
HSEL SAFEGUARDING POLICY NOVEMBER 2025

Harrow School Enterprises Ltd.

5 High Street, Harrow on the Hill, Middlesex, HA1 3HP
Tel.: 020 8426 4638 **E-Mail:** enterprises@harrow-school.org.uk

Table of Contents

HSEL Safeguarding Policies Overview	4
Review of Policies	4
Safeguarding & Child Protection Policy	5
Key Contacts	6
Policy Statement and Principles	6
Key Points	6
HSEL's Core Safeguarding Principles	6
Terminology	6
Contextual Safeguarding	7
Adultification and Parentification	7
Safeguarding Statement	7
Safeguarding at HSEL	7
Guiding Principles	8
Policy Aims	8
HSEL's Commitment	8
Confidentiality	8
Safeguarding Legislation and Guidance	9
Child Protection Procedures	10
Recognising Abuse	10
Indicators of Abuse	11
Child Abduction and Community Safety Incidents	12
Child Criminal Exploitation	12
Child Sexual Exploitation	13
Children and the Court System	14
Children who have a Social Worker	14
Children with Family Members in Prison	14
Domestic Abuse	14
Homelessness	14
Mental Health	15
Modern Slavery and the National Referral Mechanism	15
Child-on-child Abuse	15
Allegations against Children	17
SEND	17
Serious Violence	17
Sexual Violence and Sexual Harassment between Children	17
Bullying	19
Concerns about a Child's Welfare	19
If a Child makes a Disclosure	20
Notifying Parents	20
Referral to Police and Harrow Children's Services	20
County Lines	21
Youth Produced Sexual Imagery	21
Looked after Children	22
Private Fostering	22
Confidentiality and Sharing Information	22
Reporting Directly to Child Protection Agencies	23
Children and Families Requiring Early Help and Additional Support	23
Prevent Duty, Honour based violence and Forced Marriage	23
The Prevent Duty	23
Honour Based Abuse	25
Female Genital Mutilation	25
Forced Marriage	25
Roles and Responsibilities	25
Professional Expectations	25
Good Practice Guidelines and Staff Code of Conduct	26
Abuse of Trust	26

HSEL Safeguarding Policies, Code of Conduct and ICT Policy

Early help for Children who may be Particularly Vulnerable	26
Support for those Involved in a Child Protection Issue	26
Complaints Procedure	27
Allegations or Concerns Relating to Professionals	27
Low Level Concerns	28
Staff Training	29
Safer Recruitment	30
Site Security	30
Road Safety	30
Third Party Use	31
Procedure for Third Party Users of Harrow School's Facilities	31
Procedure for Dealing with Concerns or Allegations of Abuse by an Individual of a Third-Party-User using the School's Facilities	31
Photography and Images	31
Online Safety	31
CODE OF CONDUCT	34
Overview	34
Introduction	34
Maintaining Professional Boundaries	35
The Legal Position on Sexual Conduct with Students	35
Communication with Students (including the use of Electronic Technology)	36
Photos and Videos	36
Social Networking and Online Gaming	36
Social Contact	37
The Use of Personal Living Space	37
Grooming	37
Physical Contact	38
Transporting Students	38
Extra-curricular Activities	38
Favouritism	39
Infatuation	39
Changing Clothes and Showering	39
Confidentiality and Data Protection	39
Conflicts of interest	39
Gifts and Rewards	39
Bribery Act 2010	40
More General Guidelines	40
Dress and Appearance	40
Alcohol, Recreational Drugs, Smoking and other Substance Abuse	40
Gambling	41
Conduct Outside of Work	41
Breaches of this Code of Conduct	41
Whistleblowing (public interest disclosure)	41
Review	42
ICT ACCEPTABLE USE POLICY	43
School Property	43
Monitoring	43
Personal Use	44
Content	44
Data Protection and Privacy	45
Distribution and Copyright	46
Social Media Rules	46
Confidentiality	47
Viruses	48
General	48
For the Attention of Staff Issued a Mobile Phone	48
Mobile Device User Agreement	48

HSEL SAFEGUARDING POLICIES OVERVIEW

Harrow School Enterprises Limited (HSEL) is the commercial trading arm of Harrow School. We offer a variety of services to Harrow School and the wider community that covers four key areas: Education, Events, Sports, Locations. As a wholly owned subsidiary of Harrow School, we are guided by Harrow School policies for the high expectations of conduct of those who are contracted and engaged by us.

This document is relevant to all those contracted in the following areas of HSEL operations:

- Harrow School Short Courses
- HSEL Events & Filming

All employees, agents and professionals whose services have been contracted by HSEL and/or who may come into contact with under 18s in one of the above contexts must be fully aware of both the guidelines set out within this document and additionally those relevant to their specific role. The latter can be found within the handbook given to you before the commencement of your contract or within guidance provided by your line management during induction. For ease of reference throughout these policies, all employees, agents, group leaders, people on work experience and self-employed contractors are referred to as professionals.

This document sets out the main policies and expectations of conduct that are in place to ensure a happy and safe environment both for the professionals who work with us and for the children in our care. It must be read in full before your contract or placement with us starts, and your contract is conditional to your declaration that you have read and fully understood each part of the document and your agreement to observe the conditions outlined within.

The policy overview is comprised of the following parts:

- Safeguarding & Child Protection Policy
- Code of Conduct
- ICT Acceptable Use Policy

HSEL policy is derived from Harrow School policy, and we have the same expectations of behaviour from professionals who work on temporary contracts with HSEL as for year-round employees of Harrow School. These particular policy documents have been adapted from Harrow School policy to take into account the different organisational activities and structures at HSEL. There are references within these documents to other Harrow School policies which are directly applicable to professionals who work with us at HSEL. These are downloadable from the Harrow School intranet for those professionals provided with HSEL IT logons, and available in hard copy on request from the HSEL HR Coordinator.

Review of Policies

This document will be reviewed in the event of any new developments in employment or child protection legislation and on taking into consideration feedback from professionals and students at HSEL and Harrow School. As a minimum it will be reviewed on an annual basis. It is not a contractual document and can be amended at any time. You will be notified of any amendments. You must comply with both the provisions of this document and HSEL's other policies and procedures. If you do not understand any aspect of this document or HSEL's requirements with regards to the conduct of employees or contractors, then you should seek advice and guidance from your line manager or the person responsible for your induction.

SAFEGUARDING & CHILD PROTECTION POLICY

Key Contacts

Harrow School Enterprises

Designated Safeguarding Lead (DSL)	Neil Shirvington, Academic Principal shirvingtonn@harrowschool.org.uk 020 8872 8077
Deputy Designated Safeguarding Lead (DDSL)	Josh Billinge, Deputy Commercial Director of HSEL billingej@harrowschool.org.uk 020 8872 8075
Nominated Safeguarding Board Member	Stephen Harrison, Harrow School Deputy Headmaster sah@harrowschool.org.uk 020 8872 8039 07848 007140
Commercial Director of HSEL	Catriona Guthrie, Commercial Director of HSEL guthriecm@harrowschool.org.uk 020 8872 8072
Chairman of Board	Adam Hart Via Andrew Millett, Clerk to Governors andrew.millett@crippspg.co.uk 020 7591 3333 (Office)

Child and Family Services of the London Borough of Harrow

Children's Access Team	The Golden Number 020 8901 2690
Emergency Duty Team	(24 hours) 020 8424 0999
Harrow Strategic Safeguarding Partnership Harrow Safeguarding Children Board	Second Floor, Civic Centre, Station Road, Harrow, Middlesex HA1 2UL lscb@harrow.gov.uk 020 8424 1147
Allegations Manager/LADO	Rosalind South Rosalind.south@harrow.gov.uk 020 8736 6435 07871 987254
Education Lead, MASH Team	Gavin Baker Gavin.Baker@harrow.gov.uk 020 8416 8664

National contacts

Crimestoppers	https://crimestoppers-uk.org/ 0800 555 111
NSPCC	Weston House, 42 Curtain Road, EC2A 3NH 0808 800 5000
NSPCC Whistleblowing Helpline (for staff)	help@nspcc.org.uk 0800 028 0285
Childline	0800 1111
Kidscape Bullying Helpline	020 7730 3300
Samaritans	0845 790 9090
Children's Commissioner	Rachel de Souza advice.team@childrenscommissioner.gsi.gov.uk 020 7783 8330

Policy Statement and Principles

1 Key Points

- HSEL takes a whole-organisation approach to safeguarding and child protection and this will be at the forefront and underpin all relevant aspects of process and policy development.
- This policy applies to all children studying on courses run by or in conjunction with HSEL and/or under the care or supervision of HSEL. Any student on such a course, whether under or over the age of 18, will be regarded as a child for the purpose of this policy.
- All professionals working for or with HSEL have a responsibility for the implementation of this policy.
- Any concerns regarding Safeguarding and/or Child Protection must be reported immediately to the Designated Safeguarding Lead (DSL), Neil Shirvington, or in his absence to the Deputy Designated Safeguarding Lead (DDSL), Josh Billinge.
- All professionals working for or with HSEL should be alert to identifying children who may benefit from early help.
- If, at any point, a child is in immediate danger or is at risk of harm, a referral should be made to Children's Social Care and/or the police immediately.
- If a crime has been committed, it should be reported to the police.
- All professionals working for or with HSEL must have read, understood and then act in accordance with Part One and Annex A of [Keeping Children Safe in Education \(KCSIE\) \(DfE, September 2025\)](#) – often abbreviated as KCSIE.
- All professionals working for or with HSEL must know who the trained DSL and DDSL are.
- All concerns of a safeguarding of child protection nature must be treated in the utmost confidence.
- Where there is a safeguarding concern, HSEL should always ensure that a child's wishes and feelings are taken into account when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously and that they can safely express their views.
- The DSL or DDSL must report all concerns in line with local authority thresholds to Children's Social Care.
- Allegations of abuse in relation to adults must be dealt with in line with the associated policy.

2 HSEL's Core Safeguarding Principles

- HSEL's responsibility to safeguard and promote children's welfare is paramount.
- It is everyone's responsibility to safeguard children. Everyone who comes into contact with children and their families has a role to play in keeping children safe.
- Safer children make more successful learners.
- The HSEL safeguarding policies are derived from the Harrow School safeguarding policies, which are reviewed at least annually, with development and review in line with the requirements of the courses and activities operated by HSEL.

3 Terminology

Safeguarding and promoting the welfare of children refers to the process of 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 the impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

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

Professionals refers to all those working for or on behalf of HSEL, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

4 Contextual safeguarding

In order to help prevent and tackle peer-on-peer abuse, HSEL understands the value of Contextual Safeguarding. Contextual Safeguarding is an approach to understanding, and responding to, children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers sometimes have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, safeguarding practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that children are vulnerable to abuse in a range of social contexts.

Child includes everyone under the age of 18. However, HSEL's duty to promote the welfare and health and safety applies to all the students in its care whether they are under or over the age of 18.

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

5 Adultification and Parentification

HSEL is committed in its approach to safeguarding in combatting and supporting children who are subject to adultification and parentification.

Adultification is a type of bias which skews the perception of certain children, leading to others – including professionals – viewing them as more 'grown up' or, 'adult'. This can then lead to lapses in appropriate safeguarding. This approach can be based on race, ethnicity, or socio-economic situations and is a form of discriminatory bias. Such children can be viewed as responsible in some way for their abuse or as able to cope with it, rather than seen as children who are victims of abuse. Adultification happens outside of the home, e.g. in schools.

Parentification refers to a child taking on the role of a parent within their family e.g. looking after younger siblings; caring for a parent. This is a safeguarding concern as the needs of the child are being neglected, whilst they are given responsibility for the needs of others.

6 Safeguarding Statement

HSEL fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. Professionals working for and with HSEL should be alert to the signs of abuse and neglect and follow procedures to ensure that our students receive effective support, protection and justice.

The procedures contained in this policy apply to all those working for and with HSEL and are consistent with those of the Harrow Safeguarding Children Partnership (HSCP) (<http://www.harrowscb.co.uk/scp/guidance-for-practitioners/>).

7 Safeguarding at HSEL

This includes:

- ensuring students' health and safety;
- referring concerns or allegations about a child to the Local Authority promptly;
- preventing bullying;
- preventing all forms of abuse;
- preventing harassment and discrimination;
- using physical intervention where necessary;
- meeting the needs of students with medical conditions;
- an awareness of the link between mental health and safeguarding;

HSEL Safeguarding Policies, Code of Conduct and ICT Policy

- provision of first aid and medical support;
- preventing alcohol, drug and substance misuse;
- ensuring educational visits are conducted appropriately;
- providing intimate care where necessary;
- monitoring online -safety;
- considering issues specific to the local area (for example, road safety or gang activity); and
- providing School security.

8 Guiding Principles

- The welfare of the child is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All professionals have equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- Students and professionals involved in child protection issues will receive appropriate support.

9 Policy Aims

- To provide all professionals with the necessary information to enable them to meet their child protection responsibilities;
- To ensure consistent good practice;
- To demonstrate HSEL's commitment with regard to child protection to students, parents and other partners; and
- To contribute to HSEL's portfolio of safeguarding policies.

10 HSEL's Commitment

HSEL adopts an open and accepting attitude towards children as part of its responsibility for pastoral care. We hope that children, parents, and agents will feel free to talk about any concerns and see HSEL as a safe place when there are difficulties. Children's worries and fears will be taken seriously. Children are encouraged to seek help from HSEL professionals.

HSEL will therefore:

- establish and maintain an ethos where children feel secure and are encouraged to talk and are listened to;
- ensure that children know that there are adults at HSEL whom they can approach if they are worried or are in difficulty;
- ensure every effort is made to establish effective working relationships with parents, agents, and colleagues from other agencies;
- operate safe recruitment procedures and make sure that all appropriate checks are carried out on new staff, contractors and volunteers who will work with children through HSEL; and
- ensure that all professionals are aware of how and when to act on concerns that they have and work in a safe and appropriate manner at all times.

11 Confidentiality

HSEL recognises that all matters relating to child protection are sensitive and confidential. The DSL will share that information on a 'need to know, what and when' basis. Concerns about individuals should never be discussed elsewhere, inside or outside the School, unless in confidential meetings for that purpose.

Professionals are expected to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and Children's Services. Professionals should never promise a student that they will not tell anyone about an allegation, as this may not ultimately be in the best interests of the child.

Safeguarding Legislation and Guidance

The courses run by HSEL do not fall under the UK government definition of a school as issued in statutory guidance. However, as we look to Harrow School to inform our safeguarding and safer recruitment practices, the policies in this guide have been drawn up taking into account the following guidance, including government guidance issued in response to Section 94 of the [Education and Skills Act 2008](#), which requires the Secretary of State to prescribe standards for independent educational institutions to safeguard the welfare, health and safety of children. The relevant standards are set out in the [Education \(Independent School Standards\) Regulations 2014 \(the ISS Regulations 2014\)](#).

[Keeping Children Safe in Education \(KCSIE\) \(DfE, September 2025\)](#) is statutory guidance issued under Section 175 of the [Education Act 2002](#) and the [Education \(Independent School Standards\) Regulations 2014](#). The guidance is applicable to all schools in England and Wales. Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of children. This means that they should comply with it unless exceptional circumstances arise. The document contains information on what schools and colleges should do and sets out the legal duties with which schools and colleges must comply in order to keep children safe. It should be read alongside [Working Together to Safeguard Children \(DfE, December 2023\)](#) and department advice.

Under the Equality Act 2010 schools must not unlawfully discriminate against pupils because of their protected characteristics. The School carefully considers how it supports pupils with particular protected characteristics. Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with certain protected characteristics in order to meet their specific need. There is also a duty to make reasonable adjustments for disabled children and young people.

Being subjected to harassment, violence and or abuse, may breach a child's rights, as set out in the Human Rights Act 1998.

All professionals must read at least Part One of [Keeping Children Safe in Education \(KCSIE\) \(DfE, September 2025\)](#). Professionals in positions of leaders and those staff who work directly with children are additionally required to read Annex B of [Keeping Children Safe in Education \(KCSIE\) \(DfE, September 2025\)](#). All professionals are required to have signed a document to confirm that they have read and understood at least Part One of this guidance. HSEL staff will be required to confirm that this reading has completed by ticking a box in iProtectu and also to complete a short test within iProtectu.

[The Teachers' Standards 2011](#) state that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

The statutory guidance [Working Together to Safeguard Children \(DfE, December 2023\)](#) covers the legislative requirements and expectations on individual services to safeguard and promote the welfare of children. The guidance applies to all local authorities, clinical commissioning groups and police, as well as other organisations and agencies. It applies, in its entirety, to all schools. It applies to all children up to the age of 18 years whether living with their families, in state care, or living independently.

[What to do if you are worried a child is being abused - Advice for practitioners \(DfE, March 2015\)](#) provides more information on understanding and identifying abuse and neglect. Examples of potential signs of abuse and neglect are highlighted throughout the advice. The NSPCC website also provides useful additional information on types of abuse and what to look for.

[The Prevent Duty](#): from 1 July 2015 all schools became subject to a duty under Section 26 of the [Counter-Terrorism and Security Act 2015](#), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". HSEL recognises that "safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm".

[Guidance for safer working practice for those working with children and young people in education settings \(Safer Recruitment Consortium, \(February 2022\)\)](#), whilst not safeguarding guidance, provides advice for all staff

HSEL Safeguarding Policies, Code of Conduct and ICT Policy

working with children of illegal, unsafe, unprofessional or unwise behaviour and advises staff to monitor their own standards and practice.

In the light of Everyone's Invited and the subsequent [Review of Sexual Abuse in Schools and Colleges \(OFSTED June 2021\)](#) KCSIE 2025 details what sexual violence and harassment is, schools' and colleges' legal responsibilities, a whole school approach to safeguarding and child protection, and how to respond to reports of sexual violence and sexual harassment.

[Criminal Exploitation of Children and Vulnerable Adults](#) guidance outlines what county lines (and associated criminal exploitation) is, signs to look for in potential victims, and what to do about it. The document is a supplement to existing safeguarding policies, to help identify and protect those exploited through this criminal activity.

[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) is advice for practitioners and senior managers. It helps them decide when and how to share personal information legally and professionally. It might also be helpful for practitioners working with adults who are responsible for children who may be in need.

Child Protection Procedures

All professionals have a responsibility to identify the symptoms and triggers of abuse and neglect, to share information and work together to provide children and young people with the help they need.

Professionals are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

When concerned about the welfare of a child, professionals should always act in the best interests of the child.

HSEL will act on identified concerns and provide early help to prevent concerns from escalating. Any child may benefit from early help, but school staff should be particularly alert to the potential need for early help for children who may be deemed vulnerable because of the reasons outlined in paragraph 18 of [Keeping Children Safe in Education \(KCSIE\) \(DfE, September 2025\)](#).

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. HSEL will ensure it provides as much information as possible as part of the referral process to allow any social care assessment to consider all the available evidence and enable a contextual approach to address such harm.

12 Recognising abuse

To ensure that our students are protected from harm, it is important to understand what types of behaviour constitute abuse and neglect.

All professionals should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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. Children may be abused by an adult or adults or by another child or children.

There are four principal categories of abuse: physical abuse, emotional abuse, sexual abuse, and neglect. The definitions are taken from [Keeping Children Safe in Education \(KCSIE\) \(DfE, September 2025\)](#)

12.1 Physical abuse

A form of abuse that 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.

12.2 Emotional abuse

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

12.3 Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and **all** staff should be aware of it and of HSEL's policy and procedures for dealing with it.

12.4 Neglect

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 because 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); or ensure access to appropriate medical care or treatment. This form of abuse may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

13 Indicators of abuse

It is the responsibility of all members of staff to report any and all niggling worries or concerns over safeguarding and welfare. It is not their responsibility to investigate or decide whether a child has been abused. A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for sports or swimming;
- look unkempt and uncared for;

HSEL Safeguarding Policies, Code of Conduct and ICT Policy

- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- show other signs of deterioration in mental health;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol; or
- display sexual knowledge or behaviour beyond that normally expected for their age; or
- be showing signs of being drawn into anti-social or criminal behaviour including gang involvement and association with organised criminal groups.

Please note, the above indicators are not exhaustive. If you have any concerns, please follow the procedures set out within this policy.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is therefore essential that professionals report their concerns. You do not need 'absolute proof' that a child is at risk but should act on any hunches or worries in the knowledge that you will be supported in your safeguarding role. Reports made in good faith will always be dealt with in accordance with HSEL's Whistleblowing Policy, regardless of outcome.

All professionals should have awareness of safeguarding issues in the broad. In particular, they should know that behaviours linked to drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

14 Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. It can be committed by parents, or other family members; by people known but not related to the victim; and by strangers. Other community safety incidents in the vicinity of a school can raise concerns among children and parents, for example people loitering nearby or unknown adults engaging children in conversation. Incidents of this type should be reported either direct to the police on 999 or to Harrow School Security on 07766 688597.

15 Child Criminal Exploitation

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. The victim may have been criminally exploited even if the activity appears consensual. HSEL is aware of the reality that the experience of girls who are criminally exploited can be very different from that of boys.

CCE does not always involve physical contact; it can also occur through the use of technology. Children can become trapped by this type of exploitation because perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

CCE can include children being forced to work in cannabis factories, coerced into transporting drugs or money through county lines, forced to shoplift, pickpocket, commit vehicle crime, or to threaten / commit serious violence to others.

Some of the following can be indicators of CCE:

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

16 Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE may involve physical contact such as assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. It can affect any child, including 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they believe they are in a genuine romantic relationship.

A significant number of children who are victims of exploitation go missing from home, care, and education at some point. Some of the following signs may be indicators:

- children who appear with unexplained gifts, money or new possessions;
- children who have associations with gangs and/or are isolated from their peer networks;
- children who associate with other young people involved in exploitation;
- children who have older girlfriends or boyfriends or controlling individuals;
- children who suffer from sexually transmitted infections or become pregnant, display evidence of physical or sexual abuse or who behave in an excessively sexualised manner for their age;
- children who suffer from changes in emotional wellbeing or display signs of self-harm;
- children who misuse drugs or alcohol;
- children who frequent areas known for sex work;
- children who display increasing secretiveness or concerning use of the internet;
- children who receive excessive texts/phone calls;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All members of staff are made aware of the indicators of sexual exploitation in their safeguarding training and any concerns should be reported immediately to the DSL.

The PSHE Education programme covers CSE in Relationship Education, Relationships and Sex Education and Health Education. The statutory guidance can be found here: [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(DfE 2025\)](#). The DfE has also produced a one-stop page for teachers on GOV.UK, which can be accessed here: [Teaching about relationships sex and health \(DfE 2020\)](#).

17 Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The government has produced a useful guide [Going to court and being a witness \(12 to 17-year-olds\)](#).

18 Children who have a Social Worker

We recognise that when a child has a social worker it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour, and poor mental health. We take these needs into account when making plans to support students who have a social worker.

19 Children with Family Members in Prison

Children with a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders ([NICCO](#)) provides information designed to support professionals working with offenders and their children to help mitigate negative responses for those children.

20 Domestic Abuse

In April 2021, the [Domestic Abuse Act 2021](#) received Royal Assent and introduced a statutory definition for the first time. The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- Physical or sexual abuse.
- Violent or threatening behaviour.
- Controlling or coercive behaviour.
- Economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services).
- Psychological, emotional or other abuse.

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

All professionals should be aware that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic background and domestic abuse can take place inside or outside of the home.

21 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL is aware of contact details and referral routes into the Local Housing Authority so they can raise / progress concerns at the earliest opportunity.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances. The Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17-year-olds who may be homeless and/ or require accommodation, which can be found [here](#).

22 Mental Health

All professionals should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

When children have suffered abuse and/or neglect or other potentially traumatic adverse childhood experiences, professionals should be aware that this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that professionals are aware of how these children's experiences, can impact on their mental health, behaviour, attendance and progress at school.

Only appropriately trained professionals in the field should attempt to diagnose mental health conditions. Other professionals are, however, well placed to observe children day-to-day and to identify those whose behaviour suggests that they may be experiencing or at risk of developing a mental health problem. Any professional who has a concern about the mental health of a child that might also be a safeguarding concern should speak to the DSL or a DDSL straight away. More guidance can be found in the [Mental health and behaviour in schools \(DfE 2018\)](#). Detailed information can also be found in the School's Mental Health and Wellbeing Policy.

23 Modern Slavery And The National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the indicators that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Statutory Guidance \(Home Office 2021\)](#).

24 Child-on-Child Abuse

HSEL has a zero tolerance and whole-department approach to child-on child abuse. Consequently, it seeks to educate all professionals, parents and children about the issue and to follow local criteria for action and local protocols for assessment.

Further information on the subject may be found in the School's separate guidance document Child-on-Child Abuse.

All professionals should:

- be aware that children can abuse other children at any age;
- be aware that this can happen both inside and outside HSEL and online, sometimes involving pupils at other schools;
- be aware that it is more likely that girls will be victims and boys perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously;
- recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports;
- understand that even if there are no reports in their school it does not mean it is not happening, it may just be that it is not being reported
- understand the importance of challenging inappropriate behaviours between peers as such behaviours can actually be abusive in nature;
- avoid downplaying certain behaviours, for example dismissing sexual harassment as "just banter" or "just having a laugh", as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst-case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it; and

HSEL Safeguarding Policies, Code of Conduct and ICT Policy

- be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Child-on-child abuse may take different forms, such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate partner relationships;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence) – see separate section ‘Sexual violence and sexual harassment between children’;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern or abuse – see separate section ‘Sexual violence and sexual harassment between children’;
- 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 nudes and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery/YPSI) – further information and guidance can be found in [Sharing nudes and semi-nudes \(March 4\)](#); (HSEL will follow guidance and procedures in this document when dealing with such incidents);
- 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; and
- initiation/hazing-type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All professionals should be clear regarding HSEL’s policy and procedures for dealing with incidents of child-on-child abuse and the important role that they must play both in preventing it and responding to it.

- If a child is in immediate danger or at risk of significant harm, a referral to children's social care (if the pupil is aged under 18) and/or the police should be made immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.
- If a professional thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s) or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.
- If a child speaks to a member of staff about child-on-child abuse that they have witnessed or that they are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. As above, they should then discuss their concern with the DSL without delay so that a course of action can be agreed.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Professionals will refer such abuse to an external agency where there is a risk of significant harm. The DSL will refer serious allegations of child-on-child abuse to Children’s Services.

Children are able freely to report instances of child-on-child abuse through any of the full range of pastoral support mechanisms in place at HSEL. All such reports will be taken seriously, investigated and recorded HSEL will work to put in place appropriate support for all those involved – victims, perpetrators and any other children affected, chaired by the DSL.

25 Allegations Against Children

A child against whom an allegation of a child protection nature has been made may be suspended from HSEL during the investigation. HSEL's policy on behaviour, discipline and sanctions will apply.

Where there is a risk of significant harm, child-on-child abuse will be referred to an external agency. Allegations of child-on-child abuse will be referred to Children's Services.

HSEL will follow advice on the investigation of such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved, including the child or children accused of abuse.

If it is necessary for a child to be interviewed by the police or other authorities in relation to allegations of abuse, HSEL will ensure that, subject to advice from external agencies, parents are informed as soon as possible, and that the child is supported during the interview by an appropriate adult.

26 SEND

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges; and
- 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.

At HSEL, we provide additional pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place. Resources and guidance can be found on the NSPCC website: [Safeguarding children with special educational needs and disabilities \(SEND\)](#) and [Safeguarding/deaf and disabled children and young people](#).

27 Serious Violence

- Professionals should be aware of the indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include: increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Professionals should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or excluded from School, having experienced child maltreatment and having been involved in offending, such as theft or robbery.
- Professionals should share their concerns immediately with the Director of Safeguarding if they suspect such involvement.

28 Sexual Violence and Sexual Harassment between Children

HSEL adopts a zero-tolerance approach to sexual violence and sexual harassment. It adheres to the guidance in [Keeping Children Safe in Education \(KCSIE\) \(DfE, September 2025\)](#) and recognises that:

HSEL Safeguarding Policies, Code of Conduct and ICT Policy

- we must also protect any adult students (i.e., aged 18 and above) and engage with adult social care, support services and the police as required;
- professionals need to choose terminology carefully (for example, the use of 'victim' and 'perpetrator'), on a case-by-case basis;
- a child abusing another child may have been abused themselves and may also need support;
- sexual violence and sexual harassment can be driven by wider societal factors such as everyday sexist stereotypes and everyday sexist language.
- sexual violence and sexual harassment can happen both in and out of HSEL as well as online, and often occurs in a mixture of environments;
- it is important to explain to children they will be taken seriously and that the law is in place to protect rather than criminalise them;
- HSEL should understand intra-familial harms and put in place any necessary support for siblings following incidents;
- the scale of the problem nationally is considerable and has probably been underestimated;
- sexual assault can result in a range of health needs, both mental and physical, including unwanted pregnancy;
- children might not find it easy to talk about their abuse verbally so might not tell staff about abuse; it may be that professionals overhear a conversation regarding the abuse or a child's behaviour changes etc.;
- the definition of 'consent', including reference to an individual having the 'freedom and capacity to choose', needs to be included in the School's curriculum;
- all professionals, and particularly the DSL, need to adopt a contextual safeguarding approach to incidents, which involves considering the context within which incidents or behaviours occur;
- assessments of children need to consider wider environmental factors present in a child's life that are a threat to their safety or welfare.
- information sharing and effective multi-agency working, especially where children involved in allegations of sexual violence or sexual harassment attended two or more different schools or colleges;
- in cases where police will not take further action, HSEL will continue to engage with specialist support for the victim (and perhaps also for the perpetrator), as required;
- issues and actions are regularly reviewed in order to ascertain patterns of behaviour and to look for further ways to improve procedures and practices; and
- how an organisation responds to an incident will impact future victims of sexual violence or sexual harassment.

When there has been a report of sexual violence, the DSL or DDSL should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk assessment should consider the factors in [Keeping Children Safe in Education \(KCSIE\) \(DfE, September 2025\)](#) and be kept under review.

There are four likely routes to consider when managing a report of sexual violence or sexual harassment:

- **Managing internally:** in some cases of sexual harassment (such as one-off incidents) a school may manage the incident internally.
- **Early help:** this is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation.
- **Referrals to Children's Services:** in cases where there has been harm, or there is an immediate risk, a referral should be made to Children's Services.
- **Reporting to Police:** in cases where rape, assault by penetration or sexual assault is reported, HSEL will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other children in the school. The DSL will work closely with the Police to ensure that HSEL's actions do not jeopardise the police investigation. If a child is convicted or cautioned, HSEL will update the risk assessment and consider suitable action through its disciplinary policy.

HSEL Safeguarding Policies, Code of Conduct and ICT Policy

Note: It is important for schools to ensure that the victim and the perpetrator(s) remain protected, especially from bullying and harassment. Where no further action is taken, or a child found guilty, HSEL will continue to support the victim and the perpetrator.

Whatever the response, it will be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

Records will be kept of concerns, discussions and decisions made, and the reasons for those decisions. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child who made the allegation is in need of help or may have been abused themselves by someone else and this was a cry for help. If a report is shown to be deliberately invented or malicious, HSEL will consider whether any disciplinary action is appropriate against the individual who made it, in line with its Behaviour Policy.

The management of children and young people with sexually harmful behaviour is complex and HSEL will follow guidance set out in [Keeping Children Safe in Education \(KCSIE\) \(DfE, September 2025\)](#). HSEL will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Professionals who become concerned about a child's sexual behaviour should speak to the DSL as soon as possible.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour ([Keeping Children Safe in Education \(DfE, September 2025\)](#), para 545).

Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to [concerns of child sexual abuse and abusive behaviours](#).

29 Bullying

Bullying is one form of child-on-child abuse. While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and even has featured in the suicide of some young people. Professionals should be aware of the harm caused by bullying. In some situations, a child's behaviour may warrant a response under child protection rather than or as well as counter-bullying procedures.

All incidences of bullying, including cyber-bullying and prejudice-based bullying and discriminatory bullying, should be reported, and will be managed through our disciplinary procedures. If the bullying-type behaviour is particularly serious, or the counter-bullying procedures are deemed ineffective, the DSL will consider implementing child protection procedures.

30 Concerns about a Child's Welfare

All professionals should be able to distinguish between a safeguarding concern about a child and a child who is in immediate danger or at significant risk of harm. There will be occasions when a professional may suspect that a student may be at risk but have no 'real' evidence. The child's behaviour may have changed, his or her actions may reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, the professional must try to give the student an opportunity to talk. The signs they have noticed may be due to a variety of factors. It is fine for a professional to ask the student if he/she is okay, or if he/she can help in any way.

Professionals should report their concerns via an incident report. If the child starts to reveal that he or she is being (or has been) harmed, professionals should follow the advice below. Following an initial conversation with the student, if the professional remains concerned, he/she should discuss their concerns with the DSL or DDSL.

31 If a Child makes a Disclosure

It takes courage for a student to disclose that he or she has been or is being abused. He or she may feel ashamed, particularly if the abuse is sexual. The abuser may have made threats about what will happen if he or she tells. The student may have lost trust in adults; or he or she may believe, or been told, that the abuse is his or her own fault.

During such conversations with students, professionals should:

- allow the student to speak freely;
- remain calm and avoid overreaction;
- offer reassurance and general words comfort (rather than physical touch);
- not be afraid of pauses or silences;
- not ask investigative or leading questions;
- explain at an appropriate time that, in order to help, the information must be passed on to relevant people in positions of responsibility;
- not reprimand the student for failing to disclose earlier;
- establish next steps (the student may agree to see the DSL or the Welfare Officer, otherwise let them know that someone will come to see them before the end of the day);
- report verbally to the DSL, even if the student has agreed to do this by themselves;
- write up the conversation as soon as possible on an incident form and hand it to the DSL; and
- seek support, if distressed.

32 Notifying Parents

The DSL will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively. HSEL will make contact with parents in the event of a concern, suspicion or disclosure. However, if we believe that notifying parents could increase the risk to the student or exacerbate the problem, advice will first be sought from Harrow Children's Services MASH or the police.

33 Referral to Police and Harrow Children's Services

If a child is in immediate danger, the DSL will contact the police and Children's Services immediately.

HSEL may contact statutory agencies to seek advice about concerns before making a referral.

HSEL will normally inform a child's parents when contact is being made with a statutory agency (unless doing so would put a child at further risk) but is clear that parental consent is not required for such contact to be made.

The DSL will make a referral to Children's Services MASH if it is believed that a child is 'suffering or is at risk of suffering significant harm'. The child (subject to his or her age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the student or issues of confidentiality pertain. First response will be by telephone to Harrow Children's Services and then followed with written confirmation on the appropriate Inter-Agency Referral Form within 24 hours. There may be need for a subsequent referral to the Children's Services local to the student's home, if his or her family lives in the UK and outside the Harrow area.

Where subsequently the child's situation does not improve, HSEL will press for re-consideration by Children's Services. Concerns should always lead to help for the child at some point.

Professionals should challenge any inaction and follow this up with the DSL and Children's Services, as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Staff should understand that they can refer a child directly to Children's Services, especially where they are concerned that a child is suffering or likely to suffer significant harm. Indeed, there is a duty on all staff to persist with referrals to Children's Services, if they feel that appropriate action is not being taken.

HSEL Safeguarding Policies, Code of Conduct and ICT Policy

HSEL will contribute to any assessment as required, providing information about the student and his family. A suitably senior member of staff will attend any strategy discussion or child protection conference and work together to safeguard any student from harm in the future.

HSEL understands that there are no absolute criteria on which to rely when judging what constitutes 'significant harm'. Harm is defined as ill treatment or impairment of health and development which may include impairment suffered from seeing or hearing the ill treatment of another. HSEL understands that LSCB procedures require it to consider the severity of the ill-treatment, which may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements.

34 County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or another form of "deal line". Children and vulnerable adults are exploited to move, store and sell drugs and money, both locally and across the UK (no specified distance is required). Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines is missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Similar indicators as those described above for CCE and CSE are likely to be applicable to children who have become involved with county lines. Some additional indicators are when a child:

- goes missing and is found in areas away from home;
- has been involved with serious violence, either as a victim or as a perpetrator;
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs ;
- are exposed to techniques such as "plugging", where drugs are concealed internally to avoid detection;
- is found in accommodation with which they have no obvious connection;
- owe a 'debt bond' to their exploiters; or
- is found to have large amounts of money moving in and out of a bank account

35 Youth Produced Sexual Imagery (Sexting)

This refers to the consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery). Any incident involving youth-produced sexual imagery should immediately be reported to the DSL who will follow the guidance set out in [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(UKCIS, March 2024\)](#).

Professionals should be aware of the risk of 'sextortion'. This is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them. Throughout 2022 and 2023, there has been a considerable increase in reporting of these incidents.

36 Looked after Children

A looked after child is a child who is looked after by a local authority in the UK, subject to a care order or who is voluntarily accommodated by a local authority, commonly as a result of abuse or neglect. Where a professional has responsibility for a looked after child, they will be provided with the information they need in relation to the child's legal status, care arrangements and the level of authority delegated to the cases by the local authority looking after him. The DSL takes the lead on all looked after children and will hold details of and liaise with the child's social worker and the Virtual School headteacher.

37 Private Fostering

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

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

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

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

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

Professionals should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the local authority. HSEL itself has a duty to inform the local authority of the private fostering arrangements.

38 Confidentiality and Sharing Information

Professionals should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

All professionals will understand that child protection issues warrant a high level of confidentiality, not only to respect any children or staff involved but also to ensure that information released into the public domain does not compromise evidence.

Professionals should only discuss concerns with the DSL, Deputy DSL or the Commercial Director of HSEL, (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following a number of highly publicised cases where senior leaders in schools failed to act upon concerns raised by staff, [Keeping Children Safe in Education \(KCSIE\) \(DfE, September 2025\)](#) emphasises that any professional can make a referral to Harrow Children's Services, if they are concerned about a child. If anyone other than the DSL makes the referral, he/she should inform the DSL, as soon as possible.

Child protection information will be stored and handled in line with the [Data Protection Act 2018](#) principles. Information is processed for limited purposes; adequate, relevant, and not excessive; accurate; kept no longer than necessary; processed in accordance with the data subject's rights; and secure.

HSEL Safeguarding Policies, Code of Conduct and ICT Policy

Child Protection Records and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. The School's ICT Acceptable Use Policy will be adhered to and every effort will be made to prevent unauthorised access. Records should include:

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

Child protection records will consist of sensitive personal data and will be subject to special rules under the Data Protection Act. This means that children and parents do not have an automatic right to see them. If any professional receives a request from a child or parent to see child protection records, they will refer the request to the Commercial Director of HSEL.

The Data Protection Act does not prevent professionals from sharing information with relevant agencies, where that information may help to protect a child.

39 Reporting Directly to Child Protection Agencies

Professionals should follow the reporting procedures outlined in this policy. However, anybody can make a direct referral by sharing information directly with Harrow Children's Services on 020 8901 2690 or the NSPCC on 0808 800 5000 if:

- the situation is an emergency and the DSL, the Deputy DSL and the Commercial Director of HSEL are all unavailable;
- they are convinced that a direct report is the only way to ensure a child's safety; or
- for any other reason they make a judgement that direct referral is in the best interests of the child.

40 Children and Families Requiring Early Help and Additional Support

All professionals should be able to identify children in need of early help and to distinguish these from children in immediate danger or at risk of significant harm. As distinct from cases where a child has suffered or is likely to suffer significant harm, where children and families need support from agencies beyond our School, we will respond according to the Harrow Strategic Safeguarding Partnership (HSSP) and to the Harrow Safeguarding Children Board (HSCB) to ensure there is an inter-agency assessment, including use of the 'Common Assessment Framework' (CAF) or the 'Team around the Child' (TAC) approaches as appropriate. The CAF will help us to identify what the child needs to prevent the need for statutory assessment under the Children Act 1989 and 2004. We will liaise closely with the HSCB, including acting as lead professional to co-ordinate support, with the agreement of the child and their parent/carer(s), and in accordance with local procedures. This will include working with the three safeguarding partners; the HSCB, the Clinical Commissioning Group and the Police. It is to be hoped that in each case early help or additional services will improve the welfare of the child. However, each case will be kept under review and consideration given to a formal referral to Children's Services if the child's situation does not appear to be improving.

Prevent Duty, Honour-Based Violence and Forced Marriage

41 The Prevent Duty

HSEL is subject to a duty under section 26 of the [Counter-Terrorism and Security Act 2015](#), in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty. As the [Home Office's Prevent duty guidance \(2023\)](#) notes that schools are "are often in a unique position, through interacting with learners on a regular basis, to be able to identify concerning behaviour changes that may indicate they are susceptible to radicalisation." The School sees the Prevent duty and protecting children from radicalisation as part of its wider safeguarding obligations.

HSEL Safeguarding Policies, Code of Conduct and ICT Policy

Extremism refers to the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

Terrorism refers to 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.

Radicalisation refers to the process by which a person comes to support terrorism or forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour that could indicate that they may be in need of help or protection. HSEL will work more generally to ensure the fundamental British values of democracy, rule of law and tolerance are celebrated and not undermined.

Professionals who have concerns about a child will make these concerns known to the DSL at the earliest opportunity. The DSL will then make a judgement as to whether it is appropriate to make a referral, through Harrow's Multi Agency Safeguarding Hub (MASH) to the Channel programme.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Signs of Vulnerability

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are number of signs that together increase the risk. Signs of vulnerability include:

- underachievement;
- being in possession of extremist literature;
- poverty;
- social exclusion;
- traumatic events;
- global or national events;
- religious conversion;
- change in behaviour;
- extremist influences;
- conflict with family over lifestyle;
- victim or witness to race or hate crimes;
- confused identity; and
- rejection by peers, family, social groups or faith

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes;
- glorifying violence, especially to other faiths or cultures;
- making remarks or comments about being at extremist events or rallies outside school;
- evidence of possessing illegal or extremist literature;
- advocating messages similar to illegal organisations or other extremist groups;
- out-of-character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent);
- secretive behaviour;
- online searches or sharing extremist messages or social profiles;
- intolerance of difference, including faith, culture, gender, race or sexuality;
- graffiti, artwork or writing that displays extremist themes;
- attempts to impose extremist views or practices on others;
- verbalising anti-Western or anti-British views; and
- advocating violence towards others.

Non-emergency advice for professionals is available via DfE's helpline 020 7340 7264 and by email at: counter.extremism@education.gov.uk

42 Honour-Based Abuse

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

Where staff are concerned that a child might be at risk of HBA, they must contact the DSL as a matter of urgency.

43 Female Genital Mutilation

Honour-based violence includes the physical act of female genital mutilation (FGM). FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. This is a severe form of child abuse and a method of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures.

Professionals recognise the possibility that a child may disclose information relating to a sibling or close friend who has suffered abuse in the form of honour-based abuse, including FGM. Professionals are alert to the mandatory reporting requirement for suspected cases of FGM, which became a statutory duty from October 2015. Any professional who believes that an act of FGM has been carried out is legally obliged personally to report this to the police. Any professional concerned that a child may have knowledge of someone who has suffered or might be vulnerable to FGM should contact the DSL or Deputy DSL immediately.

44 Forced Marriage

Another component to honour based abuse is forced marriage; forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of free and full consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the [Multi-Agency Guidelines: Handling cases of forced marriage 2023](#). School staff can also contact the Forced Marriage Unit, if they need advice or information: contact 020 7008 0151 or email fmv@fco.gov.uk.

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with existing forced marriage law, this applies to non-binding, unofficial "marriages" as well as legal marriages. <https://www.legislation.gov.uk/ukxi/2023/88/contents/made>

Roles and Responsibilities

45 Professional Expectations

Everyone who encounters our children and their families has a role to play in safeguarding children. We place a high priority on identifying concerns early and provide help for children to prevent concerns from escalating. We do this because we are aware that we play a vital role in the wider safeguarding system for children. Together with our colleagues in the police, health and other children's services, we promote the welfare of children and protect them from harm. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. HSEL recognises it has clear powers to share, hold and use information for these purposes.

Good practice Guidelines and Staff Code of Conduct

HSEL publishes professional guidelines in relevant handbooks alongside the Staff Code of Conduct (attached to this document) with specific regard to Safeguarding to ensure that professionals meet and maintain their responsibilities towards children.

Professionals are expected to follow the guidance given in the document *Working Together to Safeguard Children* (DfE, December 2023).

46 Abuse of Trust

All professionals are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, professionals should understand that, under the [Sexual Offences Act 2003](#), it is an offence for a person over the age of 18 to have any kind of sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a student under 18 would be a criminal offence, even if that student were over the age of consent.

47 Early Help for Children who may be Particularly Vulnerable

Some children may be at an increased risk of abuse. It is important to understand that this increase in risk is more likely due to societal attitudes and assumptions, and failures to acknowledge children's diverse circumstances, rather than the individual's personality, impairment, or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that all children receive equal protection, special consideration will be given to a child who:

- is disabled or has specific additional needs and has specific additional needs;
- has special educational needs (whether or not he has a statutory education, health or care plan);
- has a mental health need;
- a young carer at home;
- showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or country and / or serious violence, including knife crime;
- frequently misses school or goes missing from care or from home;
- is misusing drugs or alcohol;
- at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to his family from care;
- has a parent or carer in custody or is affected by parental offending;
- showing early signs of abuse and/or neglect;
- at risk of being radicalised or exploited;
- is a privately fostered child;
- is vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality; or who
- does not have English as a first language.

This list provides examples of particularly vulnerable groups but is not exhaustive.

48 Support for those Involved in a Child Protection Issue

Child abuse is devastating for the child. It can also result in distress and anxiety for professionals who become involved.

HSEL Safeguarding Policies

HSEL will support children, their families, and professionals by:

- taking all suspicions and disclosures seriously;
- nominating a link person (normally the DSL) who will keep all parties informed and be the central point of contact;
- where a professional is the subject of an allegation made by a child, nominating a separate (independent) link person to avoid any conflict of interest and appropriate support provided for him or her;
- responding sympathetically to any request from children or professionals for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of help lines, counselling or other avenues of external support;
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures; and
- cooperating fully with relevant statutory agencies.

49 Complaints Procedure

HSEL's complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a child that does not initially reach the threshold for child protection action. Examples of poor practice include unfairly singling out a child or attempting to humiliate them, bullying or belittling a child or discriminating against them in some way. Heads of Department, House Masters, members of the Senior Management Team and Governors manage such complaints.

Complaints from members of staff are dealt with under the School's Complaints and Disciplinary and Grievance procedures.

50 Allegations or Concerns Relating to Professionals

When an allegation is made against a professional or a concern expressed about their conduct relating to children, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

Professionals who are concerned about the conduct of a colleague towards a child are placed in a difficult situation. He or she may worry that they have misunderstood the situation and will wonder whether a report could jeopardise a colleague's career. However, all professionals must remember that **the welfare of the child is paramount**. No professional will suffer a detriment for raising a genuine concern. HSEL's Whistleblowing policy enables professionals to raise concerns or allegations in confidence and for a sensitive enquiry to take place. Professionals may also use the NSPCC whistle-blowing helpline number: 0800 028 0285.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we accept that some professionals can pose a serious risk to children and will therefore act on every allegation or concern. Professionals who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, professionals may be suspended where this is deemed the best way to ensure that children are protected.

- Allegations or concerns against professionals – including the DSL or DDSL – should be reported directly to the Commercial Director of HSEL. If the Commercial Director of HSEL is absent, allegations against or concerns about all professionals should be reported to the Chairman of the HSEL Board.
- Allegations against or concerns about the Commercial Director of HSEL or a member of the HSEL Board should be reported to the Chairman of the HSEL Board without the Commercial Director of HSEL being informed.
- You may also report any allegations or concerns directly to the police or Harrow Children's Services, if you believe direct reporting is necessary to secure action.

HSEL Safeguarding Policies

The full procedures and statutory guidance for dealing with allegations against staff can be found in [Keeping Children Safe in Education \(KCSIE\) \(DfE, September 2025\)](#).

51 Low-Level Concerns

Concerns may arise in several different 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. HSEL adopts a whole organisation approach to safeguarding. As such, it seeks to ensure that there is an open and transparent culture in which all concerns about any adults working in any capacity (employed or voluntary) on behalf of HSEL are dealt with promptly and appropriately.

Creating a culture in which **all** concerns about adults (including those which do not meet the 'harms threshold' or 'harms test') are shared responsibly with the right person, recorded and dealt with appropriately, is critical. This should enable HSEL to identify concerning, problematic or inappropriate behaviour early, thus minimising the risk of abuse and ensuring that adults working in or on behalf of HSEL are clear about professional boundaries and the ethos and Values of HSEL. It should also protect those working in or on behalf of HSEL from potential false allegations or misunderstandings.

What is a low-level concern?

The term 'low-level concern' does not mean that it is insignificant. Rather, it means that the behaviour towards a child does not meet the 'harms threshold' or 'harms test' as set out in Appendix B of this policy. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of HSEL may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of low-level concerns could include, but are not limited to:

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

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. HSEL aims to:

- ensure that its professionals are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, both in themselves and in others;
- empower professionals to share any low-level safeguarding concerns with the DSL or the DDSL;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- provide a responsive, sensitive, and proportionate handling of such concerns when they are raised; and
- help identify any weakness in the organisation's safeguarding systems.

Sharing low-level concerns

Low-level concerns about a member of staff should be reported to the DSL or the DDSL. Where a low-level concern is raised about the DSL, it should be shared with the Commercial Director of HSEL.

HSEL Safeguarding Policies

HSEL seeks to create an environment in which professionals are encouraged and feel confident to self-refer where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, or in which their own behaviour might have fallen below expected professional standards.

Where a concern relates to a person employed by an agency or contractor, that concern should still be shared with the DSL or the DDSL and recorded in accordance with HSEL's low level concerns policy. Reports about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

The sharing of low-level concerns will be treated confidentially.

Recording low-level concerns

All low-level concerns should be recorded in writing by the DSL or the DDSL. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous, then that should be respected as far as reasonably possible. HSEL must keep these records confidential, held securely in compliance with the [Data Protection Act 2018](#) and the [UK General Data Protection Regulation \(UK GDPR\)](#). Records should be reviewed periodically so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, HSEL will decide on a course of action, either through its disciplinary procedures or where a pattern or behaviour moves from a concern to meeting the 'harms threshold', in which case it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within HSEL that enabled the behaviour to occur and, where appropriate, policies could be revised or extra training delivered to minimise the risk of it happening again. HSEL will retain information on low level concerns at least until the individual leaves its employment.

References

Only substantiated safeguarding allegations will be included in staff references. Low-level concerns will not be included unless they relate to issues which would normally be included in a reference, such as misconduct or poor performance. Low-level concerns relating exclusively to safeguarding (and not to misconduct or poor performance) will therefore not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

Responding to low-level concerns

Concerns about safeguarding should be reported to the DSL (or the DDSL). If the concern has been raised by a third party, the DSL (or the DDSL) should collect as much information as possible by speaking:

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

The information collected will help the DSL to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for any decisions and action taken.

Further information on the management of low-level concerns may be found in the document [Developing and implementing a low-level concerns policy: a guide for organisations which work with children \(Farrer & Co, 2022\)](#).

52 Staff Training

All professionals at HSEL will receive appropriate training in safeguarding and child protection, which is regularly updated. All new professionals working with HSEL receive an induction, which will include an introduction to our Child Protection and Safeguarding policy and the Code of Conduct along with contact details for the DSL

HSEL Safeguarding Policies

and DDSL They will be instructed on reporting and recording arrangements. The programme will also cover our Whistleblowing policy, the ICT Acceptable Use policy as well as guidelines on communications between professionals and use of social media.

All members of staff will be required to have read and understood [Keeping Children Safe in Education \(KCSIE\)\(DfE, September 2025\)](#) or , Annex A (where the professional does not work directly with children), and where relevant, Annex B.

The DSL and DDSL will receive Advanced Level Safeguarding and Child Protection training updated at least every two years, including training in inter-agency procedures, in addition to annual updates. Other key professionals (including the Lead Nurse and other nursing staff) will also be expected to receive advanced-level safeguarding and child protection training.

The DSL will undertake Prevent awareness training. Members of the academic staff will also receive Prevent and Channel awareness training. A member of staff will supervise visitors at all times. All staff supplied by other bodies will be made aware of the School's Child Protection and Safeguarding policy and will be given the contact details of the DSL and DDSL.

53 Safer Recruitment

HSEL endeavours to ensure that it does its utmost to employ 'safe' staff by following the guidance in [Keeping Children Safe in Education \(KCSIE\)\(DfE, September 2025\)](#) with information provided by Harrow HSCB (see <http://www.harrowscb.co.uk/safer-recruitment-of-staff-and-volunteers-working-with-children-and-young-people/>) and the various procedures pertaining to contractors, PFI partners etc.

HSEL's Safer Recruitment policy and the Recruitment, Selection and Disclosure policy is adhered to in all recruitment activities. In addition, as part of the shortlisting process HSEL will carry out an online search as part of the due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which HSEL might want to explore with the applicant at interview. HSEL should inform shortlisted candidates that online searches may be done as part of the due diligence checks.

Site Security

Harrow School is an open site occupying over 300 acres across Harrow on the Hill. All members of the School's community including HSEL professionals are required to take responsibility for site security and remain vigilant about trespassers. The School's Security Department provides oversight of the site and can be contacted 24/7 in the event of an emergency on 07766 688597.

Visitors to the School, including contractors, are required to sign in at one of the authorised locations, the main one being the Reception at 5 High Street (The Bursary). Subject to their position and purpose, visitors are escorted or given a lanyard, which confirms they have permission to be on site.

All visitors are expected to observe the procedures laid down in the School's Child Protection and Safeguarding policy and Health & Safety policy to ensure that students in the School are kept safe.

54 Road Safety

HSEL regularly reminds professionals/visitors and children about the importance of road safety, especially during the summer when children are in residence at the summer schools.

The Deputy Headmaster of Harrow School designates appropriate crossing points on High Street as well as permitted access routes into Harrow Town. All professionals should reinforce the message to children that they should show respect to drivers and other pedestrians. Students on HSEL courses are informed about these and reminded about road safety in their induction.

Third Party Use

55 Procedure for Third Party Users of Harrow School's Facilities

The School's facilities, particularly sporting facilities, may be hired by Third Party Users (TPUs), including children's clubs, and under these arrangements HSEL has no control over, and assumes no liability for the conduct of individuals from TPUs. However, HSEL will ensure, as far as it is able, that TPUs have appropriate child protection and safer recruitment procedures in place. TPUs are also made aware of the areas of the School's grounds, which are out of bounds.

TPUs will be required to provide HSEL with a copy of the organisation's Child Protection policy prior to approval being given for their use of the School's facilities and all TPUs providing activities, which involve children, will be required to sign a declaration to confirm that:

- the TPU has a child protection and safeguarding policy in place;
- safer recruitment procedures are followed for the TPU's staff and volunteers; and
- all professionals and volunteers are appropriately trained in child protection and safeguarding procedures.

The DSL or DDSL will be informed of any child protection allegation or incident that takes place on the School's premises during use by that organisation.

56 Procedure for Dealing with Concerns or Allegations of Abuse by an Individual of a Third-Party User using The School's Facilities

If an allegation of abuse is made about an adult in a TPU, the organisation's Safeguarding Officer must notify the DSL (or DDSL) on the same day as the incident occurred or the disclosure was made, or as soon as possible thereafter. As with any safeguarding allegation, HSEL will follow their safeguarding policies and procedures, including informing the LADO if necessary. When services or activities at the School are provided under the direct supervision or management of HSEL, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of HSEL, it will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and HSEL will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with HSEL on these matters where appropriate.

Photography and Images

Most people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have safeguards in place.

To protect our students, we will:

- seek parental consent for photography of our students through our Terms and Conditions;
- demonstrate respect, care and caution when including photographs of students in any marketing material;
- encourage children to tell a professional, if they are worried about any photographs that are taken of them; and
- prevent the possibility of linking the name of a child to an image. No image will carry a caption naming a child who can be clearly identified.

Online Safety

The use of technology is an integral part of everyday life but, as such, has also become a significant component of many safeguarding issues. In child sexual exploitation; radicalisation; sexual predation, for instance, technology

HSEL Safeguarding Policies

often provides the platform that facilitates harm. Therefore, an effective approach to online safety empowers HSEL to protect and educate students in responsible use of technology and to establish mechanisms which can identify, intervene and escalate an incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example pornography, , racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories;
- **contact:** being subjected to harmful online interaction with other users, for example peer to peer 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 nude and semi-nude photographs and/or pornography), sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If staff think that pupils, students or staff are at risk, they should report it to the Anti-Phishing Working Group (<https://apwg.org/>).

HSEL has an Online Safety policy which aligns and draws upon various other policies such as the ICT Acceptable Use Policy, Student ICT Acceptable Use Policy and HSEL Guest Wi-Fi Acceptable Use Policy. The Online Safety Policy outlines HSEL's commitment to promoting online safety and responsible digital behaviour. HSEL adopts a proportionate and educative approach whereby sanctions are applied where appropriate, but children will not be penalised for raising genuine safeguarding concerns, even where doing so involves a breach of policy. Cyber-bullying and the transmission of sexualised images by children, via texts and emails, will be treated as seriously as any other bullying-type behaviour and will be managed through our procedures.

HSEL has a clear policy on the use of mobile and smart technology, reflecting, among other things, the fact many professionals and/or children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). HSEL understands that this access means some professionals and /or children, while at the School, could sexually harass, bully and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

The following measures are in place:

- Harrow School **IT Safeguarding Committee** meets to discuss all aspects of IT monitoring and filtering as well as to review the Online Safety Policy in line with any legislative changes. It meets once a term or as needed. HSEL is updated and implements any and all recommendations as appropriate.
- The **Student ICT Acceptable Use Policy** protects all parties by clearly stating what is acceptable and what is not. Students at summer school are expected to sign up this before access can be given to Harrow School's ICT facilities.
- By clicking agree Professionals and students confirm that they accept the terms of the **HSEL Guest Wi-Fi Acceptable Use Policy** and that you agree to comply with them.
- **Induction and education:** all students attending the summer school are inducted in appropriate use of the School's ICT facilities and other aspects of this policy upon arrival. This is reinforced by a presentation in Houses about online safety.
- **Monitoring and filtering:** HSEL through Harrow School exercises its right to monitor and filter the use of computer systems, school devices and school networks, including the monitoring and filtering of internet use, interception of emails and the deletion of inappropriate materials at all times. In circumstances where HSEL believes unauthorised use of the computer system is, or may be, taking place, or the system is, or may be, being used for unlawful purposes, HSEL reserves the right to inform appropriate authorities and provide documentary evidence. The computer network is owned by Harrow School and may be used by students to advance and extend their knowledge and understanding.

HSEL Safeguarding Policies

Professionals can also receive advice regarding the use of social networking and electronic communication with children, through the guidance given in the document [Guidance for safer working practice for those working with children and young people in educational settings \(Safer Recruitment Consortium, May 2019\)](#).

This means that professionals should:

- Understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring and be aware of how to escalate concerns and manage such systems effectively;
- ensure that personal social networking sites are set at 'private' and that unrelated children are never listed as approved contacts;
- never use or access an unrelated child's social networking sites;
- avoid giving their personal contact details to unrelated children, including their mobile telephone number, except in emergencies or for specific safety purposes on expeditions;
- only use equipment, for example mobile phones, provided by the HSEL to communicate with children;
- only make contact with children for professional reasons and in accordance with the HSEL's policy;
- recognise that text messaging, iMessaging and other similar systems should only be used as part of an agreed protocol and when other forms of communication are not possible; and
- not use internet or web-based communication channels to send personal messages to unrelated children.

HSEL
November 2025
Annual Review

HSEL Safeguarding Policies

CODE OF CONDUCT

Safe Working Practices for the Protection of Students and Professionals at HSEL

1 Overview

The purpose of this code is to provide a clear framework within which employees of HSEL and those whose services have been contracted by HSEL are expected to conduct themselves with particular regard to safeguarding. It is a supporting document to the Safeguarding and Child Protection Policy above.

HSEL recognises that it has a duty of care to maintain a working environment for its employees and other associated professionals, and a learning environment for its students, in which honesty, integrity and respect are reflected in personal behaviour and standards of conduct, where the welfare of students is paramount and where the working environment is safe. In turn, professionals must recognise that they are each accountable for their own actions. They have a duty not only to keep young people safe but also to protect them from physical and emotional harm.

2 Introduction

This Code of Conduct applies to all professionals employed by the HSEL, as well as those who undertake work for and on behalf of HSEL. A relationship between an adult and a child or young person is not a relationship between equals. Because of their knowledge, position and/or the authority invested in their role, all adults working in educational settings are in positions of trust in relation to the young people either in their care or in the environment in which they work.

As some of the courses run by HSEL are fully residential, contact time with children can be greatly increased. Whilst this represents one of the most significant benefits of residential education, professionals must take into account the vulnerability of children living away from home and of working within this setting. HSEL bases its expectations upon legality, proportionality and common sense.

It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship. There is potential for exploitation and harm of vulnerable young people. Adults therefore have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Professionals must ensure their relationships with children are not of a kind that compromise (or could be perceived to compromise) their professional responsibilities.

To meet and maintain our responsibilities towards children and those who work for and with HSEL, we need to agree standards of good practice, which form a code of conduct for professionals, regardless of their position, employment status or specific department.

Good practice must include:

- Recognising that the welfare of the children is paramount;
- Treating all children and colleagues with dignity and respect and ensuring that behaviour, either intentional or unintentional, does not constitute discrimination, bullying or harassment;
- Setting the highest standards of professionalism and personal conduct, recognising that we are each responsible for our own actions;
- Working in an open and transparent way;
- Giving clear and fair management instructions and, as employees, following reasonable rules and instructions given by managers;
- Discussing or taking advice promptly from their line manager or other senior members of staff over any incident, which may give rise to concern;
- Involving children in decisions that affect them;
- Encouraging positive, respectful and safe behaviour among children at all times.
- Being prepared to listen.

HSEL Safeguarding Policies

- Being alert to changes in children's behaviour, which may indicate that they are having problems;
- Reading and understanding the School's Child Protection & Safeguarding Policy and other policies relating to students' welfare.
- Asking a child's permission before initiating physical contact, such as assisting with dressing, physical support during sports, music or administering first aid.
- Maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language.
- Adhering to Harrow School's Reasonable Force Policy, where physical intervention in a given circumstance is required.
- Referring all concerns about a child's safety and welfare via incident forms or, as necessary, to the Designated Safeguarding Lead (DSL).

Failure to follow the code of conduct may result in disciplinary action being taken, as set out in our disciplinary policies and procedures.

3 Maintaining Professional Boundaries

All adults should clearly understand the need to maintain appropriate boundaries in their contact with students to minimise the possibility of behaviour which might be misinterpreted by others. Any incidents or exchanges that others could misinterpret should be immediately reported and recorded.

Staff contact with other staff should be adult, professional, and respectful at all times. HSEL follows the School's Equality Statement which marks the commitment to eliminating unlawful discrimination on the grounds of any of the protected characteristics, and to its commitment to ensure that everyone in the Harrow School community, regardless of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity, is treated fairly and equally. HSEL's Equal Opportunities and Dignity at Work policy provides further detail for staff to staff contact.

Inevitably, professionals will need on occasions to have one-to-one contact with students/children. In these circumstances ensure that the setting is appropriate and complies with requirements of the HSEL's Guidance on One-to-One Contact.

4 The Legal Position on Sexual Contact with Students

All professionals are aware that inappropriate behaviour towards students/children is unacceptable and that their conduct towards every student/child must be beyond reproach. Breaches of this Code may well result in serious disciplinary action and fall into the category of gross misconduct resulting in disciplinary action up to and including dismissal.

In addition, professionals should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a professional and a student/child under 18 may be a criminal offence, even if that student/child is over the age of consent. Professionals need to properly understand the law.

This offence has nothing to do with the legal age of consent; it deals specifically with the abuse of a position of trust, whatever the age of the student. This means that the young person's consent is not the issue, which determines whether an offence has been committed. Even if the young person were to have consented to the relationship, this would not detract from the seriousness of the offence.

The legal definition of a child is a person under the age of 18. Professionals must be aware of this. If convicted of such an offence, a person is likely to serve a custodial sentence and have their name added to the sex offender register, which would bar them from working with children again.

The sexual activity referred to is not exclusively physical contact including penetrative and non-penetrative acts. It may also involve other activities, such as causing children or young people to engage in or watch sexual activity

HSEL Safeguarding Policies

through the sending of explicit sexual images, emails and texts. Professionals must never engage in any form of sexual activity with a student, regardless of whether that student is a child or aged 18 or above.

5 Communication with Students (including the use of Electronic Technology)

Communication between students and professionals, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, webcams, websites, social networking sites, online gaming and blogs.

Professionals should not share any personal information with a student. They should not request, or respond to, any personal information from the student, other than that which might be appropriate as part of their professional role. Professionals should ensure that all communications are transparent and open to scrutiny.

Professionals should also be careful in their communications with students so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. They should not give their personal contact details to students including e-mail, home or mobile telephone numbers, unless the need to do so is agreed with senior management and parents. E-mail or text communications between a professional and a student outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet-based websites, such as social networking, instant messaging or gaming.

Communication with former students, who are over 18 years old, is left to the professionals discretion. However, be conscious of the fact that former students may be in contact with or related to current students. Caution is therefore urged, and professional standards should always be maintained.

6 Photos and Videos

Many HSEL activities involve recording images. Such activities may be undertaken as part of a course of studies, as out of school activities, for publicity, celebratory event or to celebrate achievement.

HSEL requests permission from students and parents to use images for the purpose of publicity. Images should not be displayed on other websites, in publications or in a public place without the permission of a member HSEL staff.

Professionals should not have images of students stored on personal cameras, devices or home computers. Any images stored on school equipment must be justified.

Under no circumstances should adults in the school access inappropriate images on the internet. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating such material is illegal.

Professionals must read and sign the HSEL's ICT Acceptable Use Policy.

7 Social Networking Sites and Online Gaming

HSEL professionals may use social networking for personal use. However, HSEL requires that profile and photos of professionals remain 'locked down' as private so that students or parents do not have access to personal data or images. Any and all activity on social media sites should not bring HSEL into disrepute. In the event that activity is deemed as bringing the reputation of HSEL into disrepute, action may be taken under the Disciplinary policy.

Professionals should be aware that they leave themselves open to a charge of professional misconduct if images of staff in a compromising situation are made available on a public profile by anyone. If a student does gain access to the profile of a professional by fraudulent means (impersonation or hacking), senior management should be informed immediately.

HSEL Safeguarding Policies

Outside of the context of academic study or formal extra-curricular school activities, professionals should not seek out students and/or share their own gamer tags/ID with students or use HSEL equipment to play online games. Similarly, as soon as a professional becomes aware that they are in an online game with a student who is known to them from a HSEL operated activity, he/she should cease to play against that student and should not enter any games containing that player as part of the group.

Professionals must deny current or past students under the age of 18 any access to their personal online profiles.

Where relationships exist between professionals and those who are parents of students on HSEL courses, or personal friends who are parents of students on HSEL courses, social networking is acceptable, but caution must be exercised so that professional standards are maintained and professionals do not compromise themselves or HSEL. This same caution should apply to online communications with past students of HSEL.

Professionals are advised to report any inadvertent online contact with current or recent students to the DSL to ensure full transparency is maintained.

8 Social Contact

Professionals should not establish (or seek to establish) social contact with students for securing a friendship or to pursue or strengthen a relationship. If a student or parent seeks to establish social contact, or if this occurs coincidentally, the professional should exercise his/her professional judgement in making a response and ensure that a member of the HSEL managerial staff is aware.

There will be occasions when there are social contacts between students and professionals, where for example the parent and professional are part of the same social circle. These contacts, however, will be easily recognised and openly acknowledged.

9 The Use of Personal Living Space

No student should be invited into the home of an adult who works with them, unless the reason for this has been firmly established and agreed with a member of the HSEL managerial team.

10 Grooming

All professionals should be aware that persons intent on sexual abuse of children groom both children and adults around them. This is to ensure that they can carry out their abusive behaviour without raising anybody's suspicion or making other people scared to blow the whistle on them.

It is important that professionals do not behave in a way that could be misinterpreted, leaving themselves open to suspicion. Managing relationships within (and especially outside) of HSEL in line with this policy should minimise the risks of any such misunderstandings occurring.

11 Physical Contact

There are occasions when it is entirely appropriate and proper for professionals to have physical contact with students. This may be to comfort a distressed student, to demonstrate a sporting or music technique or, in appropriate circumstances, to provide restraint.

It is crucial that this contact is carried out in ways appropriate to the professional's role. When professionals make physical contact with students, this should be in response to their needs at the time, be of limited duration, be appropriate and take place in an open environment. Professionals should use their professional judgement at all times about the appropriateness of any physical contact.

Where a professional has a particular concern about the need to provide this type of care he/she should seek further advice from a senior colleague. He/she should also record any situations with their line manager or with the DSL, which may give rise to concern.

HSEL Safeguarding Policies

Physical contact which occurs regularly with an individual student/child is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to students with physical disabilities). Any such contact should be the subject of an agreed and open policy but also subject to review.

On occasion, it may be necessary for a professional to restrain a student. Professionals should refer to HSEL's Reasonable Force Policy as summarised here:

No professional may strike, manhandle or intimidate a pupil. Corporal punishment is prohibited. The law forbids a teacher or any member of staff from using any degree of physical contact that is deliberately intended to punish a pupil or that is primarily intended to cause pain or injury or humiliation. A student should only be subject to reasonable force to prevent:

- *The committing of an offence;*
- *Injury to himself or others;*
- *The damage of property; and/or*
- *The causing of significant disorder.*

In such rare events, the use of reasonable force must be by judicious and non-injurious means and for the minimum time necessary. 'Reasonable' means using no more force than is needed. The decision on whether or not physically to intervene is down to the professional judgement of the professional concerned and should always depend on the individual circumstances.

All HSEL professionals have a legal power to use reasonable force. Reasonable adjustments must be made for disabled children and children with special educational needs or disabilities (SEND). All instances must be recorded in writing and reported to the DSL, who must maintain a log of such incidents and review them regularly.

Physical contact should never be secretive or for the gratification of the professional or represent a misuse of authority. If a professional believes that an action could be misinterpreted, the incident and circumstances should be declared immediately to a senior staff member or to the DSL.

12 Transporting Students

In certain situations, for example on airport transfers for summer courses, professionals may agree to transport students. Wherever possible and practicable, professionals should use transport provided by the School with one designated driver and at least one escort.

Where it is necessary to transport a student in a privately owned vehicle on a one-to-one basis, the vehicle must be roadworthy, taxed, insured.

The driver must be a member of staff and have been registered on the School's list of approved drivers. The member of staff may only transport students alone if the journey is within 20 miles of Harrow and does not include an overnight stay.

Further information can be found in your Employment Handbook.

13 Extra-Curricular Activities

Professionals should take particular care when supervising students in the less formal atmosphere of a residential setting or extracurricular activity or as part of an excursion which takes place away from the Hill.

14 Favouritism

Professionals should exercise care when selecting students/children for teams, roles in activities, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when students/children are excluded from an activity. Methods of selection and exclusion should always be subject to clear and agreed criteria and not be used as a tool for humiliation which could be perceived as abusive.

15 Infatuation

Occasionally, a student may develop an infatuation with an adult professional. Professionals should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. However, they should remain aware that such infatuations carry a high risk of words or actions being misinterpreted.

Therefore, professionals should make every effort to ensure that their own behaviour is above reproach. They should discuss this situation at the earliest opportunity with a senior colleague so that appropriate action can be taken.

16 Changing Clothes and Showering

Professionals must respect the privacy of student toilets, washing, changing and shower areas, and should therefore not ordinarily enter such areas. However, there needs to be an appropriate level of supervision in order to safeguard students, satisfy health and safety considerations and ensure that bullying or teasing does not occur.

If in exceptional circumstances the need arises, professionals must clearly announce their intention to enter such areas before ever doing so. Where possible, more than one professional should be present.

17 Confidentiality and Data Protection

Professionals should familiarise themselves with the School's Data Protection Policy which defines how the School and HSEL will meet its obligations with regards to personal data, as required by the Data Protection Act 2018 (the '2018 Act') and the EU General Data Protection Regulation ('GDPR'). They should also familiarise themselves with the School's and HSSC various Privacy Notices as relevant to their role. From time to time during the course of their work with HSEL, professionals may be privy to information of a confidential or sensitive nature. Under no circumstances should professionals disclose this information to a third party or provide them with documentary evidence of a confidential nature. Should this rule be broken, it may be considered gross misconduct and result in termination of employment in line with our Disciplinary Policy and Procedure.

18 Conflicts of Interest

Professionals should identify conflicts of interest to avoid involvement in decisions, where others might read bias into their actions. A conflict of interest represents a conflict between the private interests and official responsibilities of a person in a position of trust.

Professionals must also consider potential conflicts when they find themselves responsible for dealing with friends or family members in the normal course of their employment. There is a risk that others may view such involvement as an opportunity for favouritism or corruption. Examples would include a decision regarding the award of a contract for goods and services or the employment of friends and family members. HSEL therefore actively discourages direct line management of close friends or family members.

19 Gifts and Rewards

HSEL and Harrow School has a clear Gifts and Hospitality Policy regarding arrangements for the declarations of gifts received and given, which must be followed very carefully. Professionals need to take care that they do not accept any gift, personal payment or other incentive (such as secondary employment) that might be construed as a bribe by others or lead the giver to expect any form of preferential treatment. There are occasions when students or parents wish to pass small tokens of appreciation to professionals, for example as a thank-you, and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

Any professional concerned about whether they or their colleagues may be at risk of giving or receiving a bribe (financial or otherwise) should contact the School Bursar. Any professional receiving gifts or entertainment valued at more than £250 must disclose this to the School Bursar. Any professional receiving gifts or hospitality valued at more than £50 must be recorded in the School's Gifts and Hospitality Register.

HSEL Safeguarding Policies

Professionals may not give personal gifts to students. It is acceptable for professionals to offer prizes of small value in certain tasks or competitions.

20 Bribery Act 2010

A bribe is a financial payment or other form of reward or advantage, offered, promised, or given to induce a person to perform a relevant function of activity improperly, or to reward them for doing so.

Under the Bribery Act 2010, individuals can be prosecuted for accepting bribes or offering bribes. In addition, the School and HSEL can be prosecuted for failing to prevent bribery committed to obtain or retain business or a business advantage for the School and/or HSEL by an employee.

Professionals are expected to comply with applicable bribery and corruption laws and to report to their line manager or another senior manager any conduct that could amount to a bribe being offered, promised, given, requested or accepted.

More General Guidelines

Dress and Appearance

Professionals should ensure their appearance and clothing:

- Promotes a positive and professional image and is appropriate to their role.
- Is not likely to be viewed by others as offensive, revealing or sexually provocative.
- Does not distract, cause embarrassment or give rise to misunderstanding.
- Is absent of any political or otherwise contentious slogans.

Professionals should:

- Keep the wearing of rings, pierced earrings and any other jewellery (including body piercings) to a minimum (to be removed when advised or prohibited by health and safety regulations).
- Cover up tattoos, where possible.
- Ensure that any uniform, when worn, is clean and presentable.
- Adhere, where appropriate, to the Personal Protective Equipment Policy.

Alcohol, Recreational Drugs, Smoking and other Substance Misuse

HSEL wishes to promote the health and wellbeing of professionals and minimise problems at work arising from the effects of alcohol, drugs (whether prescribed or recreational), solvents, etc. These elements are covered in the Harrow School's Alcohol, Drugs and Smoking policies. The taking of recreational drugs during working hours is unacceptable and will not be tolerated. All professionals are expected to attend work without being under the influence of alcohol or recreational drugs and without their performance being adversely impacted by the consumption of alcohol or recreational drugs.

Our smoking policy dictates that HSEL professionals are not allowed to smoke on any school premises at any time, except in the designated smoking areas as follows and when not in view of students:

- At the back of Speech Room near the projector room
- The Works Department yard
- The area outside the kitchens (towards the bottom of Moretons' garden)
- Outside the grounds staff tea rooms

Professionals are not allowed to smoke in the presence of students, whether on or off school premises.

HSEL Safeguarding Policies

Professionals taking prescribed medication are required to advise their manager if these are likely to impact on their duties, their ability to drive and/or use equipment required by their role. Professionals whose performance or behaviour falls below the acceptable standard, or who cause danger or disruption because of alcohol, drug or other substance misuse, may be the subject of disciplinary action.

Where there are reasonable grounds to suspect that a professional is under the influence of alcohol or drugs on reporting for work or during the course of work, the School reserves the right under its Alcohol and Drug Policy to exercise alcohol and drug testing of the employee. The School will take steps to ensure that it does not use the policy in a discriminatory manner against any employee and that it targets no individual unfairly. The School will put in place all measures to protect confidentiality of test results. The School will respect the employee's dignity at all times. Employees refusing to submit to an alcohol and drug test where a reasonable suspicion has been raised may still be subject to disciplinary action and may be suspended pending a full investigation.

20 Gambling

Professionals should not conduct gambling activities on the School's premises. Professionals should employ discretion in relation to small raffles for charitable purposes, National Lottery syndicates, occasional sweepstakes etc.

21 Conduct Outside of Work

HSEL does not concern itself with the private lives of its professionals unless they affect its effective operation or its reputation. Any employees, who demonstrate unlawful or anti-social behaviour or who conduct themselves in a way that may jeopardise HSEL or Harrow School's reputation or position, may be dealt with under the disciplinary procedure. In particular, a professional accused of a criminal offence is expected to inform HSEL at the earliest opportunity. Failure to do so may be a disciplinary offence.

During their employment with HSEL, professionals must disclose any criminal offences with which they are charged or cautions they receive.

Professionals will not act in a way that would bring HSEL, Harrow School or the teaching profession into disrepute. This covers relevant criminal offences, such as violence or sexual misconduct, as well as negative or inappropriate comments about HSEL or Harrow School on social media or in any public capacity.

22 Breaches of this Code of Conduct

This Code of Conduct is not exhaustive. If situations arise, which this code does not cover, HSEL expects professionals not only to use their professional judgement but also to act in the best interests of HSEL and its students.

Any breaches of this code will be dealt with in accordance with the relevant policies and procedures, which might include the Disciplinary Policy.

Any professional, who has a concern or is unsure about an event that has arisen, should discuss the matter with a senior colleague as soon as possible.

23 Whistleblowing (public interest disclosure)

Professionals have a right and a duty to raise concerns (in other words, 'to blow the whistle') about any suspected breaches of the law or wrongdoing by HSEL or its employees, which they encounter. This could include suspected cases of fraud, breaches of Health and Safety, safeguarding concerns and/or any other criminal or moral activities.

Please refer to Harrow School's Whistleblowing Policy for further information.

Whistleblowing legislation does not cover personal grievances.

HSEL Safeguarding Policies

Professionals, who feel obliged to make a disclosure, will be treated as having done so in good faith and will not be victimised for raising their concerns, even if they later turn out not to be true.

24 Review

HSEL reviews its Code of Conduct with Specific Regard to Safeguarding on an annual basis and in the event of any new developments in employment or child protection legislation It is not a contractual document and can be amended at any time.

HSEL
November 2025
Annual Review

ICT ACCEPTABLE USE POLICY

HSEL PROFESSIONALS

This document sets out the security, administration and internal rules which you should observe when communicating electronically or using the IT facilities provided by Harrow School and HSEL (the 'School'). You should familiarise yourself with the terms of this Policy in order to minimise potential difficulties to you, your colleagues, pupils, and the School and HSEL, which may arise as a result of misuse of email or Internet facilities.

This Policy applies to all employees and contractors of HSEL, as well as resident family members of resident employees who use School ICT facilities.

1 School Property

- 1.1 The School acknowledges and welcomes the creativity of staff in the production and storage of material to support teaching, learning and administration. It is important to note that, according to the letter of the law, computer files and email messages created and stored on the school network by employees, contractors and residents in the performance of their normal duties technically remain the property of the School. In any question regarding copyright and intellectual property, staff are encouraged to seek advice from the IT Services Department.

2 Monitoring

- 2.1 The School's computer network is a business and educational tool to be used primarily for business or educational purposes. You therefore have a responsibility to use these resources in an appropriate, professional and lawful manner.
- 2.2 All messages and files on the School's system will be treated as education or business related, which may be monitored. Accordingly, you should not expect any information or document transmitted or stored on the School's computer network to be entirely private.
- 2.3 Professionals should also be aware that the School maintains systems that automatically monitor and filter use of the Internet, both during school or working hours and outside of those hours. This includes the sites and content that you visit and the length of time you spend using the internet.
- 2.4 Professionals should structure electronic messages in recognition of the fact that the School may, if concerned about possible misuse, have the need to examine its contents.
- 2.5 Data will be archived by the School as it considers appropriate and to comply with statutory requirements.
- 2.6 The School will routinely send out phishing test emails as part of our cyber security process. Professionals that routinely click on phishing emails, both genuine or test, may be subject to disciplinary action depending upon the circumstances.

3 Personal Use

- 3.1 Any use of the School network, internet or electronic communication for personal purposes is subject to the same terms & conditions as otherwise described in this Policy.

HSEL Safeguarding Policies

- 3.2 In the case of shared IT facilities, you are expected to respect the needs of colleagues and use the computer resources in a timely and efficient manner.
- 3.3 Inappropriate use of email or internet facilities for personal reasons during working hours may lead to disciplinary action.
- 3.4 Professionals are discouraged from using work email for personal use and likewise should not use personal email for work communications. Use of the internet during working hours for personal reasons should be kept to a minimum so that it does not interfere with the performance of work duties.
- 3.5 The internet is a shared resource. You should not download or stream excessive volumes of files or images for personal use, nor should you download or install software or applications without the consent of the Director of IT. The School reserves the right to limit use of the internet for staff who misuse it.
- 3.6 At all times, you should conduct email communications with the utmost propriety and avoid any internet behaviour that may bring you or HSEL into disrepute. Depending on the severity of the incident, this may lead to disciplinary action.
- 3.7 Professionals should familiarise themselves with the Code of Conduct with specific regard to Safeguarding, noting particularly that neither social networking nor gaming sites should be used for communication with current students.

4 Content

- 4.1 Electronic correspondence should be treated in the same way as any other correspondence, such as a letter, in that is, as a permanent written record which may be read by persons other than the addressee and which could result in personal, HSEL or the School's liability.
- 4.2 Professionals, HSEL and/or the School may be liable for what is communicated in an electronic message. Electronic messages are neither private nor secret. It may be easily copied, forwarded, saved, intercepted, archived or requested under a Data Subject Access Request (DSAR) and may be presented in litigation.
- 4.3 The School network, internet or electronic messaging should never be used for the following purposes:
 - To abuse, vilify, defame, harass or discriminate on any grounds. Staff should familiarise yourself with the School's Equality and Diversity statement and the Equal Opportunities and Dignity at Work Policy;
 - To send or receive obscene or pornographic material;
 - To injure the reputation of the School or any of its employees or to cause embarrassment to the School;
 - To spam or mass mail or to send or receive chain mail;
 - To infringe the copyright or other intellectual property rights of another person;
 - To perform any other unlawful or inappropriate acts;
 - To upload or publish images of School pupils or staff out or inside the School without permission; or
 - To infringe the privacy of another person.
- 4.4 Electronic message content that may seem harmless to you may in fact be highly offensive to someone else. You should be aware, therefore, that in determining whether an email falls within any of the categories listed above, or is generally inappropriate, the School will consider the reaction and sensitivities of the recipient of an email.
- 4.5 If you receive inappropriate material by email which is not related to safeguarding, you should delete it immediately and not forward it to anyone else. If you receive inappropriate material which may be related to Safeguarding you should stop immediately, not touch the device and contact HSEL's Designated Safeguarding Lead. The material should not be forwarded to anyone else. You should then

HSEL Safeguarding Policies

not take any further action until advised to do so by the appropriate member of Senior Staff.

- 4.6 Comments that are not appropriate in the workplace or school environment will also be inappropriate when sent by email. Electronic messages can easily be misconstrued. Accordingly, words and attached documents should be carefully chosen and expressed in a clear, professional manner.
- 4.7 Use of the School's computer network in a manner inconsistent with this policy or in any other inappropriate manner, including but not limited to use for the purposes referred to in this Policy, may give rise to disciplinary action, including termination of an employee's employment or contractor's engagement.
- 4.8 Managing School Data is yours and the IT department's responsibility, especially with mobile devices which are being used by away from the School. Be vigilant about the physical security of mobile devices containing School data. You must take responsibility for ensuring that, where they in use, your OneDrive and OneNote files are being backed up. If OneDrive or OneNote files on the device are not syncing correctly (identified by either a missing OneDrive icon, or a red X) then staff must inform IT as soon as possible to prevent potential data loss. Staff should contact IT Services if you have any queries about this.
- 4.9 When leaving the School's employment, it is your responsibility to ensure you have a new, personal, non-School email account. It is your responsibility to copy or forward any relevant personal data to your new personal account, ensuring that anything transferred does not contain School data and complies with The Data Protection Act 2018 and UK General Data Protection Regulation (UK-GDPR). Upon the ending of a contract of employment, your login is closed, and any school-issued mobile devices are erased.

5 Data Protection and Privacy

- 5.1 In the course of carrying out your duties on behalf of the School or HSEL, you may have access to, or handle personal information relating to others, including pupils, colleagues, contractors, residents, parents and suppliers. Email should not be used to disclose personal information of or about another except in accordance with the School's Data Protection Policy and Privacy Policy or with proper authorisation.
- 5.2 The Data Protection Act 2018 and General Data Protection Regulation (GDPR) requires both you and the School to take reasonable steps to protect any personal information, that you hold as a consequence of your employment, from misuse and unauthorised access. Please note that Data Protection breaches may be treated as gross misconduct by the School, which could result in summary dismissal for employees and significant fines for employers. We stress therefore:
 - Professionals must take responsibility for the security of your school computer and any personal computers and removable storage devices (including mobile phones) that you may use as a consequence of your employment.
 - Unless absolutely necessary, you must not use your own home computer, laptop or any portable electronic device to store school confidential data (such as student/parent addresses, email addresses, telephone numbers, medical histories, staff information or the like).
 - If professionals are working with School data outside of the school (either by email or internet storage, or by using removable storage media such as memory sticks, removable hard drives etc.) they must take all reasonable precautions to encrypt the data during use and to securely delete or destroy the data once it is no longer required.
 - If you need any assistance or advice regarding appropriate security measures, please contact the School's IT department.
- 5.3 Professionals will be assigned a username and a password to use the School's electronic communications facilities. Professionals should ensure that their login details are not disclosed to anyone else and that steps are taken to keep these details secure. For example, professionals should change their password regularly and if it must be written down it should be stored in a secure password manager which is

HSEL Safeguarding Policies

password protected. For advice on creating secure passwords and keeping details safe staff should contact IT Services.

- 5.4 Certain IT systems are protected by multi-factor authentication (MFA) for an extra step of security. Staff must ensure that you have set this up where required, in order to keep your account and School data safe.
- 5.5 Professionals are encouraged either to lock your screen or log-out when you leave your desk, and to log out and shutdown your computer overnight. This will avoid others gaining unauthorised access to your personal information, the personal information of others and confidential information within HSEL and the School.
- 5.6 In order to comply with the HSEL and the School's obligations under the Data Protection Act, you are encouraged to use the blind copy (BCC) option when sending emails to multiple recipients where disclosure of those person's email addresses will impinge upon their privacy.
- 5.7 In addition to the above, you should familiarise yourself with the Data Protection Act 2018 and UK General Data Protection Regulation (UK-GDPR) and ensure that your use of email does not breach these. If professionals require more information on compliance, contact the School's Privacy Officer.

6 Distribution and Copyright

- 6.1 When distributing information over the School's computer network or to third parties outside the School, you must ensure that you and the School have the right to do so, and that you are not violating the intellectual property rights of any third party.
- 6.2 If you are unsure of whether you have sufficient authorisation to distribute the information, please contact the Director of IT.
- 6.3 In particular, copyright law may apply to the information you intend to distribute and must always be observed. The copyright material of third parties (for example, software, database files, documentation, cartoons, articles, graphic files and downloaded information) must not be distributed through email without specific authorisation to do so. A similar caveat applies to the posting of student photographs on the School's network.

7 Social Media Rules

HSEL recognises that many professionals make use of social media in a personal capacity outside the workplace and outside normal working hours. While they are not acting on behalf HSEL in these circumstances, professionals must be aware that they can still cause damage to the School or HSEL if they are recognised online as being one of its staff or contractors. Therefore, it is important that HSEL and the School has strict social media rules in place to protect its position.

When logging on to and using social media websites and blogs at any time, including personal use on non-School computers outside the workplace and outside normal working hours, HSEL professionals must not:

- Conduct themselves in a way that is potentially detrimental to HSEL and/or the School or brings the School or HSEL or its students, contractors, residents, parents and suppliers into disrepute, for example by posting images or video clips that are inappropriate or links to inappropriate website content;
- Allow their interaction on these websites or blogs to damage working relationships with or between professionals and students, colleagues, contractors, residents, parents and suppliers of the School, for example by criticising or arguing with such persons;
- Include personal information or data about the School or HSEL's professionals, students, colleagues, contractors, residents, parents or suppliers without their express consent (an employee may still be liable even if professionals, students, colleagues, contractors, residents, parents or suppliers are not expressly named in the websites or blogs as long as the School

HSEL Safeguarding Policies

reasonably believes they are identifiable) - this could constitute a breach of the Data Protection Act 1998 which is a criminal offence;

- Make any derogatory, offensive, discriminatory, untrue, negative, critical or defamatory comments about the School or HSEL, its professionals, students, contractors, residents, parents or suppliers (an employee may still be liable even if the School, HSEL, its professionals, students, contractors, residents, parents or suppliers are not expressly named in the websites or blogs as long as the School reasonably believes they are identifiable);
- Make any comments about the School or HSEL's professionals that could constitute unlawful discrimination, harassment or cyber-bullying contrary to the Equality Act 2010 or post any images or video clips that are discriminatory, or which may constitute unlawful harassment or cyber-bullying – professionals can be personally liable for their actions under the legislation;
- Disclose any trade secrets or confidential, proprietary or sensitive information belonging to the School or HSEL, its staff, students, colleagues, contractors, residents, parents or suppliers or any information which could be used by one or more of the School or HSEL's competitors, for example information about the School or HSEL's work, its products and services, technical developments, deals that it is doing or future business plans and staff morale;
- Breach copyright or any other proprietary interest belonging to the School or HSEL, for example, using someone else's images or written content without permission or failing to give acknowledgement where permission has been given to reproduce particular work - if professionals wish to post images, photographs or videos of their work colleagues or students, contractors, residents, parents or suppliers on their online profile, they should first obtain the other party's express permission to do so.

HSEL professionals must remove any offending content immediately if they are asked to do so by the School or HSEL.

HSEL professionals should remember that social media websites are public, even if they have set their account privacy settings at a restricted access or "friends only" level, and therefore they should not assume that their postings on any website will remain private.

HSEL professionals must also be security conscious when using social media websites and should take appropriate steps to protect themselves from identity theft, for example by placing their privacy settings at a high level and restricting the amount of personal information they give out, e.g., date and place of birth. This type of information may form the basis of security questions and/or passwords on other websites, such as online banking.

Should professionals notice any inaccurate information about the School or HSEL online, they should report this to their line manager in the first instance.

8 Confidentiality

- 8.1 As mentioned above, the Internet and email are insecure means of transmitting information. Therefore, items of a highly confidential or sensitive nature should not be sent via email unless it is encrypted or password protected. Alternatively, a OneDrive link to the item can be used to restrict access to specific email addresses. Professionals should be aware that emails sent between organisations can often be held by third party email companies so are not only stored on the School's network.
- 8.2 All emails that are sent outside of the School from School email addresses contain the School's standard disclaimer message. This message will be set to appear automatically on each outgoing email. Please contact IT Services if this feature is not working. The standard disclaimer is:

The Keepers and Governors of the Possessions, Revenues and Goods of the Free Grammar School of John Lyon, within the town of Harrow-on-the-Hill (registered charity number 310033), and its associated entities (collectively known as John Lyon's Foundation), Harrow School, John Lyon School, John Lyon's Charity (registered charity number 237725), Harrow School Enterprises Limited (company number 1617359), Harrow Development Trust (registered charity number 296097), the John Lyon School Development Trust (registered charity number 1054501), the Harrow Association and Harrow

HSEL Safeguarding Policies

International Schools Limited (company number 7103979) do not accept responsibility for email contents. This email and any attachments are intended only for the addressee(s) named above and may not therefore be disclosed to any other person. If you are not the named addressee, please delete or destroy all copies whether in electronic or hard copy form and email us on postmaster@harrowschool.org.uk including the message headers if possible.

- 8.3 Always maintain a reasonable degree of caution regarding the identity of the sender of incoming email. Professionals should verify the identity of the sender by other means if you have concerns. Please notify IT Services of any suspicious activity regarding suspect emails, clicked links or malicious attachments by providing details or a screenshot of the email. Professionals should not forward suspicious emails to anyone else.

9 Viruses

- 9.1 All external files and attachments will be automatically virus-checked using scanning software. However, it is extremely important that professionals always remain vigilant when opening attachments or clicking links contained in emails or other electronic communications. Failure to do so could have potentially catastrophic effects on the School network.
- 9.2 If you are concerned about an email attachment or believe that it has not been automatically scanned for viruses, do not open the attachment or reply to the email but contact the IT Services.

10 General

- 10.1 This policy may be updated or revised from time to time. HSEL and the School will notify professionals annually of any revisions to this Policy. If professionals are unsure whether you are reading the most current version, you should contact HSEL.
- 10.2 The terms and recommended conduct described in this Policy are not intended to be exhaustive, nor do they anticipate every possible use of the School's email and Internet facilities. Professionals are encouraged to act with caution and take into account the underlying principles intended by this Policy. If professionals feel unsure of the appropriate action relating to use of email or the Internet, you should contact IT Services.

For the Attention of Staff who are Issued a Mobile Device

11 Mobile Device User Agreement

This includes mobile phones, laptops, tablets and Surface devices and applies to professionals who have been issued with a mobile device to perform their work-related duties.

- 11.1 Where a device is allocated to a specific person it is intended for their use only. Allocated devices should not be transferred to other professionals or allowed to be used by others, including family members, in cases where these devices will be used away from the School.
- 11.2 Professionals must follow the expectations outlined in this Policy when using the School issued device.
- 11.3 School devices are School property and should be used for School-related work and are not for personal use. If there are any investigations, Harrow IT Services reserve the right to, at any point, request the return of the issued device to perform any required searches of its contents.
- 11.4 In the event of failure to return a device or accessories upon departure from the School, you will be responsible for the full replacement cost of the items not returned.
- 11.5 If any OneDrive or OneNote data is stored on the mobile device, it must be backed up. Professionals should report any OneDrive or OneNote sync errors (as shown by a red X, or a missing OneDrive

HSEL Safeguarding Policies

icon) to IT Services as soon as possible to avoid possible data loss. In the event of a system failure or hardware problem, unsynchronised data is at risk. Staff should contact IT Services with any questions regarding this.

- 11.6 Professionals should use only software licensed or approved by Harrow School, as authorised and installed by the School's IT Services staff.
- 11.7 School mobile devices are covered by a limited manufacturer's warranty. This covers faults with the device but not accidental damage, loss or theft. The School's insurance policy does not cover loss, damage or theft of these devices. After a consideration of the circumstances, any repairs or replacements that are otherwise required (broken screens, water damage, theft etc.) could thus be recharged to the respective professional by the School depending upon the circumstances.
- 11.8 Professionals should not modify or adjust the device in any way that voids the manufacturer's warranty. Professionals making any such modifications will be liable for the full cost of the device in the event of a required repair or replacement.
- 11.9 The allocated device and all relevant accessories must be returned when the professional's employment with HSEL ceases, or when requested by the School or HSEL. The use of the device provided by HSEL and the School is not transferable to anyone and expires in line with the termination of the professional's contract of employment with HSEL.
- 11.10 Where the School provides a laptop or Surface device BitLocker encryption will be enabled for the local disk on the mobile device. Professionals should not under any circumstances attempt to disable or remove this encryption.

HSEL
November 2025
Annual review