not expect of a child their age.</li> </ul> <p><b>Older children may:</b></p> <ul style="list-style-type: none"> <li>• Struggle to control strong emotions or have extreme outbursts</li> <li>• Seem isolated from their parents</li> <li>• Lack social skills or have few, if any, friends</li> <li>• Use language, act in a way or know about things that you wouldn't expect them to know for their age</li> <li>• Risk and vulnerability factors</li> <li>• Children from any background can be at risk of emotional abuse. But some are more vulnerable than others.</li> </ul>

Indicators of Sexual Abuse	Indicators of Neglect
<p>Not all children will realise they are being sexually abused, particularly if they have been groomed, but there may be physical, behavioural and emotional signs that indicate a child has experienced sexual abuse.</p> <p><b>Physical indicators include:</b></p> <ul style="list-style-type: none"> <li>• Bruising</li> <li>• Bleeding</li> <li>• Discharge</li> <li>• Pain or soreness in the genital or anal area</li> <li>• Sexually transmitted infections (Lindon and Webb, 2016)</li> <li>• Girls who are being sexually abused may become pregnant at a young age.</li> </ul> <p><b>Emotional and behavioural indicators include:</b></p> <ul style="list-style-type: none"> <li>• Being afraid of and/or avoiding a particular person (including a family member or friend)</li> <li>• Having nightmares or bed-wetting</li> <li>• Being withdrawn</li> <li>• Alluding to 'secrets'</li> <li>• Self-harming</li> <li>• Running away from home</li> <li>• Developing eating problems</li> <li>• Displaying sexualised behaviour or having sexual knowledge that is inappropriate for their stage of development</li> <li>• Misusing drugs or alcohol.</li> </ul> <p><i>This list is non-exhaustive and covers the more typical indicators</i></p>	<p>Neglect can be difficult to spot. Having one of the signs doesn't necessarily mean a child is being neglected. But if you notice multiple signs that last for a while, they might show there is a serious problem. Children and young people who are neglected might have:</p> <ul style="list-style-type: none"> <li>• Poor appearance and hygiene, being smelly or dirty (unkempt)</li> <li>• Being hungry or not given money for food</li> <li>• Having unwashed clothes, the wrong clothing, such as no warm clothes in winter</li> <li>• Health and development problems, regular illness or infections</li> <li>• Anaemia</li> <li>• Body issues, such as poor muscle tone or prominent joints</li> <li>• Medical or dental issues</li> <li>• Missed medical appointments, such as for vaccinations</li> <li>• Not given the correct medicines</li> <li>• Poor language or social skills.</li> </ul> <p><i>This list is non-exhaustive and covers the more typical indicators</i></p>
<p><i>This list is non-exhaustive and covers the more typical indicators</i></p>	<p><i>This list is non-exhaustive and covers the more typical indicators</i></p>

Indicators of Child Criminal Exploitation CCE	Indicators of Child Sexual Exploitation CSE
<ul style="list-style-type: none"> <li>• Having money or things they can't or won't explain</li> <li>• Being found or stranded in other locations</li> <li>• Committing petty crimes like shoplifting/vandalism</li> <li>• Exclusion/unexplained absences from school</li> <li>• Self-harm or significant changes in emotional well-being</li> <li>• Missing episodes</li> <li>• Being secretive about time online</li> <li>• Taking drugs and abusing alcohol</li> <li>• Being withdrawn or showing volatile behaviour</li> <li>• Carrying weapons</li> <li>• Relationships with controlling or significantly older individuals or groups</li> <li>• Unexplained injuries and refusing to seek medical help</li> <li>• Making more calls/texts, having multiple or new phones</li> <li>• Gang-association and/or isolation from peers/social networks.</li> </ul> <p><i>This list is non-exhaustive and covers the more typical indicators</i></p>	<ul style="list-style-type: none"> <li>• Self-harm</li> <li>• Being secretive</li> <li>• Sharp changes in mood or character</li> <li>• Having money or things they can't or won't explain (ie: clothes/food/jewellery/drugs)</li> <li>• Having an older boyfriend or girlfriend</li> <li>• Associating with older people who don't appear to be parent/carer/family</li> <li>• Involved in criminal activities like selling drugs or shoplifting.</li> <li>• Looking dishevelled or tired</li> <li>• Physical signs of abuse</li> <li>• Seen out late when they should be at school.</li> <li>• Spending a lot of time in one area</li> <li>• Others speaking on their behalf</li> <li>• Alcohol/Drug use</li> <li>• Sexually transmitted infections</li> <li>• Pregnancy.</li> </ul> <p><i>This list is non-exhaustive and covers the more typical indicators</i></p>

Recording Safeguarding Concerns About an Adult Poster



# Reporting Safeguarding Concerns about an Adult

(Teaching Staff, Operations Staff, Boarding Staff, Volunteers, Contractors, Residents living on site)

## 1. Has the adult or may the adult have behaved in a way that:

- Has harmed or may have harmed a child.
  - Possibly is a criminal offence against a child or related to a child.
  - Indicates they may pose a risk of harm to children.
  - Indicates they may not be suitable to work with children – inside or outside of College.
- Makes you concerned and/or gives you a sense of unease.
  - Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work.

## 2. Report your concerns to the Principal immediately \*

([woodsd@hockerill.com](mailto:woodsd@hockerill.com)) or to the Chair of Governors, if the concerns are about the Principal ([chairofgovernors@hockerill.com](mailto:chairofgovernors@hockerill.com)).

You should include brief details of the concern plus date, time, location and names of students and staff involved.

Examples of behaviour that should prompt professional curiosity even if they seem to be low level concerns.

- being overly friendly with children;
- having social media contact with children;
- humiliating children;
- engaging with a child on a one-to-one basis in secluded areas;
- taking photographs of children on a mobile phone

\* Concerns will be treated in confidence as far as possible but may, in certain circumstances, be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.