



ALDENHAM

SCHOOL

ALDENHAM SCHOOL

SAFEGUARDING POLICY
Safeguarding@aldenham.com

Revised September 2023
by the Designated Safeguarding Lead and
Head of Aldenham Foundation

Chair of Governors **Date**

Safeguarding Governor *J. M. Hancher* **Date 02/09/23**

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1. Policy Statement

Aldenham School is committed to Safeguarding, Child Protection and the promotion of welfare and wellbeing – placing it at the heart of what the School seeks to achieve. It is recognised that Children and young people learn best when they are healthy, safe, and secure. All Children, Pupils, Students and Staff should feel safe and protected from any form of abuse. This includes Children who are in need (Section 17, Children Act 1989) and Children who are at risk of harm (Section 47, Children Act 1989). The School expects all Staff, Governors, contractors, volunteers and organisations or individuals who lease School facilities to share this commitment.

This policy is addressed to all people working with any Child, Pupil and/or Student on School property or on behalf of the Foundation, whether on-site or off-site. This can include members of teaching and support Staff, supply Staff, contractors, volunteers, Governors, and organisations or individuals who lease School facilities. The Safeguarding Policy can be accessed on the School website, Families can access the policy via MySchoolPortal (MSP), Staff can also access the policy via MyConcern, or the policy can be provided on request.

This policy has been authorised by the Aldenham School Governors and is reviewed annually. If the Policy is updated during the School year, the Designated Safeguarding Lead (DSL) will inform the Governing Body via the Clerk to the Governors and the Safeguarding Governor. The Governors recognise the expertise Staff build by undertaking Safeguarding training and managing concerns daily. Opportunities in the form of meetings and discussions are offered for all Staff to contribute to the shaping of the Safeguarding arrangements and policy.

The policy has regard to all guidance outlined in ‘Section 5 Statutory Guidance’ of this policy, particularly Keeping Children Safe in Education (KCSIE) 2023, Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014. The School regularly monitors updates to statutory and non-statutory guidance to ensure the Safeguarding Policy effectively safeguards and promotes the welfare of Children, Pupils and Students.

2. Terminology

Foundation means the Aldenham Foundation, a collection of schools including Aldenham Prep School, Aldenham School, and St Hilda’s. This document is the policy which applies to Aldenham School and Aldenham Prep School.

School means Aldenham Prep School and Aldenham School.

Pupil means a Child enrolled at Aldenham Prep School.

Student means any person enrolled at Aldenham School.

Child/Children refers to unenrolled Children using School facilities and enrolled Pupils/Students, as per KCSIE, (2023).

Family/Families can mean one or both parents, a legal guardian, or education guardian.

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

Abuse is defined as a form of maltreatment of a Child. Abuse may take the form of physical, emotional or sexual abuse and includes neglect. This may involve inflicting harm, or by failing to act to prevent harm. Children may be abused by an adult or adults or another Child or Children.

Online abuse is defined as a form of abuse that happens via the internet. Online abuse can take the form of cyberbullying, emotional abuse, grooming, sexting, sexual abuse, and sexual exploitation. Someone can be a victim of online abuse while using social media, text messages and messaging apps, emails, online chats, online gaming and while accessing live-streaming sites – regardless of device. Children and young people are particularly vulnerable to online abuse.

Safeguarding and promoting the welfare of Children **refers to:**

- Protecting Children at risk from maltreatment and promoting the welfare and wellbeing of Children in need of additional support, even if they are not suffering harm or at immediate risk.
- Preventing impairment of Children’s health or development, including mental health.
- Ensuring that Children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all Children to have the best outcomes. (Working Together to Safeguard Children DFE 2020).

3. Summary

The welfare of **all Children, Pupils and Students**, including Early Years Foundation Stage (EYFS), at Aldenham School must be the primary concern for all Staff. The School will do all that it can, within reason, to ensure that the Children in our care are safe and happy.

Safeguarding Children is the action we take to promote the welfare of Children and protect them from harm. Every adult who comes into contact with our Pupils and Students, **or Children using our facilities** has a role to play. Although referrals are usually managed via the DSL, anyone can refer a Child to Children’s social care. Safeguarding Children is everyone’s responsibility.

The Teacher Standards 2011 (updated 2021 to reflect minor changes in terminology), state that teachers, including Headteachers, should safeguard Children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties and all Staff have a responsibility to take appropriate action, working with other services as needed.

This policy seeks to demonstrate the commitment of the Head of Foundation, each Head of School, all Staff (including temporary Staff), contractors, volunteers, the governing body **and all who lease School facilities** to promoting a safe environment for Children and to report any allegations of abuse or suspicions of abuse to the relevant local authority agency.

The School’s Safeguarding Policy **considers** the statutory guidance, local Child Protection procedures and best practice. The School is committed to remedying any difficulties or weaknesses without delay.

Confidentiality

Adults at the School should never give absolute guarantees of confidentiality to **Children**, Pupils, Students or adults wishing to tell them about something serious. They should, however, guarantee that they will only pass on information to the minimum number of people who must be told to ensure that the proper action is taken to resolve the problem. They should never

tell anyone who does not have a clear 'need to know', and they should take whatever steps they can to protect the informing **Children**, Pupil, Student or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made. Every effort will be made to maintain confidentiality and guard against unwanted publicity for both the victim and the accused. These restrictions apply up to the point where the accused person is charged with an offence or the DfE/Teaching Regulation Agency (TRA) publish information about an investigation or disciplinary case (KCSIE Sept 2023).

Sharing confidential information

Concerns regarding Safeguarding issues inevitably involve the sharing of highly sensitive information. Whilst colleagues should be aware of their obligations under the General Data Protection Regulations (GDPR), **concerns relating to sharing sensitive information** should never be used as a reason for not passing on information to the DSL about a Child at risk of harm. The School's Safeguarding Management Software, MyConcern, is fully GDPR-compliant and should be the sole means (other than a direct report to the DSL) by which concerns are raised.

Notwithstanding the paragraph above, colleagues should be aware that confidential information placed on MyConcern is not necessarily exempt from a Subject Access Request (SAR). Therefore, care should be taken to ensure that information is as objective as possible in the circumstances, and only information relevant to a particular **Child, Pupil, and/or Student** is raised in a concern.

What to do if you suspect abuse

If you suspect abuse, a young person confides in you, or a complaint is made to you about any adult, it is your duty to report the concern to the Designated Safeguarding Lead (DSL). **The DSL for the Aldenham School and Aldenham Prep School is Mr Paul Dunstan**. While the DSL has deputies (DDSLs) acting on their behalf, the DSL retains ultimate responsibility for Safeguarding and **Child Protection** in the School. If the DSL is not available (or a DDSL is more readily available), a report should be made immediately to a DDSL, who will then discuss the matter with the DSL.

If the suspected abuse involves a member of the Foundation Staff who may have harmed or may be likely to harm a Child, you should inform the relevant Head of School immediately and simultaneously report your concern using the online MS form. If the member of Staff in question is a Head of School, you should contact the Head of Foundation and not use the online form. If the member of staff in question is the Head of Foundation, you should raise this with the Chair of Governors and not use the online form. For more information, see Section 18 of this policy.

What to do if a young person tells you about abuse by someone else

- **Always stop and listen. If you believe the disclosure to be of a severe nature, inform the Child/Pupil/Student you would like to seek a second person to be present for the disclosure and ask the Child/Pupil/Student if they have a preferred trusted adult to be present. If they do not want a second person present, continue to listen.**
- **Ask open-ended questions such as 'What happened?' and 'Who was involved?', rather than leading questions such as 'Did X do this to you?'**
- **Do not guarantee confidentiality. Explain that you must report the matter to the DSL for help and guidance. If you believe the Child/Pupil/Student, or any other person, is at risk of harm - you have a statutory duty to report to the DSL immediately.**
- **It is essential a written record of your conversation is made. Best practice (according**

to KCSIE, 2023) is to wait until the end of the conversation and immediately type up a thorough summary to MyConcern. It may be useful to make brief notes during the conversation, if making notes does not restrict giving the Child your full attention. It is recommended that notes are typed directly into MyConcern to avoid GDPR breach.

- Report the matter to the DSL, either directly or via MyConcern.
- If a Child is at immediate risk of harm, you must contact the DSL in person as soon as possible, even if it means arranging emergency cover for a class. This is a top priority.
- The DSL will inform you if you have any further obligations.
- Should a Child be deemed at risk, the DSL will make an initial referral to Children's Social Services immediately. A full referral in any case will be made within 24 hours.
- If you are not happy with the DSL's response, you have the right to refer the matter directly to Children's Services.

The School appoints a Designated Safeguarding Lead (DSL) in charge of Safeguarding for the whole School. This appointment is Mr Paul Dunstan. In their absence, the Head of the Aldenham Foundation, Mrs Alex Hems, acts as a deputy DSL for the whole School. The DSL is supported by six Deputy Designated Safeguarding Leads (DDSL), Revd Jos Perris, Miss Lilly Thynne, Mrs Lisa Sherman and Revd Tony Richardson based in Aldenham School, and Mrs Ann Suffield and Mrs Sarah Galpin based in Aldenham Prep School. All DDSLs have been trained to an appropriate level. In the event of the DSL and DDSLs not being available in person, they will make every effort to be available for consultation via MS Teams. If this is not possible, the following Staff in Aldenham School have all undertaken Advanced Safeguarding training in the last two years:

Mrs. Louise Gall, Assistant to the Deputy Head Pastoral
Mr. Luke Harding, Assistant Head (Learning)
Mrs. Katy Miller, Assistant Head (Operations and External Affairs)
Miss Katie Cooke, Head of Sixth Form
Mr Sam Pennycook, Housemaster, Beevor's
Mr. James Kerlake, Housemaster, Kennedy's
Mr. Grant Cornock, Housemaster, Leeman's
Mr. Sam Dawe, Housemaster, Martineau's
Mr. Mike Yeabsley, Housemaster, McGill's
Mrs. Rebecca Cassell, Housemistress, Paull's
Miss Lowri Jones, Housemistress, Riding's
Miss Niamh Brewer, Housemistress, Woodrow's
Mr. Chris Jenkins, Head of English and Media Studies
Mr Ben Frais, Head of History and Politics.

4. Important Contact Details

School Safeguarding Team

Students, Staff and Families can seek Safeguarding support or advice during the working day in term time (between 8:30am and 5:30pm on any School day) by emailing Safeguarding@aldenham.com. Out of hours and during the holidays, this email address can be used to seek non-urgent advice or to keep the Safeguarding Team updated regarding non-urgent Safeguarding matters. Where relevant, emails will be responded to, but there can be no expectation of a response time during School holidays and out of School hours.

Staff can contact the DSL or a DDSL via MS Teams. Urgent concerns should be reported

immediately via a MS Teams call or using the Safeguarding telephone number below. This will be answered by Revd Jos Perris who will triage the concern appropriately.

Safeguarding Telephone number: 07884 585324

Designated Safeguarding Lead (DSL):
Mr Paul Dunstan pmd@aldenham.com

Deputy Designated Safeguarding Leads (DDSLs), Aldenham School:

Revd Jos Perris jcperris@aldenham.com

Miss Lilly Thynne lthynne@aldenham.com

Mrs Lisa Sherman lsherman@aldenham.com

Foundation Chaplain and DDSL, Aldenham School:
Revd Tony Richardson trichardson@aldenham.com

Deputy Designated Safeguarding Lead (DDSL), Prep School:
Mrs Ann Suffield asuffield@aldenham.com

Head of Aldenham Prep and DDSL, Prep School:
Mrs Sarah Galpin smgalpin@aldenham.com
07966 341156

Head of Aldenham Foundation (and Acting Head of Aldenham School):
Mrs Alex Hems ahems@aldenham.com
07977 392382

Counselling Manager:
Mrs Debbie Love counselling@aldenham.com

Health Centre 07785 303555
emergencies only:

School Governor Contacts

Chair of Governors:
Mrs Sarah Altman chair@aldenham.com

Designated Governor for Safeguarding, and Filtering and Monitoring:
Dr Jane Hawdon Contact via School Office (enquiries@aldenham.com)

Useful external agencies for Children, Pupils, Students and Families

Hertfordshire Contact Centre 0300 123 4043
County Council Children's Services

Hertfordshire Single Point of Access 0800 6444 101 or 111 and select option 2
24/7 Mental Health Helpline

Independent Person Mark Klimt
0208 207 3789 or 07713 053 576

Childline, UK 0800 1111
NSPCC, UK 0808 800 5000
Samaritans National Helpline 116 123
Confidential Anti-Terrorism Line 0800 789 321
Watford Sexual Health Clinic 0300 008 5522

Useful external agencies for Staff

The School has a large catchment area which covers multiple Local Authorities, each with their own Safeguarding teams and procedures. To determine which local authority a Pupil or Student is resident in, Staff can use iSAMS to locate a permanent address and search the postcode using www.gov.uk/report-child-abuse-to-local-council. Incidents involving full-time boarders or Staff should be referred to Hertfordshire County Council. Referrals should always be made to the appropriate local authority.

In Hertfordshire, the Multi Agency Safeguarding Hub (MASH) brings together Police, Probation, Health Visiting and Children's Services Staff, working together as a team, to share information and decision making about the best way to safeguard and meet the needs of vulnerable Children.

MASH 0300 123 4043
– Multi-Agency Safeguarding Hub Protectedreferrals.cs@hertfordshire.gov.uk

CPSLO Hertsmere and St Albans Christina (Chrissy) Lea
– Child Protection School Liaison Officer 01992 531907
Christina.lea@hertfordshire.gov.uk

CPSL Admin Support Officer Joanne Freckleton
– Child Protection School Liaison Officer 078122 71303
Cpsloadmin@hertfordshire.gov.uk

LADO Officer 01992 555420
– Local Authority Designated Officer LADO.Referral@herfordshire.gov.uk

Hertfordshire CAMHS 01438 843322 or 0800 644 4101

Herts Sunflower 08088 088 088 or 999 in emergency
– Hertfordshire Domestic Abuse Hotline kim@mailpurple.org

Counter Terrorism Hotline 0800 789 321 or 01438 735373
– Prevent advice

SAFA 0300 123 4042 or 101
– Safeguarding Adults from Abuse

If you are concerned about a Child being at risk of abuse and believe that the School is not handling the issue appropriately, exacerbating the risk, you may contact the NSPCC's Whistleblowing Service for advice.

Alternative Multi-Agency Safeguarding Hubs

Barnet	020 8359 4066
Bedford Borough 'Integrated Front Door'	012 3471 8700
Brent	020 8937 4300
Buckinghamshire	012 9638 3962
Camden Children & Families Contact Service	020 7974 3317
Central Bedfordshire Access & Referral Hub	030 0300 8585
Enfield	020 8379 5555
Haringey	020 8489 4470
Hillingdon	018 9555 6006
Islington Children's Services Contact Team	020 7527 7400
Luton	015 8254 7653
Westminster	020 7641 4000

5. Statutory Guidance

All guidance is hyper-linked.

- [The Education \(Independent School Standards\) Regulations \(2014\)](#)
- [Keeping Children Safe in Education \(Sept 2023\)](#)
- [The Education Act \(2002\)](#)
- [The Children Act \(2004\)](#)
- [The Equality Act \(2010\)](#)
- [The Equality Act and Schools Guidance \(2014\)](#)
- [The Human Rights Act \(1998\)](#)
- [Working Together to Safeguard Children \(2018, updated 2020\)](#)
- [National Minimum Standards for Boarding Schools \(2022\)](#)
- [What to do if you're worried a Child is being abused: guidance for practitioners \(2015\)](#)
- [Information Sharing – Advice for practitioners providing Safeguarding services to vulnerable Children, young people, parents and carers \(2018\)](#)
- [Statutory framework for the Early Years Foundation Stage \(2023\)](#)
- [Prevent duty guidance for England and Wales \(2021\)](#)
- [Female genital mutilation: resource pack \(2023\)](#)
- [Sharing Nudes and Semi-Nudes – Responding to incidents and Safeguarding Children and young people, \(UKCIS, 2020\)](#)
- [Child Sexual Exploitation: definition and guide for practitioners \(and annexes\), \(2017\)](#)
- [DBS barring referral guidance \(2018, updated 2023\)](#)
- [Relationships and Sex Education and Health Education Guidance, \(2019, updated 2021\)](#)
- [Preventing Youth Violence and Gang Involvement, \(March 2015\)](#)
- [Home Office County Lines Guidance, \(May 2022\)](#)
- [DFE: Mental Health and Behaviour in Schools \(November 2018\)](#)
- [National Police Chiefs' Council: When to Call the Police \(2020\)](#)
- [PHE: Promoting Children and young people's mental health and wellbeing \(2021\)](#)
- [Meeting digital and technology standards in schools and colleges \(2022, updated 2023\)](#)
- [Keeping Children Safe in Out-of-School Settings \(2022\)](#)

When paying due regard to this guidance, colleagues must take account of any particular circumstance or context of the School which may indicate a need for protocols greater than the minimum legal requirements.

6. Supporting Documents

- Acceptable Use of ICT and Mobile Phone Policy for Pupils (2022)
- Access, Security and Visitors Policy (2022)
- Administering Medicines Policy (2023)
- Anti-Bullying Policy (2023)
- Attendance and Absence Policy (2023)
- Behaviour Policy (2023)
- Complaints Policy (2022)
- Code of Conduct (2023)
- Disability Policy (2022)
- Educational Visits Policy (2023)
- First Aid Policy (2023)
- Health and Safety Policy (2022)
- Life Matters Policy (2022)
- Low-Level Concerns and Allegations Policy (2023)
- Mental Health and Emotional Wellbeing Policy (2023)
- Missing Pupil Policy (2022)
- Pastoral Care Policy (2023)
- Protocol for Visitors Staying in Staff Accommodation (2023)
- Racist Incidents in School Policy (2022)
- Recruitment, Selection and Disclosure Policy (2023)
- Restraining Pupils and Use of Reasonable Force Policy (2020)
- Relationship and Sex Education Policy (2022)
- Safeguarding of Boarders Policy (2023)
- Smoking, Alcohol and Misuse of Drugs Policy (2023)
- Spiritual, Moral, Social and Cultural Policy (2023)
- Social Media Policy (2023)
- Staff Transporting Pupils on a One-to-One Basis Policy (2021)
- Trans Policy (2023)
- Whistleblowing Policy (2022)

The School has an Independent Person (NMS, 2022, 11.4) who Students may contact directly about personal problems or concerns at School.

The School follows the procedures established by Hertfordshire Safeguarding Children Partnership and is in accordance with locally agreed multi-agency procedures.

7. Role of the School Governors

The role of School Governor in relation to Safeguarding is to provide strategic challenge to test and assure that the Safeguarding policies and procedures are effective, and to support the delivery of a whole-School approach to Safeguarding.

The Governing Body will appoint a 'Safeguarding Governor', who will regularly visit the School to check that Safeguarding processes are in place and are being followed. This will include a

meeting with the Aldenham School DSL and the DDSL based in the Prep School at least once a term and may include meeting other Staff as appropriate.

Governors provide strategic challenge by ensuring that:

- Members of the Governing Body have all completed appropriate Safeguarding training, which is regularly updated in accordance with statutory guidance.
- The DSLs and DDSLs have completed appropriate training in Child Protection and inter-agency working.
- The Safeguarding Policy and procedures are consistent with statutory guidance and Hertfordshire Safeguarding Children Partnership (HSCP), or relevant Local Authority, requirements. School Governors have a responsibility to approve the policy.
- The Safeguarding Policy is reviewed annually and made available to Families, Staff, Pupils and Students.
- Members of Aldenham School's SLT and Aldenham Prep School's SLT are fully conversant with statutory guidance including *Keeping Children Safe in Education (KCSIE)*, September 2023.
- The School has procedures in place to deal with Allegations of abuse made against members of Staff and volunteers, including Allegations made against a Head of School or Head of Foundation.
- The School has appropriate Filtering and Monitoring systems in place which are regularly reviewed to determine effectiveness; and all Staff, including the Senior Leadership Team, understand the provisions in place and manage them effectively in liaison with the Head of Technology and the DSL.
- The School operates Safer Recruitment procedures which include statutory checks on the suitability of all Staff and volunteers to work with Children.
- The School carries out S128 checks on all new members of the Senior Leadership Teams and Heads of Department.
- The School ensures all Staff annually receive refresher training and are provided with an updated version of KCSIE Part 1 and Annex B.
- The DSL and DDSLs receive refresher training every 2 years and Prevent training every 3 years, (in line with HSCP or relevant Local Authority guidance).
- The School makes all volunteers and temporary Staff aware of Safeguarding arrangements via a leaflet containing essential information and a verbal briefing when they first report for duty.
- Members of the Governing Body are all aware of their obligations under the Human Rights Act (1998), the Equality Act (2010) and their local multi-agency Safeguarding arrangements.
- A member of the governing body (normally the Chair) is nominated to be responsible for liaising with the local authority in the event of an Allegation being made against the Head of Foundation.

8. Safer Recruitment

All School appointments are subject to safer recruitment guidelines. Key Staff including the Head of Foundation, the Head of Aldenham School and the Head of Prep School are trained in safer recruitment. All interview panels will have at least one member of Staff trained in safer recruitment.

As part of the shortlisting process, an online search will be carried out on candidates to help identify any incidents or issues that have happened and are publicly available which the

interviewer may want to explore with the applicant at interview. Shortlisted applicants must be notified that online searches are done as part of due diligence checks.

Appointments are not made without suitable checks and evidence including criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information. All such information is stored on the single central register.

An enhanced DBS certificate, which includes barred list information, will be required where Staff will be engaging in regulated activity. A person is considered to engage in a regulated activity if, as a result of their work, they:

- Will be responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising Children; or
- Will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with Children; or
- Engage in intimate or personal care or overnight activity, even if this happens only once.

For all other Staff who have an opportunity for contact with Children who are not engaging in regulated activity, e.g. on-site contractors, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.

A supervised volunteer who regularly teaches or looks after Children is not in regulated activity.

For more information, refer to Aldenham Foundation Recruitment Policy and KCSIE 2023.

9. Duty of Care

The Children Act (2004) places a “Duty of Care”:

- On the School in respect of a risk or perceived risk of significant harm to a Child.
- On the Head of an independent school to report to a local social services department any evidence or suspicion of Children being or at risk of being abused.
- On all members of Staff to report to their manager the same evidence or suspicion.

In the document Working Together to Safeguard Children (2020) and KCSIE (2023) our role as a School is clearly set out and our statutory duty is made clear. All Staff working directly with Children will read KCSIE part I and Annex B annually. All Staff will complete an annual online assessment to ensure they have understood the contents.

Sections 175 and 157 of the Education Act 2002 places a duty on independent schools to exercise their functions with a view to Safeguarding and promoting the welfare of Children who are Pupils or Students at the School.

KCSIE (September 2023, Sections 51 to 57) states:

“Staff working with Children are advised to have an attitude of ‘it could happen here’ where Safeguarding is concerned, even if no direct disclosure has been made by a pupil. When concerned about the welfare of a Child, Staff should always act in the best interests of the Child”. [para. 51]

If Staff have any concerns about a Child's welfare, they should act on them immediately. See Appendix B for a flow chart [copied from p22 of KCSIE] setting out the process for Staff when they have concerns about a Child [para. 52]

“If Staff have a concern, they should follow their own organisation's Child Protection policy and speak to the Designated Safeguarding Lead (or deputy)”. [para. 53] For the purposes of School Staff, this policy [Safeguarding Policy 2023] should be followed when raising concerns about a Child's welfare.

Options will then include:

- Managing any support for the Child internally via the school or college's own pastoral support processes;
- An early help assessment; and,
- A referral for statutory services, for example as the Child might be in need, is in need or suffering or likely to suffer harm. [para. 54]

The DSL or a Deputy should always be available to discuss Safeguarding concerns. If in exceptional circumstances, the DSL (or Deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the Senior Leadership Team and/or take advice from local Children's social care. In these circumstances, any action taken should be shared with the DSL (or a Deputy) as soon as is practically possible. [para. 55]

If anyone other than the Designated Safeguarding Lead makes a referral, they should inform the Designated Safeguarding Lead as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming. The online tool [Reporting Child abuse to your local council](#) directs Staff to their local Children's social care contact number.

In accordance with Section 11 of the Children Act (2004), Teachers' Standards (2011) and KCSIE (2023), the school has in place arrangements that reflect the importance of Safeguarding and promoting the welfare of Children. These include:

- Appointing a designated professional lead for Safeguarding (referred to as the DSL).
- A clear line of accountability for the provision of services designed to safeguard and promote the welfare of Children.
- A clear commitment by senior leadership to the importance of Safeguarding and promoting Children's welfare including appointing a Governor to take leadership responsibility for Safeguarding arrangements.
- Promoting a culture of listening to Children and taking account of their wishes and feelings.
- Engendering a culture of “professional curiosity” amongst Staff with regard to possible causes of changes in the behaviour or conduct of Children.
- Making arrangements which set out clearly the processes for sharing information with other professionals and the HSCP or relevant Local Authority.
- Providing appropriate supervision and support for Staff including undertaking Safeguarding training and so ensure that Staff are competent to carry out their responsibilities for Safeguarding, promoting the welfare of Children and creating an

environment where Staff feel able to raise concerns and feel supported in their Safeguarding role.

- Providing opportunities for reflective supervision with a trained facilitator for senior pastoral Staff.
- Providing Staff with mandatory induction training including familiarisation with Child Protection Procedures and subsequent reviews and updates to all Staff and residents, as necessary. The induction programme includes familiarisation with the School's Safeguarding policy, Professional Conduct guide, Whistle-blowing policy and KCSIE (Part I) and Annex B or Annex A for those not dealing directly with Children. All Staff are required to read these and complete a short online assessment to ensure they have understood the contents and the procedures which must be adhered to. **In addition, the DSL and DDSLs will be introduced, or will lead the training, and Staff will be made aware of how to contact them.**
- Using safe recruitment practices in accordance with KCSIE (Sept 2023)
- Providing clear guidelines with reference to **Hertfordshire Safeguarding Children Partnership (HSCP) and relevant Local Authorities**, in accordance with locally agreed interagency procedures, for dealing with Allegations against Staff. Allegations may relate to a person who works with Children who 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 indicated they may pose a risk of harm to Children;
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with Children.
- Involving the Local Authority Designated Officer (LADO) in the management and oversight of individual cases (the LADO should be informed within 24 hours of all Allegations that come to the school's attention or are reported directly to the Police).
- Making referrals to the Disclosure and Barring Service (DBS) if an individual (paid or volunteer) is removed from work looking after Children because it is deemed that they pose a risk of harm to Children.

The documents *Working Together to Safeguard Children (2020)* and *KCSIE (2023)* promote a multi-agency approach to the care of Children and set forth the good practice of separate agencies co-operating and working together for the benefit of the Child.

The Aldenham School Safeguarding Policy and procedures also consider the requirement of the National Minimum Boarding Standards (NMS) (2022), Standards 7, 8 & 9. Consideration must be given to any Allegations or disclosures of abuse or possible abuse concerning themselves or another boarder, particularly if the subject of the Allegation is another boarder or a member of Staff. In such circumstances it may be necessary to arrange alternative accommodation for boarders to ensure the safety and well-being of the Student and appropriate pastoral support. Boarders are also provided with one or more appropriate helpline(s), including Childline, the NSPCC, the School Counsellor, Hertfordshire Social Services and the School's Independent Person, to call in case of problems or distress. In addition, posters with the DSL's and DDSLs' contact details will be widely displayed throughout the School. As part of its commitment to the Safeguarding of boarders, the School will make every attempt to adhere to the National Minimum Standards for all boarders.

For further details, please see the Safeguarding of Boarders Policy.

10. Diversity and Inclusion

The School is committed to celebrating diversity, actively challenging discrimination and promoting equality of opportunity.

Equality Act (2010) - Pupils and Students with Protected Characteristics

Recognising obligations under the Equality Act, the School will never discriminate against Pupils and Students because of a Protected Characteristic. These include sex, race, disability (*including neurodiversity*), sexual orientation, gender reassignment, religion or belief, and pregnancy and maternity. Where appropriate, the School may take proportionate positive action to deal with particular disadvantages affecting Pupils and Students with a Protected Characteristic to better meet their specific needs.

Pupils and Students with a Protected Characteristic may be at greater risk of harassment or abuse. For example, KCSIE (2023) identifies that Children with special educational needs and disabilities (SEND) are three times more likely to be abused by their peers. It is important for all Staff to be aware that Pupils and Students with a Protected Characteristic may not feel ready or know how to tell someone that they are being abused, exploited or neglected as they may feel embarrassed, humiliated or are being threatened. This should not prevent Staff from having a professional curiosity and speaking to the DSL/DDSL if they have concerns about a Child. It is recommended that Staff consider how best to build a trusted relationship with the Pupil/Student, to better facilitate communication. Staff can speak with the DSL/DDSL if they need support building a trusted relationship.

Human Rights Act (1998)

The School seeks to respect and protect the human rights of all Pupils and Students by actively challenging discrimination, harassment, violence and abuse. The School recognises that a failure to respect and protect these rights may breach the European Convention on Human Rights, specifically Article 3 (right to freedom from inhuman and degrading treatment), Article 8 (right to respect for private and family life), Article 14 (rights and freedoms must be protected and applied without discrimination, and Protocol 1, Article 2 (right to education) – all of which are protected by the Human Rights Act (1998).

Pupils and Students who are lesbian, gay, bi or trans (LGBT+)

The fact a Pupil/Student is LGBT+ is not in itself an inherent risk factor for harm, however, Pupils/Students (and those who are perceived to be LGBT+) may be targeted, resulting in Child-on-Child abuse. This risk is compounded when the Pupil/Student lacks a trusted adult with whom they can be open. For this reason, the School seeks to provide safe spaces for LGBT+ Pupils and Students to share any concerns or challenges they may be facing.

Aldenham School Students who are gender questioning or identify as transgender (an umbrella term to describe someone whose gender identity is different from the sex they were assigned at birth) can find further information about how the school can support them in the Trans Policy.

11. EYFS

This Safeguarding Policy applies to all Pupils, including EYFS. With specific reference to the statutory framework for EYFS 2023, Staff must refer and adhere to the Prep School 'Taking, Storing and Using Images of Pupils Policy' which states that Staff, visitors, volunteers and Pupils/Students are not permitted to use their own mobile phones or cameras to take or record any images in the Prep School or around Foundation Stage Pupils. All visitors read this

policy as part of the 'signing in' procedure in the Foundation Stage.

Cameras and mobile phones are prohibited in the toilet areas. (The full policy can be found in the Foundation Stage office). The Intimate Care Policy must also be adhered to.

12. Use of School premises

When facilities are let out to external organisations or individuals (for example, community groups or sports clubs) the School will make all reasonable attempts to ensure that appropriate Safeguarding arrangements are in place. Before a third party can use School facilities, their Safeguarding policy must be inspected, and the identity and contact information pertaining to the organisation's Safeguarding officer be ascertained. Failure to provide this, and any other details required by 'Keeping Children Safe in Out-of-School Settings' (2022), will lead to termination of the agreement.

If an Allegation is made to the School relating to an incident that happened while School facilities were let out to an external organisation or individual, then the School will follow the 'Low-Level Concern and Allegations Policy'. If appropriate, this includes informing the LADO.

The primary contact for raising a Low-Level Concern about organisations or individuals who lease School facilities is the Foundation Events Manager, Mr Andy Dawson (ald@aldenham.com), who will liaise with the relevant Head of School. In the case of an Allegation, the relevant Head of School must be contacted directly.

When services or activities are provided by the School, regardless of whether the attendees are on the School roll, and are under direct supervision of School Staff - this Safeguarding Policy will apply.

In cases when the School arranges for services to be provided by a third party (for example an entertainment provider), whether on or offsite, the third party individual or organisation must demonstrate it has Safeguarding and Child Protection policies and procedures in place by sharing the appropriate policy with the School.

13. The Designated Safeguarding Lead and Deputies

The Governors approve the job descriptions of the DSL and DDSLs, and ensure they have sufficient time, funding, supervision and support to perform their duties. Safeguarding is an agenda item at every meeting of the Board of Governors and the Education Committee. The Designated Governor for Safeguarding reports annually to the Governors on Safeguarding, which is recorded in the meeting minutes. Governors understand they have no right of access to information involving any Child Protection cases within the School or to information involving an Allegation against a member of Staff unless/until it becomes an internal disciplinary issue. The exception to the above would occur if an Allegation was made against the Head of Foundation. Such an Allegation would be referred to the Chair of Governors and they would be required to contact the LADO.

The School appoints a Designated Safeguarding Lead (DSL) and a sufficient number of Deputy Designated Safeguarding Leads (DDSLs) to ensure an appropriate level of provision is maintained at all times. There are currently four DDSLs based in Aldenham School and two in Aldenham Prep School.

In addition, the Head of Foundation, Head of Aldenham School and Head of Aldenham Prep

are trained in Safeguarding and Child Protection and will receive any concerns should the DSL or DDSLs not be immediately available.

The Role of the DSL

The School will appoint an appropriate member of Staff from the leadership team to act as the DSL.

The DSL is responsible to the Head of Foundation for the following broad areas:

- Briefing School Staff (e.g., boarding support Staff, teaching Staff and volunteers), and as appropriate, prefects and other senior Students on the relevant contents of the above guidance and procedures, and on the procedures the school should follow below - including the briefing of new Staff as part of their induction after arrival at the school.
- Receiving reports of alleged or suspected Child abuse within the school or reported by a Child, Pupil or Student relating to incidents at home or outside the school. Contacting the HSCP (or relevant Local Authority) and taking other action in response, as set out below.

Job Descriptions for the DSL and DDSLs are contained in Appendices D and E.

Managing Referrals

The DSL will refer all cases of suspected abuse (including Child-on-Child and non-Staff related abuse Allegations) to the Hertfordshire Safeguarding Children Partnership (HSCP), or relevant Local Authority for Children, Pupils or Students who reside outside Hertfordshire. The DSL will also liaise with the Police, in consultation with Head of the appropriate school (and Head of Foundation if appropriate) and Bursar, in cases where a crime may have been committed.

If a referral has been made and a Child has been graded 'in need' or early intervention with multiple agencies has begun, the DSL will:

- Inform Staff on a 'need to know' basis. It would be expected that the Pupil/Students' Housemaster/Housemistress and key pastoral support Staff such as tutors/class teacher and Health Centre Staff would be informed and most likely involved in any meetings to support the Child. It may be beneficial to inform other teachers as necessary, particularly to ensure that the best educational outcomes of the Child are met.
- Coordinate CAF or TAF meetings if the School is the lead agency. Attend meetings and report on the School's behalf if not the lead agency.

If a referral has been made and the Child has been graded 'at risk', the DSL will:

- Act according to the instructions of Children's Services or the Police.
- Inform all relevant Staff, teachers, Health Centre and others such as secretarial Staff who would have regular contact with the Pupil/Student or the Family.
- Instruct Staff as to what to look out for and how to respond, according to the circumstances of each case. For example, in cases of physical abuse, any new signs of injury, however minor, would need to be reported to the DSL immediately and a new referral made.

The DSL will refer all LLCs and Allegations against members Staff, which they receive directly (contrary to the LLC and Allegations Policy but made in good faith) straight to the relevant

Head of School except in the event of the Allegation being against the Head of School, in which case the DSL will refer the Allegation to the Head of Foundation. If the Allegation involves the Head of Foundation, the DSL will communicate directly to the Chair of the Governors without notifying the Head of Foundation. The Head of School, or Head of Foundation (if the Allegation is against a Head of School) or Chair of Governors (if an Allegation is against Head of Foundation), will liaise with LADO, the TRA, the Boarding Schools Association and the Charities Commission if appropriate. The Head of School, Head of Foundation or Chair of Governors may delegate responsibilities (e.g., the Head of School may delegate to the DSL the responsibility to ensure any Children, Pupils or Students involved are appropriately safeguarded).

Additional Responsibilities:

- Ensuring that Pupils and Students on the edge of care (those on a Child Protection Plan or with sufficiently serious intervention from other external agencies) are known to all **relevant** Staff and that their learning needs are catered for appropriately. This includes ensuring that a culture of high aspirations is in evidence for the Pupils and Students, and working with relevant Staff (both inside and outside the School) to identify specific challenges the Pupils or Students may face. The DSL should also liaise with other relevant senior Staff to ensure that the overall curriculum followed by a Child in this position is tailored to their own situation as precisely as is practicable.
- Receiving reports of alleged or suspected Child abuse within the School or reported by a **Child**, Pupil or Student relating to incidents at home or outside the School, contacting Children's services and taking other action in response, as set out below.
- Providing guidance to **Families, Children**, Pupils, Students and Staff about obtaining suitable support.
- Developing links with relevant statutory and voluntary agencies.
- Monitoring and evaluating the effectiveness of the School's Safeguarding Policy and ensuring it is updated at least annually.
- Keeping accurate records of all concerns, including a summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, decisions reached and the outcome and ensuring that such records are stored securely on the MyConcern Safeguarding platform.
- Ensuring that when a Pupil or Student with a Child Protection plan leaves the School, appropriate levels of liaison between DSLs occur and the Child's information is transferred to the DSL at their new School as soon as possible. The details of the recipient of files (date, School, DSL, authority etc.) will be recorded in line with the Retention of Data and Erasure of Personal Information Policy and the DSL will ensure that the Child Protection file is transferred separately from the main Pupil/Student file, either directly via MyConcern or via secure mail.
- Liaising with the Head of Technology, the Head of Computing or Prep School Computing Co-ordinator, and the Head of Life Matters or Prep PSHE Co-ordinator to ensure that the highest possible standards of e-safety are taught and maintained in the School.
- **Liaising with the Head of Technology and the Head of Digital Learning to understand and evaluate the Filtering and Monitoring systems and processes in place for the School.**

In addition, the DSL should liaise with the Head of Foundation and the relevant Head of School to inform them of issues especially ongoing enquiries under section 47 of the Children Act 2004 and police investigations. The DSL should act as a source of support, advice and expertise to Staff on matters of safety and Safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Training

The Designated Safeguarding Lead (DSL) should:

- Receive appropriate training carried out every two years to understand the assessment process for providing early help and intervention.
- Ensure that DDSLs also receive training to an appropriate standard.
- Have a working knowledge of how local authorities conduct a Child Protection initial conference and a Child Protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of Staff is aware of and understands the School's Safeguarding Policy and procedures, especially new and part time Staff. This should include:
 - The Safeguarding Policy and procedures.
 - The Staff Code of Conduct.
 - The identities and contact details of the DSL and DDSLs.
 - The role of the DSL.

The Aldenham School SLT and Prep School SLT will be provided with a copy of KCSIE. All other Staff will be provided with a copy of KCSIE Part I and Annex B. Staff are required to confirm that they have both read and understood its contents. This will take the form of a brief online assessment via MS Forms.

All Staff members should receive Safeguarding and Child Protection updates at least annually to ensure they have relevant and current skills and knowledge to safeguard Children effectively. Staff should ensure they understand their role in the early help process including identifying emerging problems, liaising with the DSL and DDSLs when appropriate, sharing information with other professionals and in some cases acting as the lead professional in undertaking an early help assessment. Staff should also ensure they understand the expectations, roles and responsibilities in relation to Filtering and Monitoring. Updates may take the form of face-to-face briefings, written briefings and online training modules on a platform such as TES Develop (Educare).

Specifically, the DSL should brief School Staff (boarding, support Staff, teaching Staff and volunteers), and as appropriate, prefects and other senior Students on the relevant contents of the Safeguarding policy and on the appropriate procedures to follow in case of a concern - including the briefing of new Staff as part of their induction after arrival at the School.

Governors also undertake full Safeguarding training on a 3-yearly basis and are given updates by the DSL on at least an annual basis. They sign to say they have read and have understood the contents of KCSIE Part One every year.

Raising Awareness

The DSL should:

- Ensure the School's Safeguarding policies are known and used appropriately.
- Ensure the School's Safeguarding Policy is reviewed at least annually, and the procedures and implementation are updated.
- Work with nominated Safeguarding Governor to review and update policies and keep them apprised of Safeguarding procedures and concerns as appropriate.
- Ensure the Safeguarding Policy is published on MySchoolPortal, MyConcern and the School website.

- Ensure that **families** are aware that referrals about suspected abuse or neglect may be made and the role of the School in this process.
- Link with HSCP and other Local Authorities to make sure Staff are aware of training opportunities and the latest local policies on Safeguarding.
- Where Children leave the School, **and once the School has received confirmation of enrolment from the Pupil/Student's new school/college**, ensure their Safeguarding file is forwarded as soon as possible, **and within 5 days for an in-year transfer or within the first 5 days of the start of a new term**. This should be transferred separately from the main Pupil/Student file, in line with GDPR guidelines.
- If Children leave the School, and Safeguarding concerns were present, and their future educational establishment is unknown, the DSL should ensure that the relevant Admissions Co-ordinator contacts the relevant Children's Services and the correct Local Education Authority to flag the concern.
- The School admissions offices request that all feeder-schools complete a Safeguarding declaration form (via MS Forms) once a Child's family has accepted a place at School, but before they commence their studies. This requires feeder-schools to disclose any Child Protection/Safeguarding issues that have arisen while the Child is in their care or that the School is aware of from other sources.
- **Where information regarding an incoming Pupil or Student has not been received after repeated attempts, a communication to both the DSL and Headteacher of the feeder-school will state that it is assumed there are no Safeguarding and Child Protection concerns which should be kept on file.**

The DSL is responsible for holding the School's copy of the current *Local Safeguarding Children Partnership Procedures* and being fully conversant with these procedures. In addition, they should hold and be conversant with the following:

- Keeping Children Safe in Education (2023)
- What to do if you're worried a Child is being abused (2015)
- Hertfordshire Safeguarding Children Partnership Child Protection Procedures <http://hertsscb.proceduresonline.com/chapters/contents.html>
- Working Together to Safeguard Children DfE (2020)
- Boarding Schools: National Minimum Standards (2022)

14. Promoting Fundamental British Values (FBV)

Aldenham teaches a broad and balanced curriculum which promotes the spiritual, moral, social and cultural development of Pupils and Students, preparing them for the opportunities, responsibilities and experiences of life. It places great emphasis on the promotion of community cohesion. Aldenham promotes FBV in many of its day-to-day interactions with Pupils and Students. Examples of this include whole School assemblies, Chapel services, Life Matters classes, PSHE lessons, talks and presentations, the School council, tutorials and House competitions.

Aldenham is a multi-cultural and multi faith school, which aims to:

- Ensure Children become valuable and fully rounded members of society, who treat others with respect and tolerance regardless of background.
- Promote the FBV of democracy, the rule of law, individual liberty and mutual respect and tolerance for those of different faiths and beliefs.
- Promote mutual respect amongst Pupils and Students, ensuring they are fully prepared

for life in modern Britain when they leave School.

As a result of this Aldenham expects Pupils and Students to:

- Gain an understanding of how citizens influence decision making through democratic processes.
- Recognise that freedom to hold faith and beliefs is protected in law.
- Accept that people having different faiths or beliefs to oneself (or having none) should be accepted and tolerated and should not be the cause of prejudicial or discriminatory behaviour.
- Recognise the means of identifying and combatting discrimination.

Guidance on promoting fundamental British values in schools is available at:
www.gov.uk/government/news/guidance-on-promoting-british-values-in-schools-published.

15. Filtering and Monitoring

Overview

It is essential that Children, Pupils and Students are safeguarded from potentially harmful and inappropriate online material. The School recognises that online safety can be categorised into four areas of risk:

- Content, (such as racism, misogyny, fake news, radicalisation and pornography).
- Contact, (such as Child to Child pressure).
- Conduct, (such as making and sending explicit images).
- Commerce, (such as online gambling, inappropriate advertising, and financial scams).

Filtering and Monitoring helps provide a safe environment for Children, Pupils and Students to learn and work online by blocking internet access to harmful sites and inappropriate content, and raising any Safeguarding concerns related to a Pupil or Student's activity on the School network. Filtering and Monitoring should not unreasonably impact teaching and learning or School administration or restrict Pupils/Students from learning how to assess and manage risk themselves.

Roles and Responsibilities

The Safeguarding Governor (Dr Jane Hawdon) is responsible for ensuring that appropriate training is in place so that staff understand the Filtering and Monitoring processes, and that the School reviews the system annually.

The Aldenham School Head of Digital Learning (HoDL), a member of the extended SLT, is responsible for ensuring the School meets the Department of Education's [Digital and Technology Standards \(2023\)](#), including the [Filtering and Monitoring Standards \(2023\)](#).

They will:

- provide training to Staff on the School processes for Filtering and Monitoring, and Staff responsibilities. Training should include how LanSchool can be used, where appropriate, to monitor Pupil and Student use of devices during lessons.
- work with the Prep School Computing Lead to ensure compliance across the School.
- work with the Head of Technology to procure Filtering and Monitoring systems.

- work with the Head of Technology to document decisions on what is blocked or allowed and why. Any changes to what is blocked or allowed should be explained to the SLT on a termly basis. The Governors should have access to the list of what is blocked or allowed, with reasons as to these decisions.
- work with the Head of Technology and DSL to review the effectiveness of the system, which should be reported to the Governors on an annual basis.

The DSL must understand the full Filtering and Monitoring provision and take responsibility for any Safeguarding and Child Protection matters picked up through monitoring. The DSL will:

- triage all monitoring reports to the appropriate DDSL and, where appropriate, Housemaster/Housemistress for further investigation.
- oversee all Filtering and Monitoring investigations, ensuring records are updated on MyConcern.
- work with the HoDL to communicate Staff responsibilities.
- work with the HoDL and Head of Technology to review the effectiveness of the system, which should be reported to the Governors on an annual basis.

The DDSLs will follow-up any monitoring reports triaged by the DSL with the support, where appropriate, of the Housemaster/Housemistress. They may do this by having a conversation with the Pupil or Student to better understand the context of the search or to identify any necessary e-safety education. The DDSL will document the outcome of their investigation on MyConcern.

The Head of Technology supports the HoDL in ensuring the School meets the Standards by taking responsibility for the technical aspects of the system. They will:

- work with the service provider to ensure the Filtering and Monitoring systems are maintained and updated when appropriate.
- work with the service provider to ensure the system provides accurate reports to the DSL.
- identify and report any risks to the system, carrying out checks when necessary.
- work with the HoDL and DSL to review the effectiveness of the system, which should be reported to the Governors on an annual basis.
- understand the Cyber security standards for schools (2023).

All Staff have a responsibility to report (using the respective system in brackets below) if they:

- witness or suspect unsuitable material has been accessed (MyConcern).
- can access or access unsuitable material (IT Support Ticket).
- teach topics that could create unusual activity on the filtering logs (IT Support Ticket).
- find a failure in the software or abuse of the system (IT Support Ticket).
- perceive unreasonable restrictions that affect teaching and learning or administrative tasks (IT Support Ticket).
- notice abbreviations or misspellings that allow access to restricted material (IT Support Ticket).

Systems

The School utilises Palo Alto Firewalls as a first line of defence against cyber threats. They continuously monitor network traffic, identifying and blocking any unauthorised access or suspicious activities. These firewalls help fortify our system against potential vulnerabilities/intrusions and block access to inappropriate web content, ensuring that

Children, Pupils' and Students' data and online presence are protected at all times.

The School uses Securly to filter and monitor the online activity of Pupils and Students when connected to the School network. Securly restricts access to websites which host or are suspected to host inappropriate content. Securly also monitors Pupil and Student activity on the network and raises automatic reports when it detects a search phrase which may be a Safeguarding concern (e.g., phrases related to self-harm, suicide, or violence). These reports are received by the DSL/DDSLs and acted upon accordingly.

The School provides a platform for teachers to physically monitor the screens of Pupils and Students during their lessons using LANSchool. Like Securly, this platform only allows a teacher to monitor the screen of a device connected to the School network.

To ensure systems are being used most effectively to protect Children, Pupils and Students, the Safeguarding Team will maintain a regular dialogue with IT colleagues, the HoDL and the Head of Technology.

16. Prevent

Aldenham has a duty of care to Children, Pupils, Students and Staff. This includes Safeguarding them from the risk of being drawn into terrorism. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The government has defined extremism in the Prevent strategy 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”.

Schools should be safe spaces in which Pupils and Students can understand and discuss sensitive topics, including terrorism and extremist ideas that are part of the terrorist ideology and learn how to challenge these ideas. Aldenham does not intend to limit discussion of these or other issues related to FBV e.g. democracy, law and government, however, it is mindful of its existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

The Prevent strategy, published by the Government in 2011 and updated in 2021, is part of the overall counter- terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism.

Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on schools to have “due regard to the need to prevent people from being drawn into terrorism”.

The 2011 Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

If Staff become aware of activity that could fall within the categories outlined in the Prevent

strategy, they must **pass the information on to the DSL** who will share this with the Head of Foundation, relevant **Head of School and Bursar, if a referral is appropriate**. The School will **then** work with the Local Authority to make appropriate referrals to Channel, a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- Identifying individuals at risk;
- Assessing the nature and extent of that risk; and,
- Developing the most appropriate support plan for the individuals concerned.

Further guidance can be found at www.gov.uk/government/publications/channel-guidance.

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. A list of indicators is attached as Appendix C to provide support for Staff to understand and identify factors that could suggest a Child or their family may be vulnerable or involved with extremism. The list of indicators is not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable people / young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. Over-simplified assessments based upon demographics and poverty indicators have consistently demonstrated to increase victimisation, fail to identify vulnerabilities and, in some cases, increase the ability of extremists to exploit, operate and recruit.

All Staff receive training on recognising the indicators of potentially vulnerable Children and those who may be susceptible to radicalisation and the associated risks (such as being drawn into extremism or terrorism).

See Appendix C for indicators of vulnerability with regard to extremism.

17. Disclosures from Children, Pupils and Students

Children, Pupils and Students who report abuse to a teacher (or other member of Staff or volunteer) must be listened to and heard, whatever form their attempts to communicate with you may take. You should engage the DSL or a DDSL in this process as soon as practicable. The following points give guidance on how to deal with a Child who makes a disclosure:

- The Child **must** be listened to but not interviewed or asked to repeat the account.
- Avoid questions, particularly leading questions.
- The Child should not be interrupted when recalling significant events.
- All information should be noted immediately following the conversation, including details such as timing, setting, who was present and what was said, in the Child's own words. The account obtained should be recorded verbatim or as near as possible.
- Care should be taken not to make assumptions about what the Child is saying or to make interpretations or decisions about whether or not abuse has occurred.
- 'Listened to' means just that; on no account should suggestions be made to Children as to alternative explanations for their understanding of a situation.
- Advice or promises must not be given to the Child other than the assurance that they have done the right thing in telling you and that you will be passing on their concern to the relevant person.

- At all times the Child's wishes and feelings must be respected as far as the law allows. Victims should be taken seriously, kept safe and never made to feel that they are creating a problem by reporting abuse, sexual violence or sexual harassment as their Children's rights may be breached as set out in the Human Rights Act (1998).
- These notes **must** be uploaded to MyConcern as soon as possible after the disclosure, although priority should always be given to referring the incident to external agencies if required.
- All evidence (e.g. scribbled notes, mobile phones containing text messages, clothing and computers) must be preserved, then passed on to the DSL/DDSL intact.
- All actions subsequently taken **must** be recorded with dates, times and signature. It is particularly important that, if a disclosure is logged directly on MyConcern, the date and time of the disclosure is changed to the time it took place, rather than the time of being logged.
- All Staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim **must** never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. (KCSIE 2023, para. 18.)
- You must then immediately inform the DSL, a DDSL or, in their absence, the Head of Aldenham School, the Deputy Head (Pastoral), the Head of Prep or the Head of Foundation (see contact list toward the end of this document for details).

N.B the School does not require **consent from a family** to make a referral to social services but will seek to engage **the family** in the process unless doing so **may** put the Child at further risk.

When it is clear that ongoing support will be required, the DSL/DDSL will ask the Child, Pupil or Student if they would find it helpful to have a designated trusted adult to talk to about their needs. The choice of any such adult should be the victim's, as far as reasonably possible.

If you are uncertain about whether to be concerned about a Child, it is always best to share that information with the DSL/DDSL.

A member of Staff or volunteer may come across circumstances where they suspect or observe **Child-on-Child abuse**. This may take the form of:

- verbal, physical, emotional abuse
- intimidation or bullying
- sexual abuse

Whilst Children and young people who abuse others need to be held responsible for their abusive behaviour, it is also important that whilst being identified, they are responded to in a way that meets their needs as well as protecting others. They may well be Children in need or at risk themselves. This sort of concern is to be reported to the DSL/DDSLs in the same way as any other form of abuse or suspected abuse; the Anti-bullying Policy should also be consulted.

Confidentiality

A member of Staff or volunteer must not promise absolute confidentiality. The Child can be assured that whilst you cannot keep a disclosure of abuse or suspected abuse to yourself, you will not tell anyone who does not need to know. It is best not to explain procedures in detail to the Child but to say that the DSL will have to be told and will decide the next course of

action.

Complaints by a Pupil or Student against Staff

An initial complaint against a teacher by a Pupil or Student, if there are Safeguarding implications, should be referred to the DSL who will initially investigate the claims where appropriate.

As per the Low-Level Concerns and Allegations Policy, if the concern reaches the threshold for either a Low-Level Concern or Allegation, the DSL must refer the case to the relevant Head of School, or Head of Foundation (if a Head of School is the subject of the Allegation), or Chair of Governors (if the Head of Foundation is the subject of the Allegation).

Where the complaint does not reach the threshold for a Low-Level Concern, and is directed against a member of teaching Staff, the DSL will work with the Head of Department/Housemaster and/or the Deputy Head (Academic/Pastoral) and/or Head of Prep/Aldenham School to resolve the complaint.

Referral Guidelines

Allegations against Foundation Staff, volunteers and organisations or individuals leasing school facilities, must be referred to the LADO by the relevant Head of School, Head of Foundation (where an Allegation is about a Head of School), or Chair of Governors (where an Allegation is about the Head of Foundation), within 24 hours of the Allegation being made.

If a crime may have been committed, it should be reported to the police in accordance with 'Working Together' procedures. The relevant Head of School, Head of Foundation (where appropriate) or Chair of Governors (where appropriate), will work with the DSL to make judgements as to whether the Child is 'in need' or 'at risk'. Where boundaries are unclear, the Head of School will discuss the matter with the LADO (if Staff are involved) or the Local Safeguarding Children Partnership (for example, Hertfordshire's Targeted Advice Service or Brent's MASH team) to seek further guidance.

For example, in the following circumstances the relevant Head of School may take advice from the LADO or Children's social care before a decision about making a referral is made:

- The complaint does not involve a serious criminal offence.
- A referral would be contrary to the wishes of the Child, Pupil or Student complainant who is of sufficient maturity and understanding and properly informed, or is contrary to the wishes of the complainant's Family (not involving them as perpetrators).
- The case is one that could be satisfactorily investigated and dealt with under the School's internal procedures, the family being kept fully informed, as appropriate.

Under the relevant Head of School's instruction, if the Child, Pupil or Student is deemed to be 'in need', the DSL will discuss with Children's services whether to begin early intervention and support using the Common Assessment Framework (or local version if outside Hertfordshire). If the Child, Pupil or Student is deemed to be 'at risk', the DSL will make a referral under Section 47 of the Children's Act immediately.

External agencies

Whether or not the School decides to refer a particular complaint to the LADO or the police, the **family** and **student** will be informed of their right to make their own complaint or referral and will be provided with the appropriate contact details.

Mental Health

All Staff should recognise that poor mental health can, in some cases, be an indicator that a Child has suffered from or is at risk of suffering abuse, neglect or exploitation. Key pastoral Staff (e.g. tutors or teachers) are in an excellent position to ascertain when the mental health of a Child has changed. They should not attempt a mental health diagnosis and must be careful in the use of any specific language used in dialogue with the **Child**, Pupil or Student, such as the term “depression”. All Children thought to be suffering from poor mental health, persistent low mood and/or poor self-esteem should be referred via MyConcern to the Housemaster/Housemistress (in Aldenham School) or Head or Deputy (in Aldenham Prep School). They will then liaise with the School Counselling Manager who will undertake an initial assessment or will refer to external agencies such as CAMHS for advice. In an emergency, the Child should be referred directly to the DSL, who will arrange with the Health Centre for emergency care to be provided. In addition, any suspected or disclosed incidents of self-harm should be logged on MyConcern. If a **Child**, Pupil or Student requires immediate medical attention, the Health Centre must be contacted urgently for assistance. A **Child**, Pupil or Student requiring immediate assistance must never be left unattended.

Abuse from the use of Electronic Technology

The era of greater access to and use of mobile technology and the internet exposes young people to previously unforeseen risks of abuse. Instances of cyber bullying are increasing on social media sites/apps, such as WhatsApp, Facebook, Instagram, BeReal, TikTok and Snapchat, and through text and email messaging. People working with young people need to be aware of the risks posed by the use of such media. School policies on Anti-Bullying and Anti-Cyber Bullying should be adhered to as well as Staff adopting safe working practices when considering communicating with Pupils or Students electronically.

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

The use of technology has become a significant component of many Safeguarding issues such as Child sexual exploitation; radicalisation; sexual predation - technology often provides the platform that facilitates harm. An effective approach to online safety empowers a School to protect and educate the whole School or college community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate. Online safety training forms part of annual updates to Staff and is also available via the Educare platform.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk (as specified in Filtering and Monitoring).

The School's e-safety policy is incorporated in the Pupil's Acceptable Use of ICT and Mobile Phone Policy for Pupils which can be found in the Policies section of MySchoolPortal. This explains how we try to keep **Pupils and Students** safe in School.

Cyber-bullying and sexting by **Pupils and Students**, via texts and emails, will be treated as seriously as any other bullying-type behaviour and will be managed through our counter-bullying procedures.

Staff should also be wary of the possibility of Children with particular skill and interest in computing being drawn into cybercrime and should refer such Children to the [Cyber Choices programme](#) if appropriate.

Further guidance on keeping Children safe online, particularly during online learning, is available in KCSIE (September 2023), Part Two.

See the relevant DfE advice on Searching, screening and confiscation [UK Council for Internet Safety - GOV.UK \(www.gov.uk\)](#)

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

Induction and Education: All **Pupils and Students** are inducted in appropriate use of the School's ICT facilities and other aspects of this policy upon arrival. Subsequently, Teachers/Tutors remind **Pupils and Students** at the start of each academic year about their obligations and code of conduct. They should be constantly vigilant for inappropriate use of technology, e.g. unauthorised filming in lessons, and take appropriate action in line with the School's behaviour policy if such breaches occur.

Monitoring/Filtering: The School will exercise its right to monitor the use of computer systems, including the monitoring/filtering of internet use, interception of e-mails and the deletion of inappropriate materials at all times. The School makes use of the monitoring service Securly, which provides regular reports to the DSL about perceived and actual online safety risks.

(Factors considered when putting in place these measures, are set out in [UK Safer Internet Centre: appropriate Filtering and Monitoring](#). Follow these links for [Guidance on e-security and buying advice](#) for schools.)

In circumstances where the School believes unauthorised use of the computer system is, or may be taking place, or the system is, or may be, being used for unlawful purposes, the School reserves the right to remove the **Pupil or Student's** access to our systems with immediate effect whilst investigating the situation, inform appropriate authorities and provide documentary evidence.

Training: Staff receive advice regarding ICT Code of Conduct, the use of social networking and electronic communication with **Pupils and Students**. Online safety training is integrated into the regular Safeguarding training Staff undergo and this forms part of the curriculum programmes for Life Matters, PSHE and Tutor-Time.

Sharing nudes and semi-nudes

All Staff **must** be aware Safeguarding issues can manifest themselves via use of technology in

the form of **consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)**, often as a form of Child-on-Child abuse. **Other terminology used by young people to refer to 'sexting' is identified in the UKCIS Sharing Nudes and Semi-Nudes Advice.**

Creating and sharing sexual photos, livestreams and videos of under 18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management. 'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
- 'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

See the detailed **UKCIS advice on Sharing Nudes and Semi-Nudes**. Foundation Staff can access a one-page summary of this advice, also published by UKCIS, **via MyConcern**.

Steps to take when dealing with an incident of sexting:

For general concern expressed by a **Child, Pupil or Student** about how sexting may affect them or for information only. This should be for cases where the concern expressed is not specific or related to an alleged incident or disclosure. In this case Staff should direct the **Child, Pupil or Student** to the following government website **Sex and sexual content online (thinkuknow.co.uk)**

If a disclosure is made about an alleged sexting incident by a **Child, Pupil or Student**, the following steps should be taken:

- Refer to the one-page summary of how to respond to incidents of sharing Nudes and Semi Nudes, available on MyConcern.
- Contact the DSL as soon as possible.
- Follow the steps outlined in 'What to do' for the recording and reporting of any disclosure as outlined in the Summary of the Safeguarding Policy.
- If appropriate, and with the **Child, Pupil or Student's** permission, take the mobile phone. Do not view any content. Place it face down. Turn it off. Place it in an envelope on which you have written: What the envelope contains, the name of the **Child, Pupil or Student**, the date and time. Ask the **Child, Pupil or Student** to sign the envelope over the seal to ensure that it cannot be opened and resealed without anyone knowing about it.
- Hand the mobile phone to the DSL. In the DSL's absence, hand the device to either the Deputy Head (Pastoral), the Head of Aldenham School, the Head of Prep, or the Head of Foundation, at the same time as you report your concern.
- The DSL will then interview the **Child/Children, Pupil(s) or Student(s)** concerned, **with another member of Staff present of the gender of their choice and with whom the Child, Pupil or Student is comfortable**, to ascertain the facts of the incident, such as whether images have been widely shared. The welfare of the Child must be always paramount.
- **Where appropriate, the family will be informed in consultation with the Child, Pupil or Student at an early stage and involved in the process to provide the best support, unless there is a good reason to believe that involving them would put the Child or young**

person at risk of harm.

- A referral should be made to Children’s social care and/or the police immediately if there is a concern that the **Child, Pupil or Student** has been harmed or is at risk of immediate harm at any point in the process.
- Once the DSL has made a judgement that it is not appropriate to engage external agencies, the **Child, Pupil or Student** should be given guidance as to how such images should be deleted from the **Child, Pupil or Student’s** digital footprint. This must happen without the images being viewed.

The DSL must follow the guidance contained in the UK Council for Internet Safety document ‘[Sharing Nudes and Semi-Nudes](#)’.

Bullying (Child-on-Child abuse)

While bullying between Children is not a separate category of abuse or neglect, it is a very serious issue that can cause considerable anxiety and distress. All incidences of Child-on-Child abuse should be logged on MyConcern and managed by the DSL (or DDSLs) in accordance with the School’s Anti Bullying Policy. If bullying is particularly serious and there is reasonable cause to suspect that a Child is suffering or likely to suffer significant harm it could lead to the implementation of Child Protection procedures.

Child-on-Child abuse can take several forms:

- Cyber-bullying, prejudice-based bullying and discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence and sexual harassment (SVSH) or other forms of harmful sexual behaviour – see below.
- Consensual and non-consensual sharing of nudes and semi-nudes.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Upskirting.
- Downblousing (taking photos of a female’s chest without consent).
- Initiation/hazing-type violence and rituals.

Staff should recognise that Children are capable of Child-on-Child abuse. Full reference to this can be found in the School’s Anti-Bullying Policy, which details the following:

- What constitutes Child-on-Child abuse.
- How Allegations of Child-on-Child abuse will be dealt with.
- How victims of Child-on-Child abuse will be supported.
- How perpetrators of such abuse will be given support to change their behaviour, in addition to being disciplined as appropriate.
- How the risk of Child-on-Child abuse can be minimised.

It is vital that Staff are aware of potential incidences of Child-on-Child abuse, which should never be tolerated or passed off as “banter” or “part of growing up”. Although it is generally assumed that Child-on-Child sexual abuse is always perpetrated by a male on a female, Staff must be open to the possibility of such abuse being instigated by a **Child of any gender against a Child of any gender**. Incidences of online Child-on-Child abuse or sexting will be investigated

by the School in the first instance to establish the severity. If deemed to meet the threshold that requires it to be reported to the relevant authorities, will then not be further investigated by the School until the authorities have responded.

The School recognises that Children and young people can be particularly vulnerable in residential settings and are alert to the potential for Child-on-Child abuse. Any incidents that occur in the boarding setting will be responded to swiftly by the HSM in conjunction with the Deputy Head (Pastoral) and the DSL. A full investigation will establish the facts and, in all cases, the first priority will be the wellbeing of the victim. Immediate measures will be put into place to protect them and sanction and rehabilitate the perpetrators as appropriate, using a restorative justice approach whenever possible.

Child-on-Child abuse manifests itself particularly where there are minority groups in an organisation. Care should be taken to ensure that such groups are protected as far as possible from majority groups, (see KCSIE 2023 Annex B).

Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Female Genital Mutilation (FGM) and Honour-Based Abuse (HBA)

Child sexual exploitation (CSE) 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. (Working Together to Safeguard Children 2020). CSE must always be treated as a form of Child sexual abuse.

Child Criminal Exploitation (CCE) may also occur because of an imbalance of power. In addition to age, the imbalance may be due to a range of other factors, including (but not limited to) gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. The experience of girls who are criminally exploited can be very different to that of boys. It is also important to note that a Child of any gender being criminally exploited may be at higher risk of sexual exploitation, (KCSIE 2023, Para 39.)

It is important to note that both CSE and CCE may be perpetrated by:

- Groups or individuals
- People of any gender identity
- Children or adults.

Incidents of CSE and CCE must be investigated very carefully, and it must not be assumed that the alleged perpetrator fits the stereotype of a strong male.

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a Child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the Child or young person. Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff

should activate local Safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's social care. (See KCSIE 2023, Annex B for further details.)

So-called 'honour-based' abuse (HBA) includes crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. All the above, by definition, constitute abuse, regardless of motivation. If Staff have concerns about the possibility of a **Child, Pupil or Student** being subject to HBA, these should be reported immediately to the DSL and relevant members of SLT.

If you encounter a case of FGM or have reason to believe that a girl is at risk of FGM you must inform the DSL or SLT immediately.

All employees of the School have a statutory duty to report cases of FGM involving Children directly to the police, rather than via the DSL or Head of Prep/Aldenham School, who should both be informed immediately once a report has been filed. FGM concerns should be reported to Hertfordshire Domestic Violence/Abuse helpline on 08088 088 088 or in emergency dial 999. For victims living in London, the Metropolitan Police should be informed on 101.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a Child to marry, including 'unofficial' non-binding marriages, before their eighteenth birthday. Any concern a Child, Pupil or Student may have entered a 'binding' or 'non-binding' marriage before their eighteenth birthday must be reported immediately to the DSL or DDSL.

Child-on-Child Sexual Violence and Sexual Harassment

Sexual violence includes, but is not limited to, rape or assault by penetration by one or more perpetrators against a victim or victims. It can also include intentional touching of a sexual nature where consent has not been freely given. (For further guidance, see KCSIE 2023 Part 5). Should Staff become aware of a sexual assault having taken place, they must inform the DSL or DDSL(s) as a matter of urgency. If a **Child, Pupil or Student** wishes to disclose details of such an assault, this should be done with at least two members of Staff present, one of whom should be the DSL/DDSL. The Child, Pupil or Student should be given the choice of gender of Staff present. Every effort should be made to support the victim and to protect the identity of the alleged perpetrator to ensure that legal proceedings can run their course. **The DSL and Deputy Head (Pastoral), or other member of SLT as appropriate, will liaise with the Police regarding minimising the risk of a further assault taking place if the alleged perpetrator is still in School.** This will involve conducting a written risk assessment.

Sexual harassment includes, but is not limited to, sexual comments, taunting and threatening sexual behaviour. This should be dealt with **by the DSL and Deputy Head (Pastoral), or appropriate member of SLT,** and a record logged on MyConcern. The victim of harassment will be offered appropriate support, such as counselling.

The issues of sexual violence and sexual harassment will be addressed during Life Matters lessons and in other forums such as assemblies. **The School will emphasise that the law is in place to protect rather than criminalise them, and will teach the importance of understanding intra-familial harms.**

KSCIE (2023, para 445 states that all Staff working with Children are advised to maintain an

attitude of “it could happen here” when considering the possibility of Child-on-Child abuse occurring. Furthermore, Para. 446 states that abuse “should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for Children.” It must be stressed that not only boys perpetrate sexual violence and/or sexual harassment. KCSIE makes it clear that sexual violence and sexual harassment can occur between two or more Children “of any age and sex.”

The DSL should regularly review cases of sexual violence and sexual harassment to see if any distinct patterns emerge. Consideration should then be given to take further preventative measures, e.g. additional teaching time, enhanced Staff training or changes to the physical infrastructure to ensure that the risk of further occurrences of inappropriate behaviour is minimised. Even if there are no reported cases of Child-on-Child abuse (of any description), it should not be assumed that it is not happening. The School will therefore make it as straightforward as possible for Children to be able to report such behaviour.

If, after investigation, it is found that a report of sexual violence or harassment is unsubstantiated, unfounded, false or malicious, the DSL should consider whether the Child and/or the person who has made the disclosure is in need of any help or whether disciplinary action should be taken against the person reporting. This should be done in line with the School’s Behaviour Policy.

Upskirting and Downblousing

“Upskirting typically involves taking a picture under a person’s clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm” (KCSIE 2023, Annex B). **Downblousing is where a photo is taken of a female’s chest for the purposes of sexual gratification.** Anyone of any gender can be a victim. Any suspected incidents of upskirting or downblousing must be reported immediately to the DSL/DDSLs. **In cases of upskirting, the DSL will refer the matter to the police as it is a criminal offence.** Pupils and Students are aware of the seriousness of Upskirting and Downblousing as it is referenced in **Appendix 4 of the Acceptable Use of ICT and Mobile Phone Policy for Pupils.**

Gang Violence

There are several areas in which young people are put at risk by gang activity, both through participation and as victims of gang violence which can be in relation to their peers or to a gang involved adult in their household. A Child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

For more information on Safeguarding Children affected by gang violence refer [‘Preventing Youth Violence and Gang Involvement’](#).

If you become aware that a **Child, Pupil or Student** is involved in gang activity this should be reported immediately to the DSL who will arrange to meet with HSM, tutor and SLT to decide the best course of action which may involve the police and other outside agencies.

County Lines

Aldenham School's proximity to major transport thoroughfares, in addition to the widespread catchment area of its Pupils and Students, makes the School a prime target for the organisers of County Lines. Essentially, these involve coercing young people into transporting drugs and other illegal items from urban areas into provincial towns. Staff should be particularly vigilant in monitoring **Children, Pupils and Students** for indicators, such as the following:

- Sudden changes in appearance or dress.
- **Significant and unexplained change in their personal finances.**
- Carrying a second mobile phone.
- Unusual anxiety when delayed, e.g. to attend a detention.
- Unexplained absences, particularly on Mondays and Fridays.
- Unexplained injuries.

These are just some of the indicators that a Child might be involved in County Lines. Further information can be obtained from the Home Office publication [Criminal Exploitation of Children and Vulnerable Adults: County Line Guidance](#). Suspected involvement in County Lines must be reported to the DSL immediately, who will then liaise with appropriate pastoral Staff to protect the Pupil(s) or Student(s) from harm.

Domestic violence

The issue of Children living with domestic violence is now recognised as a matter for concern in its own right by both government and key Children's services agencies. The link between Child physical and sexual abuse and domestic violence is high. All the outcomes for Children can be adversely affected if they are living with domestic violence and abuse - the impact is usually on every aspect of a Child's life. The impact of domestic violence and abuse on an individual Child will vary according to the Child's resilience and the strengths and weaknesses of their circumstances.

Staff should be aware that Children under 18 cannot be the direct victims of domestic abuse. However, the impact on their wellbeing is likely to be significant and therefore they should be given as much support as possible. Staff must also be open to the possibility of Students over the age of 16 perpetrating acts of domestic abuse against their family or other adults in the family home. Students over the age of 18 can also be the direct victims of domestic abuse.

If Staff become aware that a **Child, Pupil or Student** is living with domestic violence, the DSL should be made aware, and a decision made about the involvement of social services and the Police. Our aim is to work with **the family** alongside outside agencies in the best interest of the Child. The School has the flexibility to provide boarding space for Aldenham School Children who may be particularly vulnerable while outside agencies seek to resolve issues at home. Although the School is not part of Operation Encompass, due to its Pupils and Students coming from a wide range of different Local Authorities, it will make every effort to liaise closely with the Police and will act immediately on any information being provided by the Police to ensure that a Child's welfare is always maximised.

Impact of abuse

The impact of abuse should not be underestimated. Many Children do recover well and go on to lead healthy, happy, and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some Children, full recovery is beyond their reach and the rest of their Childhood, and their adulthood may be characterised by

anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long term medical or psychiatric difficulties. In addition, their life chances may be severely curtailed due to the impact on their academic progress during the period of abuse.

Good practice

- Treat all **Children, Pupils and Students** with respect.
- Set a good example by conducting ourselves appropriately.
- Encourage positive, respectful, and safe behaviour amongst Pupils and Students.
- Be a good listener.
- Be alert to changes in **Children, Pupils' and Students'** behaviour.
- Recognise that challenging behaviour may be an indicator of abuse.
- Read and understand the Safeguarding Policy and guidance documents on wider Safeguarding issues, e.g., bullying, behaviour, code of conduct, restraint.
- Maintain the appropriate standard of conversation and interaction with and between **Children, Pupils and Students**.
- Maintain professional standards of pastoral care within the context of appropriate professional separation and avoiding the use of sexualised, derogatory or over familiar language in the company of **Children, Pupils and Students**.
- Be aware that the personal and family circumstances and lifestyles of some **Children, Pupils and Students** lead to an increased risk of abuse.
- **Be aware that Pupils and Students with a protected characteristic may have an increased risk of abuse.**

Children who may be particularly vulnerable

Some Children may be at increased risk. Many factors may contribute to this including prejudice, discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

A vulnerable Child should not be left on their own or sent back to lessons or sent back to their boarding house; you must make arrangements to stay with the Child until an initial assessment of the situation has been made by the DSL or, in his/her absence, a DDSL, the Deputy Head (Pastoral), the Head of Aldenham School, the Head of Prep, or the Head of Foundation. If lesson cover is needed contact the member of Staff in charge of cover.

Any Child at the School who is looked after by the Local Authority must have special attention paid to their needs, including ensuring that their learning is managed as effectively as possible. **The DSL should have details of the Pupil or Student's social worker and the name of the Virtual School Head in the authority that looks after the Child.**

Any Child at the School with special educational needs or who has a disability must have special attention paid to their vulnerabilities.

To ensure all Children, Pupils and Students receive equal protection, it is important Staff pay particular attention to the needs of Children who are particularly at risk from abuse, for example:

Children, Pupils and Students:

- With Special Educational Needs and disabilities (because they might not have the communication skills necessary to disclose abuse if it occurs).
- Affected by parental substance abuse.
- Who do not have English as their first language.
- Living away from home, in temporary accommodation or have transient lifestyles.
- Who run away or go missing.
- Who are absent from education for a prolonged period and/or repeated occasions.
- Who are vulnerable to being bullied or engaged in bullying.
- Who are vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, sexuality or any other protected characteristic.
- At risk of Child sexual exploitation (CSE), prostitution or Child trafficking.
- At risk of Child criminal exploitation (CCE).
- Are likely to be victims of prejudice-based bullying.
- At risk from being brought into County Lines operations; or,
- At risk of forced marriage or female genital mutilation (FGM).

Children with Special Educational Needs and Disabilities (SEND) and those with English as an Additional Language (EAL) are particularly vulnerable and as such can face additional Safeguarding challenges. Staff are aware and mindful that additional barriers can exist when recognising abuse and neglect in Children with SEND or EAL. Such barriers can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the Child's disability without further exploration.
- Children with SEND or EAL can be disproportionately impacted by things like bullying without outwardly showing any signs or being able to fully express their feelings.
- Communication barriers, such as difficulties in articulating how they have been abused and difficulties in overcoming these barriers.

The School's Anti Bullying, Behaviour, Special Educational Needs and Disabilities, English as an Additional Language and Equal Opportunities policies provide additional information on the strategies adopted.

Helping Children to keep themselves safe

Children are taught to understand and manage risk through the School's Life Matters programme, PSHE lessons, assemblies and pastoral input from tutors etc. The School's approach is to help Children think about the risks they may encounter and with Staff work out how these risks might be overcome. Being taught to manage risk is a valuable part of a Child's education. Children are regularly reminded about safety, e-safety and tackling bullying issues. The School promotes an ethos of respect, and Children, Pupils and Students are encouraged to speak to a member of Staff if they have concerns about themselves or others.

Child abuse can be devastating for the Child and very distressful for the Staff who become involved. The School will support Children, Pupils, Students, Families and Staff by:

- Taking all suspicions and disclosures seriously.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant agencies and individuals.
- Storing records securely.

- Offering details of help lines, counselling and other avenues of external support in all Houses and other public areas of the School, such as classrooms.
- Co-operating fully with relevant statutory agencies.

Children who run away or go missing

Occasionally, Pupils and Students may run away from home or from a boarding environment. If a Pupil or Student goes missing from School, Staff should follow the Missing Pupil Policy. Sometimes, the School may become aware that the Child ran away from home. In such a case:

- The School should work with the Police and Family to give any possible assistance in finding the Child – such as contacting known friends and searching School buildings and grounds, particularly boarding houses.
- Assuming the Child is found, and irrespective of whether the police were involved, the School should still see such an incident as a possible indicator of abuse or a cry for help.

Using the School's pastoral team (Housemaster/Housemistress, Deputy Head (Pastoral), DSL, Deputy Head of Prep and Chaplain as deemed appropriate), the School should gently investigate the reasons for the Child running away – using open questions. If further concerns become apparent, or a disclosure is made at this point, the DSL should make the necessary referrals.

Aldenham School will inform the local authority of any Pupil or Student who fails to attend School regularly or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the Local Authority. (In default of such agreement, at intervals determined by the Secretary of State) See the School's Missing Pupil Policy.

Reporting concerns – allegations against Pupils and Students

A Pupil or Student against whom an allegation of abuse has been made, may be suspended from School during the investigation and the School's policy on behaviour, discipline and sanctions will apply. In the instance where there is an allegation of abuse by one or more Pupils or Students against another Pupil or Student and there is 'reasonable cause to suspect that a Child is suffering, or likely to suffer, significant harm' then any such abuse will be referred to the HSCP (or the relevant Local Authority) as a Child Protection concern. The expectation is that in this instance all Children involved whether perpetrator or victim will be treated as being 'at risk'.

Reporting concerns - one to one teaching

Where Pupils or Students are engaged in close one-to-one teaching, particularly in art, drama, dance, music or PE/games lessons, the following precautions should be observed: that another member of Staff is in reasonably close proximity within the building, lessons take place within normal working hours or if out of hours that a member of SLT is aware. In addition, the activity should be visible (e.g. open doors and curtains etc.) and any physical touch should be minimal, instructive or confined to necessity in order to avoid harm or risk of injury. If it is necessary to touch a Pupil or Student to demonstrate a position/move/technique this should be preceded by an explanation of the manner of touching and assent should be sought e.g. 'I'll need to hold your shoulder to demonstrate this position is that OK?' Colleagues should take every possible precaution to avoid placing themselves at the risk of false Allegation.

Reporting concerns - suspected harm from outside School

A member of Staff who suspects a Child is suffering harm from outside School should seek information from the Child with tact and sympathy, using open but not leading questions. A record should be made of the conversation and the matter referred to the DSL or a DDSL if, after the initial conversation, there remains a cause for concern. The School has a vital role to play in providing information to external agencies in such cases.

18. Raising a Low-Level Concern or Allegation

Safeguarding all members of the Aldenham community is at the heart of what the Foundation seeks to achieve. To support this, the Foundation encourages Staff to discuss with the relevant Head of School any matters which may have implications for the Safeguarding of Children, Pupils and/or Students involving a colleague, or themselves. These matters can relate to actions taken within the workplace, or where appropriate, outside of the workplace (including online). By doing this, Staff help create a culture of openness, trust and transparency.

If you have concerns about a colleague

Staff who are concerned about the conduct of a colleague (including a member of supply Staff, volunteer or Governor) towards a Child, Pupil or Student are placed in a difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All Staff must remember that the welfare of the Child is paramount and they have an obligation to raise any concerns without delay. The processes for handling a concern or Allegation about a colleague is outlined in the 'Low-Level Concerns and Allegations Policy'. A copy of the full policy can be found in Appendix F and can be accessed in the Policies and Handbooks section of SharePoint or on MyConcern.

Incidents of inappropriate conduct may not necessarily involve Children but could have an impact on a colleague's suitability to work with Children. For example, if a colleague was the perpetrator of domestic violence against an adult, it could potentially put Children in School in danger due to the concept of transferable risk.

All Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School Safeguarding provision and that such concerns will be taken seriously by the Aldenham School SLT or Prep School SLT. In addition, the NSPCC provides a Whistleblowing Advice Line which offers free advice and support to professionals with concerns about how Child Protection issues are being handled in their own or another organisation. <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Local procedures plus the government guidance in Working Together to Safeguard Children (2020) and Keeping Children Safe in Education (2023) must be followed at all times.

How to distinguish a Low-Level Concern from an Allegation

The distinction between a Low-Level Concern and an Allegation is whether the harm-threshold has been met. A Low-Level Concern is one in which the Staff member may have breached the Staff-code of conduct or acted in an unprofessional way, whereas an Allegation is when the Staff member's actions have harmed a Child, and/or committed a criminal offence, and/or behaved in a way that poses a risk to the Child, and/or behaved in a way that suggests

they are not suitable to work with Children. Allegations must be reported to the Local Authority Designated Officer (LADO) by the Head of the Respective School in liaison with the Head of Foundation.

How to report a Low-Level Concern

Where there is concern that someone working on behalf of the Foundation (including Staff, supply-staff, contractors, volunteers and Governors) may have breached the Staff Code of Conduct or acted unprofessionally, a Low-Level Concern must be raised. This can be done using the online MS Form. All Staff receive instructions on how to access the MS Form and can speak with the relevant Head of School if they have questions or need support completing the form. If your Low-Level Concern is regarding the Head of School, do not complete the online form and instead contact the Head of Foundation only. If your Low-Level Concern is regarding the Head of Foundation, do not complete the online form and instead contact the Chair of Governors only.

All Low-Level Concerns raised will be kept securely on record while the Staff-member is working on behalf of the Foundation, accessible to the Head of School, Head of Foundation and, where appropriate, Human Resources (HR). If multiple concerns are raised, where appropriate, the Head of School may consider contacting the LADO and following the processes for an Allegation.

How to report an Allegation

Where an Allegation is made against someone working on behalf of the Foundation (including Staff, supply-staff, contractors, volunteers and Governors) or against someone leasing School facilities, it must be reported immediately to the relevant Head of School. This is done by requesting an immediate meeting with the Head of School in conjunction with using the online form. If your Allegation is regarding the Head of School, do not complete the online form and instead contact the Head of Foundation only. If your Allegation is regarding the Head of Foundation, do not complete the online form and instead contact the Chair of Governors only.

All Allegations will be referred to the LADO for advice before any investigation takes place and within one working day. In case of serious harm, the police should be informed from the outset.

To minimise the risk of harm to Children and accusations being made against Staff because of their daily contact with Children, Pupils and Students, Governors ensure, through the Head of Foundation that all Staff are aware of safe working practice as outlined in the Staff Code of Conduct and follow guidelines on their behaviour and actions and the use of control and physical restraint.

All School Staff are aware that inappropriate behaviour towards Children, Pupils and Students is unacceptable and that their conduct towards Children, Pupils and Students must always be respectful. The School has procedures for dealing with Allegations against Staff, volunteers and organisations or individuals who lease School facilities, that aim to strike a balance between the need to protect Children from abuse and the need to protect Staff and volunteers from unfounded or false Allegations. These procedures follow the guidance in part 4 of KCSIE 2023.

In addition, all adults working with a Child on behalf of the Foundation, whether onsite or

offsite, and organisations or individuals leasing School facilities, should understand that under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where the former is in a position of trust, even if the relationship is consensual. This means any sexual activity between a member of Staff and a Pupil or Student under 18 is a criminal offence. Furthermore, consensual sexual activity between a member of Staff and a Student who is 18 or above would be a serious breach of the Code of Conduct. All Allegations must be reported immediately to the Head of School, unless the subject of the Allegation is the Head of School – in which case, contact the Head of Foundation. If the Allegation is about the Head of Foundation, contact the Chair of Governors.

If an Allegation is made against a teacher, a quick resolution should be a clear priority for all concerned. It will be dealt with according to the statutory guidance set out in part 4 of the KCSIE 2023. At any stage of consideration or investigation, all unnecessary delays should be avoided, notwithstanding the principle of due process.

The School will not undertake its own investigation of Allegations without prior consultation with the Local Authority Designated Officer (LADO) or in the most serious cases the police, in order not to jeopardise statutory investigations. The Head of School, in liaison with the Head of Foundation, or the Head of Foundation (where a Head of School is the subject of an Allegation) or the Chair of Governors (where the Head of Foundation is the subject), will contact the LADO within 24 hours of the Allegation. The School makes every effort to maintain confidentiality and guard against unwanted publicity. The restrictions apply up to the point where the accused person is charged with an offence or the DfE/ Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

In response to an Allegation, suspension is not the default option and alternatives to suspension will always be considered. In some cases, Staff may be suspended where this is deemed to be the best way to ensure that Children are protected. If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons.

If the LADO or any of the statutory Child Protection authorities decides to take the case further, any Staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the Staff member informed of them. In the case of Staff, the matter will be dealt with in accordance with the Disciplinary Procedure. Where a member of the residential Staff is suspended pending an investigation of a Child Protection nature, suitable arrangements must be put in place for alternative accommodation away from Children.

It is rare for Children, Pupils and Students to make an entirely false or malicious Allegation, although misunderstandings and misinterpretations of events can and do happen. Children, Pupils and Students may also make an Allegation against an innocent party because they are too afraid to name the real perpetrator. Notwithstanding this, we must act on every Allegation.

Staff who are the subject of an Allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Staff will be offered support, such as counselling, during the investigation.

If the School ceases to use the services of a member of Staff (or a Governor or volunteer) because they are unsuitable to work with Children, a settlement agreement will not be used

and there will be a prompt and detailed report to the DBS and TRA. It is a criminal offence not to report an incident when the criteria have been met. Any such incidents will be followed by a review of the Safeguarding procedures within the School with a report being presented to the Governing Body without delay.

Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to and a referral to the TRA and the Charities Commission. Reasons a referral to TRA would be considered are; “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Advice about whether an Allegation against a teacher is sufficiently serious to refer to the TRA can be found in *Teacher misconduct: the prohibition of teachers* (October 2015) and DBS barring referral guidance 2018. Further guidance is published on the TRA website.

Where an Allegation is raised against a **contractor** provided by an agency, e.g., a supply teacher, the agency should be fully involved in the referral process.

Responsibilities of the DSL

The Respective Head of School is the ultimate decision maker for all Low-Level Concerns, in liaison with the Head of Foundation as appropriate, and is responsible for contacting the LADO for all Allegations. Where appropriate, the Head of School or Foundation will delegate tasks to the DSL.

Under the instruction of the Head of School or Foundation, the DSL shall:

- Take necessary steps to protect **Children, Pupils or Students** from risk of immediate harm, and **update the Pupil/Student file on MyConcern (anonymising the teacher concerned)**.
- **If the DSL receives an Allegation**, they will not interview or investigate the Allegation further other than to ascertain the basic facts of the case. They will refer the matter within 24 hours to the relevant Head of School or directly with the Head of Foundation, who will raise it with the HSCP or relevant Local Authority and act on their advice. This may involve multi-agency working and the instigation of a Common Assessment Framework (CAF) or ‘Team around the Family (TAF) approach.
- Although Working Together (2020) encourages joint working with **the family**, their consent is not required for referral to statutory authorities and the best interests of the Child must be the primary consideration.
- Preserve all evidence (for example, scribbled notes, mobile phones containing text messages, clothing and computers) and **give these to the Head of School or Head of Foundation where appropriate**.
- **Gather information about Low-Level Concerns, make recommendations to the Head of School or Foundation on each case.**

The School keeps a record of any Safeguarding incidents and these are kept in locked storage. (Incidents since May 2018 have all been recorded on MyConcern.) The records are kept until the Child moves to another School. At this point the records will be passed on to the new School, either via registered post or transfer on MyConcern. Aldenham will record where the records have been sent to and the date it happened. The records of the Safeguarding incidents will subsequently be treated in accordance with data protection guidelines.

19. Arrangements to fulfil other Safeguarding responsibilities

Visitors

All visitors, including speakers, must follow the 'Access, Security and Visitors Policy'. This includes:

- Visitors must be escorted if they visit anywhere on site.
- Visitors must sign in at Reception and always wear their ID badge.
- Visitors must sign out at Reception before leaving.

All visitors and overnight guests staying with Staff who reside on site must follow the 'Protocol for Visitors staying in Staff Accommodation'. This includes:

- Visitors must be escorted if they visit anywhere on site apart from their host's accommodation.
- Visitors should be aware of their responsibilities when engaging Pupils and Students in conversation, so should keep conversations to a minimum.
- Visitors must be given the name and contact details of the DSL in case of need to report a safeguarding matter.
- Overnight visitors in Boarding Houses must (a) be pre-authorised by the Head of Aldenham School and the HSM, (b) have a completed DBS check, (c) have their name, any previous names, and date of birth provided to HR to be checked against The Barred List.
- Overnight visitors in School House must (a) be pre-authorised by the Head of Aldenham School or the Bursar, (b) have their name, any previous names, and date of birth provided to HR to be checked against The Barred List.

Recruitment

The School has within its Recruitment Policy a commitment to establishing and following safer recruitment procedures. The policy is in line with the guidance contained within the document KCSIE (2023).

The School's procedures include the training in Safer Recruitment for key personnel involved in advertising, interviewing and recruitment. HR department Staff will undertake an online search as part of their due diligence on the shortlisted candidates (KCSIE 2023, Para 220) and candidates will be informed. Before taking up a post, all Staff and volunteers are required to submit to an enhanced DBS check and a check on the Children's Barred List and DfE Prohibited List.

Our procedures are in line with the Protections of Freedom Act 2012 and guidance on Disclosure and Barring (June 2018). A copy of the Safeguarding Policy and Procedures are part of the recruitment pack sent to prospective applicants and new members of Staff are given training in Safeguarding and Child Protection awareness as part of the induction process. Policies are also held on the use of supply and agency personnel and the School's trips policy covers the requirements for monitoring and checking non-School Staff accompanying educational visits.

Clear working practice policies are also in place for Staff working in sensitive areas and in the boarding houses and the induction period for new Staff will make people aware of these policies and how they are to be implemented. Additionally, the School has policies covering the use of private cars for the transportation of Children, Pupils and Students, a Missing Child

Policy, an Intimate Care Policy, a Whistleblowing Policy, a Behaviour Policy an Administration of Medicine Policy, Lone Worker Policy, a Pupil Search Policy, an Acceptable Use of ICT and Mobile Phones for Pupils Policy and a Health and Safety Policy.

The School has a responsibility to report promptly to the DBS any person (Staff, contractor, volunteer or Student) who has harmed, or poses a risk of harm to a Child and who has been removed from working with Children, or would have been removed had he or she not left earlier.

Training and New Staff Training

The DSL and DDSLs will undertake appropriate training in Child Protection and multi-agency working (updated every two years), in addition to being updated on new guidance and procedures via the weekly NSPCC Update Bulletins and/or other relevant sources of information.

All Staff, including the Head of Foundation, will receive level I Safeguarding training every three years, in accordance with HSCP or relevant Local Authority requirements. **School Staff were last trained face-to-face in April 2023.**

New Staff, temporary Staff (including Supply Staff) and volunteers will be trained either before they start or on their first day (or as soon as possible thereafter) by the DSL or external agency as part of their induction. Staff are reminded annually by the DSL or DDSL about the procedure for Child Protection and it forms part of the “induction of new Staff” programme.

New Staff will receive the following documents as part of their induction training:

- Safeguarding Policy
- Keeping Children Safe in Education – either Part One and Annex B (for members of the SLTs and those working directly with Children) or Annex B (for those not working directly with Children)
- Behaviour Policy
- Anti-Bullying Policy
- Missing Pupil Policy
- Low-Level Concerns Policy
- Social Media Policy
- The relevant Code of Conduct, depending on role.

Staff Safeguarding training will include reference to dealing with inappropriate relationships – either Child to Child or between **Children, Pupils**, Students and Staff, inappropriate use of ICT, staying safe online and how to avoid exploitation via social media. In addition, Staff will be provided with guidance on the use of social media in relation to Pupils and Students, as contained in the **Foundation** Staff Code of Conduct.

Governors will undertake an annual review of the School’s Safeguarding policies and procedures and the efficiency with which the related duties have been discharged.

All Staff have read and signed the School Staff Code of Conduct. All Staff read key policies including the Safeguarding Policy and KCSIE (2023) Part I and Annex B for those dealing with admissions or directly with Children) at the beginning of each academic year and as part of their induction.

Monitoring and Evaluation of this Policy

The School monitors and evaluates its Child Protection policy and procedures through the following activities:

- This policy is updated at least annually.
- Governors annually review and sign off the policy (see minutes of Governors' meetings).
- Safeguarding Governor Jane Hawdon meets with the School DSL and Ann Suffield (DDSL) termly and reviews Safeguarding throughout the Aldenham Foundation.
- Safeguarding is an agenda item at every meeting of the Board of Governors and the Education Committee.
- Safeguarding Governor reports annually to the Governors on Safeguarding and a detailed minute is recorded.
- The Governors approve the job description for the School's DSL and DDSLs, and ensure that they have sufficient time, funding, supervision and support to perform their duties, including access to appropriate counselling if required.
- The Governors monitor the work of the School (through pastoral work, PSHE etc.) in equipping Pupils and Students to reduce risks and keep themselves safe.
- The Governors monitor pastoral care in the School to ensure that Staff have the skills, knowledge and understanding necessary to keep Children safe (including Children who are looked after by a local authority).
- The DSL/DDSLs update the Senior SLT/ Prep SLT on Safeguarding issues at every formal meeting.
- Senior SLT/ Prep SLT monitor and review Safeguarding procedures.
- Staff read the KCSIE (Sept 2023) part I (or Annex A as appropriate), Safeguarding, Whistleblowing and Staff Professional Code annually and complete an online assessment to confirm their understanding.
- Attendance data is monitored and reviewed at Senior SLT/ Prep SLT.
- Risk assessments are regularly analysed in line with the Health and Safety Policy.
- Incidents of bullying/ racial behaviour incidents are regularly reviewed by the Senior SLT/ Prep SLT.

This document is to be read in conjunction with the other policies and procedures including KCSIE Part I, Annex A and Annex B (Sept 2023), the Professional Conduct Guide, Whistleblowing Policy, Anti-bullying and Anti-cyber Bullying policies.

20. Appendix A

Signs and Symptoms of Abuse - General Comments (KCSIE 2023)

Children can be harmed either by deliberate acts or by a failure to provide proper care, or both. Children may suffer neglect, emotional, physical or sexual abuse or a combination of such types of abuse.

Staff **must** be aware that while abuse of Children is more commonly perpetrated by adults, Child-on-Child abuse can be a Safeguarding issue and concerns about bullying or inappropriate behaviour **must** be referred to the HSM, Deputy Head (Pastoral) and DSL. For more details, see the 'Anti Bullying Policy'.

A significant deterioration in a Child's mental health could well be an indicator of abuse. Staff **must** raise a concern via MyConcern if they are concerned about a Pupil or Student's mental health. The DSL will share the concern with the HSM to ensure that the services of a mental health professional (e.g. the School Counselling Manager) are engaged. The mental health professional will in turn inform the DSL if abuse in any form is suspected.

Neglect

Neglect refers to the persistent failure to meet a Child's basic physical and/or psychological needs likely to result in the serious impairment of the Child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a Child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a Child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a Child's basic emotional needs for security, love, praise and recognition. Basic needs, such as food, drink and warmth may not be provided. Slowing of growth without a medical cause may be indicative of emotional abuse and occur even when a Child is not deprived of food.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a Child such as to cause severe and adverse effects on the Child's emotional development. It may involve conveying to a Child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. 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 cyberbullying), 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 also occur alone.

Physical Abuse

This is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or

scalding, drowning, suffocating or otherwise causing physical harm to a Child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a Child.

It is important that a professional who sees an injury on a Child takes careful note of how the injury allegedly happened, including the informant, the date, time, place, sequence of events, nature of injury etc. The assessment of the plausibility of the explanation should be a medical judgement - other professionals should not make this decision. Although Children do have a variety of accidents, the most common types of injury they sustain are usually different from the injuries caused by abuse.

The following situations, in cases of physical injury, should cause concern about the possibility of physical abuse:

- No explanation.
- Inappropriate explanation, e.g., description of a minor accident in relation to a major injury.
- Different explanations given to different enquirers.
- Parents touchy or defensive, compared with genuine accidents when parents are usually distressed and blame themselves.
- Delay in seeking treatment.
- Child states that a particular adult hurt them, or one parent accuses another of physical chastisement.

Injuries should be a cause of concern as they indicate the possibility of physical abuse because they fit recognisable patterns (e.g., human hand marks, human bite marks). A list of injury types is listed below.

Possible Indicators of Physical Abuse

- Multiple injuries of various types and ages.
- Bruising and skin marks such as.
- Black eyes – these cannot be caused by a fall on a flat surface; two black eyes are particularly suspect, especially if the lids are swollen and tender or there is no bruise to the nose or forehead.
- Bruised ears, sometimes with bleeding.
- Bruises of upper lip, torn frenulum of upper lip and injuries under the tongue.
- Bruising around mouth of Child (may have finger bruises: up to three or four on one side and one on the other).
- Flat hand marks, particularly on cheeks, buttocks and lateral thighs.
- Bruises on scalp and "bald patches".
- Finger bruises on shoulders, upper arms or on the trunks or legs of babies.
- Linear marks or bruises - often seen on buttocks or backs of thighs.
- Bruises or weals curving around the body. Sometimes buckle or loop marks noted.
- Bizarre-shaped bruises with sharp borders, e.g. from hairbrush, comb, slipper.
- Bruises on abdomen - unlikely to be accidental.
- Ligature and choke marks - red mark or bruising around wrist, ankles or neck (in the latter area may be due to sudden pulls on tee shirt).
- Bite mark – two crescent shaped marks or bruises. If more than three centimetres apart they may be caused by an adult or older Child.
- Human nail marks - these shows piled up skin at the end of the marks and are unlike

abrasion from falls on rough surfaces; they may just be linear bruises.

Burns

- Scalds - glove or stocking scalds to hands and/or feet caused by dunking in water.
- Scalded buttocks - Children cannot scald their buttocks accidentally without also scalding their feet and leg.
- Splash marks - look at direction of splash to see if it is compatible with story or might indicate hot liquid being thrown at Child.
- Cigarette burns - small circular burns most typically on the back of hands or forearms, seen in clusters and often of different ages.
- Contact burns - Child held against heaters, iron, cookers. Well demarcated burns following contours of hot objects.

Bone and Joint Injuries

- These can be caused by direct blows, twists (from swinging a Child round by one limb) or throwing against hard objects.

Poisoning

- Non-accidental poisoning should be suspected in bizarre episodes of ill health or unconsciousness or when poisoning involves more than one Child.

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, upskirting, downblousing, 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. The vast majority of sexually explicit images of Children are user-generated, meaning that Children have been coerced into taking explicit photos or videos of themselves.

Children of all ages, boys and girls, can be victims of sexual abuse. This abuse often comes to light in a veiled way, for Children are reluctant to tell. Many kinds of sexual abuse do not leave any signs of physical injury.

- Children may try to tell others that they are being sexually abused. They may do this by hinting in words, play or drawings of sexual activities to "test the waters". If the adult response is empathic they may wish to reveal more, but if the response is angry or evasive, they may remain silent and not try again.
- If a Child exhibits several signs or types of behaviour as listed below, or a pattern emerges of when or how a Child exhibits such signs, the possibility of sexual abuse should be considered.
- However, it must be emphasised that the behaviour described below are descriptions of some very common conditions of Childhood indicating that the Child is distressed.

Only rarely will they be caused by sexual abuse.

Possible Indicators of Sexual Abuse

- Sudden change in mood or behaviour.
- Change in eating patterns: loss of appetite, faddiness or excessive preoccupation with food.
- severe sleep disturbance with fears, vivid dreams or nightmares, sometimes with overt or veiled sexual content.
- Withdrawal and depression, learning failure, self-injury, suicidal attempts.
- Temper, aggression, disobedience and attention-seeking, anxiety or restless behaviour.
- Lack of trust in familiar adults.
- Girls take over the mothering role in the family whether or not the mother is present.
- Absconding; requests to leave home.
- Sexualised conduct or inappropriate sexual knowledge in Children may be due to direct sexual abuse or other forms of sexual abuse, such as from observing others or watching pornographic videos.
- Continual open masturbation, aggressive, inappropriate and explicit drawing and sex play (masturbation and some exploration are a normal part of growing up, but it is the type and persistence of these activities that cause concern).
- Precocious knowledge of adult sexual behaviour.
- A boy or girl who behaves in a sexually precocious way or exhibits harmful sexual behaviour.
- Requests for contraceptive information. These are rare, but may be a cry for help, as may be anxieties about pregnancy or sexually transmitted disease.
- Inappropriate displays of affection, e.g. parent and Child behaving more like lovers.
- Marked fear of men.
- Fear of undressing.

Some physical conditions may also be indicators of sexual abuse, but not necessarily so:

- Difficulty in walking or sitting
- Pain on passing water
- Recurrent urine infections
- Soiling
- Recurrent bed wetting

Specific Safeguarding Issues

KCSIE 2023 Annex B provides information regarding specific Safeguarding issues. The following situations should be taken as potential causes of concern for the welfare of Children.

Child abduction and community safety incidents

Child abduction is the unauthorized removal or retention of a minor from a parent or anyone with legal responsibility for a Child. If colleagues become aware of this issue, they should seek support from the DSL/DDSLs immediately. Those with pastoral responsibility for Children should be particularly vigilant about signs of unease amongst Children travelling to, or returning from, international destinations over School holidays.

Pupils and Students are not immune to the possibility of potential abduction, particularly those travelling from/to London on coaches. They will be given practical advice on how to keep

themselves safe when travelling to/from coach stops.

Children and the court system

Going to court can be an immensely stressful time for Children, either as a witness to a crime (or as an alleged perpetrator), or as a party to family court action. The DSL/DDSLs should be made aware of Children in court for any reason and will seek to liaise closely with CAFCASS (Children and Family Court Advisory and Support Services) and other relevant parties to offer support to the Child(ren).

Children absent or missing from education

Colleagues should be aware that **Children absent from education for prolonged periods and/or repeated occasions**, and Children missing from education may be engaged in a range of activities which could cause Safeguarding concerns. These issues may include (but are not limited to) abuse and neglect, involvement in county lines, or 'honour'-based abuse. Particular attention should be paid to patterns of absence. Colleagues should consult the Missing Children Policy and Attendance and Absence Policy for further guidance.

Children with family members in prison

Children with parents or other family members in prison are more likely to suffer from Adverse Childhood Experiences (ACEs) such as poverty, stigma, isolation and poor mental health. Such Children should be supported sensitively by their pastoral managers. Information about parents or other family members in prison must only be shared on a "need-to-know" basis.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Involvement in CCE and/or CSE (they often overlap) can have a devastating impact on a Child. It must be stressed that age is not the only factor to increase vulnerability; gender, sexual identity, cognitive ability, SEND, physical strength, status within the peer group and access to economic resources can all contribute. Particular attention should be paid to Children who are at risk of CCE/CSE due to these or other relevant factors. Colleagues should inform the DSL/DDSLs immediately if they become aware of a Child's involvement in such activity.

County Lines

Children at Aldenham could be drawn into County Lines and other gang-related activity due to the School's suburban location and proximity to good transport links. If colleagues suspect such involvement, the DSL/DDSL should be contacted immediately.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. The National Referral Mechanism can be used to refer potential cases of modern slavery to the authorities.

Cybercrime

Children with very high levels of IT skills can easily be drawn into nefarious activities online. The School's monitoring and filtering systems will protect its network against most attacks, but care should always be taken to ensure that Pupils and Students do not engage in such activities. Cybercrime is covered as part of online safety lessons.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be the victims of domestic abuse. They may see, hear or

experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

Domestic abuse (DA) can have a huge impact on Children. Although DA is committed by one adult against another (or by groups of adults), it should not be assumed that witnessing such events is not deleterious to a Child's wellbeing. The School will make every attempt to support such Children, whilst maintaining a neutral stance towards the parents (or other perpetrators). It should be remembered that older siblings, even Students over the age of 18, can also be the victims of domestic abuse.

The School will normally be made aware of Children living with DA in Hertfordshire via *Operation Encompass (OE)*. Although those living outside the county will not always be contacted in the same manner, the School will put the OE procedures in place and will liaise closely with the relevant police force to ensure the Child's best interests are followed.

Given that Children over 16 can also be perpetrators of DA, every attempt will be made to support Children who are reported to the School as alleged perpetrators.

Homelessness

Although homelessness *per se* is unlikely within the School community, there may well be Children who are vulnerably housed due to reasons such as a family break-up. Such Children should be treated with discretion and a referral to Children's Services should be made if their welfare is at risk due to their residential situation.

In addition, Children aged 16 and 17 could be living independently from their parents or guardians, for instance as a result of exclusion from the family home. If a Child's welfare is at risk due to such a situation, a referral should be made. In the short term, it is appropriate to offer emergency boarding accommodation to Children rather than seeing them housed in a dangerous environment. The Deputy Head (Pastoral and Co-curricular) should always be consulted in such circumstances.

So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

If colleagues suspect a Child is the victim of so-called 'honour'-based abuse (HBA), they must report it immediately to the DSL/DDSL. It is important to recognise that all forms of HBA are abuse (regardless of the motivation) and should be treated as such.

Colleagues are made aware that there is a mandatory reporting duty for all incidents of Female Genital Mutilation (FGM), and that this duty lies on the colleague who discovers the practice (either by visual evidence or disclosure by the victim). The DSL/DDSL should, of course, be informed in such circumstances.

It is a crime in England to force someone into marriage, including non-binding unofficial 'marriages' as well as legal marriages. If colleagues become aware of such a crime having taken place affecting a Student at the School, they should report it immediately to the DSL or in their absence to a DDSL. Even though a victim of Forced Marriage may well give the impression that they entered into an arrangement willingly, the prospect of coercion being used to obtain their consent must never be ruled out.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a Child to marry before their eighteenth birthday. Any concern a Student

may have entered a 'binding' or 'non-binding' marriage before their eighteenth birthday must be reported immediately to the DSL or DDSL.

Preventing radicalisation, the Prevent Duty and Channel

Children are vulnerable to extremist ideology and radicalisation. Extremism, for instance, could include the vocal or active opposition to fundamental British values. Radicalisation is where a person comes to support terrorist groups and 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. Colleagues should be aware of the Prevent Programme and the DSL/DDSL should make a referral as necessary.

Channel is a voluntary programme which seeks to provide support at an early stage to those who are vulnerable to being drawn into terrorism. The School will work closely with the local Channel panel if a Pupil or Student is invited to participate; if the Pupil or Student subsequently leaves the School, the DSL will liaise with the destination school or college to ensure that the support provided by the Channel programme can continue.

Colleagues, particularly those on the SLTs and the DSL/DDSLs should avail themselves of the additional support on the Home Office website in the form of e-learning modules.

Child-on-Child abuse

It is important to recognise that a) Children can abuse other Children; b) such abuse can happen both inside and outside school, and c) it can happen in a real or virtual environment. Such abuse may involve physical aggression in the form of bullying, sexual violence and sexual harassment (including coercive behaviour) and the sharing of nudes and semi-nudes.

The School should adopt a zero-tolerance approach to such abuse and should offer support to the victim/survivor(s), whilst working with the perpetrator(s) to modify their behaviour.

Sexual violence and sexual harassment between Children in School

Sexual violence and sexual harassment (SVSH) can occur between two (or more) Children of any age and sex. It can also occur online. Colleagues must adopt the attitude that "it could happen here" and all members of Staff should be ready to receive a report of such activity. In all cases, it is essential that **all** victims/survivors are reassured that they are being taken seriously and that they will be supported and kept safe.

For further details, please see Annex B of KCSIE 2023 or the DfE publication *Sexual Violence and Sexual Harassment between Children in schools and colleges (2021)*.

Upskirting and downblousing

Upskirting is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim. Downblousing is where a photo is taken of a female's chest for the purposes of sexual gratification. It is important that Staff remain vigilant of the possibility of upskirting and downblousing occurring, particularly in stairwells.

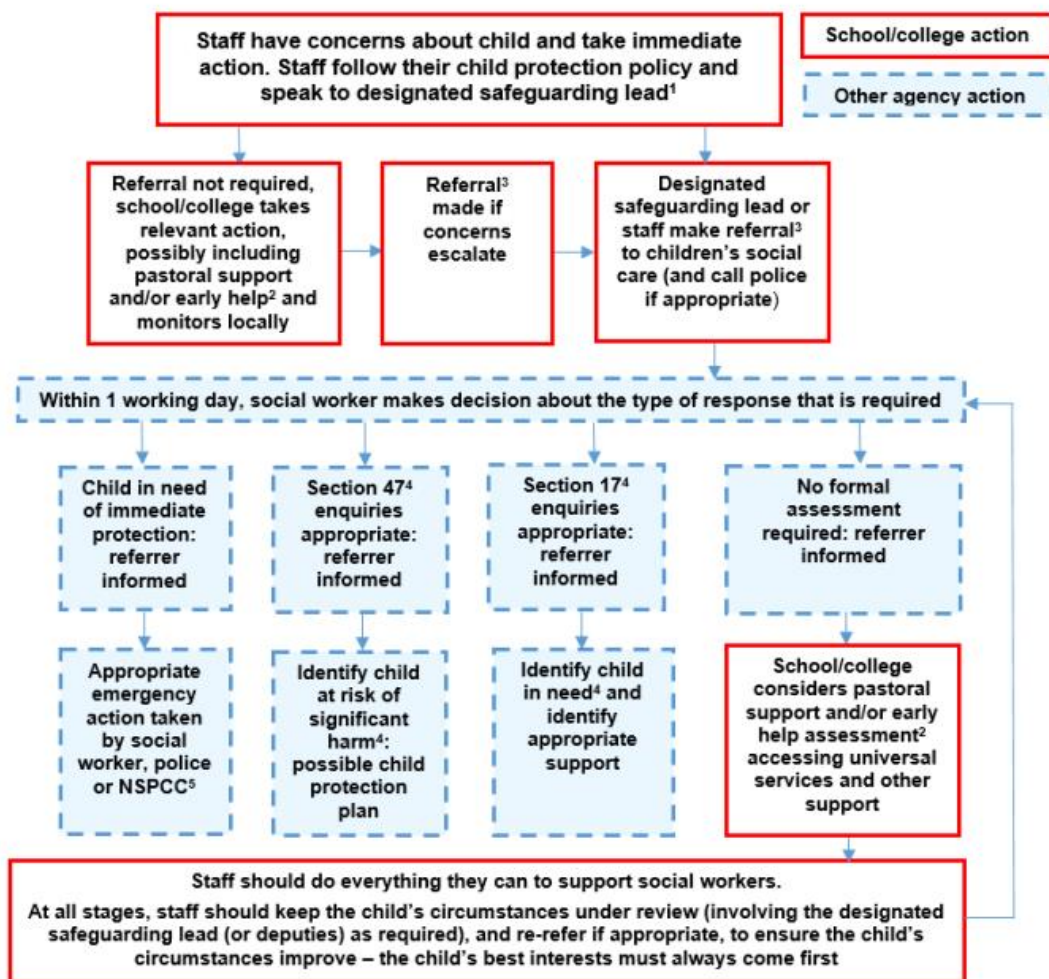
The response to a report of sexual violence or sexual harassment

There should be a zero-tolerance approach to any incidence of SVSH. All such incidents should be reported via MyConcern, and cases will be added to the SVSH register (kept by the DSL). A victim must be reassured they they are being taken seriously and that they will be

supported and kept safe. No victim should ever be made to feel ashamed for making a report, whether this is to a member of Staff or to an external agency such as the NSPCC.

21. Appendix B: Flowchart from Keeping Children Safe in Education 2023

Actions where there are concerns about a child



(Keeping Children Safe in Education, September 2023 © Department for Education)

22. Appendix C - indicators that Children or young people may be vulnerable to or involved with extremism.

Vulnerability

- Identity Crisis – Distance from cultural/ religious heritage and uncomfortable with their place in the society around them.
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life.
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups.

Access to extremism / extremist influences

- Is there reason to believe that the Child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the Child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the Child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc.)
- Is there reason to believe that the Child/young person has been or is likely to be involved with extremist/ military training camps/ locations?
- Is the Child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the Child/young person sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the Child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?

Experiences, Behaviours and Influences

- Has the Child/ young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the Child/ young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the Child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of Children dying) it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the Child/ young person's behaviour or outward

- appearance that suggests a new social/political or religious influence?
- Has the Child/ young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the Child/ young person vocally support terrorist attacks; either verbally or in their written work?
- Has the Child/ young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?

Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the Child/young person travelled for extended periods of time to international locations known to be associated with extremism?
- Has the Child/young person employed any methods to disguise their true identity? Has the Child/ young person used documents or cover to support this?

Social Factors

- Does the Child/ young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the Child/ young person experience a lack of meaningful employment appropriate to their skills?
- Does the Child/ young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the Child/ young person demonstrate identity conflict and confusion normally associated with youth development?
- Does the Child/ young person have any learning difficulties/ mental health support needs?
- Does the Child/ young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the Child/ young person have a history of crime, including episodes in prison?
- Is the Child/young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the Child/ young person have insecure, conflicted or absent family relationships?
- Has the Child/ young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the Child/young person's life has extremist view or sympathies?

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites, especially those with a social networking element.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Significant changes to appearance and/or behaviour.

If you have any concerns discuss them with the DSL and/or local Prevent Officer.

23. Appendix D: Designated Safeguarding Lead Job Description

The person appointed to be the Designated Safeguarding Lead (DSL) fulfils a critical role within the life of Aldenham School. The DSL has a key responsibility for overseeing the School's Safeguarding responsibilities and in assuring the Head of Foundation and the Governors that all is being done to safeguard the welfare of Pupils and Students within the School. DfE requirements mandate that there can only be one DSL for the entire School; therefore, the DSL's responsibilities will necessarily include oversight of the Prep School's Safeguarding team.

Person Specification:

1. To be an approachable and visible member of the school community who is seen by Staff as responsible for this crucial area.
2. To be able to demonstrate to Staff the importance of Safeguarding as a school community and to give them the confidence to be able to exercise their responsibilities appropriately.
3. To have the appropriate seniority within the school to undertake this responsibility with Staff, the leadership team, the governors and outside agencies. (DfE requirements mandate that the DSL is a member of the Senior Leadership Team of the School.)
4. To be able to co-ordinate the work of the Safeguarding teams in both the Aldenham School and the Prep School

Job Specification:

1. To offer advice, support and expertise of Safeguarding within the School.
2. To be a prime and accessible point of contact for any person regarding Child Safeguarding concerns.
3. To liaise closely with tutors, HSMs, SLT, parents, the school medical team and school Counselling Manager as appropriate.
4. To manage the work Deputy Designated Safeguarding Leads (DDSLs) in both the Senior and Prep Schools and to provide appropriate support as necessary.
5. To liaise with the DDSLs in the Aldenham Prep School in order to provide coordinated procedures and supportive advice.
6. To be available during the School day and whilst any residential trips are in progress during holidays, or to arrange appropriate cover by the DDSLs as necessary.
7. To be responsible for coordinating action regarding referrals by liaising with Children's Social Care Services (CSCS) and other relevant agencies.
8. To refer immediately to the Head of Foundation any Allegations against a member of Staff.
9. To refer immediately to the Chair of Governors any Allegation against the Head of Foundation and ensure they consult with relevant authorities.
10. To communicate with the various Local Authorities in which Aldenham Pupils and Students are resident and manage referrals as necessary.
11. To maintain suitable Safeguarding files in accordance with established procedures and to update them when necessary.
12. To manage MyConcern, the School's Safeguarding software package.
13. To be responsible for online safety, working with the Head of Technology and Head of Digital Learning to ensure that appropriate blocking software is in place and with key pastoral and academic Staff to ensure that online safety is taught across the two Schools.
14. To liaise with the Admissions Co-ordinator in order to ensure that Safeguarding records are transferred from feeder schools, and to ensure that records of Pupils and Students leaving the School are transferred appropriately.
15. To coordinate The Common Assessment Framework, ensuring its understanding and appropriate completion by any relevant Staff.

16. To ensure that all Staff have access to and are aware of the Safeguarding policy and procedures, in addition to the latest version of *Keeping Children Safe in Education*. The DSL is also responsible for updating such policies in accordance with any changes in legislation.
17. To ensure that all adults within the school are appropriately trained to statutory requirements using outside providers where appropriate and to liaise with the HR Department to ensure that training records are kept up to date.
18. To lead some training of Staff on appointment prior to statutory training being undertaken.
19. To ensure that they undertake Safeguarding training to an advanced standard at least every two years.
20. To undertake training of Pupils and Students with positions of responsibility within the school.
21. To ensure that supply Staff and volunteers are provided with a summary of disciplinary and Child Safeguarding procedures.
22. To ensure that Pupils and Students receive an appropriate level of education in e-safety.
23. To work with the Head of Digital Learning and the Head of Technology to understand the Filtering and Monitoring system.
24. To refer members of the school community to the Channel programme if there is a concern about radicalisation.
25. To refer cases to the Police where a crime may have been committed.
26. To support Staff who make referrals to relevant authorities.
27. To ensure that the DBS, TRA and Charities Commission are informed if a person leaves or is dismissed due to harm (or risk of harm) to a Child.
28. To liaise with the Clerk to the Governors to ensure that all Governors have completed appropriate induction training in Safeguarding and are briefed on at least an annual basis on Safeguarding issues.
29. To liaise on a termly basis with the nominated Governor for Safeguarding to monitor procedures and update them on specific issues.
30. To assist the nominated Governor in preparation of an annual report on Child Safeguarding Procedures.
31. To prepare reports for Child Protection Conferences and Core Group meetings and to attend such meetings as necessary.
32. To ensure that all Pupils and Students removed from roll are reported to their Local Authority by the Admissions Co-ordinator.

24. Appendix E: Deputy Designated Safeguarding Lead Job Description

A person appointed to be a Deputy Designated Safeguarding Lead (DDSL) fulfils a very important role within the life of Aldenham School. The DDSL's primary function is to provide cover for the DSL when he/she is not immediately available and to work under the direction of the DSL to ensure that all is being done to safeguard the welfare of Pupils and Students within the School. Although a DDSL in the Prep School will manage Safeguarding issues on a day-to-day basis, DfE requirements mandate that there can only be one DSL for the entire School; therefore, the ultimate responsibility for the DDSL's actions lie with the DSL.

Person Specification:

1. To be an approachable and visible member of the school community who is seen by Staff as providing expertise in this crucial element of the school.
2. To be in at least a middle management position (or have an equivalent whole-school role) within the school's organisation structure in order to demonstrate an appropriate level of seniority within the school to undertake the responsibilities of providing cover for the DSL.
3. To be an effective team player and to contribute to the wider promotion of good Safeguarding practices throughout the school.

Job Specification:

1. To offer advice, support and expertise of Safeguarding within the School under the direction of the DSL.
2. To cover for the DSL when they are not on school premises during the school day, nor easily contactable by other means.
3. To be a point of contact for urgent concerns during periods outside the school day when the DSL is not immediately available, by mutual agreement with the DSL and other DDSLs. (DfE requirements mandate that the DSL or a DDSL should be onsite during the school day, and available during out of school hours, including school holidays when Pupils and Students are on residential trips.)
4. To be available as a point of contact for any person regarding Child Safeguarding concerns.
5. To be part of the core welfare team within the school, liaising with HSMs, the school medical team and school Counselling Manager as appropriate.
6. To provide appropriate support as necessary to the DSL in the fulfilment of their statutory duties.
7. [For a DDSL working in the Prep School] To advise the DSL of ongoing Safeguarding issues in the Prep School in and to seek support for the resolution of such issues where necessary.
8. [For a DDSL working in the Aldenham School] To act as "Case Manager" (i.e. first port of call) for the ongoing management of concerns for specific Pupils and Students as directed by the DSL (not withstanding the DSL's statutory obligations to ensure that processes are followed at all times).
9. To contribute to the production of referrals to Children's Social Care Services (CSCS) and other relevant agencies under the direction of the DSL.
10. To attend Child Protection / Child in Need case conferences as appropriate.
9. To deliver training on Safeguarding issues to colleagues as appropriate.
10. To refer immediately to the Head of Foundation any Allegations against a member of Staff. (Note that DDSLs will **never** be involved in managing Allegations against colleagues, unless it is an extreme emergency and the Head of Foundation and DSL are unavailable.)
11. To ensure that they keep up-to-date with cases raised on MyConcern, the School's Safeguarding software package.

12. To contribute to the revision of the Safeguarding policy and procedures, in accordance with any changes in legislation and developments in good practice.
13. To establish contact with new colleagues as soon as possible after appointment.
14. To ensure that they undertake Safeguarding training to an advanced standard at least every two years.
15. To keep abreast of current developments in Safeguarding such as by attending relevant training events and reading e-bulletins on a frequent basis.

25. Appendix F: Low-Level Concerns and Allegations Policy (in full)



ALDENHAM

— FOUNDATION —

Low-Level Concerns and Allegations Policy

Reviewed by	Head of Foundation
Regulation	Education and Skills Act (2008): 94.1c Keeping Children Safe in Education (2023) Data Protection Act (2018)
Last Review	September 2023
Next Review	September 2024

Introduction

Safeguarding all members of the Aldenham community is at the heart of what the Foundation seeks to achieve. To support this, the Foundation encourages Staff to discuss with the Head of School or Head of Foundation any matters which may have implications for the safeguarding of Pupils or Students involving a colleague, or themselves. These matters can relate to actions taken within the workplace or, where appropriate, outside of the workplace, (including online). By doing this, colleagues help create a culture of openness, trust, and transparency.

The purpose of this policy is to set out the necessary structures, processes, and procedures for reporting a Low-Level Concern or Allegation about anyone acting on behalf of the Foundation. This may include, Staff, governors, contractors (including supply-staff) and volunteers. This policy also applies to any Allegations made about external organisations or individuals who lease school facilities. By following this policy, colleagues are supporting Aldenham's culture of safeguarding.

The distinction between a Low-Level Concern and an Allegation is whether the harm-threshold has been met. A Low-Level Concern is one in which the Staff member may have breached the Staff-code of conduct or acted in an unprofessional way, whereas an Allegation is when the Staff member's actions have harmed a child or young person, and/or committed a criminal offence, and/or behaved in a way that poses a risk to the child or young person, and/or behaved in a way that suggests they are not suitable to work with children or young people. Allegations must be reported to the Local Authority Designated Officer (LADO) by the Head of School, Head of Foundation, or the Chair of Governors (when an Allegation involves the Head of Foundation).

It is clear from several Serious Case Reviews into organisations where safeguarding policies and procedures have not been adequate, that a major cause of failure was where insufficient (or no) action was taken when members of an organisation first became concerned about the actions of a colleague. It is important to note that Allegations which are believed to meet the harm threshold must be reported immediately.

This policy is based extensively on guidance provided by Farrer & Co in the document: '[Developing and implementing a Low-Level Concerns policy: A guide for organisations which work with children](#)' (published January 2020; updated September 2022). The management of Low-Level Concerns has also been highlighted in part four of the 2023 version of the statutory guidance 'Keeping Children Safe in Education'. It should be read in conjunction with the following policies:

- Safeguarding Policy
- Foundation Staff Code of Conduct
- Data Protection Policy
- Whistleblowing Policy
- Capability Policy
- Support Staff Disciplinary Policy
- Teaching Staff Disciplinary Policy

Definitions

Foundation means the Aldenham Foundation, a collection of schools including Aldenham Prep School, Aldenham School, and St Hilda's Prep School.

Head of School refers to the Headteacher of either Aldenham Prep School, Aldenham School, or St Hilda's Prep School.

Colleague refers to anyone acting on behalf of the Foundation, including contractors, staff, volunteers, and Governors.

Staff refers to someone employed either part-time or full-time by the Aldenham Foundation.

Pupil means a child enrolled at either Aldenham Prep School or St Hilda's Prep School.

Student means any person enrolled at Aldenham School.

Family/families can mean one or both parents, a legal guardian, or education guardian.

Objectives of the Policy

- To provide a consistent mechanism by which Low-Level Concerns and Allegations about colleagues can be reported and logged.
- To foster a culture of openness, trust, and transparency between colleagues so that they feel confident that their concerns will be acted upon.
- To identify specific training needs amongst colleagues about protecting themselves from false Allegation.
- To ensure the effectiveness of key policy documents, such as the relevant Safeguarding Policy and the Code of Conduct, are evaluated in line with actions by Staff.
- To support the Head of School in providing information when reporting an Allegation to the LADO.

How to raise a Low-Level Concern

What is a Low-Level Concern?

A Low-Level Concern is one which does not meet the harm threshold, but nevertheless raises concerns about a colleague's conduct. This may include, but is not necessarily limited to, where a Foundation colleague has acted in a manner which:

- is not consistent with the Code of Conduct.
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about the colleague's suitability to work with children.
- is of sufficient concern to report (or self-report) to the Head of School.

Examples of Low-Level Concerns given in Keeping Children Safe in Education (2023), with comments relating specifically to the School in italics:

- being over-friendly with children, by overstepping professional boundaries.
- having 'favourite' pupils.
- taking photographs of children on their personal mobile phone. *There are specific cases where this is allowed in Aldenham School only – please see the Social Media Policy (2023) for details.*
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door. *For behavioural or pastoral reasons, Staff may need to speak with a Pupil or Student alone – which usually would not be a Low-Level Concern. In such an instance, where appropriate, the Staff member should either leave the door open or have the conversation in a public area or in a room with a window which allows colleagues to see in or in a room with CCTV. If this is not possible, either notify a nearby colleague or make a record of the meeting after the conversation.*
- using inappropriate, intimidating, humiliating, discriminatory, sexualised or offensive language. *In such instances, particularly if repeated, this may reach the harm-threshold for an Allegation.*

These are examples and every concern should be treated on its own merits. If you do not know whether your concern is a Low-Level Concern or an Allegation, you should speak with the relevant Head of School.

How to raise a Low-Level Concern

When a member of the Aldenham Foundation has a concern about a colleague which meets the guidelines for a Low-Level Concern in the section above, they should raise it immediately. Staff can raise Low-Level Concerns using the online MS Form. Any colleague who is not Staff can raise a Low-Level Concern by contacting the relevant Head of School directly.

The Foundation is transitioning to a new reporting process whereby Staff will raise Low-Level Concerns exclusively using **Confide**. Until further notice, the below instructions must be followed to report a concern.

1. If you are Staff, record your concern using the online MS Form. If you are a colleague who is not Staff, contact the relevant Head of School directly.
2. If your Low-Level Concern is regarding the Head of School, do not complete the online form and instead contact the Head of Foundation. If your Low-Level Concern is regarding the Head of Foundation, do not complete the online form and instead contact the Chair of Governors.

The Head of School will assess the concern and assign one of three outcomes:

1. The concern reaches the harm-threshold and will therefore be dealt with as an Allegation, (see 'How to raise an Allegation' below). If there is any doubt about whether the harm threshold is met, the Head of School will contact the LADO for advice on a no-names basis.
2. The concern merits action in line with this policy, in which case the steps below in the policy will be followed.
3. The concern does not meet the threshold for either a Low-Level Concern or Allegation. If the concern is regarding a break-down in the professional relationship between a Pupil or Student and member of Staff, the incident will be resolved either in line with the appropriate Complaints Policy, or by the DSL, Head of Department or Deputy Head (Academic) as outlined in 'Complaints by a Student against a Teacher', (Safeguarding Policy, page 28).

Occasionally, colleagues may feel that their own conduct has raised concerns amongst colleagues. The process of self-referral is to be encouraged, and the steps above will be taken with the co-operation of the self-referrer.

MS Forms Links

[Aldenham Prep](#)

[Aldenham School](#)

[St Hilda's](#)

What will happen after a Low-Level Concern has been raised?

1. The Head of School will acknowledge and record the concern.
2. If the concern has not been raised face-to-face, a meeting will be arranged as soon as possible between the Head of School and the person who raised the concern. This meeting will seek to clarify any details on the form.

3. If previous Low-Level Concerns have been raised regarding the subject of the concern, the Head of School will consider whether the accumulated concerns meet the harm threshold. The Head of School may consult with the Head of Foundation and/or LADO as appropriate.
4. Anonymity of the person raising the concern will be protected as far as possible, but cannot be guaranteed (e.g., if the case is escalated to formal proceedings). This is notwithstanding the measures to protect anonymity detailed in the Foundation's Whistleblowing Policy.
5. The Head of School will speak directly to the individual about whom the concern has been raised, (unless advised not to by the LADO or other external agencies if they have been contacted for advice). The emphasis in this conversation will be to enable the subject of the concern to reflect on how their actions were perceived by others and for the Head of School to offer support and training in how the colleague should behave differently if in the same situation again.
6. The Head of School is the ultimate decision maker with respect to all Low-Level Concerns, unless about them. The Head of Foundation is the ultimate decision maker regarding concerns about a Head of School. If the concern is regarding the Head of Foundation, the Chair of Governors is the ultimate decision maker.
7. A record of the concern, including the context and outcome, will be held securely in line with the Data Protection Policy for Staff. This data will be retained while the colleague is working for the Aldenham Foundation. This data may be used to triangulate possible future Allegations.
8. Where appropriate, the Head of School will allow the original concern and appropriate data regarding the concern to be accessed by Human Resources (HR).
9. If a Pupil or Student was involved in the Low-Level Concern, where appropriate, the Family will be kept updated.
10. The Head of School will report all cases of Low-Level Concerns, that they have managed, to the Head of Foundation when appropriate. The Head of School or Head of Foundation will keep the Safeguarding Governor updated on a termly basis.
11. Concerns regarding contractors (including supply-staff) should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

How to raise an Allegation

What is an Allegation?

An Allegation is defined as where it is alleged that a member of the Foundation Staff has:

- Behaved in a way that has harmed, may have harmed or may pose a risk of harm to a child/children or young person/young people.
- Possibly committed a criminal offence against or related to a child or young person.
- Behaved in a way in their personal life that raises safeguarding concerns. These concerns do not necessarily relate to a child or young person, but could, for example, include arrest for the possession of a weapon.
- Become subject to child protection procedures as a parent or carer.
- Been closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to a child/children or young person/young people for whom the adult is responsible in their employment.

How to raise an Allegation

Allegations must be raised immediately with the Head of School for the subject of the Allegation. To raise an Allegation, an 'urgent appointment regarding conduct' should be requested with the relevant Head of School, in conjunction with using the online form. In their absence, contact the Head of Foundation. If your Allegation is regarding Head of School, do not complete the online form and instead contact the Head of Foundation only. If your Allegation is regarding the Head of Foundation,

do not complete the online form and instead contact the Chair of Governors only.

MS Forms Links

[Aldenham Prep](#)

[Aldenham School](#)

[St Hilda's](#)

What will happen after an Allegation has been raised?

1. The Head of School will either acknowledge the Allegation or, if appropriate, change the level of the Allegation to a Low-Level Concern.
2. If the Allegation has been acknowledged, the Head of School may contact the DSL to ensure the safety of any child or young person who may have been harmed or may be at risk of harm. In the DSL's absence, the Head of Foundation may delegate this responsibility to a DDSL (*provided that the DDSL is **not** the Foundation Chaplain as they may be required to support the Staff member who is the subject of an Allegation*).
3. The Head of School should contact the Head of Foundation within 24 hours to discuss the Allegation.
4. The Head of School, as Case Manager, will discuss the nature, content, and context of the Allegation with the LADO. A course of action will be agreed.
5. Further action and any timeline of action will depend on the context of the Allegation and the agreement with the LADO. When dealing with Allegations, the School will apply common sense and judgement while seeking to resolve the Allegation as quickly, fairly, and consistently as possible.
6. When consulting the LADO, or the local authority children's social care and/or the police where involved, the Head of School should determine what information regarding the Allegation can be shared with the Family/Families of the Pupil/Students involved. The Family/Families involved should be formally told about the Allegation as soon as possible, kept informed about the progress of the case in relation to their child, and made aware of the requirement to maintain confidentiality and unwanted publicity about the Allegation as set out in section 141F of the Education Act 2002.
7. The School has a duty of care to Staff and Pupils/Students alike. As outlined, Pupils/Students will be supported by the DSL or DDSL. The Staff member subject to the Allegation will be informed as soon as possible with the likely course of action explained. A named representative will be appointed to keep the colleague informed about the progress of the case. If appropriate, either the Foundation Chaplain will be available to provide emotional support or alternative counselling support will be arranged.
8. During any investigation, the School must take every effort to maintain the confidentiality of the Staff member and guard against unwanted publicity.
9. After the investigation is concluded, the Head of School or Head of Foundation will update the Safeguarding Governor as to the outcome.

What will happen if the Allegation leads to no further action?

If the initial discussion leads to no-further action, the Case Manager and LADO should:

- record the decision and justification.
- agree on what information should be put in writing to the individual concerned and by whom.

What will happen if further enquiries are required?

Where further investigation is needed to enable a decision about how to proceed, the LADO and Case Manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance regarding Allegations against adults working with children and/or young people to ensure an appropriate investigation is carried out, the LADO will not investigate the Allegation themselves. Depending on the context of the Allegation, further investigation may be carried out by one or a combination of:

- a member of the SLT or the Foundation Leadership Group (FLG)
- Police
- Local Authority Children's Social Care

Where the nature or complexity of the Allegation requires it, further enquiries should be carried out by an independent investigator.

The Case Manager should monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process.

What are the possible outcomes of an Allegation?

An Allegation will be determined to be either:

- Substantiated – sufficient evidence to prove the Allegation.
- Malicious – sufficient evidence to disprove the Allegation and there has been a deliberate act to deceive or cause harm to the person subject of the Allegation.
- False – sufficient evidence to disprove the Allegation.
- Unsubstantiated – insufficient evidence to either prove or disprove the Allegation. The term does not imply guilt or innocence.
- Unfounded – there is no evidence or proper basis which supports the Allegation being made.

Following a substantiated Allegation, the person is either dismissed, resigns, ceases to provide their services, or The Aldenham Foundation ceases to use their services. Settlement Agreements will not be used where an Allegation outcome indicates the person is a risk or poses a risk of harm to children or deemed not suitable to work with children. If the member of Staff is a teacher, the Case Manager should consider whether the case should be referred to the Teacher Regulation Agency. There is a legal requirement for a referral to the DBS be made where an individual has engaged in conduct that has harmed a child or where they pose a risk of harm to a child.

Following an unsubstantiated, unfounded, false, or malicious Allegation, a conversation should take place with the child, young person or colleague who made the Allegation to determine whether they are being abused by someone else and/or require support for a different problem.

Following an unsubstantiated, unfounded, false or malicious Allegation, where it is decided that a person who has been suspended can return to work, the School should provide support to help this return.

If it is determined a colleague made a malicious Allegation, the Head of School should determine with representation from HR whether any disciplinary action is appropriate against the individual who made it.

Details of Allegations following an investigation that are found to have been malicious or false should be removed from personnel records unless the individual gives consent for the information to be retained. Details of substantiated, unfounded and unsubstantiated Allegations should be kept on the file of the person accused to enable accurate information to be given in response to a relevant and appropriate future request.

What if an Allegation is made against a contractor or volunteer?

In no circumstances should the School cease to use a contractor, such as a supply teacher, due to safeguarding concerns without finding out the facts and liaising with the LADO.

The School will take the lead in any investigation of an Allegation, using the same process as that for colleagues. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or local authority children's social care.

What if an Allegation is made about an organisation or individual leasing school facilities?

If an Allegation is received about an incident that happened when an external organisation or individual was using the school premises for the purposes of running activities for children, (for example community groups, sports associations, extracurricular clubs) then the School will follow the same Allegations process as outlined for colleagues.

What will happen after a concern is raised but does not meet the threshold for either a Low-Level Concern or Allegation?

In a culture of safeguarding, there may be times when colleagues are willing to report incidents which do not meet the threshold of a Low-Level Concern. If this is the case, it is important for the Head of School to reflect on the reasons why a concern has been flagged.

The following questions will be considered:

1. Has the Low-Level Concerns policy been made clear to colleagues across the Foundation?
2. Is the policy fit for purpose (e.g. are the examples of what might constitute a Low-Level Concern realistic)?
3. Do other policies, such as the relevant Code of Conduct, offer clear guidance on what is and what is not acceptable behaviour?
4. Are there any identifiable training needs (e.g. does the person reporting the concern understand what is acceptable behaviour)?

In instances where a Head of School identifies that a School policy was misinterpreted or misunderstood, the Head of School should either put in place training to better support colleagues, or amend the policy to provide greater clarity. The Head of School may consult the Head of Foundation when determining the most appropriate action. If the policy in question is a Foundation policy, the Head of School must inform the Head of Foundation.

Records of all concerns raised, including those which do not meet the threshold for either a Low-Level Concern or Allegation, will be kept with the name of the person who raised the concern, the name of the subject of the concern, the context, outcome and note of any subsequent actions taken.