

Safeguarding, Child Protection, Vulnerable Adults and PREVENT Policy 2025-26



Designated Senior Lead:	Barbara Erskine
Link Trustee for Safeguarding:	Alison Kelly
Responsible Officer: DSL	Barbara Erskine
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Policy Available:	Breathe and Harington Website
Authorised by:	Harington Board

1 Introduction

Harington is committed to protecting all students and staff. The fundamental principles of this policy are based on legislation and a moral duty to safeguard the welfare of students and staff at the Harington.

This policy reflects statutory guidance including **Keeping Children Safe in Education (KCSIE) 2025**, **Working Together to Safeguard Children (2023)** and relevant safeguarding legislation.

Harington recognises that many of its learners have **special educational needs and/or disabilities (SEND)** and that this can increase vulnerability to harm, abuse, neglect and exploitation. Safeguarding practice is therefore tailored to meet the additional needs of learners and to ensure barriers to disclosure are reduced.

This policy applies to all staff, trustees, volunteers, contractors, partners and learners and should be read alongside associated safeguarding policies and procedures.

Through this policy the Harington aims to:

- Minimise the risks to health and well-being of students and staff.
- Promote safe practices and challenge poor and unsafe practice.
- Identify instances in which there are grounds for concern about the welfare of students and staff at risk and take action to keep them safe.
- Enable students and staff at risk to raise concerns relating to safety and for those concerns to be actioned.
- Take appropriate action to prevent unsuitable people working with our students.
- Ensure staff receive adequate training and supervision in relation to Child Protection, Safeguarding, e-Safety and Prevent.

In pursuit of these aims, the Board and Education Management Team will approve and annually review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare and the promotion of a safe environment for the students at risk learning.
- Aiding the identification of students and adults at risk of significant harm and providing procedures for reporting concerns.
- Establishing procedures for reporting and dealing with allegations of abuse against a member of staff.
- Safeguarding students at risk covers more than Child Protection. Issues including Child Sexual Exploitation (CSE), child on child abuse, health and safety, online safety, radicalised behaviour, Young Carers, mental health and wellbeing, dealing with bullying, sexual harassment arrangements.
- All staff and trustees are responsible for complying with this policy, reporting incidents and co-operating with any investigations or incidents in-line with procedures.
- The DSL, Safeguarding Link Trustee and the CEO/Principal meet termly to oversee the wider responsibilities of the Safeguarding Policy and Procedure and review statutory guidance.

2 Scope of this policy

This policy applies primarily to all children and young people under the age of 18; adults at risk up to the age of 25, including learners with SEND, learning disabilities, mental health needs or care and support needs; learners placed with employers, alternative provision, partners or subcontractors, and applies, with appropriate adaptations, to allegations of abuse and the protection of adults at risk.

Particular safeguarding consideration is given to:

- Children with a social worker
- Children in care and previously looked-after children
- Children in kinship care
- Learners with SEND
- Learners experiencing poor attendance or disengagement

The safer recruitment aspects of this policy relate to all staff, volunteers, and Agency workers. Procedures are also in place with sub-contractors and partners. All staff must read and understand Keeping Children Safe in Education 2025 Part 1. This is a statutory guidance from the Department for Education:

This policy should be read in conjunction with the following:

- Health & Safety Policy
- Recruitment and Selection Policy
- Grievance Policy and Procedure
- Teaching, Learning and Assessment Policy
- Online Safety Policy
- Whistleblowing Policy
- Staff Code Conduct /Behaviour Policy

3 Statutory responsibilities and background

This policy is underpinned and informed by the following legislation:

- Keeping Children Safe in Education 2025 is statutory guidance that sets out the responsibilities of schools and colleges to safeguard and promote the welfare of children and young people, including requirements for staff conduct, safer recruitment and child protection procedures.
- Working Together to Safeguard Children 2023 is statutory guidance outlining how organisations and agencies must work together to safeguard and promote the welfare of children through effective multi-agency arrangements.
- Children Act 1989 & 2004 is primary legislation that places a duty on organisations to safeguard and promote the welfare of children and establishes the framework for child protection and early help.
- Care Act 2014 is legislation that sets out the safeguarding duties owed to adults at risk of abuse or neglect, including those with care and support needs.
- Equality Act 2010 legislation that protects individuals from unlawful discrimination and requires organisations to promote equality and make reasonable adjustments for people with protected characteristics.
- The Education Act 2002 requires that governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of students and adults at risk.
- The Sexual Offences Act 2003 makes it an offence for a person over 18 (e.g., a member of staff) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child

is in full-time education and the person works in the same establishment as the child, even if she/he does not teach the child.

- The Safeguarding Vulnerable Groups Act 2006 which sets out the type of activity in relation to students and adults at risk for which employers and individuals will be subject.
- The Protection of Freedoms Act 2012 which changed the definition of Regulated Activity including who is eligible for a barred check list.
- FGM Act 2003 Section 5B of this Act introduces a mandatory reporting duty, which requires regulated health and social care professionals and teachers in England and Wales to report “known” cases of FGM in under 18s which they identify in the course of their professional work to the Police. The Duty came into force on 31st October 2015. Sexual violence and sexual harassment between children in schools and Harington’s (2018). This guidance highlights the advice to prevent and deal with sexual violence and sexual harassment between students.

In addition, the Harington takes account of guidance issued by the Department for Education, the Disclosure and Barring Service and other relevant bodies and groups.

4 Definition of Abuse

Students can self-refer to the safeguarding team either in person or email. Staff can refer a student either in person or online.

See Appendix 1

5 Recording General Concerns

Staff must record all general concerns, incidents, and communication regarding individual students, in line with Harington expectations, which includes the online recording and reporting system Databridge. This includes any general well-being, emotional or behavioural concerns.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label, but in most cases, multiple issues will overlap with one another, patterns may emerge and this is why areas of concern, no matter how small, need to be recorded by all staff. This will enable managers and other staff, including key workers, to have an overview of any concerns, which may lead to areas of neglect, abuse or other safeguarding issues, being identified.

Serious Safeguarding Incidents, Concerns or Disclosures should not be reported on Databridge, because it is not confidential and is accessible by all staff. Instead staff should follow the Recording and Reporting Serious Safeguarding Incident, Concern or Disclosure

See Appendix 3

6 Serious Safeguarding Incidents, Concerns or Disclosure

Where there has been a serious safeguarding incident or disclosure made, where a member of staff suspects abuse or neglect they must:

- Allow the individual to speak without interruption.
- Never trivialise or exaggerate the issue.
- Never make suggestions.
- Not coach or lead in any way.
- Reassure the individual and let them know they were right to report the matter.
- Always ask enough questions to clarify understanding but not probe or interrogate.

- Be honest – the staff member should let the individual know that it cannot be kept a secret and someone else will need to be told.
- Try to remain calm, remembering that this is not an easy thing for them to do.
- Not show emotions – to show anger, disgust or disbelief may stop the individual talking. This may be because the individual feels they are upsetting the staff member or feel the staff member's negative feelings are directed towards them.
- Let the individual know they are taking the matter very seriously.
- Make them feel secure and safe without causing them any further anxiety.
- Make a written record as soon as it is practically possible of what has happened.

If the member of staff believes the concern needs immediate attention, they should contact the Designated Safeguarding Lead, a Deputy Designated Safeguarding Lead or the CEO/Principal.

The concern must be factual and not contain the staff member's opinions or analysis. Terms such as "I think..." and "In my opinion..." must be avoided. The Designated Safeguarding Lead or a Deputy Designated Safeguarding Leads will advise and provide support to the member of staff.

The DSL and Deputy Designated Safeguarding Leads

- Will know how to make an appropriate referral.
Will be available to provide advice and support to other staff on issues relating to Child Protection, Safeguarding, e-Safety and Prevent.
- Have responsibility to be available to listen to students at risk who are studying at the Harington.
- Will deal with individual cases, including attending case conferences and review meetings, as appropriate.

In the event the Deputy Designated Safeguarding Leads are unavailable, the Designated Safeguarding Lead will notify the Local Authority Designated Officer (LADO) when:

- A safeguarding concern related to sexual violence.
- An allegation of abuse made against a teacher, lecturer or other member of staff.

The LADO will confirm whether it is, or is scheduled to be, investigated by the Local Authority and/or the Police).

The Harington is committed to working with and assisting the local children's departments regarding child protection matters and is committed to liaison with the Local Safeguarding Children's Board (LSCB).

7 Procedure for dealing with Looked After Children

Looked after children, previously looked after children 'care leavers', children with social workers and students with special educational needs up to the age of 25 may need additional services, assistance, protection and consideration. They are supported through the scope of this policy by the Education Management Team.

8 Allegations against staff

The primary concern of the Harington is to ensure the safety of its students. It is essential that in all cases of suspected abuse by a member of staff, action is taken quickly and professionally, whatever the validity. It must be made clear however that suspension is not an indicator of guilt. In the event that any member of staff suspects any other member of staff of abusing a student, it is their responsibility to bring these concerns to the Deputy Safeguarding Lead, except where they themselves are the suspect. The CEO/Principal must be informed. The LADO must be informed within 24 hours of a concern/allegation being raised. If the allegation concerns the Principal/ CEO/Principal, the matter should be referred to the Designated Trustee, in addition to following the normal procedure for safeguarding. In line with KCSIE 2025 low level concerns regarding staff are dealt with in consultation with Citation, our HR service, recorded on Breathe and actioned appropriately.

9 Allegations about employers

Employers and their staff play a key and growing role in supporting and delivering education, training and assessment. Any cases of suspected abuse by an employer or their staff must be investigated quickly and professionally, whatever the validity. The CEO/Principal has the right to pause engagement with an employer whilst an investigation takes place. In the event that suspected abuse by an employer is reported to any member of the Harington team, that team member is responsible to bring these concerns to the Lead or Deputy Lead for safeguarding. The LADO must be informed within 24 hours of a concern/allegation being raised. Depending on the outcome of the investigation, the CEO/Principal

has the authority to suspend or terminate employer contracts as well as blacklist the employer from future apprenticeships, placements or Harington engagement activities.

10 Designated staff with responsibility for safeguarding

The Designated Safeguarding Lead for the Harington is the Student Support & Safeguarding Manager. In the absence of the Student Support & Safeguarding Manager, this role will be fulfilled by the, Deputy Designated Safeguarding Lead, the Recruitment & Progression Manager. All members of Education Management Team are designated Safeguarding Officers. The team is fully trained on all aspects of safeguarding and receives refresher training every two years. Further training has been undertaken on aspects such as mental health, substance and alcohol abuse, Prevent and trauma related practice.

The Designated Safeguarding Lead is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Providing advice and support to other staff on issues relating to safeguarding.
- Maintaining a proper record of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral).
- Liaising with the Local Authority, LSCB and LADO and other appropriate agencies.
- Liaising with employers and training organisations – who host students from the Harington on placements to ensure appropriate safeguards are put in place.

- Ensuring staff receive basic training in safeguarding issues, including Prevent, appropriate to their roles and are aware of the Harington's safeguarding procedures.
- Ensuring the Harington is represented at case conferences and review meetings as appropriate.
- The Designated Safeguarding Lead will compile a quarterly report for the Board of Trustees setting out how the Harington has discharged its duties (supported by contribution from the lead Trustee for Safeguarding). This report will include emerging themes and any changes to legislation.
- The Harington will make sure structures and processes are in place to ensure the Harington holds contact details for parents, guardians and carers of all students up to the age of 25 with learning difficulties and/or disabilities.
- It is the responsibility of the DSL to work closely with the Education Managers to provide oversight of the outcomes of safeguarded students and ensure that all staff receive appropriate safeguarding, child protection (including online) and prevent training during induction. The training should be regularly updated.

11 Designated Trustee

The Harington will appoint a Designated member of the Board of Trustees (also known as the Safeguarding Link Trustee) with responsibility for Child Protection, Safeguarding, e-Safety and Prevent implementation. All Trustees receive appropriate safeguarding and child protection training at induction, and then at regular intervals. The Designated Trustee is responsible for liaising with the designated person with lead responsibility over matters regarding Child Protection, Safeguarding, e-Safety and Prevent, ensuring that:

- The Harington has procedures and policies which are consistent with the procedures.
- The Board considers the policy on Child Protection, Safeguarding, e-Safety and Prevent on an annual basis.
- Each year the Board is informed of how the Group and its staff have complied with the policy including, but not limited to, a report on the training staff have undertaken.

The Designated Trustee is responsible for overseeing the liaison between agencies, such as the Police and Social Services, in connection with allegations against the CEO/Principal. This will not involve undertaking any form of investigation but will ensure good communication between parties and provide information to assist enquiries.

- To assist in these duties, the Designated Trustee shall receive appropriate training and is invited to attend termly meetings.

12 Online Safety

Harington recognises that online safety is a core safeguarding responsibility and that children, young people and adults at risk may be exposed to harm through digital technologies both on-site and off-site. Learners, particularly those with SEND, may be vulnerable to online risks including grooming, exploitation, cyberbullying, exposure to harmful content, misinformation, disinformation, conspiracy theories and radicalisation. Harington has appropriate filtering and monitoring systems in place and maintains senior leadership and Designated Safeguarding Lead oversight. All staff are expected to remain vigilant to indicators of online harm, understand that concerns may present through changes in behaviour, wellbeing or attendance, and report concerns promptly in line with safeguarding procedures. Online safety concerns are treated as safeguarding concerns and managed through Harington's safeguarding and Prevent arrangements, with support and education provided to learners in a way that is appropriate to age, ability and need. Confidentiality.

13 Attendance and Safeguarding

Attendance is a safeguarding issue. Poor attendance, non-attendance or disengagement may indicate abuse, neglect, exploitation or mental health concerns.

Harington follows Working Together to Improve School Attendance and ensures safeguarding concerns linked to attendance are identified, recorded and escalated appropriately.

14 Confidentiality

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the person disclosing is the overriding concern. The degree of confidentiality will be governed by the need to protect those concerned. The young person or vulnerable adult should be informed at the earliest possible stage of the disclosure the information will be passed on. The Harington complies with current legislation, General Data Protection Regulations (GDPR) 2018, which allows for disclosure of personal data where this is necessary to protect the vital interests of a student or adult at risk.

15 Safer recruitment

Safer recruitment is part of the Harington's Recruitment and Selection Policy which includes how our Disclosure and Barring Service procedures. We also have procedure for dealing with allegations of abuse against members of staff, all of which are relating to safeguarding and are located on Breathe. KCSIE 2025 highlights that educational settings should consider online searches as part of their due diligence checks on shortlisted candidates.

The Business Support Team will maintain a single central register of all checks carried out on all staff and volunteers who will work with anyone within the scope of this policy. KCSIE 2025 clarifies that a CV should only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment.

16 Communication

The policy is displayed on the Harington website, Breathe and an accessible and abridged version is included as part of the Student Handbook.

Prevent Policy

Harington is committed to meeting its duties under the Prevent agenda as part of its wider safeguarding responsibilities. The organisation recognises that learners, particularly those with SEND, may be vulnerable to radicalisation through both online and offline influences, including exposure to extremist ideology, disinformation and conspiracy theories. Radicalisation may occur gradually and can be linked to online activity, social isolation, identity issues or emotional vulnerability.

All Prevent-related concerns are treated as safeguarding concerns and must be reported immediately to the Designated Safeguarding Lead or Deputy. The DSL will assess risk, record concerns securely and, where appropriate, liaise with parents or carers and make referrals to relevant agencies, including the local Prevent team or Channel programme, in line with statutory guidance. Prevent concerns are managed through established safeguarding procedures, and staff and trustees receive appropriate training to enable them to identify concerns and respond proportionately and effectively.

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The new KCSIE 2025 offers updated definitions of the following:

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

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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

The Prevent Duty is seen as part of the Harington's wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent Duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools and Harington's. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

There is additional guidance; Prevent duty guidance: for further education institutions in England and Wales that applies to Harington's. All extremists aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way.

The Harington does not tolerate extremist views of any kind whether from internal sources; students, staff or trustees, or external sources; Harington community, external agencies or individuals. Students see our Harington as a safe place, free from harm or risk of harm and where necessary we will action referrals or processes to ensure the Harington remains a safe place for all. As a Harington, we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for students and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our students. Therefore, at the Harington we will provide a PHSE programme with additional targeted mentoring so that our students understand and become tolerant of difference and diversity. We will ensure that they feel valued and not marginalized. By delivering a broad and balanced tutorial programme, augmented by the use of external sources where appropriate, we will strive to ensure our students recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help them develop the critical thinking skills needed to engage in informed debate. Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate dealt with in accordance with our student performance management policy.

As part of wider safeguarding responsibilities, Harington staff will be alert to:

- The importance of promoting British Values through both the curriculum and as part of the student engagement team (SET).
- Disclosures by students, of their exposure to the extremist actions, views or materials of others outside, such as in their homes or community groups, especially where students have not actively sought these out.
Graffiti symbols, writing or art work promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.

- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- Partner Harington's, Local Authority services, and Police reports of issues affecting students in other Harington's or settings.
- Students voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Anti-Western or Anti-British views.
- Emerging groups such as INCELS or MUUR.
- Tackle the ideological causes of terrorism

The Harington will closely follow any locally agreed procedure as set out by the Local Authority including agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation. We will actively engage with the Police, and regional DfE Further Education Prevent Co-ordinators. As a Harington we reserve the right to initiate our own internal policies in light of a safeguarding concern that may put the student, other students, or staff at risk of harm.

We will help support students who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a student is being directly affected by extremist materials or influences. We will ensure that we follow procedure as directed by the Local Authority, Prevent coordinator, Police, social care and any other agency necessary to safeguard and support that student and others. Additionally, in such instances our internal policies may be actioned to prevent risk of harm.

Equality Impact Statement

We have a duty to consider the impact of changes on groups with Protected Characteristics (race, disability, age, sexual orientation, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership).

What are the overall aims of the change? Why are you proposing it?	The aim of this policy is to provide a framework to ensure that the guidelines are in place to support all stakeholders
Given the aims of your proposal, what issues does your data/information highlight?	Everybody is included within this policy, and all groups are given equality in regards to their needs and provisions
How could the proposed change affect positively/negatively on groups with protected characteristics?	This has a positive impact on all groups with protected characteristics, as they are ensured equal treatment and provision based on their needs. Risk assessments may be carried out to ensure that this is the case and provisions maybe altered to accommodate specific needs

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What actions will you take to mitigate any negative impact?	No negative impact to having this policy
Is there any potential negative impact justified in light of wider benefits of the proposal?	No negative impact to having this policy
Recording final decision	This policy requires Executive and Corporation approval
Has the policy taken into consideration the requirements of GDPR regulations? Are there any actions that need addressing, e.g.; data sharing agreement; has data consent been considered; data retention timescales?	GDPR regulations have been considered and actions comply with data protection requirements.

Appendices

APPENDIX 1 - Definitions of Abuse

In respect of the policy the Harington recognises the following as definitions of abuse:

- **Bullying:** Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power.
- **Physical abuse:** Physical abuse causes harm. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring. Physical abuse can also be when a parent, guardian or carer fabricates symptoms or induces illness in a student.
- **Neglect:** Neglect is the persistent or severe failure to meet a student's or adult at risk's basic physical and/or psychological needs. It will result in serious impairment of the student's and/or adults at risk's health or development.
- **Sexual abuse:** Sexual abuse involves a student or adult at risk being forced or coerced into participating in or watching sexual activity. It is not necessary for the student or adult at risk to be aware that the activity is sexual and the apparent consent of the student or adult at risk is irrelevant. It also relates to sexual abuse in terms of e-safety and child sexual exploitation, such as inappropriate images, film and evidence of grooming.
- **Non-contact abuse:** Non-contact abuse is when abusive acts do not involve actual physical contact, i.e., pornographic or violent films, sexual acts performed in front of the victim, violent acts with the abused present.
- **Emotional abuse:** Emotional abuse occurs when there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the student or adult at risk's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse.
- **Financial abuse:** Financial abuse is the misuse of a person's funds and assets; obtaining property and funds without his/her knowledge and full consent, or in the case of an elderly person who is not competent, not in his/her best interests. This is also known as material abuse. Financial or material abuse can involve the theft or misuse of a person's money or property.
- **Radicalisation and extremism:** Radicalisation refer to the process of supporting terrorism and extremist ideologies and, in some cases, to then participate in terrorist activity. Extremism is defined as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
- **Terrorism:** Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for advancing a political, religious or ideological cause.
- **Discriminatory abuse:** Discriminatory abuse is motivated by oppressive and discriminatory attitudes. Examples of discriminatory abuse may include:

- Disability - physical or learning disability, mental, ill-health or sensory impairment
- Race
- Gender
- Age
- Religion
- Cultural background
- Sexual orientation
- Political convictions
- Appearance
- **Child Sexual Exploitation (CSE) and Child Crime Exploitation (CCE):** Both Child Sexual Exploitation and Child Crime Exploitation are forms of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Individuals or groups, male or females, children or adults can carry out this abuse. It can be a one-off occurrence or over a long period. County Lines – Criminal exploitation is a geographically widespread form of harm, that is a typical feature of County Lines criminal activity; drug networks or gangs groom children and young people to carry drugs and money from urban areas to suburban and rural areas.
- **Grooming:** Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know – for example a family member, friend or professional.
- **Cyber-bullying:** Cyber-bullying is bullying that takes place over digital devices like mobile phones, computers, and tablets. Cyberbullying can occur through SMS, text and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behaviour.
- **Forced Marriage:** Forced marriage is where one or both people do not consent to the marriage and pressure or abuse is used. Pressure can include threats, physical or sexual violence, and financial pressure. All child marriages are forced, because a child cannot provide informed consent, and is therefore a violation of children's rights.
- **Female Genital Mutilation (FGM):** Female Genital Mutilation (FGM) is a human rights violation, torture and an extreme form of violence and discrimination against girls and women. It is most often carried out on girls between infancy and age 15, though adult women are occasionally subjected.
- **Significant Harm:** Some children may be in need because they are suffering or likely to suffer significant harm. The Children Act introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.
- **Child on child Sexual Violence and Sexual Harassment:** Further guidance has been published in the sexual violence and sexual harassment between children in schools act (May 2018). The referral process is as per any safeguarding concern, but Harington must act swiftly and ensure a risk assessment is carried out. The risk assessment must consider:
 - The victim

- The alleged perpetrator
- All other children and, if appropriate, other adults, children and staff.
- **Children Missing in Education:** Children missing in education is often an indicator for other potential safeguarding concerns. The Group should have measures, through its attendance reporting and follow up procedures, to ensure it is following up on students, who could potentially be “missing in education”.
- **Domestic Abuse:** Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The Police are committed to tackling crime and disorder and supporting public protection across London and work on a regular basis with education establishments. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse.
- **Child on child Abuse:** This can include, but is not limited to bullying (including cyberbullying), sexual violence and sexual harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals between students; sexual violence such as rape, assault by penetration and sexual assault; sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be stand-alone or part of a broader pattern of abuse. The Department of Education has published advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads in the document: Sexual violence and sexual harassment between children in schools and Harington’s. (September 2021).
- **Upskirting:** The Voyeurism (offences) Act, which is commonly known as the Upskirting Act, came into force on the 12th April 2019. Upskirting typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.
- **Homelessness:** Being homeless or being at risk of becoming homeless presents a real risk to a student’s welfare. The DSL, and any deputies, should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.
- **Fabricated or Induced Illness:** (FII) is a form of abuse associated with a range of poor outcomes for children and young people extending to the serious harm or even death of the child. Behaviours by a parent or carer may result in harm to a child or young person. FII can occur when a child or young person also has a confirmed diagnosis of illness or disability and the two may coexist, but the health seeking behaviour or presentation is outside that expected for the condition or disability.
- **Honour based abuse:** This can be a form of abuse that may be linked to certain practices that are related to culture, faith, beliefs, and that may put young people at the risk of abuse.
- **Serious Violence:** There are indicators, which may signal that a child is at risk from, or involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate children have been approached by, or are involved with, individuals associated with criminal networks or

guns. All staff should be aware of the associated risks and understand the measure in place to manage these. Advice is provided in the Home Office's Preventing Youth Violence and Gang Involvement and Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance.

APPENDIX 2 - Keeping Children Safe in Education (KCSiE) – Translations

It is the responsibility of everyone to keep children safe and to read Part One of the statutory guidance “Keeping Children Safe in Education”. The London Grid for Learning (LGfL) have had KCSiE part one translated into a number of languages; Arabic, Bengali, Cantonese, Gujarati, Mandarin, Polish, Portuguese, Punjabi, Spanish and Urdu. The translations can be downloaded here:

<https://national.lgfl.net/digisafe/kcsie/kcsietranslate>

Vulnerable Adult – someone who is over 18 who is, or may be, in need of community services due to age, illness or a mental or physical disability, who is, or may be unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation.

Information on recognising abuse

What is neglect?

Neglect is the ongoing failure to meet a child's basic needs and the most common form of child abuse. A child might be left hungry or dirty, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger. And it can also have long term effects on their physical and mental wellbeing.

Signs of abuse Poor appearance and hygiene:

- Being smelly or dirty
- Being hungry or not given money for food
- Having unwashed clothes, having the wrong clothing, such as no warm clothes in winter
- Health and development problems; eg, anaemia
- Body issues, such as poor muscle tone or prominent joints
- Medical or dental issues
- Missed medical appointments, such as for vaccinations
- Not given the correct medicines
- Poor language or social skills
- Regular illness or infections or repeated accidental injuries, often caused by lack of supervision.
- Skin issues, such as sores, rashes, flea bites, scabies or ringworm
- Thin or swollen tummy
- Tiredness
- Untreated injuries
- Weight or growth issues.
- Housing and family issues; living in an unsuitable home environment, such as having no heating
- Being left alone for a long time
- Taking on the role of carer for other family members.

Changes in behaviour such as:

- Becoming aggressive
- Being withdrawn, depressed or anxious
- Changes in eating habits
- Displaying obsessive behaviour
- Finding it hard to concentrate or take part in activities
- Poor attendance
- Showing signs of self-harm
- Using drugs or alcohol

What is physical abuse?

Physical abuse is when someone hurts or harms a child or young person on purpose. It includes; hitting with hands or objects, slapping and punching, kicking, shaking, throwing, poisoning, burning and scalding, biting and scratching. It is important to remember that physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child to become unwell. Signs of abuse; bumps and bruises do not always mean a child is being physically abused. All children have accidents, trips and falls. And there is not just one sign or symptom to look out for. But it is important to be aware of the signs. If a child regularly has injuries, there seems to be a pattern to the injuries or the explanation does not match the injuries, then this should be reported.

Symptoms include:

- Bruises
- Broken or fractured bones
- Burns or scalds
- Bite marks

It can also include other injuries and health problems, such as:

- Scarring
- The effects of poisoning, such as vomiting, drowsiness or seizures
- Breathing problems from drowning, suffocation or poisoning.

What is sexual abuse?

When a child or young person is sexually abused, they are forced or tricked into sexual activities. They might not understand that what is happening is abuse or that it is wrong. And they might be afraid to tell someone. Sexual abuse can happen anywhere – and it can happen in person or online. It is never a child's fault they were sexually abused – it is important to make sure children know this. Types of sexual abuse. There are 2 types of sexual abuse – contact and non-contact abuse. And sexual abuse can happen in person or online. Contact abuse is where an abuser makes physical contact with a child.

This includes:

- Sexual touching of any part of a child's body, whether they are clothed or not.
- Using a body part or object to rape or penetrate a child.
- Forcing a child to take part in sexual activities.
- Making a child undress or touch someone else.

Contact abuse can include touching, kissing and oral sex – sexual abuse is not just penetrative. Noncontact abuse is where a child is abused without being touched by the abuser.

This can be in person or online and includes:

- Exposing or flashing.
- Showing pornography.
- Exposing a child to sexual acts.
- Making them masturbate.
- Forcing a child to make, view or share child abuse images or videos.
- Making, viewing or distributing child abuse images or videos.
- Forcing a child to take part in sexual activities or conversations online or through a smartphone.

Emotional and behavioural signs:

- Avoiding being alone with or frightened of people or a person they know.
- Language or sexual behaviour you wouldn't expect them to know.
- Having nightmares or bed-wetting.
- Alcohol or drug misuse.
- Self-harm.
- Changes in eating habits or developing an eating problem.
- Changes in their mood, feeling irritable and angry, or anything out of the ordinary

Physical signs:

- Bruises.
- Bleeding, discharge, pains or soreness in their genital or anal area.
- Sexually transmitted infections.
- Pregnancy.

What is emotional abuse?

Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child or young person. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child or young person. Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.

Types of emotional abuse include:

- Humiliating or constantly criticising the child.
- Threatening behaviour including shouting.
- Using sarcasm or making the child the subject of jokes.
- Blaming the child for situations.
- Making a child perform degrading acts.
- Pushing a child or trying to control their lives.
- Exposing a child to events or situations such as domestic abuse or drug taking.
- Not allowing a child to have friends.
- Failing to promote a child's social development.
- Making a child perform degrading acts.
- Persistently ignoring a child.
- Being absent.
- Manipulating a child.
- Being constantly negative about the child.
- Never showing any emotion to a child.

Signs of emotional abuse

With emotional abuse there may not be any obvious physical signs and a child may not tell anyone what is happening until they reach a crisis point. It is therefore important you look at how the child is acting and behaving.

Signs may include:

- Unconfident or lacking in self-assurance.
- Struggling to control their emotions.
- Having difficulty in maintaining relationships.
- Acting in a way that is inappropriate for their age.
- Use of inappropriate language.

- Being isolated from their parents.
- Lacking social skills.
- Have few or no friends.

GLOSSARY OF TERMS

Safeguarding is a term, which is broader than “child protection” and relates to the action taken to promote the welfare of children and young people and protect them from harm. Safeguarding is everyone’s responsibility.

Children and Young People – throughout the document, references are made to “children and young people”. These terms are interchangeable and refer to children to have not yet reached 18 or vulnerable adults up to the age of 25.

Staff - includes any adult who is employed, commissioned or contracted to work with children or young people, including volunteers and guest speakers in either a paid or an unpaid capacity.

Designated Safeguarding Lead – a senior member of staff with overall responsibility for child and Adult protection within the Harington.

Duty of Care – the duty which rests upon an individual or organisation to ensure the safety of a child or young person involved in any activity or interaction for which that individual or organisation is responsible.

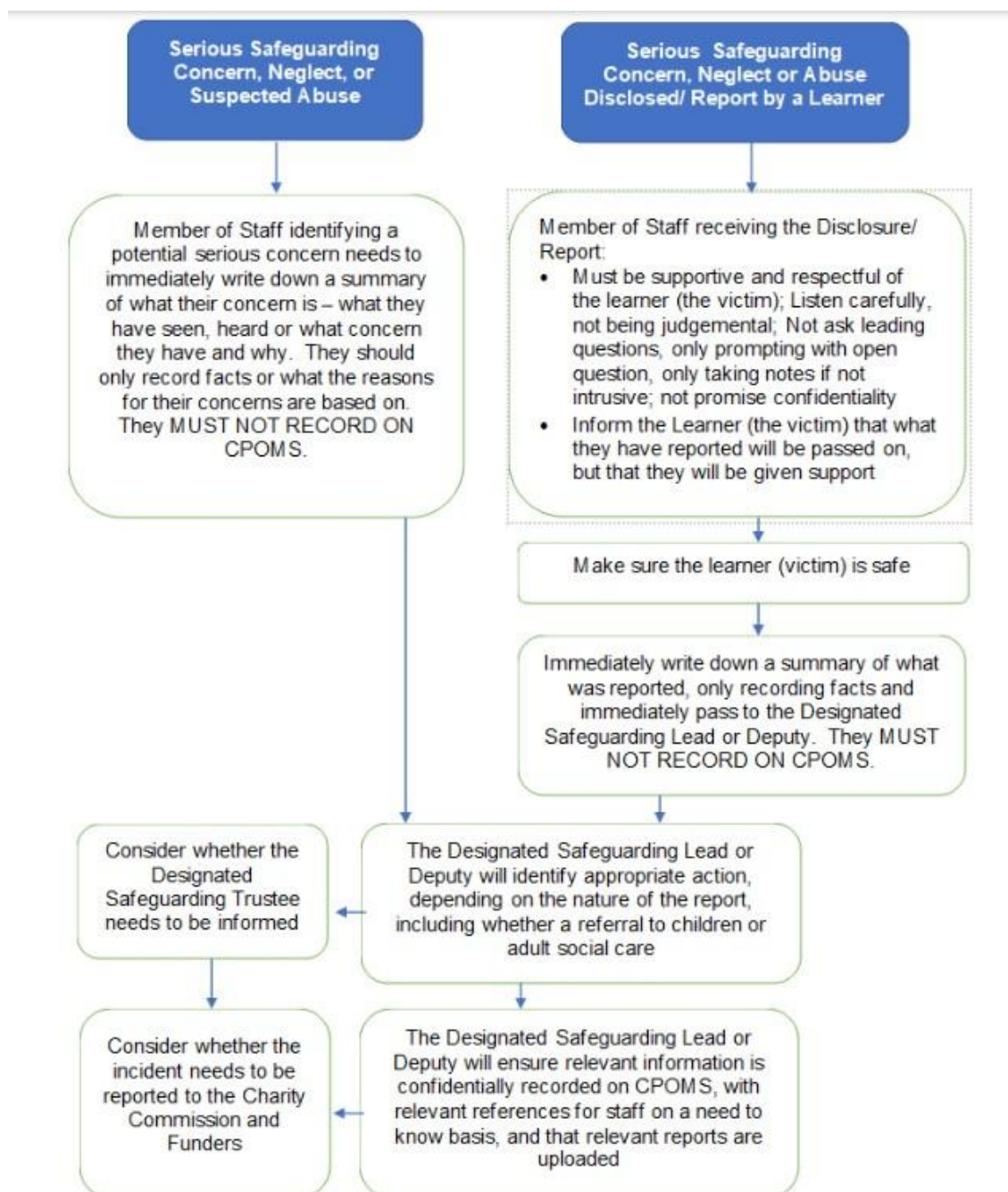
External Agencies - including Children’s Services, Independent Safeguarding Authority, Haringey Safeguarding Children Partnership, Safeguarding Board, Police, etc.

External Contractors – including building or maintenance contractors who are required to work at the Harington for a given period.

APPENDIX 3: Recording and Reporting Flowchart – Serious Safeguarding Concern, Neglect or Abuse

It is the duty of all staff to record and report serious incidents, concerns or any disclosures immediately, to the Designated Safeguarding Lead or Deputy.

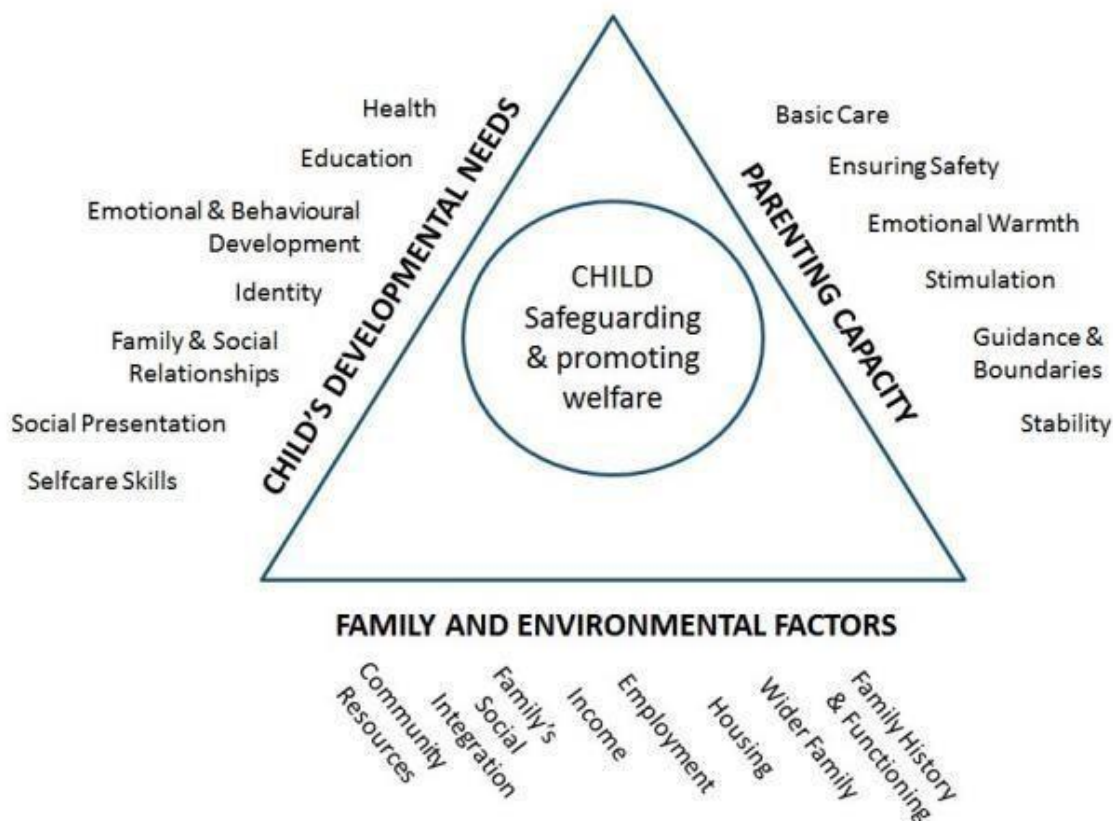
*Note references to CPOMS: Databridge is now used instead of CPOMS



APPENDIX 4:

Assessment Framework

(Taken from Working Together to Safeguard Children, July 2018)



Every assessment should draw together relevant information gathered from the child and their family and from relevant practitioners including teachers and Harington staff, early years workers, health practitioners, the Police and adult social care.

Every assessment of a child should reflect the unique characteristics of the child within their family and community context.

Each child whose referral has been accepted by children's social care should have their individual needs assessed, including an analysis of the parental capacity to meet those needs, whether they arise from issues within the family or the wider community.

Frequently, more than one child from the same family is referred and siblings within the family should always be considered.

APPENDIX 5: HARINGTON'S SAFEGUARDING CHECKLIST

To be used by the CEO/Principal and Trustees to carry out an assessment of Harington's safeguarding framework

Requirement	Yes	No	Comments/action
Leadership and the safeguarding and child protection framework			
Harington has comprehensive safeguarding policies covering early help and child protection, behaviour management and a staff conduct policy covering use of technology, relationships with students, communications and use of social media			
Harington has agreed procedures for dealing with incidents of sexual violence and sexual harassment that are linked to Harington's behaviour and bullying policies			
There are agreed procedures in place for making referrals to the local authority where there are concerns about the safety and welfare of a child			
There is a designated Trustee with responsibility for safeguarding and child protection			
Harington and Board of Trustees are aware of duties under the Human Rights Act 1998 and the Equality Act 2010			
A senior staff member has been appointed as the Designated Safeguarding Lead and a nominated Deputy to carry out the role in their absence. They have the time and resources allocated to carry out their responsibilities			
The safeguarding lead and their Deputy have received safeguarding and child protection training at the appropriate level on appointment and this training is updated every two years.			
Arrangements are in place to ensure staff can liaise with the safeguarding lead or their Deputy at all times during school hours			
Harington promotes a multi-agency approach to safeguarding and child protection in line with <i>Working together</i> and staff are able to attend child protection conferences and other multi-agency meetings as appropriate			
Harington is represented on the local authority Safeguarding Students Partnership			
Harington has taken steps to implement Operation Encompass and have a process for dealing with police notifications of domestic abuse incidents			
The curriculum offers opportunities for students to learn how to keep themselves safe, including online, and offers students guidance on healthy relationships in line with the new statutory duty to provide relationships and sex education.			

Harington promotes positive behaviour and this is reflected in the behaviour management strategies used. Reasonable force and restraint is used only in line with legislation. Use of any behaviour management strategy is tailored to the needs of the student and			
carefully monitored for effectiveness; efforts are made to reduce the use of physical intervention and restraint for vulnerable students.			
Harington has effective policies for dealing with bullying and discrimination, including cyberbullying, sexting, up skirting and inappropriate language			
Harington has effective policies for dealing with sexual violence and sexual harassment between students			
There is a policy on dealing with allegations against staff and all staff are aware of the policy and know what action to take if they have concerns about another member of staff			
Harington has a policy of openness and challenge and staff and students feel safe to raise concerns. There is a whistleblowing policy in place and all staff and students know who to contact if they are concerned that safeguarding issues are not being adequately dealt with by Harington			
Harington have taken steps to implement the Prevent duty and staff are aware of how to make appropriate referrals to the local authority.			
Harington has a child on child abuse policy dealing with students who harm other students and all staff are aware of what action to take under this policy			
Harington seeks the views of students and parents about safeguarding issues and all safeguarding and child protection policies are available on Harington website;			
Staff knowledge and safeguarding practice			
All staff are inducted in safeguarding arrangements in Harington and have received and read all relevant policies			
Staff are aware of the safeguarding culture of Harington and their role in challenging inappropriate behaviour and language and being vigilant to child on child abuse			
All staff and Trustees have received safeguarding and child protection training at the appropriate level on appointment and this training is updated every 3 years.			
All staff receive regular updates to safeguarding and child protection legislation via the Designated Safeguarding Lead as required			

All staff are able to identify those students who may benefit from early help and are able to provide support within Harington or make appropriate referrals to the local authority where necessary.			
All staff are able to recognise the indicators of abuse and harm, can identify students who may be at risk of harm and those who may be vulnerable to harm including LGBT students, those with social workers, those with SEND			
All staff know what action to take to refer students appropriately to the local authority where there are concerns and make timely referrals and follow up referrals where it is thought the student's situation is not improving			

All staff are aware of their legal duty under the mandatory reporting rules for FGM and can make appropriate notifications to the police and CSSW in known cases of FGM			
All staff are aware of extra-familial harm and the indicators that a student may be at risk from harm within the community, particularly through criminal and sexual exploitation, and know what action to take to refer the student on for safeguarding			
All staff are aware of what actions to take when a child goes missing from education or does not attend and that missing episodes are monitored; all staff are aware of the link between going missing and safeguarding issues such as sexual exploitation, criminal behaviour, substance misuse and trafficking; there are procedures in place to notify The local authority where a child is removed from Harington roll in line with the local authority <i>Students missing from school</i> policy			
All staff are aware of how harm, abuse, neglect, and trauma can impact on student's mental wellbeing and can recognise those students who need help with their mental health; all staff know what actions to take to signpost or refer students who need a mental health service.			
All staff are able to share information lawfully and appropriately and work jointly with partner agencies; parents are informed of concerns and actions taken unless this puts the student at further risk			
Records of concerns and referrals are up to date and timely and kept securely			
All staff receive regular supervision that enables them to raise safeguarding issues			
Risk assessments are routinely carried out to ensure the health and safety of students on site, on school trips and during work experience			
Students feel safe and are aware of how to raise concerns and complaints with a trusted adult			
Safer recruitment			

Harington has a safer recruitment procedure that is in line with statutory requirements			
Harington has a single central record providing details of when and by whom the following checks on candidates were taken out: • Identity checks • DBS/barred list checks • Prohibition from teaching/section 128 checks • Appropriate checks with overseas organisations where the candidate is from abroad • Checks to establish right to work in the UK • Professional qualifications check • Checks on individual's social media accounts			
Harington has a clear system in place in line with statutory requirements for volunteers or contractors coming into Harington. Enhanced DBS checks are taken out on all staff members, volunteers and Trustees. Barred list checks are also taken out on staff, volunteers and Trustees who are involved in regulated activity			
The CEO/Principal decides on whether or not volunteers, visitors or contractors require a DBS check and this decision is informed by a risk assessment; arrangements are put in place to supervise and oversee volunteers, visitors and contractors where a DBS check is not carried out. Students are not left unsupervised with any individual who has not undergone a DBS check			
Harington seeks written confirmation from agencies that these checks have been taken out on all agency and supply staff prior to appointment; All agency and supply staff are required to present proof of identity prior to beginning work			
A member of the Board of Trustees or senior leadership team involved in interviewing has completed an accredited safer recruitment training course			
Dealing with allegations against staff			
There is a named staff member with responsibility for liaising with the police and LADO for all staff subject to allegations, including supply staff			
Appropriate referrals are made to the DBS where staff cease to work at Harington following investigation into allegations			
Harington has a system in place to deal with low-level concerns about staff that do not reach the threshold to be dealt with under the allegations procedures and how to seek advice from the LADO where it is not clear if the threshold has been reached			

Appendix 6 – Contact Details and Useful links

Role	Name	Contact Details
Designated Safeguarding Trustee	Alison Kelly	amckelly@outlook.com
CEO/Principal	Jacqui Steel	Jacqui.steel@harington.org.uk 020 3457 7997
Designated Safeguarding Lead	Barbara Erskine	Barbara.erskine@harington.org.uk 020 3457 7997
Deputy Designated Safeguarding Lead	Michelle Besant	Michelle.besant@harington.org.uk 020 3457 7997
Local Authority Children social care	Haringey Children's Social Care	See referrals – contact MASH (see below) General: 0208 489 0000
Local Authority Adult social care	First Response Team	020 8489 1400 Email: firstresponseteam@haringey.gov.uk
MASH (Multi-Agency Safeguarding Hub)	Haringey's Multi Agency Safeguarding Hub (MASH)	Monday to Thursday 8.45am to 5pm; Friday 8.45am to 4.45pm Tel: 020 8489 4470 mashreferral@haringey.gov.uk
Emergency Duty Team (Children's Social Care)	Haringey's MultiAgency Safeguarding Hub (MASH)	Out of office hours, including weekends the Emergency Duty Team Tel: 020 8489 0000 mashreferral@haringey.gov.uk
NSPCC helpline	NSPCC	0808 800 5000
NSPCC Whistleblowing Advice Line	NSPCC Whistleblowing	0800 028 0285 help@nspcc.org.uk
UK Safer Internet Centre	UK Safer Internet Centre	https://www.saferinternet.org.uk
Police Anti-Terrorist Hotline Number	Police Anti-Terrorist Hotline Number	0800 789 32 https://www.met.police.uk

Haringey Police Prevent Team	Prevent Coordinator	If you are concerned about a child, young person, or a family: make a referral to the SPA (Single Point of Access) Team>: 020 8489 4470 during office hours, or 020 8489 0000 out of hours For Adults 020 8489 3884 or 020 8489 1280 (office hours only). Email: prevent@haringey.gov.uk
Forced marriage		https://www.gov.uk/guidance/forced-marriage

Reviewed: 9 January 2026

Next review date: 9 January 2027

Name: Jacqui Steel

Role: CEO/Principal

Signature: *Jacqui Steel*