



Safeguarding Children and Vulnerable Adults Policy

Harrow Way Community School





SAFEGUARDING CHILDREN AND VULNERABLE ADULTS **POLICY**

This policy, like all school policies, is to be implemented in accordance with the principles and practice stated in our Equality Policy.

This policy applies to all Staff as well as the Community Education Department and all volunteers at Harrow Way Community School, irrespective of their role. It applies equally to visitors and learners and users and hirers of our facilities.

Organisations who deal with children on a regular basis should already have a child protection policy in place. If no such policy exists in the organisation, the school requires the organisation to adhere to the school's policy.

This policy should be read in conjunction with:

- Keeping Children Safe in Education (2025) [Part One]; and school leaders and staff that work directly with children should also read Annex A
- Staff Code of Conduct
- Child Protection Policy
- School's Behaviour Policy

RATIONALE

This policy applies to everyone at Harrow Way Community School.

It follows the expected standards for good practice set down by Hampshire County Council, from which the following is taken:

We recognise the legal “duty of care” laid down on us as “an organisation working with children and vulnerable adults to ensure that all reasonable steps are taken to ensure the safety of any child or vulnerable adults involved in any activity or interaction” for which we are responsible.

By “child” we mean any young person who has not yet reached their 18th birthday.

By “vulnerable adult” we mean any person aged 18 or older who, by reason of mental or other disability, age or illness is, or may be, unable to take care of him/herself, or unable to protect him/herself against “significant harm” or “exploitation”.

It is the responsibility of the Headteacher to ensure that this policy and any attached procedures are enforced.



PURPOSE

Aims:

- To provide Staff & volunteers with the framework to promote and safeguard the wellbeing of children and vulnerable adults and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the school.
- To demonstrate our commitment to protecting children and vulnerable adults.

Principles and Values

Safeguarding is everyone's responsibility. As such, it does not rest with the Designated Safeguarding Lead (DSL) and their deputies to take a lead of responsibility in all of the areas covered within this policy.

Some areas, such as Health and Safety, are a specialist area of safeguarding and a separate lead for this area is in place in the school.

Safeguarding processes are intended to put in place measures that minimise harm to children. There will be situations where gaps or deficiencies in the policies and processes we have in place will be highlighted. In these situations a review will be carried out in order to identify learning and inform the policy, practice and culture of the school. Annually the school will consider the particular risks to the children in our care and ensure appropriate measures are taken to safeguard their wellbeing.

All pupils in our school are able to talk to any member of staff to share concerns or talk about situations which are giving them worries. The staff will listen to the pupil, take their worries seriously and share the information with the safeguarding lead.

Staff should also share any other concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the Designated Safeguarding Lead if they have concerns about a child.

Confidentiality

- We maintain that all matters relating to child protection are to be treated as confidential and only shared as per information sharing advice for practitioners (DFE 2015 guidance).
- There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection



- Information will only be shared with individuals within the school who 'need to know'.
- All staff are aware that they cannot promise a child to keep a disclosure confidential.

Keeping Children Safe in Education (2025), paragraph 119 states: 'The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.'

Children at Harrow Way Community School are taught about how they can keep themselves safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special needs or disabilities.

Pupils are helped to recognise when they are at risk as part of the PSHE (Personal, Social, Health and Economic) Curriculum covering Relationships and Sex Education, and Health Education. Students are also signposted to support via regular school assemblies. In addition, we provide pupils with information of who they can talk to outside of school, both within the community and with local or national organisations who can provide support or help.

As a school, we review this policy at least annually in line with DfE, HSCP, HCC and any other relevant guidance.



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Areas of Safeguarding

Definitions (within this document):

Safeguarding is defined in KCSIE (2025) as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing 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; and taking action to enable all children to have the best outcomes. Our safeguarding practice applies to every child.

The term **staff** applies to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity. This also includes parents and Governors.

Child refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to pupils of our school; however the policy will extend to visiting children and students from other establishments

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

At Harrow Way we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

Key Personnel

The Designated Safeguarding Lead for the school is:

Katy Woods

The Deputy Designated Safeguarding Leads are:

Paula Lindfield, Nicholas Reed and Racheal Branston-Jones.

All members of SLT have completed DSL training.

The Safeguarding Governor is the Chair of Governors.

At Harrow Way all guidance for reporting concerns or making referrals is included in the Child Protection Policy.



Part 1 – High Risk and Emerging Safeguarding Issues

Low Level Concerns about Staff Behaviour

Allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors.

At Harrow Way we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the Headteacher without delay; any concerns about the Headteacher should go to the Chair of Governors who can be contacted by email.

Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the Headteacher/Principal.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Headteacher/principal has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

Allegations

It is an allegation if the person* has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.



The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the Police, Children's Social Care, the school or college, or a combination of these.

Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

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

Schools should ensure that their Code of Conduct is clear about what low-level concerns are and why it is important that such concerns are shared.

If the concern has been raised via a third party, the Headteacher/Principal should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- Name of individual* sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.)



Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

See also Developing and implementing a low-level concerns policy (Farrer & Co) <https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf>

The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or behaved or may have behaved in a way that indicates they may not be suitable to work with children. Where there are concerns about the proprietor of an independent school, the member of staff should contact the Local Authority Designated Officer without delay.

Whistleblowing

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistleblowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.



Contextual Safeguarding

In KCSIE 2025 the DfE refers to contextual safeguarding as a specific term that has come out of research from the University of Bedfordshire.

The definition of Contextual Safeguarding is *“an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore children’s social care practitioners need to engage with individuals and sectors who do have influence over/within extra- familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.”*

For us as a school, we will consider the various factors that have an interplay with the life of any pupil about whom we have concerns within the school and the level of influence that these factors have on their ability to be protected and remain free from harm particularly when it comes to child exploitation or criminal activity.

At Harrow Way we assess the risks and issues in the wider community when considering the well-being and safety of our students.

Children can be at risk of abuse or exploitation in situations outside 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. While this term applies to this specific definition, the notion of considering a child within a specific context is also important. What life is like for a child outside the school gates, within the home, within the family and within the community are key considerations when the DSL is looking at any concerns.

Types of Abuse

What is Abuse and Neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by 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 a stranger. They may be abused by an adult or adults, or another child or children.



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.

Physical Abuse

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

Emotional Abuse

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

Sexual Abuse

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

Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)



- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment

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

The HSCP (Hampshire Safeguarding Childrens' Partnership) Neglect Strategy is used to provide a more detailed summary of neglect and the local thresholds for referrals.

Indicators of Abuse

Neglect

The nature of neglect:

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on child protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment.

NSPCC research has highlighted the following examples of the neglect of children under 12:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging. Children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (What to do if You're Worried a Child is



Being Abused 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL.

Indicators of Neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The HSCP neglect toolkit provides a more detailed list of indicators of neglect and is available to all staff.

Physical Indicators of Neglect:

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated
- Behavioural indicators of neglect
- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Emotional Abuse

The nature of emotional abuse:

- Most harm is produced in *low warmth, high criticism homes*, not from single incidents.
- Emotional abuse is difficult to define, identify/recognise and/or prove.
- Emotional abuse is chronic and cumulative and has a long-term impact.
- All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.
- Children can be harmed by witnessing someone harming another person – as in domestic abuse.



It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of Emotional Abuse

Developmental issues:

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g. wetting
- Eating disorders
- Destructive tendencies
- Arriving early at school, leaving late

Social Issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional Responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression



Physical Abuse

The nature of physical abuse: Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map (Annex 2) can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

Indicators of Physical Abuse/Factors that should increase Concern:

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches

In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if the child or young person:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched



- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

Sexual Abuse

The nature of sexual abuse: Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g. relatives, family friends, neighbours, babysitters, people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation and criminal exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. Indicators of CSE can be found in the school's Child Protection Policy.

Characteristics of Child Sexual Abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives

Most people who sexually abuse children are men, but some women sexually abuse too.

Indicators of Sexual Abuse:

Physical observations:

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain
- Behavioural observations
- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity. Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour



- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour
- Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism

Preventing Radicalisation and Extremism

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff have also undertaken Prevent e-learning and should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead (or deputy) making a Prevent referral.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes



- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others.

Any child who is considered vulnerable to radicalisation will be referred by the DSL using the National Referral Form: [Prevent | Hampshire County Council \(hants.gov.uk\)](https://www.hants.gov.uk/prevent). The Counter Terrorism Police and Children's Services through MASH will then be informed. If the Counter Terrorism Police consider the information to be indicating a level of risk, a "channel panel" will be convened and the school will attend and support this process.

Mental Health

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

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the Designated Safeguarding Lead or a Deputy.

The Designated Safeguarding Lead for the school is:
Katy Woods - Deputy Headteacher and Mental Health Lead

The Deputy Designated Safeguarding Leads are:
Paula Lindfield -Safeguarding and Family Support Lead
Nicholas Reed– Assistant Headteacher
Racheal Branson-Jones - Assistant Year Leader
All members of SLT have completed DSL training.
The safeguarding Governor is the Chair of Governors.



All concerns are reported via CPOMS - Child Protection Online Management System.

Children who have a Social Worker

At Harrow Way, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker. Harrow Way Community School ensures that:

- Staff are made aware of students who have a social worker and this group of students is monitored termly.
- A Social Worker, where possible, will be invited to any relevant meetings in school. The Designated Safeguarding Lead or Deputy Designated Safeguarding Lead attends all Child Protection meetings.
- Staff are regularly updated on which students have a social worker, so that more pastoral support can be put in place if required.

Gender based Violence/Violence against Women and Girls

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

The government has a strategy looking at specific issues that women and girls face. Within the context of this Safeguarding Policy the following sections are how we respond to violence against girls. Female genital mutilation, virginity testing and hymenoplasty, forced marriage, honour-based violence and teenage relationship abuse all fall under this strategy.

Female Genital Mutilation (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin



- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from a classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear
- talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases. **At no time will staff examine pupils to confirm this.**

Female Genital Mutilation Reporting Procedures

Where there is a disclosure of FGM it is important that staff know what their statutory response should be. Keeping Children Safe in Education (2024), paragraph 44 says 'whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM



appears to have been carried out on a girl under the age of 18, the teacher must report this to the police'.

The mandatory reporting procedures say:

'It is recommended that you make a report orally by calling 101, the single non-emergency number.'

'Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate'.

In most cases 'reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day'.

The procedures also set out what information is needed, in order to make a report.

See here:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version#reporting>

Virginity Testing and Hymenoplasty

Staff should be aware that virginity testing and hymenoplasty became illegal in 2022 and that it is a criminal offence for anyone to perform or assist in the performance of FGM, virginity testing or hymenoplasty, in the UK or abroad, or to fail to protect a person under 16 for whom they are responsible. For cases where it is believed that a girl may be vulnerable to virginity testing or hymenoplasty, the staff will inform the DSL who will report it as with any other child protection concern.

Virginity testing is any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given.

Hymenoplasty is a procedure undertaken to reconstruct a hymen. The aim of the procedure is to ensure that a woman bleeds the next time she has intercourse to give the impression that she has no history of vaginal intercourse.

Forced Marriage

[www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULT
I_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf)

http://4lscb.proceduresonline.com/chapters/p_forced_marriage.html



In the case of children: 'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.' One in 3 victims of forced marriage in the U.K. are under 18.

The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force in February 2023 means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. This includes non-legally binding 'traditional' ceremonies which would still be viewed as marriages by the parties and their families. Any concerns that students may be getting married should be referred to the DSL.

It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice.

Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care.

Policies and practices in this school reflect the fact that while all members of staff, including teachers, have important responsibilities with regard to pupils who may be at risk of forced marriage, teachers and school leaders should not undertake roles in this regard that are most appropriately discharged by other children's services professionals such as police officers or social workers.

Characteristics that may indicate Forced Marriage

While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

- an extended absence from school/college, including truancy
- a drop in performance or sudden signs of low motivation
- excessive parental restriction and control of movements
- a history of siblings leaving education to marry early
- poor performance, parental control of income and students being allowed only limited career choices
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic abuse or running away from home

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.



Honour- Based Abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For example, honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- convert to a different faith from the family

Women and girls are the most common victims of honour based abuse however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

If staff believe that a pupil is at risk from honour based violence the DSL will follow the usual safeguarding referral process, however, if it is clear that a crime has been committed or the pupil is at immediate risk the police will be contacted in the first place. It is important that if honour based violence is known or suspected that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

Teenage Relationship Abuse

Relationship abuse can take place at any age, and describes unacceptable behaviour between two people who are in a relationship. It can take place in relationships of any sexual orientation and the victim and abuser can be any sexual orientation. Research has



shown that teenagers do not always understand what may constitute abusive and controlling behaviours, e.g. checking someone's phone, telling them what to wear, who they can/can't see or speak to or coercing them to engage in activities they are not comfortable with. The Government campaign "disrespect nobody" provides other examples of abusive behaviour within a relationship.

This lack of understanding can lead to these abusive behaviours feeling 'normal' and therefore left unchallenged, as they are not recognised as being abusive. In response to these research findings, the school will provide education to help prevent teenagers from becoming victims and perpetrators of abusive relationships, by encouraging them to rethink their views of violence, abuse and controlling behaviours, and understand what consent means within their relationships. This will form part of the school's curriculum content in respect of Relationship Education and in developing this curriculum, the school will follow the RSHE guidance (July 2025): [Relationships Education, Relationships and Sex Education and Health Education guidance](#)

If the school has concerns about a child in respect of relationship abuse, it will report those concerns in line with procedures to the appropriate authorities as a safeguarding concern, a crime or both.

Sexual Violence and Sexual Harassment Between Children

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Within our school all staff are made aware of what sexual violence and sexual harassment might look like and what to do if they have a concern or receive a report. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

As a school we are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. It cannot be described as 'banter', 'having a laugh' or 'boys being boys'.

We will also take seriously any sharing of sexual images (photos, pictures or drawings) and videos, sexual jokes, comments or taunting either in person or on social media or on-line sexual harassment.

Within the Child Protection Policy, there is a clear procedure for how we deal with situations where sexual assaults or behaviour considered criminal between children has taken place.



As a school we will follow the “*Sexual violence and sexual harassment between children in schools and colleges*” advice provided by the DfE.

We will challenge all contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers and impose appropriate levels of disciplinary action, to be clear that these behaviours are not tolerated or acceptable. Support will be provided to victims of sexual violence and sexual harassment and we will ensure that they are kept safe.

The school has an understanding of intra-familial harms and identifies any necessary support for siblings following incidents of sexual violence or sexual harassment.

Sexism and Stereotyping

The new RSHE Guidance (July 2025) [Relationships Education, Relationships and Sex Education and Health Education guidance](#) outlines the importance of developing positive concepts and masculinity and femininity.

Both within and beyond the classroom, staff should be conscious of everyday sexism, misogyny, homophobia and stereotypes, and will take action to build a culture where prejudice is identified and tackled. Staff have an important role in modelling positive behaviour and avoiding language that might perpetuate harmful stereotypes. Pupils should understand the importance of challenging harmful beliefs and attitudes and should understand the links between sexism and misogyny and violence against women and girls. Where misogynistic ideas are expressed at school, staff will challenge the ideas, rather than the person expressing them.

Pupils may be exposed to online content which normalises harmful or violent sexual behaviours, which might include sexist and misogynistic influencers who normalise sexual harassment and abuse. Young people may be more vulnerable to this content when they have low self-esteem, are being bullied, or have other challenges in their lives. Teachers will encourage pupils to consider how this content may be harmful to both men and women, while avoiding stigmatising or perpetuating harmful stereotypes about boys, and avoiding directly signposting to specific content and content producers.



Upskirting

In 2019 the Voyeurism Offences Act came into force and made the practice of upskirting illegal.

Upskirting is defined as someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks, with or without underwear. The intent of upskirting is to gain sexual gratification or to cause the victim humiliation, distress or alarm. If this is between pupils, we will follow the child-on-child abuse procedure.

If staff in the school are made aware that upskirting has occurred, then this will be treated as a sexual offence and reported accordingly.

There are behaviours that would be considered as sexual harassment which may be pre-cursors to upskirting. The use of reflective surfaces or mirrors to view underwear or genitals will not be tolerated and the school will respond to these with appropriate disciplinary action and education.

Pupils who place themselves in positions that could allow them to view underwear, genitals or buttocks, will be moved on. Repeat offenders will be disciplined. These locations could include stairwells, under upper floor walkways, outside changing areas and toilets or sitting on the floor or laying down in corridors.

If technology that is designed for covert placement and could be used to take upskirting or indecent images is discovered in the school it will be confiscated. If the technology is in location and potentially may have captured images, this will be reported to the police and left in situ so that appropriate forensic measures can be taken to gather evidence.

Any confiscated technology will be passed to the Headteacher to make a decision about what happens to the items and will be carried out under the principles set out in the Government guidance on [searching, screening and confiscation](#).

If the image is taken on a mobile phone, the phone will be confiscated under the same principles. This may need to be passed to the police for them to investigate, if there is evidence that a crime has been committed.

The Trigger Trio

The term 'Trigger Trio' has replaced the previous phrase 'Toxic Trio' which was used to describe the issues of domestic abuse, mental ill-health and substance misuse which have been identified as common features of families where harm to women and children has occurred.



The above are viewed as indicators of increased risk of harm to children and young people. In an analysis of Serious Cases Reviews undertaken by Ofsted in 2011, they found that in nearly 75% of these cases two or more of the issues were present.

These factors will have a contextual impact on the safeguarding of children and young people.

Domestic Abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse
- (b) violent or threatening behaviour
- (c) controlling or coercive behaviour
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property, or obtain goods or services) and
- (e) psychological, emotional or other abuse

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here:

<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. 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.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Harrow Way Community School is part of **Operation Encompass**.



Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).] Information gleaned from meetings from within Operation Encompass may be used to inform our decisions around safeguarding a child.

Parental Mental Health

The term "mental ill health" is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

For children the impact of parental mental health can include:

- The parent/carer's needs or illnesses taking precedence over the child's needs
- Child's physical and emotional needs neglected
- A child acting as a young carer for a parent or a sibling
- Child having restricted social and recreational activities
- Child finds it difficult to concentrate- impacting on educational achievement
- A child missing school regularly as (s)he is being kept home as a companion for a parent/carer
- Adopt paranoid or suspicious behaviour as they believe their parent's delusions.
- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child)
- Obsessional compulsive behaviours involving the child

If staff become aware of any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the DSL to consider a referral to Children's Social Care.

Parental Substance Misuse

Substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them.

Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely



to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.

For children the impact of parental substance misuse can include:

- Inadequate food, heat and clothing for children (family finances used to fund adult's dependency)
- Lack of engagement or interest from parents in their development, education or wellbeing
- Behavioural difficulties - inappropriate display of sexual and/or aggressive behaviour
- Bullying (including due to poor physical appearance)
- Isolation – finding it hard to socialise, make friends or invite them home
- Tiredness or lack of concentration
- Child talking of or bringing into school drugs or related paraphernalia
- Injuries /accidents (due to inadequate adult supervision)
- Taking on a caring role
- Continued poor academic performance including difficulties completing homework on time
- Poor attendance or late arrival

These behaviours themselves do not indicate that a child's parent is misusing substances, but should be considered as indicators that this may be the case.

If staff believe that a child is living with parental substance misuse, this will be reported to the designated safeguarding lead for referral to be considered for Children's Social Care.

Young Carers

As many as 1 in 12 children and young people provide care for another person. This could be a parent, a relative or a sibling and for different reasons such as disability, chronic illness, mental health needs, or adults who are misusing drugs or alcohol.

Pupils who provide care for another are Young Carers. These young people can miss out on opportunities, and the requirement to provide care can impact on school attendance or punctuality, limit time for homework, leisure activities and social time with friends.

As a school we may refer a young carer to Children's Social Care for a carers assessment to be carried out. We will consider support that can be offered and make use of the resources and guidance from Save the Children in their young carers work.

Missing, Exploited and Trafficked Children (MET)

Within Hampshire, the acronym MET is used to identify all children who are missing; believed to be at risk of or being sexually or criminally exploited; or who are at risk of or are



being trafficked. Given the close links between all of these issues, there has been a considered response to join all three issues so that cross over of risk is not missed.

Children who are absent from School

Patterns of children missing education can be an indicator of either abuse or safeguarding risks. A relatively short length of time a child is missing does not reduce risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns.

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Children who are absent from school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including criminal exploitation.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2025) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who are absent from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age
 - d. are in custody for four months or more (and will not return to school afterwards) or;
 - e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the Local Authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.



Children Missing from Home or Care

It is known that children who go missing are at risk of suffering significant harm, and there are specific risks around children running away and the risk of sexual and criminal exploitation. The Hampshire Police Force, as the lead agency for investigating and finding missing children, will respond to children going missing based on on-going risk assessments in line with current guidance. The police definition of 'missing' is: "Anyone whose whereabouts cannot be established will be considered as missing until located, and their well-being or otherwise confirmed." Various categories of risk should be considered and Hampshire Local Safeguarding Children's Partnership provides further guidance.

Local authorities have safeguarding duties in relation to children missing from home and should work with the police to risk assess and analyse data for patterns that indicate particular concerns and risks. The police will prioritise all incidents of missing children as medium or high risk. Where a child is recorded as being absent, the details will be recorded by the police, who will also agree review times and any on-going actions with person reporting.

A missing child incident would be prioritised as 'high risk' where:

- the risk posed is immediate and there are substantial grounds for believing that the child is in danger through their own vulnerability, or
- the child may have been the victim of a serious crime; or
- the risk posed is immediate and there are substantial grounds for believing that the public is in danger.

The high-risk category requires the immediate deployment of police resources.

Authorities need to be alert to the risk of sexual exploitation or involvement in drugs, gangs or criminal activity, trafficking and aware of local "hot spots" as well as concerns about any individuals with whom children run away. Child protection procedures must be initiated in collaboration with Children's Social Care services whenever there are concerns that a child who is missing may be suffering, or likely to suffer, significant harm. Within any case of children who are missing both Push and Pull factors will need to be considered.

Push factors include:

- Conflict with parents/carers
- Feeling powerless
- Being bullied/abused
- Being unhappy/not being listened to
- The Trigger Trio

Pull factors include:

- Wanting to be with family/friends
- Drugs, money and any exchangeable item



- Peer pressure
- For those who have been trafficked into the United Kingdom as unaccompanied asylum-seeking children, there will be pressure to make contact with their trafficker.

We will inform all parents of children who are absent (unless the parent has informed us). If the parent is also unaware of the location of their child, and the definition of missing is met, we will ask the parents to call the police. If we are unable to get in contact with parents the school will call the police.

Child Sexual Exploitation (CSE)

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document *Child Sexual Exploitation: Definition and a Guide for Practitioners* (DfE 2017)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence/suspicious of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:



Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues:

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories) and
- Sexual identity.

More information can be found in:

Child Sexual Exploitation: Definition and a Guide for Practitioners (DfE 2017)

Child Criminal Exploitation (including County Lines)

Information about Child Criminal Exploitation can be found in KCSIE (2025). CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

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



County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

We will treat any child who may be criminally exploited as a victim and refer to Children’s Social Care and use the CERAF form and guidance in our referral to Children’s Social Care: ([New version of the Child Exploitation Risk Assessment Framework \(CERAF\) - Hampshire SCP](#)). If a referral to the police is also required, as crimes have been committed on the school premises, these will also be made. Children who have been exploited will need additional support to help maintain them in education.

If there is information or intelligence about child criminal exploitation, we will report this to the police via the community partnership information form.

<https://www.safe4me.co.uk/portfolio/sharing-information/>

Serious Violence

Serious violence is becoming a factor for those who are involved in criminal exploitation. It can also be an indication of gang involvement and criminal activity.

All staff will be made aware of indicators, which may signal that pupils, or members of their families, are at risk from or involved with serious violent crime.

These indications can include but are not limited to: Increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm; significant change in wellbeing; signs of assault; unexplained injuries; unexplained gifts and/or new possessions; possession of weapons.

As a school we have a duty to not only prevent the individual from engaging in criminal activity, but also to safeguard others who may be harmed by their actions.

We will report concerns of serious violence to Police and Social Care. **

If there is information or intelligence about potential serious violence, we will report this to the Police via the community partnership information form.

<https://www.safe4me.co.uk/portfolio/sharing-information/>



Trafficked Children & Modern Slavery

Human trafficking is defined by the UNHCR in respect of children as a process that is a combination of:

- Movement (including within the UK);
- Control through harm/threat of harm or fraud
- For the purpose of criminal exploitation

Any child transported for exploitative reasons is considered to be a trafficking victim.

There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

There are a number of indicators which suggest that a child may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history with missing links and unexplained moves
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods
- Is known to beg for money
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
- Is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice
- Is excessively afraid of being deported

For those children who are internally trafficked within the UK indicators include:

- Physical symptoms (e.g. bruising indicating either physical or sexual assault)
- Prevalence of a sexually transmitted infection or unwanted pregnancy
- Reports from reliable sources suggesting the likelihood of involvement in sexual exploitation and the child has been seen in places known to be used for sexual exploitation
- Evidence of drug, alcohol or substance misuse
- Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner



- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for despite having not been at home
- Having keys to premises other than those known about
- Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity
- Truancy/disengagement with education
- Entering or leaving vehicles driven by unknown adults
- Going missing and being found in areas where the child or young person has no known links, and/or
- Possible inappropriate use of the internet and forming on-line relationships, particularly with adults.

These behaviours themselves do not indicate that a child is being trafficked, but should be considered as indicators that this may be the case.

If staff believe that a child is being trafficked, this will be reported to the Designated Safeguarding Lead for referral to be considered to Children's Social Care.

Technologies

Technological hardware and software is developing continuously with an increase in functionality of devices that people use. The majority of children use online tools to communicate with others locally, nationally and internationally. Access to the Internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information. While technology itself is not harmful, it can be used by others to make children vulnerable and to abuse them.

Online Safety and Social Media

With the current speed of on-line change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond. Some of the risks could be:

- unwanted contact
- grooming
- online bullying including sexting
- digital footprint



- accessing and generating inappropriate content
- misinformation, disinformation (including fake news), conspiracy theories
- Generative AI- Artificial Intelligence

The school will therefore seek to provide information and awareness to both pupils and their parents through:

- Acceptable Use agreements for children, teachers, parents/carers and governors
- Curriculum activities involving raising awareness around staying safe online
- Information included in letters, newsletters, website, VLE
- Parents evenings/sessions
- High profile events/campaigns e.g. Safer Internet Day
- Building awareness around information that is held on relevant websites and or publications
- Social media policy
- Sign-posting to applications to help monitor ICT use

Support and guidance can be found on the UKCIS (UK Council for Internet Safety) website: <https://www.gov.uk/government/organisations/uk-council-for-internet-safety>

The Government has published [Generative AI: product safety expectations - GOV.UK](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

Cyberbullying

Central to the school's anti-bullying policy should be the principle that *'bullying is always unacceptable'* and that *'all pupils have a right not to be bullied'*.

The school should also recognise that it must take note of bullying perpetrated outside school which spills over into the school and so we will respond to any cyber-bullying we become aware of carried out by pupils when they are away from the site.

Cyber-bullying is defined as "an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself."

By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile phones
- The use of mobile phone cameras to cause distress, fear or humiliation



- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
- Using e-mail to message others
- Hijacking/cloning email accounts
- Making threatening, abusive, defamatory or humiliating remarks in on-line forums

Cyber-bullying may be at a level where it is criminal in character.

It is unlawful to disseminate defamatory information in any media including internet sites.

Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.

The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. The school will pass on information to the police if it feels that it is appropriate or are required to do so.

Sexting

'Sexting' often refers to the sharing of naked or 'nude' pictures or video through mobile phones and/or the internet. It also includes underwear shots, sexual poses and explicit text messaging, as well as images created by AI - Artificial Intelligence.

While sexting often takes place in a consensual relationship between two young people, the use of sexted images in revenge following a relationship breakdown is becoming more commonplace. Sexting can also be used as a form of sexual exploitation and take place between strangers.

As the average age of the first smartphone or camera enabled tablet is 6 years old, sexting is an issue that requires awareness raising across all ages.

The school will use age appropriate educational material to raise awareness, to promote safety and deal with pressure. Parents should be aware that they can come to the school for advice.

Gaming

Online gaming is an activity that the majority of children and many adults get involved in. The school will raise awareness:



- By talking to parents and carers about the games their children play and help them identify whether they are appropriate
- By supporting parents in identifying the most effective way of safeguarding their children by using parental controls and child safety mode
- By talking to parents about setting boundaries and time limits when games are played
- By highlighting relevant resources.

Online Reputation

Online reputation is the opinion others get of a person when they encounter them online. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that children and staff are aware that anything that is posted could influence their future professional reputation. The majority of organisations and work establishments now check digital footprint before considering applications for positions or places on courses.

Grooming

Online grooming is the process by which one person with an inappropriate sexual interest in children will approach a child online, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm.

The school will build awareness amongst children and parents about ensuring that the child:

- Only has friends online that they know in real life
- Is aware that if they communicate with somebody that they have met online, that relationship should stay online

That parents should:

- Recognise the signs of grooming
- Have regular conversations with their children about online activity and how to stay safe online

The school will raise awareness by:

- Running sessions for parents
- Include awareness around grooming as part of their curriculum
- Identifying with both parents and children how they can be safeguarded against grooming.

Online Filtering and Monitoring



Filtering refers to technology preventing access to harmful or inappropriate content on the Internet, whilst monitoring refers to practical steps staff take to ensure harmful or inappropriate access is not made.

At Harrow Way School online filtering and monitoring includes:

- Using online filtering processes to prevent users from accessing inappropriate content via our school systems
- Physical Monitoring
- Live software monitoring
- Monitoring school user logs
- Monitoring individual devices at school

Each year (at least) our Designated Safeguarding Lead, along with our IT team and a governor review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.

All our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns. All our staff have taken part in annual cybersecurity training

Children who are Lesbian, Gay, Bi-Sexual or Gender Questioning

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

The CASS Review (Independent Review of Gender Identity Services for Children and Young People), identified that caution is necessary for children questioning their gender, as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs and in some cases additional diagnoses of Autism Spectrum Disorder and/or Attention Deficit Disorder.

The school will recommend that when families/carers are making decisions about support for gender questioning children that they seek clinical help and advice. Parents need to be made aware that when they are supporting pre-pubertal children, Clinical Services should ensure that they can be seen by a clinical professional with relevant experience, as soon as possible.



We will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities, such as the risk of bullying. The school will refer to the KCSIE guidance, in relation to gender questioning children, when deciding how to proceed.

Risks can be compounded where children lack a trusted adult with whom they can be open. At Harrow Way, we endeavour to reduce the additional barriers faced by creating a culture where they can speak out or share their concerns with members of staff. We offer an LGBTQ+ Forum to support our students, we monitor homophobic language and regularly take the view of students to identify any areas of concerns.



Part 2 – Safeguarding Issues Relating to Individual Pupil Needs

Homelessness

As a school we recognise that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The impact of losing a place of safety and security can affect a child's behaviour and attachments.

In line with the Homelessness Reduction Act 2017 this school will promote links into the Local Housing Authority for the parent or caregiver in order to raise/progress concerns at the earliest opportunity.

We recognise that whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into Children's Social Care where a child has been harmed or is at risk of harm.

Children & the Court System

As a school we recognise that children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. We know that this can be a stressful experience and therefore the school will aim to support children through this process.

Along with pastoral support, the school will use age-appropriate materials published by HM Courts and Tribunals Services (2017) that explain to children what it means to be a witness, how to give evidence and the help they can access.

We recognise that making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. This school will support children going through this process.

Alongside pastoral support this school will use online materials published by The Ministry of Justice (2018) which offers children information & advice on the dispute resolution service.

These materials will also be offered to parents and carers if appropriate.

Children with Family Members in Prison



Children who have a family member in prison are at greater risk of poor outcomes including poverty, stigma, isolation and poor mental health.

This school aims to:-

- Understand and Respect the Child's Wishes

We will respect the child's wishes about sharing information. If other children become aware, the school will be vigilant to potential bullying or harassment.

- Keep as Much Contact as Possible with the Parent and Caregiver

We will maintain good links with the remaining caregiver in order to foresee and manage any developing problems. Following discussions we will develop appropriate systems for keeping the imprisoned caregiver updates about their child's education.

- Be Sensitive in Lessons

This school will consider the needs of any child with an imprisoned parent during lesson planning.

- Provide Extra Support

We recognise that having a parent in prison can attach a real stigma to a child, particularly if the crime is known and particularly serious. We will provide support and mentoring to help a child work through their feelings on the issue.

Alongside pastoral care the school will use the resources provided by the National Information Centre on Children of Offenders in order to support and mentor children in these circumstances.

Pupils with Medical Conditions (in School)

There is a separate policy outlining the school's position on this: J:\Policies and Protocols\Ratified Policies\Medical Welfare Policy

As a school we will make sure that sufficient staff are trained to support any pupil with a medical condition.

All relevant staff will be made aware of the condition to support the child and be aware of medical needs and risks to the child.

An individual healthcare plan may be put in place to support the child and their medical needs.

Pupils with Medical Conditions (out of School)



There will be occasions when children are temporarily unable to attend our school on a full time basis because of their medical needs. These children and young people are likely to be:

- children and young people suffering from long-term illnesses
- children and young people with long-term post-operative or post-injury recovery periods
- children and young people with long-term mental health problems (emotionally vulnerable)

Where it is clear that an absence will be for more than 15 continuous school days the Education and Inclusion Service will be contacted to support the pupil's education.

Special Educational Needs and Disabilities

Children who have special educational needs and/or disabilities can have additional vulnerabilities when recognising abuse and neglect. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or overcoming these barriers
- Having fewer outside contacts than other children
- Receiving intimate care from a considerable number of carers, which may increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries
- Having an impaired capacity to resist or avoid abuse
- Having communication difficulties that may make it difficult to tell others what is happening
- Being inhibited about complaining for fear of losing services
- Being especially vulnerable to bullying and intimidation
- Being more vulnerable than other children to abuse by their peers

As a school we will respond to this by:

- Making it common practice to enable disabled children to make their wishes and feelings known in respect of their care and treatment
- Ensuring that disabled children receive appropriate personal, health and social education (including sex education)
- Making sure that all disabled children know how to raise concerns and give them access to a range of adults with whom they can communicate. This could mean



using interpreters and facilitators who are skilled in using the child's preferred method of communication

- Recognising and utilising key sources of support including staff in schools, friends and family members where appropriate
- Developing the safe support services that families want, and a culture of openness and joint working with parents and carers on the part of services
- Ensuring that guidance on good practice is in place and being followed in relation to: intimate care; working with children of the opposite sex; managing behaviour that challenges families and services; issues around consent to treatment; anti-bullying and inclusion strategies; sexuality and safe sexual behaviour among young people; monitoring and challenging placement arrangements for young people living away from home.

At Harrow Way we provide extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Further information from the DfE can be found:

[SEND code of practice: 0 to 25 years - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/send-code-of-practice-0-to-25-years)

[Supporting pupils with medical conditions at school - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/supporting-pupils-with-medical-conditions-at-school)

Hampshire SENDIASS: [Hampshire \(councilfordisabledchildren.org.uk\)](https://www.councilfordisabledchildren.org.uk)

[Mencap](https://www.mencap.org.uk) - Represents people with learning disabilities, with specific advice and information for people who work with children and young people.

Intimate Care

See Guidelines for good practice Annex 1 (adapted from the Chailey Heritage Centre) However, as a mainstream school we do not practice intimate care.

Perplexing Presentations (PP)/Fabricated or Induced Illness(FII)

Perplexing Presentations (PP) has been introduced to the guidance around FII (by the Royal College of Paediatrics and Child Health) to describe those situations where there are indicators of possible FII which have not caused or brought on any actual significant harm.

It is important to highlight any potential discrepancies between reports, presentations of the child and independent observations of the child. What is key to note are implausible descriptions and/or unexplained findings and/or parental behaviour.

There are three main ways that a carer could fabricate or induce illness in a child. These are not mutually exclusive and include:



- Fabrication of signs and symptoms. This may include fabrication of past medical history
- Fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents
- Induction of illness by a variety of means

If we are concerned that a child may be suffering from fabricated or induced illness we will follow the established procedures of the Hampshire Safeguarding Children Board (we will follow the HIPS protocols and inform Children's Social Care)

Mental Health

Form tutors, class teachers and Heads of Year see their pupils day in, day out. They know them well and are well placed to spot changes in behaviour that might indicate an emerging problem with the mental health and emotional wellbeing of pupils. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The balance between the risk and protective factors are most likely to be disrupted when difficult events happen in pupils' lives.

These include:

- **loss or separation** – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the child having to live elsewhere, being taken into care or adopted
- **life changes** – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school, or secondary school to sixth form
- and **traumatic events** such as abuse, domestic abuse, bullying, violence, accidents, injuries or natural disaster.

When concerns are identified, school staff will provide opportunities for the child to talk or receive support within the school environment. Parents will be informed of the concerns and a shared way to support the child will be discussed.

Where the needs require additional professional support, referrals will be made to the appropriate team or service with the parent's agreement (or child's if they are competent as per Gillick guidelines).

If staff have a mental health concern about a child that is also a safeguarding concern, they will take immediate action, raising the issue with the Designated Safeguarding Lead or a Deputy.



Preventing Suicide

Please refer to the following for more information

[Suicide Prevention/Postvention Protocol for Hampshire schools](#)

Part 3 – Other Safeguarding Issues Impacting Pupils

Child-on-Child

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This can adversely affect their educational attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. Online abuse can take the form of abusive, harassing and misogynistic/misantrist messages and non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. It is important that all victims are taken seriously and offered appropriate support. It is also important to recognise that some perpetrators may themselves also be victims.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

Policy

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children.

We recognise that children are capable of abusing other children and this will be dealt with under our Child Protection Policy and in line with KCSIE (2024)

We are clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and are not an inevitable part of growing up.

We will minimise the risk of child-on-child abuse by:-

Prevention:



- Taking a whole school approach to safeguarding & child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the school's Behaviour Policy and pastoral support system, and by a planned programme of evidence based content delivered through the curriculum
- Engaging with specialist support and interventions
- Regularly promoting understanding of child-on-child abuse and ways to report it through assembly and tutor time
- Staff and students are made aware that although girls are more likely to be the victims, all child-on-child abuse is unacceptable and is to be taken seriously

Responding to Reports of Sexual Violence and Sexual Harassment:

Children are **regularly** reminded of **self-referral** through the support button or they can talk to any member of staff. All tutor groups have displays promoting the NSPCC Helpline.

- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported
- If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: Advice for Schools (DfE 2018) Guidance
- Staff taking the report will inform the DSL or their Deputy as soon as practicably possible but at least within 24 hours
- Staff taking a report will never promise confidentiality
- Parents or carers will normally be informed (unless this would put the child at greater risk)
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care (01329 225379)
- All child-on-child allegations will be recorded via CPOMS. These will be investigated by the DSL according to our safeguarding procedures.

The DSL's have undergone the Brooks traffic light toolkit to support assessment. The school encourages a culture of openness and a belief that child-on-child harm is happening here and encourages staff to be vigilant and report incidents through CPOMS. Staff and students are made aware that any unwanted sexual language or behaviour is never acceptable and needs to be reported and is never classed as mere banter.

Risk Assessment:

Following a report the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The Risk assessment will consider:

- The victim, especially their protection and support



- The alleged perpetrator, their support needs and any discipline action
- All other children at the school
- The victim and the alleged perpetrator sharing classes and space at school

The risk assessment will be recorded and kept under review. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

Action: The DSL will consider:

- The wishes of the victim
- The nature of the incident including whether a crime has been committed and the harm caused
- Ages of the children involved
- Developmental stages of the children
- Any power imbalance between the children
- Any previous incidents
- On-going risks
- Other related issues or wider context.

Options: The DSL will manage the report with the following options:-

- Manage internally
- Refer to Early Help
- Refer to Children's Social Care
- Report to the Police (generally in parallel with a referral to Social Care)

Ongoing Response:

- The DSL will manage each report on a case by case basis and will keep the risk assessment under review
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim during the investigation
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils or students)



- Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their Behaviour Policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the principle of keeping the victim and perpetrator in separate classes where possible would be maintained and continued consideration would be given to the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases
- The victim, alleged perpetrator and other witnesses (children & adults) will receive appropriate support and safeguards on a case-by-case basis.
- The school will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in schools
- The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

Bullying

The school works to a separate anti-bullying policy that can be found at J:\Policies and Protocols\Ratified Policies\Anti-bullying Policy

Prejudice based Abuse

Prejudice based abuse or hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice based on a person's real or perceived:

- Disability
- Race
- Religion
- Gender identity
- Sexual orientation

Although this sort of crime is collectively known as 'Hate Crime' the offender doesn't have to go as far as being motivated by 'hate', they only have to exhibit 'hostility'.

This can be evidenced by:

- threatened or actual physical assault
- derogatory name calling, insults, for example racist jokes or homophobic language
- hate graffiti (e.g. on school furniture, walls or books)
- provocative behaviour e.g. wearing of badges or symbols belonging to known right wing, or extremist organisations
- distributing literature that may be offensive in relation to a protected characteristic
- verbal abuse



- inciting hatred or bullying against pupils who share a protected characteristic
- prejudiced or hostile comments in the course of discussions within lessons
- teasing in relation to any protected characteristic e.g. sexuality, language, religion or cultural background
- refusal to cooperate with others because of their protected characteristic, whether real or perceived
- expressions of prejudice calculated to offend or influence the behaviour of others
- attempts to recruit other pupils to organisations and groups that sanction violence, terrorism or hatred

As a school we will respond by:

- clearly identifying prejudice based incidents and hate crimes and monitor the frequency and nature of them within the school
- taking preventative action to reduce the likelihood of such incidents occurring
- recognising the wider implications of such incidents for the school and local community
- providing regular reports of these incidents to the Governing Body
- ensuring that staff are familiar with formal procedures for recording and dealing with prejudice based incidents and hate crimes
- dealing with perpetrators of prejudice based abuse effectively
- supporting victims of prejudice based incidents and hate crimes
- ensuring that staff are familiar with a range of restorative practices to address bullying and prevent it happening again.

Drugs and Substance Misuse

The school works to a separate drug policy that can be found at J:\Policies and Protocols\Ratified Policies\Drugs Policy

Faith Abuse

The number of known cases of child abuse linked to accusations of “possession” or “witchcraft” is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem.

Such abuse generally occurs when a carer views a child as being “different”, attributes this difference to the child being “possessed” or involved in “witchcraft” and attempts to exorcise him or her.

A child could be viewed as “different” for a variety of reasons such as, disobedience; independence; bed-wetting; nightmares; illness; or disability. There is often a weak bond of attachment between the carer and the child. There are various social reasons that make a



child more vulnerable to an accusation of “possession” or “witchcraft”. These include family stress and/or a change in the family structure.

The attempt to “exorcise” may involve severe beating, burning, starvation, cutting or stabbing and isolation, and usually occurs in the household where the child lives.

If the school becomes aware of a child who is being abused in this context, the DSL will follow the normal referral route into Children’s Social Care.

Gangs and Youth Violence

The vast majority of young people will not be affected by serious violence or gangs. However, where these problems do occur, even at low levels there will almost certainly be a significant impact.

As a school we have a duty and a responsibility to protect our pupils. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime. Dealing with violence also helps attainment. While pupils generally see educational establishments as safe places, even low levels of youth violence can have a disproportionate impact on any education.

Crucial preventive work can be done within school to prevent negative behaviour from escalating and becoming entrenched.

As a school we will:

- Develop skills and knowledge to resolve conflict as part of the curriculum
- Challenge aggressive behaviour in ways that prevent the recurrence of such behaviour
- Understand risks for specific groups, including those that are gender-based, and target interventions
- Safeguard, and specifically organise child protection, when needed
- Make referrals to appropriate external agencies
- Carefully manage individual transitions between educational establishments, especially into Pupil Referral Units (PRUs) or alternative provision, and
- Work with local partners to prevent anti-social behaviour or crime

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.



A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Parenting

All parents will struggle with the behaviour of their child(ren) at some point. This does not make them poor parents or generate safeguarding concerns. Rather it makes them human and provides them with opportunities to learn and develop new skills and approaches to deal with their child(ren).

Parenting becomes a safeguarding concern when the repeated lack of supervision, boundaries, basic care or medical treatment places the child(ren) in situations of risk or harm.

In situations where parents struggle with tasks such as setting boundaries and providing appropriate supervision, timely interventions can make drastic changes to the wellbeing and life experiences of the child(ren) without the requirement for a social work assessment or plan being in place.



As a school we will support parents in understanding the parenting role and provide them with strategies to make a difference by:

- Providing details of community based parenting courses linking to web based parenting resources referring to the School Family Partnership Liaison Manager
- Discussing the issue with the parent and supporting them in making their own plans of how to respond differently (using evidence based parenting programmes)
- Considering appropriate Early Help services.

Part 4 –Safeguarding Processes

The Designated Safeguarding Lead is responsible for safeguarding and child protection at Harrow Way. The key role of the Designated Safeguarding Lead is to:

- Manage referrals from school staff or any others from outside the school
- Work with external agencies and professionals on matters of safety and safeguarding
- Undertake training
- Raise awareness of safeguarding and child protection amongst the staff and parents and ensure that child protection information is transferred to the pupil's new school
- Be aware of pupils who have a social worker*
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.

*The Harrow Way DSL has responsibility to promote and oversee the education of all children who have an allocated social worker.

Holding and Sharing Information

The DSL and DDSs keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. These include instances where referrals were or were not made to another agency such as LA children's Social Care or the Prevent program etc. This rationale should be recorded on CPOMS.

Alternative Provision

If the school commissions a place for a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and will undertake all checks and ensure that the placement meets the pupil's needs. Checks would include, for example, suitability of provision and provision type, safeguarding, health



and safety, arrangements for attendance and reporting progress, and information sharing.

The school will follow the statutory guidance for commissioning Alternative Provision:

[Education for children with health needs who cannot attend school - GOV.UK](#)

[Alternative provision - GOV.UK](#)

[Keeping children safe in education 2025](#)

Hampshire County Council Alternative Provision Guidance June 2025

Safer Recruitment

The school operates a separate safer recruitment process as part of the school's Recruitment Policy (J:\Policies and Protocols\Ratified Policies\Recruitment Policy). On all recruitment panels there is at least one member who has undertaken safer recruitment training. The process checks the identity, criminal record (enhanced DBS), mental and physical capacity, right to work in the U.K., professional qualification and seeks confirmation of the applicant's experience and history through references.

Staff Induction

The key training elements are:

Induction Training – this is mandatory and should include:

- The Child Protection Policy
- The Behaviour Policy
- The Staff Behaviour Policy (sometimes called a Code of Conduct)
- The safeguarding response to children who are absent from education
- The role of the Designated Safeguarding Lead (including the identity of)
- Designated Safeguarding Leads and any Deputies. (See KCSIE 2024)

DSLs attend training every two years and in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually.

All other staff will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Members of the Governing Body of the school take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in



place in schools and colleges are effective.’ The training is regularly updated. (See KCSIE (2025), paragraph 81.)

Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

Health and Safety

There is a requirement that all schools must have a Health and Safety Policy that details the organisation, roles and responsibilities and arrangements in place at the premises for the managing and promoting of Health and Safety in accordance with the Health and Safety at Work Act 1974 and regulations made under the Act. Schools must assess all their hazards and record any significant findings along with what control measures are required. The plans should wherever possible take a common sense and proportionate approach with the aim to allow activities to continue rather than preventing them from taking place. The School H&S policy can be accessed on the school website.

Site Security

We aim to provide a secure site, but recognise that the site is only as secure as the people who use it. Therefore all people on the site have to adhere to the rules which govern it. These are:

- All gates are locked except at the start and end of the school day
- Doors are kept closed to prevent intrusion
- Visitors and volunteers enter at the Reception and must sign in.
- Visitors and volunteers are identified by (visitor ID badge or professional ID badge for LA or Local Government visitors)
- Children are only allowed home during the school day with adults/carers with parental responsibility or permission being given
- All children leaving or returning during the school day have to sign out and in

Off site Visits

A particular strand of health and safety is looking at risks when undertaking off site visits. Some activities, especially those happening away from the school and residential visits, can involve higher levels of risk. If these are annual or infrequent activities, a review of an existing assessment may be all that is needed. If it is a new activity, a visit involving adventure activities, residential, overseas or an ‘Open Country’ visit, a specific assessment of significant risks must be carried out. The school has an educational visits coordinator (EVC) who liaises with the local authority’s outdoor education adviser and helps colleagues in schools to manage risks and support with off site visits and provides training in the management of groups during off site visits, as well as First Aid in an outdoor context. The



school uses the Evolve system for off site visits and has a set protocol before students can go on a visit.

First Aid

First Aid is covered in the Medical Welfare Policy.

Physical Intervention (use of Reasonable Force)

As a school we have a separate policy outlining how we will use physical intervention. This can be found at J:\Policies and Protocols\Ratified Policies\Physical Intervention.

Taking and the Use and Storage of Images

As a school we will seek consent from the parent of a pupil and from teachers and other adults before taking and publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in school publications, printed media or on electronic publications. We will not seek consent for photos where you would not be able to identify the individual.

We will seek consent for the period the pupil remains registered with us and, unless we have specific written permission we will not re-use photographs after a child (or teacher) appearing in them leaves the school or if consent is withdrawn.

Photographs will only be taken on school owned equipment and stored on the school network. No images of pupils will be taken or stored on privately owned equipment by staff members.

Transporting Pupils

On rare occasions parents and volunteers support with the task of transporting children for visits and off-site activities arranged by the school. (This is in addition to any informal arrangements made directly between parents for after school clubs etc.)

In managing these arrangements the school will put in place measures to ensure the safety and welfare of young people carried in parents' and volunteers' cars. This is based on guidance from the Local Authority and follows similar procedures for school staff using their cars on school business.

Where parents'/volunteers' cars are used on school activities the school will notify parents/volunteers of their responsibilities for the safety of pupils, to maintain suitable insurance cover and to ensure their vehicle is roadworthy.



All parents/volunteers are therefore asked to complete and return the form attached as Annex 3 to the school before they offer to use their car to help with transporting pupils.

Out of School Providers

Where the school hosts out-of-school providers on their premises, whilst the provider is responsible for its own safeguarding and child protection policies and procedures, the school may refer any concerns it has about the provider to the Local Authority.

Disqualification under the Childcare Act

The Childcare Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare.

The risk by association element of the Act has now been refocused by the DfE and no longer applies to school staff.

We will continue to check for disqualification under the Childcare Act as part of our safer recruitment processes for any offences committed by staff members or volunteers.



Annex 1

Intimate Care

Guidelines for good practice adapted from the Chailey Heritage Centre

1. Treat every child with dignity and respect and ensure privacy appropriate to the child's age and the situation. Privacy is an important issue. Much intimate care is carried out by one staff member alone with one child. The 4LSCBs believe this practice should be actively supported unless the task requires two people. Having people working alone does increase the opportunity for possible abuse. However, this is balanced by the loss of privacy and lack of trust implied if two people have to be present - quite apart from the practical difficulties. It should also be noted that the presence of two people does not guarantee the safety of the child or young person - organised abuse by several perpetrators can, and does, take place. Staff should therefore be supported in carrying out the intimate care of children alone unless the task requires the presence of two people. The 4LSCBs recognise that there are partner agencies that recommend two carers in specific circumstances. Where possible, the member of staff carrying out intimate care should be someone chosen by the child or young person. For older children it is preferable if the member of staff is the same gender as the young person. However, this is not always possible in practice. Agencies should consider the implications of using a single named member of staff for intimate care or a rota system in terms of risks of abuse.
2. Involve the child as far as possible in his or her own intimate care. Try to avoid doing things for a child that s/he can do alone and if a child is able to help ensure that s/he is given the chance to do so. This is as important for tasks such as removing underclothes as it is for washing the private parts of a child's body. Support children in doing all that they can themselves. If a child is fully dependent on you, talk with her or him about what you are doing and give choices where possible.



3. Be responsive to a child's reactions. It is appropriate to "check" your practice by asking the child - particularly a child you have not previously cared for - "Is it OK to do it this way?"; "Can you wash there?" "How does mummy do that?". If a child expresses dislike of a certain person carrying out her or his intimate care, try and find out why. Conversely, if a child has a "grudge" against you or dislikes you for some reason, ensure your Line Manager is aware of this.
4. Make sure practice in intimate care is as consistent as possible. Line managers have a responsibility for ensuring that staff have a consistent approach. This does not mean that everyone has to do things in an identical fashion, but it is important that approaches to intimate care are not markedly different between individuals. For example, do you use a flannel to wash a child's private parts rather than bare hands? Do you pull back a child's foreskin as part of daily washing? Is care during menstruation consistent across different staff?
5. Never do something unless you know how to do it. If you are not sure how to do something, ask. If you need to be shown more than once, ask again. Certain intimate care or treatment procedures, such as rectal examinations, must only be carried out by nursing or medical staff. Other procedures, such as giving rectal valium, suppositories or intermittent catheterisation, must only be carried out by staff that have been formally trained and assessed as competent.
6. If you are concerned that during the intimate care of a child:
 - You accidentally hurt the child;
 - The child seems sore or unusually tender in the genital area;
 - The child appears to be sexually aroused by your actions;
 - The child misunderstands or misinterprets something;
 - The child has a very emotional reaction without apparent cause (sudden crying or shouting).

Report any such incident as soon as possible to another person working with you and make a brief written note of it. This is for two reasons: first, because some of these could be cause for concern, and secondly, because the child or another adult might possibly misconstrue something you have done.

7. Additionally, if you are a member of staff who has noticed that a child's demeanour has changed directly following intimate care, e.g. sudden distress or withdrawal, this should be noted in writing and discussed with your designated person for child protection.
8. Encourage the child to have a positive image of her or his own body. Confident, assertive children who feel their body belongs to them are less vulnerable to abuse. As well as the basics like privacy, the approach you take to a child's intimate care



can convey lots of messages about what her or his body is “worth”. Your attitude to the child’s intimate care is important. As far as appropriate and keeping in mind the child’s age, routine care of a child should be enjoyable, relaxed and fun.

Intimate care is to some extent individually defined, and varies according to personal experience, cultural expectations and gender. The 4LSCBs recognise that children who experience intimate care may be more vulnerable to abuse:

- Children with additional needs are sometimes taught to do as they are told to a greater degree than other children. This can continue into later years. Children who are dependent or over-protected may have fewer opportunities to make decisions themselves and may have limited choices. The child may come to believe they are passive and powerless
- Increased numbers of adult carers may increase the vulnerability of the child, either by increasing the possibility of a carer harming them, or by adding to their sense of lack of attachment to a trusted adult
- Physical dependency in basic core needs, for example toileting, bathing, dressing, may increase the accessibility and opportunity for some carers to exploit being alone with and justify touching the child inappropriately
- Repeated “invasion” of body space for physical or medical care may result in the child feeling ownership of their bodies has been taken from them
- Children with additional needs can be isolated from knowledge and information about alternative sources of care and residence. This means, for example, that a child who is physically dependent on daily care may be more reluctant to disclose abuse, since they fear the loss of these needs being met. Their fear may also include who might replace their abusive carer.



Annex 2



Community Partnership Information

Guidance: This form is for the sharing of non-urgent information by partner agencies that relates to the **Missing, Exploited** and **Trafficked** agenda and inter-connecting issues, such as **Modern Slavery**. This information may be sanitised and used in subsequent partnership forums for the purposes of identifying and mitigating risk. Completed forms should be sent electronically to 24/7-Intel@hampshire.pnn.police.uk. Any questions or concerns regarding this form can be raised with your police contact, or to FIB. The form is not a referral form, nor does it replace any pre-existing referral or notification mechanism.

Your name:

Your organisation:

Your telephone number:

Your email address:

Information (including date & location):

Information Source:

Where did this information come from (name/DOB/address)?



Can they be re-contacted? What are their contact details?

How did they find this information out?

When did they find this information out?

Who else have you shared this information with?

Annex 3

Transporting of Pupils by Parents

Dear Parent / Volunteer

On occasions parents and volunteers are kind enough to help with the task of transporting children for visits and off-site activities arranged by the school. (This is in addition to any informal arrangements made directly between parents for after school clubs etc.) The school is very grateful for this help. In managing these arrangements the school would like to put in place sensible measures to ensure the safety and welfare of young people carried in parents' and volunteers' cars. This is based on guidance from the local authority and follows similar procedures for school staff using their cars on school business.

Where parents/volunteers cars are used on school activities the Head should notify parents/volunteers of their responsibilities for the safety of pupils, to maintain suitable insurance cover and to ensure their vehicle is roadworthy.

The Head or Party Leader will need to consider the suitability of parents or volunteers to carry young people in their car and whether vetting is necessary. It is advisable that parents or volunteers are not put in a position where they are alone with a young person.

All parents are therefore asked to complete and return the attached form to the school before they offer to use their car to help with transporting pupils.

This form will only need to be completed once for each driver. However, please inform the school if your circumstances change and you can no longer comply with these arrangements.

Many thanks, once again, to all parents and volunteers who have been able to help with the provision of transport. Naturally our primary concern is the safety and welfare of pupils.



However, we also want to maintain a wide range of opportunities for young people to participate in off-site activities and visits.

Signed

Headteacher

DECLARATION FORM

Safeguarding Statement

At this school, we strongly recognise the need for vigilant awareness of safeguarding issues. It is important that all staff have appropriate training and induction so that they understand their roles and responsibilities and are confident about carrying them out. Staff, pupils, parents and governors should feel secure that they could raise any issues or concerns about the safety or welfare of children and know that they will be listened to and taken seriously. This will be achieved by maintaining an ethos of safeguarding and promoting the welfare of children and young people and protecting staff. This is supported by clear behaviour, anti-bullying and child protection policies, appropriate induction and training, briefing and discussion of relevant issues and relevant learning in line with current legislation and guidelines.

The school may require parents or volunteers who have regular unsupervised access to young people to be checked through arrangements with the Disclosure and Barring Service.

All drivers must:

- Hold a valid driving licence for the type of vehicle being driven
- Be fit to drive
- Have no medical condition which affects their ability to drive
- Have a valid MOT for any vehicle older than 3 years old
- Ensure that any vehicle is roadworthy, including brakes, lights, tyres, bodywork, wipers, mirrors etc.
- Ensure that any vehicle used has current road tax
- Ensure that they adhere to the appropriate speed limit
- Ensure that all seat belts are working and worn by everybody in the vehicle

Insurance:

- Maintain valid insurance, as a minimum, for third party liability
- Check with their insurance company and inform them that the driver occasionally conveys children on school activities. (This is unlikely to affect the cost of your insurance premium.)

Safety:

- Be familiar with, and drive in accordance with, the Highway Code at all times



- Drive safely and observe the speed limit
- Before driving not to consume alcohol or drugs which may impair driving
- Ensure that all passengers wear seat belts as appropriate
- Use child proof locks on rear doors where necessary
- Child seats such as booster seats are to be used at all times according to the height of each child in the vehicle

I have read and understood the above requirements and agree to comply with them.
 I agree to inform the school if circumstances change and I can no longer comply with these arrangements.

Signature:
 Name (Please print)

Date:
 Number of seats in vehicle:

Committee Responsible for Review:	Students and Curriculum
Ratified by Governing Body:	22nd January 2026
Date of next Review due by:	October 2026