



Hockerill



Child Protection Policy

- Trustee Committee: Full Governing Board
- Issue Date: September 2025
- Review Date: September 2026

CHILD PROTECTION

This policy has been adapted from the Hertfordshire County Council Children's Services Child Protection School Liaison Service, Quality Assurance Improvement and Practice Model Child Protection Policy for Schools (Reference CSF0034 25- 26 Version 1)

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

Policy Review

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

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

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

The policy was reviewed and agreed by the Governors in August 2025

It is due for review in August 2026.

Mr Alasdair Mackenzie
(Principal)

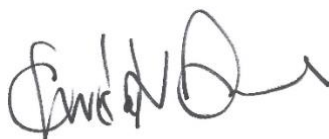
Signature



Date **August 2025**

Mr Chris Dunne
(Chair of Governors)

Signature



Date **August 2025**

Mrs Tanya Panayiotou
(Designated Safeguarding Lead)

Signature



Date **August 2025**

- Throughout this policy document reference may be made to the Designated Safeguarding Lead (DSL) – this includes the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads.
- Within this policy Hockerill Anglo-European College will be called the ‘School’ or ‘school’ rather than Hockerill Anglo-European College or ‘College’.
- As an education setting the school is responsible for ensuring that all students attending are protected from harm.
- The school uses the definition of ‘pupil’, (but uses the term ‘student’) as defined under the Education Act 1996: (1) In this Act “pupil” means a person for whom education is being provided at a school.
- Any references to ‘child’, ‘children’, ‘young person’ within this policy are considered to be our students and the ‘pupil’ definition (above) covers them.
- The term ‘parent’ includes those with parental responsibility, carers, guardians and where applicable, the Head of a Boarding House
- Whilst this is a policy for Hockerill staff, the principles also apply to visitors whose responsibilities for safeguarding are covered within the Safeguarding for Visitors document which they are provided with when attending the site.

CONTENTS

Section	Section Title	Page(s)
1	Mission Statement	4
2	Hockerill Equality Statement	4
3	School Safeguarding Policies	4
4	Safeguarding Policy Statement	4-5
5	Important Safeguarding Contacts	5-7
6	Legislation and Guidance	7-9
7	Definitions: Safeguarding and Child Protection	9-12
8	Equality Statement - Students with Protected Characteristics	12-15
9	Roles and Responsibilities of Staff Including Leadership and Management	15-20
10	Family Help	21-22
11	Confidentiality and Sharing Information	23-25
12	Recognise and Respond to Abuse, Neglect and Exploitation	25-40
13	Online Safety and Filtering	40-41
14	Managing Safeguarding Concerns or Allegations Made About Staff	42-50
15	Record Keeping	51-52
16	Safeguarding Training and Development	52
17	Quality Assurance, Improvement and Practice	52-53
Appendix 1	BSA Commitment to Care Charter	54
Appendix 2	Staff Safeguarding and Flow Chart Poster	55
Appendix 3	Student Safeguarding Poster	56
Appendix 4	Indicators of Abuse	57-60
Appendix 5	Operation Encompass Safeguarding Statement	60
Appendix 6	Reporting Safeguarding Concerns About an Adult Poster	61

1. MISSION STATEMENT

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

2. HOCKERILL EQUALITY STATEMENT

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

3. SCHOOL SAFEGUARDING POLICIES

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

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

4. SAFEGUARDING POLICY STATEMENT

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

This means we ensure that the welfare of a student, and keeping them at the centre in our decision making when working with them, their families, and those supporting them, is paramount.

This policy outlines our whole school approach and commitment to our legal duties and responsibilities to safeguard all students up to the age of 18 and also includes any student who receives education at the school, including those who are 18 or older. It applies to all staff and volunteers, including agency staff.

These duties are set out in the Children Act (1989, 2004) and Working Together to Safeguard Children (2023). We are committed to providing support and help as soon as possible, underpinned by our values that children are best looked after within their families and support networks. We are also committed to working with other agencies, including the Local Authority, to strengthen opportunities to access support when we consider that a child and their family could benefit from early help or, if a child is at risk or potentially at risk of significant harm.

In line with our Home and School Partnership, we expect that parents and carers will support us to undertake our statutory duties to offer early help support and share information with other agencies where necessary. We want to work in collaboration with parents and carers to promote the health and welfare of all our students. We know that when children feel safe they are free to learn and develop.

5. IMPORTANT SAFEGUARDING CONTACTS

Contact should be made with the College in the first instance.

office@hockerill.com

(+44) 01279 658 451

safeguarding@hockerill.com

School Contacts

Organisation / Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Mrs Tanya Panayiotou	Contact as shown above
Deputy Designated Safeguarding Lead (DDSL)	Mrs Nicola Ashlee-McCrae	Contact as shown above
Deputy Designated Safeguarding Lead (DDSL)	Mrs Sarah Coleman	Contact as shown above
Deputy Designated Safeguarding Lead (DDSL)	Mr Jonathan Ellams	Contact as shown above
Deputy Designated Safeguarding Lead (DDSL)	Mrs Caroline Lewis	Contact as shown above
Deputy Designated Safeguarding Lead (DDSL)	Mrs Clare Mackinlay	Contact as shown above
Deputy Designated Safeguarding Lead (DDSL)	Sister Lucy Tinnirello	Contact as shown above

Designated Teacher for Children Looked After (DT for CLA)	Mrs Tanya Panayiotou	Contact as shown above
Special Educational Needs Coordinators (SENCO)	Mrs Kass Allen Mrs Catherine Waltham	Contact through Office
Mental Health Lead	Sister Lucy Tinnirello	Contact as shown above
DSL Prevent Lead	Mrs Tanya Panayiotou	Contact as shown above
Chair of Governors	Mr Chris Dunne	clerk@hockerill.com
Vice Chairs of Governors	Mr Stephen Beech Mr Richard Johnson	clerk@hockerill.com
Link Governor for Safeguarding	Mr Robin Saunders	clerk@hockerill.com

Non-School Contacts

Organisation / Role	Name	Contact details
Local Authority Designated Officer (LADO)	Duty LADO	<i>Strictly for professionals use only</i>
Hertfordshire County Council Children's Social Care	Customer Service Centre	Children's Social Care Report concerns about a child or request support Hertfordshire County Council Children's Services Out of Hours Service (SOOHS) 0300 123 4043
Family Help and Support	Families First website, information for parents, carers, and professionals. Professionals can access support from Families First Coordinators when supporting a family with an FFA or other targeted and intensive support.	Families First (hertfordshire.gov.uk)
Prevent	Prevent referrals Parent guidance	https://thegrid.org.uk/assets/prevent-national-referral-form-2025.pdf Parents' Booklet (educateagainsthate.com)

	Advice line for members of the public	ACT Early Prevent radicalisation 0800 011 3764
	Channel helpline	020 7340 7264
NSPCC Helpline	Helpline	0808 800 5000
	Email	help@NSPCC.org.uk
Police	Telephone	Emergency 999, non-emergency 101

6. LEGISLATION AND GUIDANCE

Section 175 of the [Education Act 2002](#) places a duty on schools and Local Authorities to safeguard and promote the welfare of students.

All education settings include:

[Children Act 1989](#) (and [2004 amendment](#)) - provides a framework for the care and protection of children

[Serious Crime Act 2015](#), Female Genital Mutilation Act 2003 - places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Rehabilitation of Offenders Act 1974](#) - outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#) - defines what 'regulated activity' is in relation to children.

[The Human Rights Act 1998](#) - explains that being subjected to harassment, violence, and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights - ECHR Official Texts - ECHR - ECHR / CEDH](#)

[The Equality Act 2010](#) - makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Principal should carefully consider how they are supporting students regarding these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it is proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment

[The Public Sector Equality Duty \(PSED\) | EHRC](#) - explains that we must have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

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

- [Keeping Children Safe in Education](#) (KCSiE) - sets out the legal duties that all schools and colleges in England must follow to safeguard and promote the welfare of children under the age of 18.
- [Working Together to Safeguard Children](#) - is DfE guidance outlining what organisations and agencies must and should do to help, protect, and promote the welfare of all children and young people under the age of 18 in England.
- [Statutory guidance on the Prevent duty, Prevent duty guidance: England and Wales \(2023\)](#) - all schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 to have “due regard to the need to prevent people from being drawn into terrorism”.
- [Multi-agency statutory guidance on Female Genital Mutilation](#) - sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The School Staffing \(England\) Regulations 2009](#) - sets out what must be recorded on the Single Central Record and the requirement for at least one person conducting an interview to be trained in Safer Recruitment techniques.
- [Hertfordshire Safeguarding Children Partnership](#) (HSCP) - the three statutory partners (Hertfordshire County Council, Police and Health) have a joint and equal duty to ensure multi-agency safeguarding arrangements are in place at a local level, and that organisations and agencies are clear about how they will work together to safeguard children and promote the welfare of children.
- [Resolution of Professional Differences including Escalations](#) - effective partnership working is key to keeping children and young people safe from harm. HSCP encourages constructive challenge as part of our culture of learning and partnership working. In May 2025, the HSCP published this revised policy for resolutions and escalations.
- [Specific guidance for Schools/Education](#) - schools and educational institutions play a critical role in safeguarding children and young people. It is essential that they adhere to the established resolution process to ensure timely and effective resolution of professional differences.
- [Information sharing advice for safeguarding practitioners](#) - produced by the DfE, outlines the importance of sharing information about children, young people, and their families in order to safeguard children. It provides clarity on when and how information can be shared legally and professionally to achieve improved outcomes.
- [Maintained schools' governance guide - 7. Compliance](#) - provides guidance for governing bodies on how to meet their legal and regulatory responsibilities with regards to compliance. It covers various aspects of compliance, including education, funding and finances, health and safety, inspections, political impartiality, protecting and sharing information, safeguarding and student welfare, student behaviour, school admissions, school attendance, schools causing concern, school complaints, length of school day and year, opening, closing or making organisation changes to a school, managing school premises, control and community use of school premises, school uniform, staffing and performance management, and whistleblowing.
- Part 3 of the schedule to [The Education \(Independent School Standards\) Regulations 2014](#) places a duty on academies and independent schools to safeguard and promote the welfare of students at the school.

- [Academy trust governance guide - 7. Compliance](#) - provides guidance for boards on how to meet their legal and regulatory responsibilities with regards to compliance. It covers various aspects of compliance, including admissions, attendance, complaints, education, funding and finances, health and safety, inspections, political impartiality, protecting and sharing information, safeguarding and student welfare, student behaviour, schools causing concern, school day and school year, management of academy premises, control and community use of academy premises, school uniform, staffing, and whistleblowing.

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

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

7. DEFINITIONS: SAFEGUARDING AND CHILD PROTECTION

All staff at Hockerill Anglo-European College are required read our school's policies and procedures as part of their role so that they can keep our students safe and promote their wellbeing at all times.

Safeguarding is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

[Working Together to Safeguard Children](#) further extends this definition to include:

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

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

Families First Assessments (FFA) are used by practitioners who work with children, young people, parents, and carers where it is considered that the child/family would benefit from early help support. It is used to identify needs, and to organise the right support and services to address

those needs at an early stage. The FFA process allows different agencies and services to share information and work together in a coordinated way.

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

The [Continuum of Need](#) guidance aims to ensure that support in Hertfordshire is offered at the earliest opportunity, with an approach that enables us to work effectively alongside families. The Continuum of Need is a threshold document that supports everyone working with Hertfordshire's children and families to identify the "Level of Need" and the service responses that can be expected. It sets out how we can work together, by placing the child and family at the centre, sharing information, and working with families to help them to find solutions early to prevent their difficulties from escalating. It is not intended to be a prescriptive guide and does not replace professional judgement.

Child in Need: Under the Children Act 1989, local authorities are under a general duty to provide services for children in need for the purposes of safeguarding and promoting their welfare. A Child in Need is defined under Section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services, or a child who is disabled. To fulfil this duty, practitioners undertake assessments of the needs of individual children, giving due regard to a child's age and understanding when determining what, if any, services to provide.

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

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

The Gateway is the 'front door' to Hertfordshire's social care. The Gateway Service receives contacts and queries via calls or emails.

Contact - A 'Contact' is where a member of the public or a professional makes contact with Children's Services about a child who may be a child in need of support or protection, and where there is a request for information or a service.

Referrer - The 'Referrer' is the member of the public or professional making contact with Children's Services.

Referral - For this procedure, a 'Referral' is a possible outcome of a Contact, where a social worker or manager considers a statutory response may be required. In some instances, it may be

identified that a child may be better supported via other services such as Early Help or Universal Services (e.g. health, schools, family centres, etc.).

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

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

Multi Agency Safeguarding Hub (MASH) is co-located, within the Gateway. It is a partnership comprising of colleagues from Children's Services, Health, Police, and Probation; advisory support is provided by Independent Domestic Violence Advocates and satellite partners. These agencies work together to improve the quality of the information sharing process when identifying the needs and risks of children and their families. They make decisions at the earliest opportunity and make recommendations about what services and resources the child and family may benefit from.

Although all contacts being assessed by MASH or early help services are important, it is less likely that they will meet the threshold for Child Protection (significant harm).

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

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Section 9 provides the full definition.

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

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

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

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

Legal Care Arrangements:

- Informal Kinship Care
- Special Guardianship Order (SGO)
- Child Arrangements Order (CAO)
- Kinship Foster Care
- Private Fostering
- Adoption by a Family Member or Friend

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

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

8. EQUALITY STATEMENT, STUDENTS WITH PROTECTED CHARACTERISTICS

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

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

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health, and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home, or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Student Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child

Children with Special Educational Needs and Disabilities (SEND)

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

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

- A disabled child's understanding of abuse
- Lack of choice/participation

Children Looked After (CLA)

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

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

Children with a Social Worker (CWASW)

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

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

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

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

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

At Hockerill the Designated Teacher has the appropriate training, so that they are able to take the leadership of this crucial area of our safeguarding arrangement. They are also the Designated Safeguarding Lead and they:

- Work closely with virtual school heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans
- Collaborate with the virtual school heads to also promote the educational achievement of previously looked after children

9. ROLES AND RESPONSIBILITIES OF STAFF INCLUDING LEADERSHIP AND MANAGEMENT

Role and Responsibilities of the Whole School

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

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

- Behaviour policy
- Boarding policies and guidance documents
- Pastoral support system
- Planned programme of relationships, sex, and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice, and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they are always unacceptable

Role and Responsibility of all staff (permanent, temporary and supply) and volunteers

All staff will be required to:

- Read Part One and Annex B of [Keeping Children Safe in Education](#), and the reviewed version of this policy at least annually. Staff/volunteers who do not work directly with children are not required to read Part One and can be provided with Annex A (a condensed version of Part One) but to promote good practice we recommend that they do so
- Translated versions of Part One Keeping Children Safe in Education can be found at [Keeping Children Safe in Education Part 1 Translations | LGFL for staff, volunteers, parents and carers](#) whose first language may not be English, should they wish to use this
- Read Annex B of Keeping Children Safe in Education which outlines important additional information about specific forms of abuse and safeguarding issues to ensure we have a culture that recognises that children within the specific circumstances can be at greater risk of abuse, neglect and exploitation, and a working knowledge to identify indicators. As good practice, we recommend staff who do not directly work with children to also read this chapter
- Sign to confirm that they have read the expected sections according to their role, have understood the content and their roles and responsibilities in our whole school approach to safeguarding
- Promote and raise awareness about the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online)
- Contribute to creating a culture for students who are lesbian, gay, bisexual, or gender questioning to speak out and share their concerns
- Contribute to creating a culture for any child defined as having a protected characteristic to speak out and share their concerns (see Section 8)

All staff will be aware of:

Our school's safeguarding arrangements and systems are explained to staff as part of their induction and annual update training. As part of staff induction new staff/volunteers are provided with the following key guidance and information is provided by a DSL:

- Child Protection Policy
- Staff Code of Conduct
- the role and identity of the Designated Safeguarding Lead (DSL) and deputies
- Behaviour Policy
- Online Safety Policy including Acceptable Use Agreement
- Our expected safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- Signs of vulnerabilities to look out for in children who may benefit from Early Help support, we explain to staff the Early Help process for children and their families and what their role is in this to support DSLs in ensuring children and their families receive support as soon as problems emerge

- The importance of Early Help assessments and how they can help identify emerging difficulties and therefore how sharing information, including with other practitioners, can support early identification and assessment
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The process for recording and sharing information internally to DSLs and on children's safeguarding records
- The process of making referrals to the Local Authority Children's Social Care and/or Police where required and the statutory processes that may follow
- The signs of specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines.) [See Annex B Keeping Children Safe in Education](#)
- How to support and speak to children when they may share their worries or make disclosures of abuse, neglect or exploitation, and contribute to creating a culture where children feel able to speak with the relevant safeguarding leads
- The importance of reassuring children that they are being taken seriously and that they will be supported and kept safe
- The importance of supporting families and providing a culture of support to encourage parents/carers to seek support and engage with our school and professionals when issues emerge or become a concern
- Children can be at risk of harm inside the home (familial harm) and outside of their home (extra familial harms) and that any form of harm can happen directly or online
- Children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children
- What to look for to identify children who need help or protection in accordance with statutory procedures under the children act section 17 (child in need) and section 47 (significant harm)

Role and Responsibilities of the Designated Safeguarding Lead (DSL)

Our DSL is a member of the Senior Leadership Team. We also have Deputy DSLs (DDSL) within our staffing group including teaching and support staff. Whilst one of the DSLs is referred to as the 'lead' and will coordinate the DSL team, they are all trained at the same level to ensure that at all times one or more of them are available to carry out all of their designated functions in safeguarding.

The DSL takes lead responsibility for our school's child protection and wider safeguarding arrangements. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online.

Whilst all of our staff are part of our safeguarding culture, it is the role of our DSLs to receive information, review and make decisions about any necessary further considerations or actions needed to respond to any safeguarding matters that arise.

The DSLs will act as the main contact in our school when a child and their family are receiving support from the school, external agencies, and statutory services.

During term time, a DSL will be available during school hours for staff to discuss any safeguarding concerns. DSLs have an on-call rota and staff should make contact with the duty DSL in the first instance.

In the event that non-urgent matters arise out of school hours, a member of the SLT can be contacted through the SLT on call rota.

If the school's DSL and deputies are not available or cannot be reached, staff should contact the Safeguarding Administrator or the Principal's PA.

A member of the Senior Leadership Team (SLT) or a Designated Safeguarding Lead (DSL) will be available during school holidays when a school activity, such as a trip, is taking place.

During other holiday periods, when no school activities are scheduled, parents and students are expected to contact the relevant external services appropriate to their needs.

All members of the SLT and DSLs set an Out of Office email response, which clearly outlines the steps that should be taken by anyone with a safeguarding concern. These replies also reference support resources available to students through the Student Wellbeing Team, as well as information provided on the school's Safeguarding pages on the website.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in and/or lead early help support which may include a Families First Assessment and thereafter attend/chair Team Around the Child meetings
- Take part in strategy discussions organised by the Local Authority's Children's Social Care and inter-agency meetings and/or support other staff to do so when required
- Contribute to the assessment of children (when a child may have suffered harm or is at risk of harm)
- Refer suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Channel Programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly
- Have a good understanding of behaviours that may impact on a child's engagement and learning that may require consideration through safety/support planning, this includes the impact on themselves but also to other children
- Have a good understanding of harmful behaviours that may require risk management, safety planning and/or support in school. This includes those presented by children within the setting, their parents/carers, or associated adults where necessary
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Assist the Principal to review and respond to low-level concerns that may arise regarding staff
- Share information and/or take part in statutory processes that involve reviewing and analysing safeguarding practice and policies. This can include meetings held by Hertfordshire Safeguarding Children's Partnership in response to significant safeguarding incidences, child death and/or where a safeguarding practice review is required to determine learning and practice analysis

The DSL will also:

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

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

Role and Responsibilities of the Governors

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

The Governing Body will ensure:

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

- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- The Chair of Governors will act as the ‘case manager’ in the event that an allegation is made against the Principal, where appropriate (see Section 11 Managing Concerns and Allegations)

Section 16 (Safeguarding Training and Development) of this policy has information on how governors are supported to fulfil their role, also see Part two KCSiE 2025.

Role and Responsibilities of the Principal

The Principal will:

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

Role and Responsibilities of the Designated Teacher

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

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

All staff and leadership are required to support HSCP principles to safeguarding children by exercising their professional curiosity at all times. [April 2025 Professional Curiosity](#)

10. FAMILY HELP

[Keeping children safe, helping families thrive - GOV.UK](#) underpins the [Children and Wellbeing bill](#) which is a key step towards delivering the government's 'Opportunity Mission' to break the link between young people's background and their future success. It will better put in place support to drive high and rising standards throughout our education and care systems so that every child can achieve and thrive. It outlines the government's commitment to keeping families together and children safe and support children to live in family settings where children cannot remain at home, including through kinship or foster care, rather than residential care.

In March 2025 the DfE published [The Families First Partnership \(FFP\) Programme Guide](#) which sets out how every child is to be kept safe and have the opportunity to succeed, children's social care is to be reformed and committed to supporting every child to grow up in a safe, stable and loving home, for most children this means growing up within their family and support through early help and family networks.

Family Help will take place at the heart of communities, bringing together local services under a combined, multi-disciplinary practice approach and service offer. The key principles that will inform the delivery of services will include:

- wrapping support around the whole-family at the earliest opportunity – using the expertise of multi-disciplinary practitioners;
- ensuring consistency of relationships between children, families, and their lead practitioner;
- adopting one plan that will stay with families but adapt as needs change.

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

Our principles include, but are not limited to:

- Approaching families and their wider family networks and communities with empathy, respect, compassion, and creativity
- Avoiding reinforcing family shame, suffering, and blame
- Making efforts to understand the impact of the parental trauma influencing the dynamics and experiences of the family
- Using strength-based approaches, working with parents and carers to identify what is working well and how their strengths could support them to effect positive change
- Ensuring we work sensitively with parents, carers, and children, to identify and understand the impact of adversity and trauma in their lives; seeking to understand how adversity and trauma might manifest and affect children and parents' engagement and use their expertise to adapt their response with care and compassion
- Adapting our responses to meet the diverse needs of parents and carers, including fathers and male carers, and the specific challenges being faced, including parents and carers of disabled children, and where harm is outside the home
- Ensuring we understand the family's background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support
- Being alert and recognising where parents or carers may not be acting in the best interest of the child or where children may be experiencing abuse, neglect, and exploitation as a result of actions by parents, carers, or other individuals in their lives. Practitioners use their skills and expertise to adapt their response to secure engagement

- Being mindful of negative stereotypes when making decisions which might lead to false and unconscious bias

Communicating effectively verbally and non-verbally by:

- Communicating with respect, being clear, curious, and inclusive; adapting to parent's and carer's needs
- Providing materials to children, parents, carers, and families which are jargon free, developmentally appropriate and in a format that is easy to understand
- Ensuring any materials, such as minutes or reports, capture the school's contribution but also those from the children, parents and carers which must include their views and wishes
- Supporting families to access support to help translate information where English is not their first language. Our school will access interpreters where needed including British Sign Language

Empowering our parents and carers to participate in decision-making to help, support and protect children by:

- Creating a safe culture which is an open and accepting forum free from discriminatory or prejudicial judgements
- Ensuring the open culture is one which still provides reflection and challenge where the information has the potential to be a risk or influencing factor which may impact on a child's safety and wellbeing
- Asking families for their perspective on a situation or issue that arises, ensuring we consider their point of view and factor this in when thinking about support
- Promoting families' rights to support through use of advocates, family members or a supporter
- Ensuring parents and carers are fully aware of who will attend meetings and discussions, if the child will be invited to participate, and the format of the meeting or discussion
- Giving parents and carers adequate preparation at every stage, relevant information, a safe and appropriate environment for participation, and suitable access arrangements
- Signposting parents and carers to sources of help and support available locally or through the local authority
- Provide opportunities for feedback and review to ensure acknowledgement of positive progress but also reviewing and discussion of any new or increasing issues to readapt a family's plans
- Being transparent about our concerns and why we may need to request support from an outside agency; and the potential actions should our concerns increase for the children
- Helping parents and carers to understand what the issues are and how these impact on the child, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes
- Providing information about different types of support, what it involves and expects from parents and carers so they can make an informed choice and decision about which support pathways will be more helpful and effective for them

11. CONFIDENTIALITY AND SHARING INFORMATION

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

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

In line with our principles of working with families outlined above, we strive to be transparent, open, and clear when we need to discuss any information or concerns that worry us about a student's wellbeing. If we feel that we need to share information, we will explain how information will be shared or used so that families can make an informed choice about whether to consent.

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

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

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

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

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

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

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

The [Data Protection Act \(DPA\) 2018](#) does not prevent or limit the sharing of information for the purposes of keeping children safe. Hockerill recognises that timely information sharing is essential for effective safeguarding. Whilst we promote collaboration and partnership with our families, fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of students when required.

The following principles apply in relation to confidentiality at Hockerill:

- Timely information sharing is essential to effective safeguarding.
- The Data Protection Act (DPA) 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a student at risk
- Staff should never promise a student that they will not tell anyone about a report of abuse, as this may not be in the student's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - Even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the Data Protection Act that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider the following points:

- Parents or carers should normally be informed (unless this would put the student at greater risk)
- The basic safeguarding principle is: if a student is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to Children's Social Care where the child resides
- Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for students involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

- Have regard for the Government’s publication [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/information-sharing-advice-for-safeguarding-practitioners) includes 7 ‘golden rules’ for sharing information and supports staff in making decisions about information sharing

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

12. RECOGNISE AND RESPOND TO ABUSE, NEGLECT AND EXPLOITATION (WHAT ALL STAFF MUST KNOW AND DO IF THEY HAVE CONCERNS)

Abuse, Neglect and Exploitation

All our staff are aware of what Abuse, Neglect and Exploitation is and understand the different types of indicators as outlined in Appendix 4 which could suggest a child is suffering or likely to suffer harm.

We encourage our staff to be professionally curious about what to look out for as this is vital for the early identification of abuse, neglect, and exploitation so that we can identify students who may be in need of help or protection at the earliest opportunity.

Abuse

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

Our staff are aware that children may be abused by an adult or adults or by another child or children.

Physical Abuse

Physical abuse is a form of abuse which may involve:

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

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

Emotional Abuse

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

- Conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction
- A child seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying)
- Causing a child to feel frightened or in danger
- Exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It can be difficult to recognise emotional abuse, and children may not always realise they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.

Sexual Abuse

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

- **Physical contact** including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing
- **Non-contact activities:** such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse
- **Online abuse:** sexual abuse can take place online, and technology can be used to facilitate offline abuse

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

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

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

For more information see:

- HSCP [Neglect Tool](#)
- [7 minute briefing Parental Neglect of Medical Needs](#)

Exploitation

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

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

- **Child Sexual Exploitation (CSE):** this is a type of sexual abuse where children are sexually exploited for money, power, or status. It can involve contact and non-contact activities and can occur without the child's immediate recognition; this is due to their grooming by the abuser
- **Child Labour Exploitation:** This involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential, and dignity
- **Child Trafficking:** children are recruited, moved, or transported, and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities
- **Child Criminal Exploitation (CCE):** this is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing

Safeguarding Issues and Specific Forms of Abuse

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

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

- Child abduction and community safety incidents
- Child Sexual Exploitation (CSE)

- Child Criminal Exploitation (CCE)
- Children and the Court system
- Children absent from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalization
- The Prevent Duty
- Channel
- Sexual violence and Sexual harassment between children in schools
- Serious Violence
- So-called 'honour'-based abuse (including female genital mutilation and forced marriage)
- FGM and the mandatory reporting duty for teachers
- Forced marriage

Detailed information about these forms of abuse and safeguarding issues is outlined in Appendix 4.

[Additional advice and support](#) - There is a wealth of information and resources available in this chapter to support schools and colleges.

Child-on-Child Abuse

At Hockerill we know that students can cause harm to other students. As a school we have a zero tolerance of child-on-child abuse and create a culture of keeping an open mind and attitude that "it could happen here." Our staff are aware that even if no reports are being made in our school, it does not mean it is not happening.

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

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- Initiation/hazing type of violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Domestic Abuse

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

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

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

Types of Domestic Abuse

Domestic Abuse can include, but is not limited to the following signs to look out for and to be professionally curious about:

- Controlling or coercive behaviour
- Violent or threatening behaviour
- Physical or sexual abuse
- Economic abuse
- Technology-facilitated abuse
- Psychological, emotional, or other abuse
- Stalking

Violence against women and girls (VAWG) includes but is not limited to harassment, stalking, rape, sexual assault, murder, honour-based abuse, coercive control and although men and boys also suffer from many of these forms of abuse, they disproportionately affect women. [Crime and Policing Bill: reducing violence against women and girls \(VAWG\) factsheet - GOV.UK](#)

Child-to-parent-abuse (CPA) or adolescent-to-parent abuse (APA) is any behaviour used by a child or young person to control, dominate or coerce parents. It can include emotional, verbal, physical or financial abuse and includes “coercive control,” or in other words, the parent or other adult is compelled to change their own behaviours for fear of further abuse.

Female Genital Mutilation (FGM)

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

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

Our teachers are aware of their mandatory reporting duty and the requirement to immediately contact the police if they:

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

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

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

Preventing Radicalisation

Hockerill is compliant with the Counterterrorism and Security Act 2015. Under section 26, we exercise our duty, to have “*due regard to the need to prevent people from becoming terrorists or supporting terrorism*”. This duty is known as the Prevent duty.

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

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

Extremism

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

The Prevent Duty is concerned with all forms of terrorism and extremism. It also includes some forms of nonviolent extremism. For example:

- Right Wing extremism
- Religious extremism
- Environmental and Animal Rights extremism
- School Massacre ideology
- Involuntary Celibate (Incel) ideology

Radicalisation

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

Terrorism

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

Although there is no single way of identifying whether a student is likely to be susceptible to radicalisation into terrorism, there are [factors that may indicate concern](#).

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

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

Concerns about Mental Health

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

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

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

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

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

Additional Considerations for Boarding Students

As a state boarding school, we recognise the heightened importance of monitoring and supporting students' mental health within the boarding environment. Boarding students live away from their families, and staff have a greater duty to observe, respond to and support their wellbeing. Where a student's mental health condition presents a risk to themselves or others, or places an unreasonable level of demand on staff beyond what is appropriate in a boarding setting, the College will carry out a thorough risk assessment. This may include reviewing the student's suitability for boarding and considering what reasonable adjustments or alternative arrangements are required to safeguard the student and the wider community. Wherever appropriate, the College will seek external advice and support, including from the College's GP service, in order to inform decision-making and ensure the best possible outcomes for the student.

More information can be found in the [Mental health and behaviour in schools guidance](#). Health England¹⁴⁹ has produced a range of resources to support secondary school teachers to promote positive health, wellbeing, and resilience among children. See [Better Health Every Mind Matters](#) for links to all materials and lesson plans.

[youth-suicide-prevention-7-minute-briefing-may-2023.pptx](#)

What all staff need to do to respond if Abuse, Neglect and Exploitation is suspected or has been disclosed.

At Hockerill we adopt a whole school approach and safeguarding is everyone's responsibility. Staff and volunteers, and governors must comply with our safeguarding procedures as set out below:

Concerns about child-on-child abuse

In most circumstances, incidences of students hurting other students will be dealt with under our school's behaviour policy. Child Protection policy will apply to all incidents that raise safeguarding concerns where the alleged behaviour:

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

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

- Staff will respond to the allegation in line with the school's published procedures for responding to safeguarding and child protection concerns (see Appendix 2)
- The DSL will assess and consider the relevant next steps which may include, as appropriate and necessary: speaking with the child and parents, accessing relevant consultation lines provided to schools by the Local Authority, making a request for support to Children's Services, the Child and Adolescent Mental Health Service (CAMHS), or the Police if the allegation involves a potential criminal offence.

- The DSL will consider whether a risk assessment or a safety and support plan would be beneficial for any children involved, including the victim(s), the student(s) against whom the allegation has been made and any others affected, with a named person they can talk to if needed. This should include consideration of all aspects and areas of the school environment and beyond, for example off-site activities and school transport
- The DSL will speak to the student and their parent/s or carers to share the concerns, gain their views and consent to liaise with other agencies if there are any identified risks and unmet needs
- If the incident is a criminal offence school have a duty to report this and thereafter work closely with the Police (and other agencies as required) while protecting students and/or taking any measures to manage risk. For incidences which involve significant harm and/or a potential criminal offence, the DSL will endeavour to gain consent but may override this should not gaining consent increase the risk to a child

Our DSLs are committed to ensuring that where concerns are raised about child-on-child abuse, incidences are taken seriously and dealt with fairly. DSLs will consider all information available to them and ensure that any action or decision is proportionate for all students involved, and that such decisions do not disproportionately impact on their access to education, although at times some restrictions or adaptations may be required to manage identified risk.

Creating a culture where children feel safe in school and minimising the risk of all forms of abuse

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

We expect all staff to:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate students about appropriate behaviour and consent
- Ensure students are able to easily and confidently report abuse using our reporting systems. This could include speaking directly with a member of staff or reporting electronically by email or through the 'Report a Concern' process
- Reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems in the school or elsewhere that could be addressed by us updating policies, processes, and the curriculum, or could reflect wider issues in the local area that should be shared with our safeguarding partners
- Support students who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, and alleged perpetrator(s) and any witnesses are not bullied or harassed

- Consider intra-familial harms (adults close to the child and family) and any necessary support for siblings following a report of sexual violence and/or harassment

Our staff are trained to understand:

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

If a child makes a disclosure to a member of staff or volunteer:

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

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

All staff know that we place the voice of students at the centre of everything we do and endeavour to place their best interests at heart. We ensure we know who our students are, staff are encouraged to be curious by speaking and listening to students whilst respecting any protected characteristics. We hope our students have confidence and trust in our staff, believing they will be taken seriously and be supported with their issues or concerns sensitively.

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

We listen to students by:

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

We reassure students by:

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

Recording concerns

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

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

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

What staff should do if they have concerns about a child

Hockerill is committed to ensuring that all students feel safe and comfortable to share and report any concerns and/or allegations about their personal experiences at home, in the community, online or regarding a member of staff or other students in the school. As outlined above, all our

staff are clear on the importance of listening to and supporting students when making disclosures, and the need to reassure them.

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

Any member of staff, including supply teachers, contract workers, volunteers, governors and visitors at Hockerill who has any concern(s) about a child's welfare should:

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

The DSL will:

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

- If it is immediately apparent that a student has suffered significant harm or is at risk of harm e.g. suffered abuse, neglect and/or exploitation, the DSL will make a referral to Children's Social Care to request support at the earliest opportunity; consent will be gained where appropriate. If there has been a crime committed within the circumstances of the abuse, they will also report this to the Police

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

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

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

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

Making a referral to Children's Services and/or requesting support

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

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

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

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

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

What students need to know and do to report safeguarding concerns (Abuse, Neglect and Exploitation).

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

Our pledge is:

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

What students should do to report concerns:

- Students can speak to any member of staff of their choice. Students can report concerns electronically, by email or through 'Report a Concern'. The 'Student Safeguarding Poster' is displayed in all student-facing areas of the school. Staff receiving concerns will discuss the concern with a Head of Year/Head of House or DSL. Students can also access resources available to them through the Student Wellbeing Team or Safeguarding page on the school website.

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

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

Students can contact the NSPCC Helpline by calling **0808 800 5000** or email help@nspcc.org.uk.

Risk Management Plan (RAMP) and Safety and Support Plan (S&SP)

RAMP – When there has been a report of sexual violence, and or harassment, the DSL will make an immediate Risk and Needs Assessment for both the alleged victim and the perpetrator. The RAMP is to enable the DSL to use their critical thinking and consider what the needs of any students are, analyse what are the risks and what measures can be put in place to protect students and keep them safe from further harm. Risk assessments will be recorded on CPOMS and kept under review.

The school risk assessment is not intended to replace the detailed assessments of other expert specialist assessments, but the DSL will seek and share information from other agencies where required to inform the school's understanding from a multi-agency perspective so that a holistic approach in supporting and protecting students can be strengthened.

We are aware that students who are victims of sexual violence and sexual harassment will find the experience stressful and distressing, this can also impact on the family and can cause the student an adverse effect on their educational attainment and can be exacerbated if the alleged perpetrator(s) attends Hockerill. The RAMP will take this into account and plan accordingly on the gravity of a situation on treat incidents on a case-by-case situation.

Keeping Children Safe in Education, Part Five Sexual Violence and Sexual Harassment provide statutory duty for schools and colleges.

The RAMP is the responsibility of Hockerill DSLs and the wider leadership and pastoral teams, and it is critical that parents and carers place confidence and trust in the school by working with us and supporting the plan.

All schools and colleges are at liberty to adopt any form of risk management and safety planning protocols.

At Hockerill we use the following types of risk management to not only support students presenting with Harmful Sexual Behaviour but more commonly we experience a range of specific safeguarding issues that vulnerable children and young people are faced with, examples of these cited in Part one and Annex B of KCSiE.

Risk Assessment Management Plan (RAMP) for Harmful Sexual Behaviour (HSB)

The RAMP framework provides:

- DSLs the means to assess the needs and risk of students when they have presented with Harmful Sexual Behaviour (for age-appropriate exploratory sexual behaviours, use Safety and Support Plan framework)
- Guidance and evidenced based resources to support DSLs critical thinking and analysis using a multi-agency approach to identify risk and strengths
- A template to support and manage risk by developing a day-to-day plan to safeguard and promote the welfare of Children and Young People (CYP), monitor and review their progress

Safety and Support Plan (S&SP) for all safeguarding issues and specific forms of abuse and harm

The S&SP framework provides DSLs:

- The ability to assess the needs and risk of students when they have presented with vulnerabilities associated with themes set out in Part One and Annex B of 'Keeping Children Safe in Education' including all forms of child-on-child abuse
- Guidance and evidenced based resources to support critical thinking and analysis using a multi-agency approach to identify risk and strengths

- A template to manage risk by, with a day-to-day support plan to safeguard and promote the welfare of students, monitor and review their progress

13. ONLINE SAFETY AND FILTERING

We recognise the importance of safeguarding students from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. Hockerill Governors ensure that our DSLs takes lead responsibility for online safety and understanding the filtering and monitoring systems and processes we have in place, alongside their safeguarding and child protection duties.

To meet these obligations, Hockerill aims to:

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

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

- **Content** – being exposed to illegal, inappropriate, or harmful content, for example: pornography, misinformation, disinformation (including fake news), and conspiracy theories, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism
- **Contact** – being subjected to harmful online interaction with other users, for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – online behaviour that increases the likelihood of, or causes harm, for example: making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing, and/or financial scams

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

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- Ensuring students know not to meet up with a person they have met online without a safe adult

- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim

We will also:

- Train staff, as part of their induction, on how to keep themselves safe online as well as students, in line with the school's online safety policy This needs to include issues for example: cyber-bullying, the risks of online radicalisation, and the roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year.
- Educate parents/carers about online safety through letters, emails and resources sent directly to them. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Ensure staff are aware that they may access the school MIS using their personal mobile phone to take a register but they must be aware of the restrictions placed on them with regards to the use of their personal mobile phone and cameras (see Staff Code of Conduct), *for example that:*
 - *staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when students are not present*
 - *staff will not take pictures or recordings of students, storing content on their personal phones or cameras, however staff may upload content directly to the school portal*
- Make all students, parents/carers, staff, volunteers, and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, students and parents/carers are aware that appropriate staff designated by the Principal, have the power to search student's phones, as set out in the DfE's guidance on searching, screening and confiscation if there is a concern regarding a child's safety or a crime in which case the Police will be contacted
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

See Staff Code of Conduct and Online Safety Policy including Acceptable Use Agreements for Staff, Governors and Students

14. MANAGING SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS AND VOLUNTEERS

Hockerill Anglo-European College's 'Low-Level Concern and Allegations Policy' is compliant with:

- [KCSiE, Part four](#)
- Hertfordshire Safeguarding Children Partnership Procedures Manual, [Section 5.1.5 Managing Allegations Against People who work with Children and Young People](#)
- [Developing and implementing a low-level concerns policy \(Farrer & Co\)](#), which provides detailed guidance and examples.

This section of our policy is a reflection and extension of the Staff Code of Conduct.

All staff and volunteers at Hockerill hold positions of trust and are expected to uphold safe working practices outlined in our Staff Code of Conduct.

A 'position of trust' refers to any role where an adult holds power or influence over a child due to the nature of their work (either paid or voluntary). As defined in the [Sexual Offences Act 2003 \(Sections.16-24\)](#) and further clarified by the [Crown Prosecution Service](#).

It is a criminal offence for anyone in a position of trust to engage in sexual activity with a child in their care – even if that child is aged 16 or 17 and legally considered to have reached the age of sexual consent (16); this includes both in-person and online interaction, within or outside of employed/voluntary hours. For absolute clarity Hockerill considers a student to be on our school roll until 31st August of the year they leave the College.

A **breach of trust** occurs when an adult working or volunteering with children crosses established boundaries in their professional relationship with a student through inappropriate behaviour that involves an abuse of their position or authority. The behaviour itself does not need to be illegal to constitute a breach of trust – even when the child or young person is over the age of consent (16).

For clarity a member of staff engaging in an intimate or sexual relationship with a Sixth-Form student is a breach of trust.

These behaviours undermine professional integrity, breach safeguarding standards and Hockerill's Staff Code of Conduct, regardless of legal consent due to the imbalance of power and the professional duty of care.

[Section 11 of the 2004 Children's Act](#) states that schools and colleges should have clear policies aligned with HSCP Procedures for dealing with safeguarding concerns or allegations against those working in or on behalf of schools and colleges in a paid or unpaid capacity, i.e. members of staff, including supply teachers and volunteers.

These policies must clearly distinguish between:

Allegations – An allegation is a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The *Harm Threshold* (see *Managing Allegations*, below) for an allegation is when a person working or volunteering with children in a position of trust has or may have:

- Behaved in a way that has, or may have harmed a child/young person;
- Possibly committed a criminal offence against/related to a child/young person;
- Behaved toward a child/young person in a way that indicates he or she would pose a risk of harm;*
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people;*

**These categories can include behaviour that may have happened outside of an organisation that might make an individual unsuitable to work with children/young people.*

Concerns about the quality of care/practice - This is an accusation, not of a child protection nature, that the care/practice provided does not meet the expected standards. As with quality in other fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose.

Complaints – An expression of dissatisfaction about actions or the lack thereof. Concerns may reflect a worry requiring reassurance, while complaints assert that something is unacceptable

Levels of Concern and Allegation

There are two levels of Concerns and Allegations relating to adults (in both paid and voluntary roles) working with children either directly and/or online:

1. Low-Level Concerns

These are behaviours by one or more adults (paid or voluntary) which are inconsistent with the school's Staff Code of Conduct but do not meet the Harm Threshold (see above under definition of Allegations) and are referred to as 'Low-Level Concerns'.

Examples include repeated breaches of the Staff Code of Conduct in relation to safeguarding.

2. Allegations

These are behaviours by one or more adults (paid or voluntary) that do meet or may meet the Harm Threshold (see above under definition of Allegations). Such cases require referral within one working day to the Local Authority Designated Officer (LADO) and potentially other statutory bodies such as the police or children's social care.

Low-Level Concerns and Allegations may emerge as a result of either observed suspicions or direct disclosures made by a student. In assessing the potential harm and impact to a child or young person, DSLs will consider the four categories of abuse – physical, emotional, sexual and neglect – as well as any safeguarding elements related to exploitation.

The Harm Test is explained in the Disclosure and Barring service Guidance: [Making barring referrals to the DBS and Section 31\(9\) of the Children Act 1989 \(as amended by the Adoption and Children Act 2002\)](#).

Managing Low-Level Concerns (those that DO NOT meet the Harm Threshold for Allegation)

As part of our school approach to safeguarding, we are committed to fostering an open and transparent culture where all concerns involving adults working in or on behalf of Hockerill (including supply teachers and volunteers) are addressed promptly and appropriately.

Creating an environment where all concerns can be shared responsibly, with the right person, recorded accurately, and handled with care is essential to keeping our students safe.

We aim to:

- Enable all stake holders to identify inappropriate, problematic, or concerning behaviour early and encourage them to do so.
- Reduce the risk of abuse by acting preventatively.
- Ensure that all adults working/volunteering in or on behalf of the school adhere to professional boundaries consistent with our ethos and values

A 'Low-Level' Concern does not imply insignificance. It refers to any behaviour – however minor – that causes a sense of unease or a 'nagging doubt' about whether an adult's behaviour:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO

Examples may include (but are not limited to):

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating children

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The role of the Case Manager for Low-Level Concerns

At Hockerill the Case Manager is the Principal. If concerns involve the Principal, the Chair of Governors fulfils this role.

When a Low-Level Concern is raised (including third-party reports), the Case Manager or their nominated deputy will:

- Speak with the person who raised the concern (unless this was raised anonymously)
- Speak with the individual subject to the concern
- Identify and interview any other involved parties or witnesses

The information gathered will help the school to categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for the decisions and action taken.

The Case Manager, a nominated deputy, or Chair of Governors will respond to reports of Low-Level Concerns in-line with the schools' internal due processes for managing safe-staffing, our response may include the following:

- Prioritise the safety and wellbeing of any alleged victim and all other students
- Share details only with those who need to know to maintain confidentiality
- Conduct further inquiries with relevant children, staff, parents, or witnesses
- If there are reasonable grounds, launch a formal internal investigation following the school's internal processes
- Consult Human Resources on possible breaches of the Staff Code of Conduct, [Teachers' Standards](#), or TA regulations to assess disciplinary thresholds
- Inform the subject of the concerns and outline available support during the inquiry
- Determine when to allow the subject to present their account

- Review all evidence and decide on an outcome
- If no risk of harm is found, consider additional training or monitoring for the staff member
- If new information raises serious risk or meets the harm threshold, refer the matter to the LADO

Hockerill fosters a safeguarding culture where every staff member is professionally curious. We:

- Clarify expected staff behaviour and help them distinguish it from concerning conduct
- Encourage prompt reporting of Low-Level Concerns
- Address unprofessional behaviour early and support corrective measures
- Handle concerns sensitively and in proportion to their nature
- Use reported concerns to identify and address any weaknesses in our safeguarding systems

Record keeping for Concerns and Allegations

It is vital that our stakeholders know how to share information about concerns for professionals and volunteers working with children. To ensure safe working practice:

- All staff and volunteers must record the details of the Low-Level Concerns and submit them to the Principal
- Records are confidential, stored securely, and comply with the Data Protection Act 2018 and UK GDPR
- If a pattern of inappropriate behaviour emerges, the Case Manager will decide on disciplinary action, or if the Harm Threshold is reached, refer to the LADO (per KCSiE Part Four, Section One)
- We will review and revise relevant policies or training to address any school-culture factors that enabled the behaviour
- Records of concerns are retained by Hockerill until the individual reaches retirement-age or for the next ten years, whichever period is longer

Managing Allegations (those that DO MEET the Harm Threshold for LADO)

When concerns/allegations meet the harm threshold Hockerill is required to comply with both Part Four of KCSiE and Hertfordshire Safeguarding Children Partnership Procedures Manual [Section 5.1.5 Managing Allegations Against Adults Who Work With Children and Young People](#)

All staff and volunteers are required to immediately report any level of concerns about behaviour and/or conduct of an adult working/volunteering with children towards a child to the Principal. This includes reporting adults who are providing out of school activities/leasing school facilities.

These are the school procedures for managing cases of concerns/allegations that meet the Harm Threshold and may indicate a person is a risk of harm to children if they continue to work in their present position, or in any capacity with children and young people. This is the process and the threshold criteria we apply if it is alleged that anyone working in our school, including supply teachers and volunteers has:

<i>Behaved in a way that has, or may have harmed a child/young person</i>	<i>Possibly committed a criminal offence against/related to a child/young person</i>	<i>Behaved toward a child/young person in a way that indicates he or she would pose a risk of harm</i>	<i>Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people</i>
Harm Threshold	Criminal Threshold	Suitability Threshold	Transferable Risk Threshold
<p><u>Examples:</u></p> <p>Sexual abuse, including grooming, both directly or online</p> <p>Physical abuse</p> <p>Emotional abuse</p> <p>Neglect</p> <p>Exploitation</p> <p>Any form of abuse and neglect that has caused a child significant harm (as defined in the Children Act 1989)</p>	<p><u>Examples:</u></p> <p>Adult has been arrested / reported for downloading indecent images of a child</p> <p>Any sexual act that meets a criminal threshold</p>	<p><u>Examples:</u></p> <p>Adult has been the subject of criminal procedures</p> <p>Caused harm or possible harm to a child or adult at risk</p> <p>Failed to understand or comply with the need for clear personal and professional boundaries in the workplace</p> <p>Conduct concerns or breach of policies that are more serious than Low-Level Concerns e.g. persistent, concerning behaviour</p>	<p><u>Examples:</u></p> <p>Concerns about the adult's 'reckless' behaviour and conduct in their personal and private life that could bring the school into disrepute</p> <p>Criminal misuse of substances, alcohol, drugs</p> <p>Criminal acts of dishonesty or violence against another person</p> <p>Sexual violence and harassment towards another adult or child</p> <p>Internet crime</p>

What happens when an allegation is made against staff or a volunteer?

The Principal/Chair of Governors may undertake initial inquiries to gather key information. They will assess whether the allegation meets the Local Authority Designated Officer (LADO) threshold, if it does, they will make a referral to the LADO giving consideration to our school's Staff Code of Conduct, managing allegations policy and [5.1.5 HSCP procedures](#).

If necessary, they will complete a LADO referral within one working day.

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

Role of the Local Authority Designated Officer

The LADO does not have a public facing role. They do not, for example, liaise directly with children and their families, nor do they directly investigate allegations. Their role is as follows:

- **Case management** - oversee the process and ensure it is working, not to investigate.

- **Consultation** - provide advice and guidance to employers and voluntary organisations.
- **Monitoring** - the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.
- **Liaison** - with the Police, Children's Services, and other partner agencies (managers of the subject of allegation).

Role of the School's Case Manager for Allegations

This will be the Principal or Chair of Governors (if the concerns are about the Principal), their remit is to:

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

LADO Principles and Response

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

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

- relative
- friend
- colleague, supervisor/supervisee or someone who has worked with her/him previously in any of these capacities.

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

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

- protect children
- facilitate enquiries
- avoid victimisation
- safeguard the rights of the person about whom the allegation has been made and others who might be affected
- manage disciplinary/complaints aspects

- A media strategy should be developed with no improper or inadvertent releases of information to the media, in accordance with the Association of Chief Police Officers (ACPO) guidance (now known as [The National Police Chiefs' Council \(NPCC\)](#))

Support - parents/carers of a students involved should be:

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

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

If the Strategy Discussion/initial evaluation have decided that a Police investigation is required, the Police Joint Child Protection Investigation Team (JCPIT) should also set a target date for reviewing the progress of its investigation and consulting the Crown Prosecution Service (CPS) to consider whether to charge the individual/continue to investigate/close the investigation. Whenever possible that review should take place within four weeks of the decision to initiate a criminal investigation.

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

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

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

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

Reporting Concerns and Allegations

Concern/Allegation about	Report to
Member of staff (including volunteers and supply staff)	Principal, Principal or Proprietor (or other with leadership status) If the allegation is against supply staff, leadership, management will pass on report to the adult's employer at their agency/company.
Principal, Principal or Proprietor	Chair of Governors / Vice Chair of Governors / Governing board Your school website or Child Protection policy will have details of your Chair/Vice Chair of Governors.
Chair of Governors / Vice Chair of Governors / Governing board Or Manager who is the sole proprietor	Local Authority Designated Officer LADO (for staff only) LADO.Referral@hertfordshire.gov.uk and/or Report to the police on 101 or if urgent 999
If you are worried that the concerns raised have not been taken seriously or escalated.	Chair of Governors Police 101 Children Services 0300 123 4043 NSPCC Whistleblowing Helpline 0800 028 0285 NSPCC Whistleblowing Email help@nspcc.org.uk
Concerns/Allegations relating to an incident that happened when an individual or organisation has used school premises for running activities for children e.g. community groups, sports and faith associations, or service providers that run extra-curricular activities)	Principal, Principal or Proprietor As with any safeguarding allegation, DSL will follow their schools safeguarding policies and procedures, including informing the LADO. Out-of-school settings: safeguarding guidance for providers - GOV.UK

Concern about the Quality of Care/Practice: If a stakeholder is concerned about a matter that is not of a child protection nature, but general queries about the perceived quality and standard of certain practice in our school and it is considered that something is not good enough or/suitable for its purpose, they must speak to the Principal or our Chair of Governors.

Complaints: if a stakeholder is unsatisfied with any aspects of how we implement and comply with safeguarding policies and procedures, to keep children and young people safe in our school, they must refer to our *Complaints Procedures* which will advise, as part of the stages, to share any initial queries and concerns with the Principal or Chair of Governors. Feedback is important to us, and we would like to ensure to have an opportunity to reassure our stakeholders that any expression of dissatisfaction however made, about actions taken or a lack of action' is a priority to understand so that we can find a solution and support a complainant.

Our Complaints Procedures can be found on our school website, upon request from the College Office or on the Staff portal.

After-school clubs, community activities and tuition: safeguarding guidance for providers

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

It is the role of Hockerill's governing body to ensure any organisation that hires the school premises is compliant with the guidance set out in [After-school clubs, community activities and tuition: safeguarding guidance for providers – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/after-school-clubs-community-activities-and-tuition-safeguarding-guidance-for-providers)

In particular we have embedded within our lease agreement with external organisations the standards and expectations for them to provide evidence and assurance of their safeguarding and child protection procedures.

Whistleblowing

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

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

Examples where Whistleblowing may apply:

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

The concern must be reported immediately. Your concerns should be taken seriously and investigated, and your confidentiality respected.

You should report your concern to the Principal and if concerns are about the Principal, report to the Chair of Governors.

If, for any reason, there are difficulties with following the above procedure, you can whistleblow directly to Children's Social Care on 0300 123 4043 and/or the Police on 999, or to the NSPCC Whistleblowing Helpline 0800 028 0285 or email help@nspcc.org.uk.

15. RECORD KEEPING

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

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

Records will include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached (including rationale), and the outcome.

Concerns and referrals will be kept in a separate child protection file for each child on CPOMS.

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

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

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

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

The school will follow the Recommendation 17.

Receiving in and transferring student records to other education provision

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

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

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

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

Retention, archiving and destruction of records

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

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

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

16. SAFEGUARDING TRAINING AND DEVELOPMENT

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

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

17. QUALITY ASSURANCE, IMPROVEMENT AND PRACTICE

The purpose of auditing is to quality assure safeguarding arrangements and identify where they need to improve professional development and strengthen practice, it can also evidence the settings strengths and practice. Effective safeguarding should be part of a schools management shared approach and should be embedded in the vision, ethos, and strategic direction so that a 'whole school approach' is achieved as this is what ultimately creates a safe and secure environment for students to learn and develop and feel safe.

Auditing is essential for management and leaders to be able to reassure stakeholders about how schools are complying with the contractual requirements for safeguarding arrangements are met.

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

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

Parents and carers please note that schools designated leads for safeguarding access the CPSLO service to talk about concerns they may have about a student.

This policy will be reviewed **annually** by the DSL. At every review, it will be approved by our full Governing Board.

Commitment to Care Charter

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

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

Everyone working in a BSA school will raise any concerns immediately

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

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

Follow all 'safeguarding guidance and laws' means that all policies and procedures, including a school's guidelines for reporting, must comply with any applicable rules and expectations¹, and in relation to any requirement to report to the police where necessary. 'Report concerns to the relevant authority' means to follow those guidelines and, if an unsatisfactory response is received, to escalate the concern. Report 'to the BSA' means to inform the BSA that a referral has been made, but without disclosing any details by which a case or an

individual can be identified.

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


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

BSA will support member schools which responsibly follow the Charter

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

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








3. Staff Safeguarding Poster - September 2025.pdf



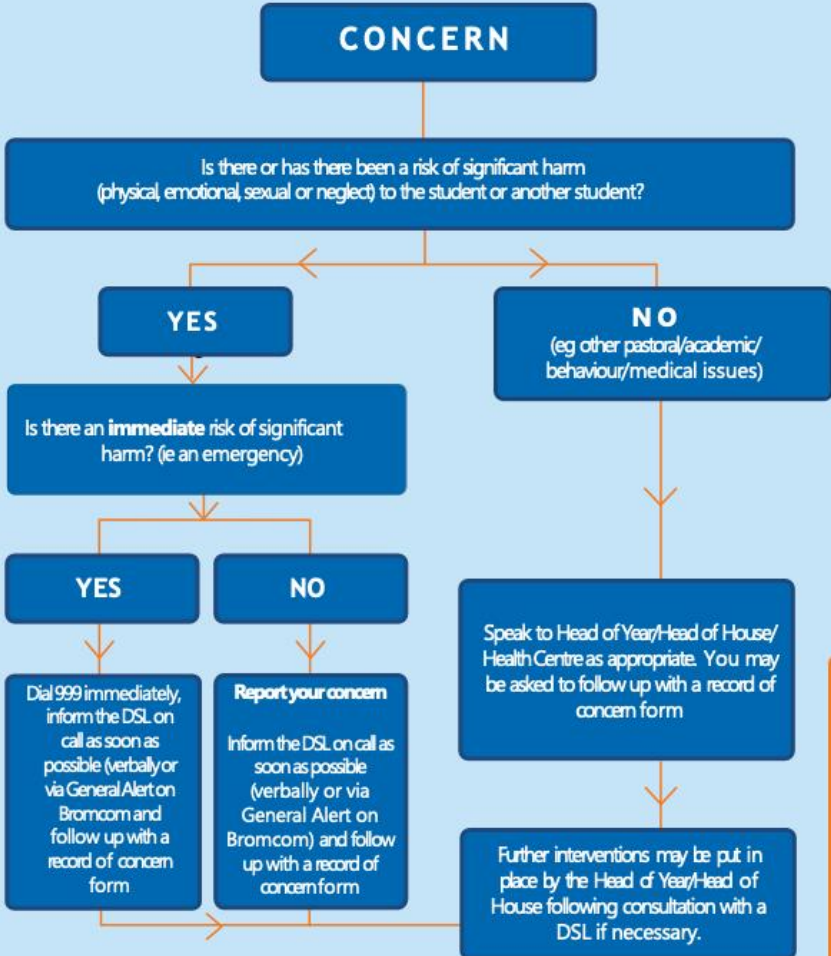
Hockerill

SAFEGUARDING

OUR DESIGNATED SAFEGUARDING LEADS (DSLs) ARE

						
Tanya Panayiotou Assistant Principal Designated Safeguarding Lead	Nicola Ashlee-McGraw Assistant Principal Deputy Designated Safeguarding Lead	Sarah Coleman Assistant Principal Deputy Designated Safeguarding Lead	Jonathan Ellams Assistant Principal Deputy Designated Safeguarding Lead	Caroline Lewis Vice Principal Deputy Designated Safeguarding Lead	Clare Mackinlay Pastoral Manager Deputy Designated Safeguarding Lead	Lucy Tinnirello Head of Student Health and Wellbeing Deputy Designated Safeguarding Lead

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



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graph TD
    A[CONCERN] --> B{Is there or has there been a risk of significant harm  
(physical, emotional, sexual or neglect) to the student or another student?}
    B -- YES --> C{Is there an immediate risk of significant harm?  
(ie an emergency)}
    B -- NO  
(eg other pastoral/academic/  
behaviour/medical issues) --> D[Speak to Head of Year/Head of House/  
Health Centre as appropriate. You may be asked to follow up with a record of concern form]
    C -- YES --> E[Dial 999 immediately, inform the DSL on call as soon as possible  
(verbally or via General Alert on Bromcom and follow up with a record of concern form)]
    C -- NO --> F[Report your concern  
Inform the DSL on call as soon as possible (verbally or via General Alert on Bromcom) and follow up with a record of concern form]
    D --> G[Further interventions may be put in place by the Head of Year/Head of House following consultation with a DSL if necessary.]
    E --> H[Ensure you are familiar with the College's Child Protection Policy and Keeping Children Safe in Education]
    F --> H
    G --> H
        
```

When responding to a disclosure

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

Out of School Hours
SLT on Call
(Term Time)

During Holidays

- Child at risk of immediate harm/emergency - **Call 999**
- Hertfordshire Children's Services
0300 123 4043

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

10447/08/18 dslstaff



Hockerill

SAFEGUARDING









Mrs Panayiotou Assistant Principal Designated Safeguarding Lead	Mrs Ashlee-McCrae Assistant Principal Deputy Designated Safeguarding Lead	Mrs Coleman Assistant Principal Deputy Designated Safeguarding Lead	Mr Ellams Assistant Principal Deputy Designated Safeguarding Lead	Mrs Lewis Vice Principal Deputy Designated Safeguarding Lead	Mrs Mackinlay Pastoral Manager Deputy Designated Safeguarding Lead	Sister Tinnirello Head of Student Health & Wellbeing Deputy Designated Safeguarding Lead
---	---	---	---	--	--	---

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

SEE something

Possible causes for concern

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

Remember harm to a child can be caused in person or online by

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

SAY something

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

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

You can inform one of the school's Designated Safeguarding Leads (see above) of any concern or any other member of staff if you would feel more comfortable.

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

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

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

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



HG447.08.18 student A4 border

APPENDIX 4

Indicators of Abuse

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

<ul style="list-style-type: none"> Physical abuse can happen in any family, but babies and children who have a disability are at a higher risk of suffering physical abuse (Jones et al, 2012). <p><i>This list is non-exhaustive and covers the more typical indicators</i></p>	<ul style="list-style-type: none"> Risk and vulnerability factors Children from any background can be at risk of emotional abuse. But some are more vulnerable than others. <p><i>This list is non-exhaustive and covers the more typical indicators</i></p>
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Indicators of Sexual Abuse	Indicators of Neglect
<p>Not all children will realise they are being sexually abused, particularly if they have been groomed, but there may be physical, behavioural and emotional signs that indicate a child has experienced sexual abuse.</p> <p>Physical indicators include:</p> <ul style="list-style-type: none"> • Bruising • Bleeding • Discharge • Pain or soreness in the genital or anal area • Sexually transmitted infections (Lindon and Webb, 2016) • Girls who are being sexually abused may become pregnant at a young age. <p>Emotional and behavioural indicators include:</p> <ul style="list-style-type: none"> • Being afraid of and/or avoiding a particular person (including a family member or friend) • Having nightmares or bed-wetting • Being withdrawn • Alluding to 'secrets' • Self-harming • Running away from home • Developing eating problems • Displaying sexualised behaviour or having sexual knowledge that is inappropriate for their stage of development • Misusing drugs or alcohol. <p><i>This list is non-exhaustive and covers the more typical indicators</i></p>	<p>Neglect can be difficult to spot. Having one of the signs doesn't necessarily mean a child is being neglected. But if you notice multiple signs that last for a while, they might show there is a serious problem. Children and young people who are neglected might have:</p> <ul style="list-style-type: none"> • Poor appearance and hygiene, being smelly or dirty (unkempt) • Being hungry or not given money for food • Having unwashed clothes, the wrong clothing, such as no warm clothes in winter • Health and development problems, regular illness or infections • Anaemia • Body issues, such as poor muscle tone or prominent joints • Medical or dental issues • Missed medical appointments, such as for vaccinations • Not given the correct medicines • Poor language or social skills. <p><i>This list is non-exhaustive and covers the more typical indicators</i></p>

Indicators of Child Criminal Exploitation CCE	Indicators of Child Sexual Exploitation CSE
<ul style="list-style-type: none"> • Having money or things they can't or won't explain • Being found or stranded in other locations • Committing petty crimes like shoplifting/vandalism • Exclusion/unexplained absences from school 	<ul style="list-style-type: none"> • Self-harm • Being secretive • Sharp changes in mood or character • Having money or things they can't or won't explain (ie: clothes/food/jewellery/drugs) • Having an older boyfriend or girlfriend

<ul style="list-style-type: none"> • Self-harm or significant changes in emotional well-being • Missing episodes • Being secretive about time online • Taking drugs and abusing alcohol • Being withdrawn or showing volatile behaviour • Carrying weapons • Relationships with controlling or significantly older individuals or groups • Unexplained injuries and refusing to seek medical help • Making more calls/texts, having multiple or new phones • Gang-association and/or isolation from peers/social networks. <p><i>This list is non-exhaustive and covers the more typical indicators</i></p>	<ul style="list-style-type: none"> • Associating with older people who don't appear to be parent/carer/family • Involved in criminal activities like selling drugs or shoplifting. • Looking dishevelled or tired • Physical signs of abuse • Seen out late when they should be at school. • Spending a lot of time in one area • Others speaking on their behalf • Alcohol/Drug use • Sexually transmitted infections • Pregnancy. <p><i>This list is non-exhaustive and covers the more typical indicators</i></p>
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APPENDIX 5

Operation Encompass Safeguarding Statement

Hockerill is part of Operation Encompass. Operation Encompass is a national Police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Violence and Abuse, and which is in place in every Police force in England and Wales.

Children were recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act.

Operation Encompass means that the Police will share information with our school about **all** Police-attended Domestic Abuse incidents which involve any of our students PRIOR to the start of the next school day.

Once a Key Adult (DSL) and their deputy/ies (DDSLs) have attended either an Operation Encompass briefing or completed the online Operation Encompass Key Adult training they will cascade the principles of Operation Encompass to all other school staff and Governors. All school's staff and Governors can undertake the online training.

Our parents are fully aware that we are an Operation Encompass school, and we ensure that when a new child joins our school the parents/carers are informed about Operation Encompass.

The Operation Encompass information is stored in-line with all other confidential safeguarding and child protection information.

As a staff we have discussed how we can support our students who are experiencing Domestic Violence and Abuse on a day-to-day basis and particularly following the Operation Encompass notification. We have used the Operation Encompass Handbooks to inform our thinking.

We are aware that we must do nothing that puts the student or the non-abusing adult at risk.

The Safeguarding Governor will report on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.

We have used the Operation Encompass Key Adult Responsibilities checklist to ensure that all appropriate actions have been taken by the school.

When the Principal, DSL or DDSLs leave the school and other staff are appointed, they will ensure that all Operation Encompass log-in details are shared with the new Principal/DSL and that the new member of staff will undertake the Operation Encompass online training.

Recording Safeguarding Concerns About an Adult

Reporting Safeguarding Concerns about an Adult



Hockerill
Anglo-European College
SAFEGUARDING

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

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

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

2. Report your concerns to the Principal immediately *

(mackenzie@hockerill.com) or to the Chair of Governors, if the concerns are about the Principal (chairofgovernors@hockerill.com).

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

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

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

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

H3447.01.25 Reporting Safeguarding Concern

