

SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURES

KEY INFORMATION

The Harington Scheme provides a learning experiences for young people and adults (mainly aged 16-25 years) with learning disabilities and/or difficulties, to help them into employment, further education or a more rewarding life through appropriate learning opportunities.

At Harington most of the young people and adults, known as our students and service users, have and Education Health Care Plan (EHCP), and in response to this Harington is committed to providing high quality, individually tailored learning opportunities for all students and service users. Their welfare is of paramount importance and hence we aim to provide a positive, supportive and secure environment where they feel safe, respected and valued.

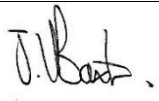
Harington fully recognises its responsibilities for safeguarding and ensuring the protection of our students. We are committed to creating and maintaining a safe environment for all our students and service users, staff, volunteers and visitors, and we expect all our staff and volunteers at Harington, to share this commitment.

Harington is committed to working with children and adult social care, the police, health and social care agencies, and other relevant agencies to ensure our students and service users are safeguarded and protected.

Within this policy where we refer to students this also includes our service users. Any use of child means someone who has not yet reached their 18th birthday, and a vulnerable adult is any person who is 18 or over who has need of care; is experiencing, or at risk of, abuse or neglect; as a result of care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

As the Scheme Manager of Harington is also the Designated Safeguarding Lead, within this policy where it refers to either of these this is to determine whether this action is taking place in the role of the Scheme Manager of Harington or within the role of the Designated Safeguarding Lead. In such cases where both are stated then this is because actions need to be considered in relation to both the organisation and safeguarding.

This Safeguarding and Child Protection Policy will be updated by the Designated Safeguarding Lead on an annual basis and reviewed by the Board of Trustees every two years.

Date Approved:	13 th May 2020
Date to be Reviewed by:	12 th May 2022
Signed: 	Designated Safeguarding Lead: Joanna Baxter

Role	Name	Contact Details
Designated Safeguarding Trustee	Jennifer Horne-Roberts	trustees@harington.org.uk
Designated Safeguarding Lead	Joanna Baxter	Joanna.baxter@harington.org.uk 0203457 7997
Designated Deputy Safeguarding Lead	Michelle Besant	Michelle.besant@harington.org.uk 020 3457 7997
Local Authority Children social care	Haringey Children's Social Care	See referrals – contact MASH (see below) General: 0208 489 0000
Local Authority Adult social care	First Response Team	020 8489 1400 Email: firstresponseteam@haringey.gov.uk
MASH (Multi-Agency Safeguarding Hub)	Haringey's Multi-Agency Safeguarding Hub (MASH)	Monday to Thursday 8.45am to 5pm; Friday 8.45am to 4.45pm Tel: 020 8489 4470 mashreferral@haringey.gov.uk
Emergency Duty Team (Children's Social Care)	Haringey's Multi-Agency Safeguarding Hub (MASH)	Out of office hours, including weekends the Emergency Duty Team Tel: 020 8489 0000 mashreferral@haringey.gov.uk
NSPCC helpline	NSPCC	0808 800 5000
NSPCC Whistleblowing Advice Line	NSPCC Whistleblowing	0800 028 0285 help@nspcc.org.uk
UK Safer Internet Centre	UK Safer Internet Centre	https://www.saferinternet.org.uk/our-helplines
Police Anti-Terrorist Hotline Number	Police Anti-Terrorist Hotline Number	0800 789 32 https://www.met.police.uk/tua/tell-us-about/ath/possible-terrorist-activity/
Haringey Police Prevent Team	Prevent Coordinator	If you are concerned about a child, young person, or a family: make a referral to the SPA (Single Point of Access) Team>: 020 8489 4470 during office hours, or 020 8489 0000 out of hours For Adults 020 8489 3884 or 020 8489 1280 (office hours only). Email: prevent@haringey.gov.uk

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- A.1.1 This policy is informed by all relevant legislative requirements, but in particular the statutory guidance for schools and colleges on safeguarding children and safer recruitment (September 2019) – *Keeping Children Safe in Education*. All staff are required to read at least Part One of this guidance and we will ensure all our staff to sign to confirm that they have done so. Within our induction and three year safeguarding training programme, we will ensure that staff re-visit this document to ensure they continue to remain informed about the guidance and the requirements it places on them, in their role in working with children.
- A.1.2 In summary, the trustees are responsible for ensuring mechanisms are in place to assist staff to understand and discharge their roles and responsibilities, and that there is Designated Safeguarding Lead and Deputy to ensure statutory guidance is reflected in the practices of Harington, at all levels
- A.1.3 In line with the above statutory guidance Harington must have regard to – *Keeping Children Safe in Education* - when carrying out our duties to safeguard and promote the welfare of the students within Harington. This policy also takes account of requirements as identified in “Working together to Safeguard Children”.
- A.1.4 Within ‘Working together to Safeguarding Children’ it states that “Child Safeguarding law applies to children and young people up to the age of 18. However, as the Children and Families Act 2014 gives rights directly to young people from the end of compulsory school age does not necessitate any change to the Local Authority safeguarding or welfare policy”. It also states that local authorities have the power to continue children’s social care services on the same basis, after the age of 18 (18-25 years) where a local authority has been providing children’s social care services to a young person under the age of 18, and they have an EHCP in place. In line with this the requirements identified in this policy will be followed in line with all our students, although we recognise that in some cases we may be required to work with adult social care services.
- A.1.5 We recognise at Harington that students with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges. In response to this the Trustees have ensured that this policy reflects the fact that additional barriers can exist, when recognising abuse and neglect. These can include:
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student’s disability without further exploration
 - Being more prone to peer group isolation than other students;
 - Students with SEN being more prone to peer-on-peer abuse;
 - The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
 - Communication barriers and difficulties in overcoming these barriers
- To address these additional challenges, Harington ensures high level staffing, including manager, teachers and support staff, to ensure their individual needs can be effectively managed and supported.

A.2. Purpose of this Policy

- A.2.1 This policy covers the arrangements for responding to Safeguarding and Child Protection issues. It outlines Harington’s position in responding to concerns and incidents which occur and the action to be taken to ensure that we meet our required duties, and it signposts to related policies and additional guidance.

A.2.2 This policy, particularly in relation to Part Two, provides specific information to support trustees, managers and the Designated Safeguarding Lead and Deputy in the decision making process.

A.2.3 This policy aims to ensure that everyone understands that Safeguarding and Child Protection are about promoting the welfare of the students at Harington. For the purpose of this policy, safeguarding and child protection are defined as:

- Protecting our students from maltreatment
- Preventing impairment of our students' health or development
- Ensuring our students grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all our students to have the best outcomes, taking account of their Special Educational Needs and Disabilities

A.3. Scope of this Policy

A.3.1 This policy applies to all staff, agency workers, trustees, volunteers, contractors and visitors who are working for Harington both outside and within the Harington sites. Everyone who is part of the Harington community is responsible for safeguarding, promoting and protecting the welfare of our students.

A.4 Legal Framework

A.4.1 Harington aims to meet legislative requirements and good practice in safeguarding and child protection. Although '*Keeping Children Safe in Education*' (2019) has been key to informing this policy. It is supported by '*Working Together to Safeguarding Children*' (2018), duties under the *Children Act* 1989 and section 175(2) of the *Education Act* 2002 to promote and safeguard the welfare of children under the age of 18. Section 11 of the *Children Act 2004* requires all agencies working with or coming into contact with anyone under the age of 18 to have measures in place to safeguard and promote their welfare. Harington also has a duty, under the *Care Act 2014*, to co-operate with local authorities to promote and safeguard the welfare of adults at risk of neglect and abuse. The *Safeguarding of Vulnerable Groups Act 2006* (as amended by the *Protection of Freedoms Act 2012*) sets out the type of activity that is 'regulated to vulnerable groups, including children and Disclosures and Barring Service checking arrangements. Account has also been considered in relation to the revised *Prevent Duty Guidance* issued under section 29 of the Counter Terrorism and Security Act (2015).

A.4.2 In addition to the above we have also considered London Safeguarding guidance.

A.5 Principles

A.5.1 Harington's safeguarding policy is based on the following principles:

- All children and vulnerable adults have the right to be safe from harm, abuse and exploitation
- All concerns about a student's welfare, including allegations of abuse, neglect or exploitation, must be taken seriously and responded to quickly and appropriately
- Safeguarding and promoting the welfare of children and vulnerable adults is everyone's responsibility and everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

B Roles and Responsibilities

B.1 Trustees

B.1.1 The Board of Trustees must ensure that:

- Harington's policies, procedures and training are effective, comply with the law and are updated in a timely manner;
- A named trustee is appointed to take leadership responsibility for safeguarding arrangements, and has read Keeping Children Safe in Education (all sections) and signed to confirm this, and that this is refreshed at least every 3 years;
- That all Trustees and Staff have up-to-date enhanced DBS checks which are renewed, at least, every five years, and that they undergo safeguarding and Prevent Duty training, as identified in this policy;
- The role of the safeguarding team – the designated leads are defined and safeguarding data and information is regularly monitored;
- They are aware of current legislation and responsibilities and that their own training is up to date, and specifically that they have read Part One of Keeping Children Safe in Education, and signed to confirm this, and that this is refreshed at least every 3 years;
- The Safeguarding and Child Protection Policy is publicly available upon request;
- Appropriate safeguarding responses are in place to deal with students, especially students who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

B.2 Harington Scheme Manager

B.2.1 Within the context of this policy is responsible for:

- Ensuring safer recruitment procedures are followed;
- Ensuring allegations against staff are appropriately and effectively dealt with;
- Ensuring wider behaviour and wellbeing practices are in place within Harington, and that these are effectively implemented to support student wellbeing and safeguarding;
- Ensuring the best interests of all students, staff and volunteers are considered when decisions are made.

B.3 Designated Safeguarding Lead and Deputy (Safeguarding Team)

B.3.1 The Designated Safeguarding Lead has responsibility and accountability for ensuring the safeguarding and child protection policy is in place, effectively implemented, and that all staff are provided with the information, guidance and training to enable them to carry out their safeguarding roles and responsibilities.

B.3.2 Specifically the Designated Safeguarding Lead is responsible for ensuring:

- Appropriate policies related to safeguarding are adopted by the Board of Trustees;
- Trustees receive quarterly safeguarding updates and an annual safeguarding review;

- DBS checks, other pre-employment checks, and where appropriate risk assessments are carried out in a timely manner for all staff in line with safer recruitment expectations and DBS guidelines;
- A Single Central Record of DBS and pre-employment checks is maintained at all times;
- A designated person is available during office hours, or in close contact with duty managers and available to respond to concerns, incidents or disclosure reports;
- Appropriate recording and monitoring systems are in place that enable them to maintain a complete safeguarding picture within Harington and monitor any trends, inter-related issues and / or any relevant contextual information;
- All staff are aware of and adhere to this policy and related policies and are aware of systems in place that contribute to safeguarding;
- All staff receive appropriate safeguarding, child protection and Prevent information and training on induction and at regular intervals thereafter;
- All staff involved in reporting incidents are appropriately supported to ensure expected procedures are consistently and effectively implemented
- Relevant referrals are made in a timely manner, and that they support joint working with other agencies, including any formal assessments.

B.3.3 The Designated Deputy Safeguarding Lead is responsible for:

- Carrying out reasonable delegated responsibilities in line with above
- Acting as the Designated Safeguarding Lead in their absence.
- Providing support for decision making regarding safeguarding matters.

B.4. Managers

B.4.1 All managers are required to support the Scheme Manager and the Designated Safeguarding Team in application of this policy, and for acting as the Designated Safeguarding Lead on rare occasions where, both the Designated Safeguarding Lead and Deputy are absent from Harington Site, and not contactable.

B.5 All Staff

B.5.1 All staff who come into contact with children and vulnerable adults in their everyday work have a duty to safeguard and promote their welfare. Staff should ensure that they have familiarised themselves with this policy, have read Part One of *Keeping Children Safe in Education*, and have accessed relevant training in order to support them in fulfilling their responsibilities.

B.5.1 Specifically staff are expected to ensure that they:

- Are aware of the safeguarding arrangements outlined in this policy and related policies and procedures
- Are familiar with and adhere to all relevant procedures involved in recognising and reporting incidents
- Report all concerns, without judgement about their significance, in line with expectations

- Treat safeguarding disclosures and information sensitively and recognise that it is confidential information that should not be shared without specific authorisation from the Safeguarding Team
- Update their training to ensure sufficient knowledge and understanding regarding safeguarding, on a regular basis.

1. PART ONE: Expectations of all Staff

1.1. Requirements of all staff at Harington

1.1.1 All staff working at Harington are required to play an important part of the wider safeguarding system for children, and within Harington, where we work with vulnerable children and adults, this is even more important. **Safeguarding and promoting the welfare of our students is everyone's responsibility.** In order to fulfil this responsibility effectively we recognise that we need to ensure that:

- the way we work and support our students puts them, and their family, at the centre;
- we at all times consider what is in their best interests;
- we effectively and consistently work in line with Harington's Safeguarding and Child Protection Policy.

1.1.2 All staff are expected to:

- Ensure they have read Part One of – **Keeping Children Safe in Education** – and that they have signed to say they have done this;
- Ensure they know who the Designated Safeguarding Lead and Designated Deputy Safeguarding Lead are;
- Be aware of the systems at Harington which support safeguarding, including referral systems and expectations;
- Have knowledge and understanding of the range of neglect and abuse;
- Identify concerns early, provide help for students and prevent concerns from escalating
- Provide a safe environment in which our students can learn;
- Support the identification of students who may benefit from early help or social care involvement by referring in line with Harington processes as soon as a problem emerges;
- Provide any additional support or information for social workers and other agencies, following any referral.

1.1.3 All staff are expected to ensure they meet the needs of students. To support this, in line with information provided in the Working together to Safeguard children, we have identified what children and young people feel they need from staff:

- **Vigilance:** to have adults notice when things are troubling them;
- **Understanding and action:** to understand what is happening, to be heard and understood; and to have that understanding acted upon;
- **Stability:** to be able to develop an ongoing stable relationship of trust with those helping them;

- Respect: to be treated with the expectation that they are competent rather than not
- Information and engagement: to be informed about and involved in procedures, decisions, concerns and plans;
- Explanation: to be informed of the outcome of assessments and decisions and response when their views have not met with a positive response;
- Support: to be provided with support in their own right as well as a member of their family;
- Advocacy: to be provided with advocacy to assist them in putting forward their views;
- Protection: to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee.

In line with the above, as a general principle we expect all staff, to safeguarding and support our students well-being, in line with the above.

1.1.4 Specifically, all staff are required to be vigilant at all times, regarding safeguarding and student well-being, and to maintain an attitude of 'it could happen here'. When concerned about the welfare of a student, staff should always act in their best interests, which, as well as reporting safeguarding concerns, may include managing support requirements via the pastoral and behaviour support processes within Harington.

1.1.5 All staff should be vigilant to potential contextual safeguarding issues which may cause a threat to the safety and/or welfare of the students. These may include risks associated with exploitation by criminal gangs and organised crime groups; trafficking; online abuse, sexual exploitation, and the influences of extremism leading to radicalisation, as well as neglect and/or sexual, physical and emotional abuse. Relevant managers should ensure that potential risks are understood and build into personal development support, EHCP reviews, and any social care assessment.

1.2. Reporting Concerns, including Serious Concerns

1.2.1 We expect all our staff to work within the principles of the Children Acts 1989 and 2004, which states that the welfare of children and young people is paramount and that they are best looked after within their families, with their parents playing a full part in their lives, unless compulsory intervention in family life is necessary. Within the context of this, we also recognise that our students may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, Whatever the form of abuse or neglect, we expect staff at Harington, to put the needs of students first when determining what action to take, while working with the remit of this policy and not compromising the safety of our students.

1.2.2 To this end, every member of staff must record all concerns, incidents, and communication regarding individual students, in line with Harington expectations, which includes the online recording and reporting system (CPOMS). This includes any neglect issues or concerns, or any general well-being, emotional or behavioural concerns. All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label, but in most cases, multiple issues will overlap with one another, and this is why **areas of concern, no matter how small, need to be recorded by all staff**. This will enable managers and other staff, including key workers, to have an overview of any concerns, which may lead to areas of neglect, abuse or other safeguarding issues, being identified.

1.2.3 Where there are serious and urgent concerns relating to either neglect or abuse, or a student reports some neglect or abuse to a staff member, then these must be reported directly to the Designated Safeguarding Lead or Deputy. The member of staff identifying or receiving a report from a student must **WRITE DOWN THEIR CONCERN OR A SUMMARY OF WHAT THE STUDENT HAS TOLD THEM AND PASS THIS DIRECTLY ON TO THE DESIGNATED SAFEGUARDING LEAD OR DEPUTY**. It will

then be the responsibility of the Designated Safeguarding Lead or Deputy to decide what action to take, which may include a referral to social services and/or the police. It is however, important for all staff to understand that when a referral is made, they may be expected to support assessments or to provide further information to support the decision making process. All staff identifying potentially serious concerns are required to ensure they maintain an appropriate level of confidentiality, and therefore **it is not appropriate for highly confidential and/or serious concerns to be factually reported using the central shared areas of the recording system (CPOMS)**, which is accessible by all staff. In addition to this, as such concerns need immediate attention, such information needs to be provided immediately.

- 1.2.4 Where a member of staff is informed of a safeguarding concern they should never promise a student that they will not tell anyone about a report of abuse, as this may ultimately not be in their best interests, and equally the member of staff should not ask questions or investigate what the student is telling them – it is for them to pass on but not to make decisions over.

1.3 Early Help

- 1.3.1 If there are concerns about a student, and it is considered appropriate, the Designated Safeguarding Lead or Deputy will liaise with other agencies in order to access early help. This may include setting up an inter-agency assessment. Staff may be required to support other agencies and professionals in an early help assessment, and in some cases may be required to act as the lead practitioner. Where early help is identified for a student, this should be kept under regular review, and if the students' situation does not appear to be improving or is getting worse, then the Designated Safeguarding lead, supported by relevant staff, may consider referral to children's/ adult social care for a statutory assessment. In such cases, consideration of potential contextual safeguarding concerns should also be considered.

1.4. Serious Concerns – Neglect and Abuse

- 1.4.1 To support staff in understanding the varied nature of serious concerns the following information has been identified. [NB Whilst the term child is used in 1.4.1 – 7 the following definitions also apply to vulnerable adults, unless a specific age range has been stated]:

Neglect and Abuse: All staff should be aware of indicators of abuse and neglect so they are able to identify where students may be in need of help or protection. Somebody may neglect or abuse a child by inflicting harm or by failing to act to prevent harm. **Neglect** is considered 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 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; or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a child's basic emotional needs. All staff should also be aware of wider safeguarding issues which can put our students at risk of harm, in particular behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery). **Abuse** may take place within the 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. Abuse may take place by an adult or adults, or by another student or students. Specific information about the different types of abuse are identified in sections 1.4.2 to 1.4.9 below, and all staff have a responsibility to familiarise themselves of this information.

- 1.4.2 **Physical abuse** is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 1.4.3 **Emotional abuse** is identified as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1.4.4 **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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 in education
- 1.4.5 All staff should be aware that students can abuse other students, known as **peer on peer abuse**. This is most likely to include, but may not be limited to:
- bullying (including cyberbullying);
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexual violence, such as rape, assault by penetration and sexual assault; sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
 - upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
 - sexting (also known as youth produced sexual imagery);
 - initiation/hazing type violence and rituals.
- 1.4.6 All staff should be aware of indicators, which may signal that students are at risk from, or are involved with **serious violent crime** or involved in **serious violence**. 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.

1.4.7 **Female Genital Mutilation (FGM):** Although it is known that mutilation is most often performed before puberty, and often on girls between the age of four and eight, staff should still be aware of the need to be vigilant for any indicators which suggest that a parent or carer may be making arrangements for a student to have female genital mutilation, which may include unusual time off to go abroad, or some changes in behaviour of the learner, or that FGM has taken place. If any member of staff has any suspicions of this then they should report these to the Designated Safeguarding Lead or Deputy. The Designated Safeguarding Lead or Deputy will be responsible for reporting the concern to the police. As there is a specific legal duty on teachers to report any suspicions or known acts of FGM which has been carried out on a girl under the age of 18 (this includes all students within the context of Harington) then it is also the responsibility of the member of staff who raised the concern to check that this has been reported.

1.4.8 **County Lines – Serious Violence Strategy:** This is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of ‘deal line’. They are likely to exploit children and vulnerable adults to move and share the drugs and money, and they will often use coercion, intimidation, or violence (including sexual violence) and weapons. All staff in Harington must be vigilant towards this and record and report appropriately, in line with the seriousness of their concerns.

1.5. Staff Training

1.5.1 Trustees, through the Designated Safeguarding Lead and Deputy are responsible for ensuring that all staff undergo safeguarding and child protection training (including online safety) at induction. They are also responsible for ensuring all staff access regular training to enable them to be updated about expectations and requirements, and to refresh their skills and knowledge about safeguarding and their role in supporting this within Harington.

1.5.2 Induction Training to be provided at Harington:

- Designated Safeguarding Lead and Deputy Information and their roles and responsibilities;
- Recognising possible signs and indicators of abuse in students;
- Use of CPOMS/ Recording expectations;
- Serious Safeguarding Concerns – Recording and Reporting expectations, including managing a reported disclosure;
- Reading Part One of the Keeping Children Safe in Education;
- Safeguarding and Child Protection Policy;
- Behaviour Policy;
- Well-being Policy;
- Staff Code of Conduct;
- Complete the online safeguarding training assessment;
- Prevent Duty training.

1.5.3 Staff Updates through team meetings and circulation of documents:

- Updates – national or Harington
- Issues of implementation of policy

- Additional guidance.

1.5.4 Annual Training:

- Review with all staff of Safeguarding expectations and associated policies, including reporting expectations and any lessons learned;
- Extended training on particular areas of neglect or abuse, to extend staff knowledge and understanding
- Update on any policy changes or national changes

1.5.5 Refresher Training for all Staff provided at least every 3 years, in addition to any annual training:

- Understanding of possible signs and indicators of abuse in students;
- Serious Safeguarding Concerns – Recording and Reporting expectations, including managing a reported disclosure;
- Reading Part One of the Keeping Children Safe in Education;
- Safeguarding and Child Protection Policy;
- Behaviour Policy;
- Well-being Policy;
- Staff Code of Conduct;
- Complete the online safeguarding training assessment;
- Prevent Duty refresher training.

1.5.6 The Designated Safeguarding Lead and Deputy will undergo appropriate safeguarding and child protection training in accordance with best practice. This will be updated every two years, and will also include Safer Recruitment Training. Additional Managers, as appropriate, will also access Safer Recruitment Training.

1.5.7 All Trustees will access the online safeguarding and child protection training, and Prevent Duty training, and in addition to this the safeguarding trustee will access relevant additional training, in accordance with best practice. This will be updated every two years. The Designated Safeguarding Trustee will access additional safeguarding and child protection training in line with their additional responsibilities, and at least one Trustee will access Safer Recruitment Training, which will be updated every two years.

1.6. Systems and Processes to support Safeguarding and Students

1.6.1 Within Harington, systems and processes are in place to support safeguarding and students, including:

- Supervision expectations in line with general supervision and vigilance expectations and also in relation to individual student needs;
- Supervision ratios, to ensure the safety of the individual student, but also the safety of other students, and to prevent peer-on-peer abuse;
- One-to-one support arrangements;

- Contact with home to check safety, make contact or to explore student needs;
- Physical, mental health, social and emotional well-being support, including self-worth;
- Protection from harm and neglect;
- Life Coaches available for regular or short term counselling;
- Partnership with parents/ carers and other agencies, enabling them to contribute to safeguarding and well-being;
- Online recording and reporting system (CPOMS)

1.6.2 Students are provided with support and guidance to help them protect themselves:

- E-safety;
- Providing a caring and safe environment in which students feel able to disclose or express concerns about safeguarding issues;
- Encouraging students to be part of a safe learning community in which students look out for each other's wellbeing;
- Ensuring that students know how to report concerns;
- Regular or targeted mentoring and key worker support.

1.6.3 Students are also provided with education and support, as part of their learning programme , personal development curriculum and wider opportunities, to enable them to understand dangers and to keep themselves safe:

- Education, training and recreation;
- E-safety;
- Personal, Social and Health developments;
- Independence;
- Opportunities to contribute to society;
- Access to Job Coaches to support them on work experience, enabling them to benefit from this training experience.

1.6.4 When a student engages in work experience Harington will ensure that:

- Health and safety checks are undertaken prior to establishing work experience placements
- Employers and providers are aware of and are carrying out their responsibilities in relation to safeguarding and the protection of children and vulnerable adults, and ensuring that providers have appropriate policies and procedures in place which are followed up by staff;
- Harington staff, volunteers, employers and work placement providers are aware of the action to be taken and by whom, should a safeguarding issue be raised before, during or after the placement
- Harington staff are appropriately trained to carry out the health and safety work placement assessment;

- Employers are provided with guidance on appropriate behaviour when relating to students on placement.

1.6.5 When students engage in educational visits Harington will ensure that:

- All education visits are approved in advance by a manager;
- All planned visits are risk assessed to ensure that arrangements for safeguarding students are adequate;
- The Education Visit Risk Assessment is reviewed and approved by the Education Visits Coordinator;
- Education visits do not go ahead if the risk assessment is inadequate or identifies risks that cannot be mitigated;
- A named member of staff is responsible for leading the visit and ensuring that all staff supporting the visit are aware of the risks and control measures.

1,6,6 Harington has an Acceptable Use of ICT Policy and the Scheme Manager is responsible for ensuring that robust systems are in place to filter inappropriate content and minimise risk to learning using Harington's ICT facilities. All staff have a duty to report suspicious or inappropriate use of E-technology, and any concerns about inappropriate use will be followed up promptly. Inappropriate use includes accessing sites that promote extremism or terrorism or in other ways actively oppose fundamental British values. To support students, all students will receive training on the safe use of technology, and will be encouraged to report any issues that they are having at Harington or anywhere else, such as cyber-bullying. Where required, the Designated Safeguarding Leader or Deputy will arrange for support for the student to help them resolve the issues and/or where it is felt appropriate, report the concerns to the relevant authorities.

1,6,7 All staff have a statutory duty through its work with students, to have due regard to the need to prevent people from being drawn into terrorism, and to actively promote 'Fundamental British Values'. Terrorism includes violent extremism and also non-violent extremism which can create an atmosphere conducive to terrorism and can popularise views that terrorists exploit. In line with this all staff are required to be vigilant in line with the Prevent Duty.

The Prevent Duty Guidance defines extremism as:

- vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.
- Calls for the death of members of our armed forces, whether in the country or overseas.

Staff should be aware that learning difficulties of some types of mental health needs may make a person vulnerable. They may lack the ability to think critically, compare ideologies or challenge what they are being told in person or online. Disclosures regarding staff, volunteers or students who display or espouse values contrary to the accepted British values of rules of law, democracy, individual liberty and respect and tolerance, should be recorded and reported directly to the Designated Safeguarding Lead or Deputy.

1.7. Recording and Reporting Systems

1.7.1 CPOMs, is the online recording and reporting system in relation to all learners at Harington. This system enables incidents, concerns, contact, information sharing etc to be recorded in one central place. It enables simple summary information to be recorded, while providing the opportunity for

more detailed reports to be attached. Sometimes, these reports will be saved in secure areas of the system, to enable confidentiality, but in such cases a log of the report existing will be recorded, including where this can be accessed. The system also enables Harington to demonstrate their application of systems to ensure our students are safe, such as contacting home where a student is absent or unwell etc.

- 1.7.2 CPOMS also enables information provided by parents/carers, or other agencies to be recorded and reported.
- 1.7.3 The two main reporting mechanisms for safeguarding are:
- CPOMS – reporting of a general safeguarding concern, which includes well-being concerns. This should be brief and factual reporting of the nature of the concern. Eg Student A said he has not had much to eat for 2 days or concerned that Student A was very tired when she arrived at Harington today. If it is felt necessary to record more specific information then this should be recorded, in line with the relevant Harington policy, as a separate word processed document and provided as an attachment;
 - Direct reporting to the Designated Safeguarding Lead or Deputy – hand written or word processed stating the nature of the significant concern and/or what the student told them. It is important to note that it is not the responsibility of the staff member to question or interview the student about this, but it is their responsibility to report this promptly and directly. The Designated Safeguarding Lead or Deputy will be responsible for reporting the necessary information on CPOMS and for attaching any relevant additional reports or information within relevant secure files, to ensure confidentiality is maintained.
- 1.7.4 In addition to the above Harington recognise that there are also wider safeguarding needs which are also reported within Harington which include:
- behaviour incidents
 - bullying incidents
 - attendance concerns
 - general wellbeing concerns.
- 1.7.5 In line with expectations regarding the use of CPOMS, a brief and factual report of the nature of the wider concern or inappropriate behaviour needs to be logged eg Student C was bullied by Student D – action is being taken; Student E and F were involved in a fight which led to both having some minor injuries and both learners have been excluded for 1 day; Student G is absent today (2nd day) and it has not been possible to gain contact with home / with the student. A more detailed report of these concerns, if available, including, action being taken or meeting notes can be provided as attachments. It is recognised that within Harington the Duty Manager will play a key role in reporting and recording most, but not all of the above, or for identifying who this will be delegated to. However, where a Key Worker/Teacher or LSA has specific responsibility for dealing with the concern e.g. inappropriate behaviour within learning, then it will be their responsibility to report and record this. In all cases where the information is being recorded as a concern – this should be flagged as a ‘cause for concern’. Where information is being recorded for general information eg managed to make contact with Student H today, then this does not need to be flagged as a concern as this is for information only.
- 1.7.6 The key expectation of all staff is to ensure that **ALL** concerns, contacts, reported information, unless considered serious and/or highly confidential, is recorded on CPOMS. Staff should not assume another colleague will take action and share information that might be critical in keeping children safe.

- 1.7.7 Additionally, if any member of staff feels that information is not being recorded/reported or they feel that action is not being taken they should check on progress or report further, if required.

1.8. Vigilance and Supervision

- 1.8.1 All staff should recognise that students in Harington are capable of abusing their peers, and that such abuse should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. As outlined in this safeguarding policy, all staff, in line with their supervision and support responsibilities should be vigilant to possible abuse, should ensure that supervision is provided in line with requirements, and that where restrictions are placed on students to support them or safeguard them, then staff should ensure these are followed.
- 1.8.2 All students in Harington generally have high levels of supervision, and some have specifically identified ratios of support to enable them to stay safe. In some cases students have specific restrictions regarding access and movement around the site, to support them. All staff must ensure they are aware of these and in line with their responsibilities ensure the requirements are followed.
- 1.8.3 Where there is any suspected, reported or known peer-on-peer abuse then staff must not ignore this and where appropriate should seek support from the Duty Manager and or other relevant managers to ensure this is not allowed to continue. The member of staff, even though they may have accessed support, is still responsible for recording and reporting this on CPOMS.
- 1.8.4 In all cases where the peer-on-peer abuse is as a result of inappropriate student behaviour eg bullying or inappropriate pushing, fighting, in addition to reporting this on CPOMs, this should be investigated in line with behaviour policy expectations, and relevant action taken. It is expected that any investigation reports gathered, including any action taken is uploaded onto CPOMS and attached to the reported/recorded incident.
- 1.8.5 Where the member of staff considers the incident as serious peer-on-peer abuse they must write down what has happened and pass this to the Designated Safeguarding Lead or Deputy, who will then be responsible for gathering relevant fact finding information and in response to this make any necessary referral, subject to consideration of the relevant Local Authority thresholds.
- 1.8.6 To support both the victim, the perpetrator(s) and any other students affected by peer on peer abuse the Designated Safeguarding Lead or Deputy, supported by other staff, will carry out relevant risk assessments and use this to support the identification of relevant plans of support to ensure their safety, and to ensure any further peer-on-peer abuse does not take place. In order to achieve this, in more serious cases, this may lead to changes in key groups, on-site learning hours, restrictions regarding movement around Harington sites, and levels of supervision.
- 1.8.7 In line with our partnership with parents it is expected that parents will be informed of any suspected, or regularly reported or known peer-on-peer abuse, and other significant or serious safeguarding matters, unless there is a genuine reason not to do so.

1.9. Information sharing

- 1.9.1 Although we recognise the importance of Data Protection, and General Data Protection Regulation (GDPR), we also recognise that these are not barriers to justified information sharing, but provide a framework to ensure that personal information about individuals, in particular our students, is shared appropriately.
- 1.9.2 Within Harington we will work in line with the national guidance – ***Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers 2018.***

In particular we will work in line with the 7 golden rules re sharing with the regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR), which are:

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

1.9.3 If any member of staff is in doubt about sharing information then they should speak to the Scheme Manager or the Designated Safeguarding Lead or Deputy, to ensure personal information is processed fairly and lawfully. The most important thing is that within Harington any fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of our students.

1.10. Concerns about a member of staff who may pose a risk or harm to children/ students

- 1.10.1 If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to students, then this should be referred, without delay, to the Scheme Manager. Where the concerns/ allegations are in relation to the Scheme Manager, then this should be referred to the Chair of Trustees.
- 1.10.2 In all such cases, the relevant manager will be responsible, working as required with the Designated Safeguarding Lead or Deputy, to carry out initial fact finding (not investigating) to ascertain the facts around the allegation, and once these have been gathered, unless it is found that the allegation is unfounded, this should be referred to the designated officer(s) at the Local Authority. More information is provided in Part Four of this policy.

1.11. Concerns about safeguarding practices within Harington

- 1.11.1 All staff have a responsibility to report any concerns regarding safeguarding practice at Harington. These concerns or examples of poor practice may include such things as:
- failing to act on and refer the early signs of abuse and neglect;
 - poor record keeping;
 - failing to listen to the views of the child;
 - failing to re-assess concerns when situations do not improve;
 - not sharing information;
 - sharing information too slowly;
 - a lack of challenge to those who appear not to be taking action.
- 1.11.2 At Harington all staff and volunteers, in line with our whistleblowing procedures, should feel able to raise concerns about poor or unsafe practice and potential failures in Harington's safeguarding regime, and know that such concerns will be taken seriously by the senior team or where the concerns are in relation to the senior team, with the Chair of Trustees.
- 1.11.3 In addition to this the NSPCC's dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

1.12. Staff Code of Conduct

- 1.12.1 All staff should familiarise themselves with the Staff Code of Conduct which lays out how staff should behave and conduct themselves at Harington. This includes expectations related to safeguarding students including:
- acceptable use of technologies, to protect student
 - staff/ student relationships and communications including the use of social media.

1.13. Students Missing from Education

- 1.13.1 Harington should ensure, as part of induction and in line with annual updates, that it has access to at least two emergency contact numbers for each student, so that contact can be made when required, or where a student is absent, without a reason.
- 1.13.2 Within Harington, due to the vulnerability of the students, where a student is absent and Harington has not been informed by the parent/ carer of this, then the Administrative Assistant will aim to contact the student (and or the parent with the student where the student has communication barriers) on their first day of absence to ascertain the reason for the absence, and ensure the safety of the student. Where contact cannot be made, the Administrative Assistant will be required to inform the Duty Manager who will review recent attendance, in conjunction with the relevant Key Worker, where required and attempt to make contact throughout the day. In all such cases a log of the attempted or achieved contact will be recorded on CPOMS. Where contact is still not made, and there are concerns, then this should be referred to the Designated Safeguarding Lead or Deputy.
- 1.13.3 Where patterns of non-attendance are repeated, and Harington are concerned about the safety of the student then the Designated Safeguarding Lead or Deputy may consider a referral being made.

- 1.13.4 Where a student is leaving Harington, at both standard and non-standard transition points then the DfE's statutory guidance - *Children Missing Education* must be followed, and additional guidance can be found in – *Missing Children and Adults Strategy*. In all cases the commissioning local authority (SEND education department or social care) will be notified.

2. PART TWO - Management of Safeguarding

2.1. Management Expectations

- 2.1.1 Harington Trustees, and Senior Team, including the Designated Safeguarding Lead and Deputy must ensure that they comply with their duties under legislation. This includes having regard to the guidance provided in – *Keeping Children Safe in Education*, ensuring policies and procedures and training at Harington, including safeguarding, are effective and comply with the law at all times.
- 2.1.2 Specifically they should ensure there are effective child protection procedures in place which describes procedures which are in accordance with government guidance and refer to local agreed multi-agency safeguarding arrangement put in place by the three safeguarding partners.
- 2.1.3 The Safeguarding and Child Protection Policy will be updated annually (as a minimum) and available publicly via Harington's website

2.2 Training – Designated Safeguarding Lead and Deputy

- 2.2.1 The designated safeguarding lead and any deputies must undergo the relevant Safeguarding training, to ensure they have the skills and knowledge to carry out the role effectively. They must update this training every 2 years.

In addition to their formal training as set out above, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

2.3 The Designated Safeguarding Team

- 2.3.1 The Designated Safeguarding Lead and/or Deputy, is required to provide support to staff in ensuring they carry out their safeguarding duties, and also to liaise closely with other services, including making safeguarding referrals, in line with expectations. The Designated Safeguarding Lead and/or Deputy will be responsible for ensuring they have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns, including ensure the required safeguarding action is taken promptly.
- 2.3.2 Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare, and this may lead to an assessment under section 17 of the Children Act 1989. Local Authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation. A local authority social worker should acknowledge receipt of any referral, to the referrer within one working day of a referral being made, and they should make

a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection, and in such cases whether urgent action is required;
- the child is in need, and should be assessed under section 17 of the Children Act 1989;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm and whether enquires must be made and the child assessed under section 47 of the Children Act 1989;
- any services are required by the child and family and what type of services;
- further specialist assessments are required to help the local authority to decide what further action to take;
- to see the child as soon as possible if the decision is taken that the referral requires further assessment;
- in line with the Adults' Care Act 2014, similar processes as those identified above, will be followed for vulnerable adults/ students, through referrals to the Multi-Agency Safeguarding Hub, and in line with the relevant Local Authority procedures.

2.3.3 The referrer should follow up if the information is not forthcoming. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment, with the support of the Designated Safeguarding Lead or Deputy, as required.

If, after a referral, the student's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the student's situation improves.

2.3.4 If early help is appropriate, the local authority designated leads will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as in the role of a lead practitioner. Any such cases should be kept under constant review and consideration.

2.3.5 The Designated Safeguarding Lead or Deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the Designated Safeguarding Lead or Deputy is not available, or cannot be contacted, then this should not delay appropriate action being taken, and in such cases the Duty Manager should take on this role. It is therefore important that all those who carry out the Duty Manager role, understand what action to take should a referral to social care or the police be required or alternatively who to contact for advice. In any such cases, any action taken should be shared with the Designated Safeguarding Lead or Deputy as soon as is practically possible, and the Designated Safeguarding Lead or Deputy should consider whether any further action is required.

2.3.6 Where a referral has been made the Designated Safeguarding Leader or Deputy should not assume another professional will take action and share information that might be critical in keeping children safe, and therefore if they feel that action is not being taken in timely manner by the local authority social worker or other, then they should check on progress or report further, if required. .

2.3.7 Trustees, through the Designated Safeguarding Lead and Deputy are responsible for ensuring information sharing between staff/ Harington and local agencies. This includes ensuring arrangements are in place that set out clearly the process and principles for sharing information within Harington and with the three safeguarding partners who are:

- local authorities, children's (or adult's) social care
- chief officers of police,

- clinical commissioning group

The Designated Safeguarding Lead and Deputy are responsible for ensuring information and contact details are available in relation to these groups, for ensuring key contact details are included in this policy, including Local Authority contacts in Local Authorities other than Haringey, and ensuring clarity regarding which local authority to contact in particular cases, in order to ensure Harington is able to make a referral or share information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of the students. This may include concerns and problems which are emerging, or where a student is already known to the local authority children's (or adult's) social care. Within Harington we recognised that information sharing is vital in identifying and tackling all forms of abuse and neglect.

- 2.3.7 The Designated Safeguarding Lead or Deputy must ensure they share relevant information in relation to all serious concerns with the Designated Safeguarding Trustee, and that they report relevant information to the Charity Commission in line with their requirements. Additionally, the Designated Safeguarding Lead or Deputy must also report relevant information to Harington Funders. To support decisions regarding what and when information is reported, to Harington Funders, the Charity Commission guidance will be used to inform this – both in terms of when Safeguarding Information is reported and what is reported.

2.4 Multi-agency working

- 2.4.1 Harington recognises that it plays a pivotal role to play in multi-agency safeguarding arrangements for children and vulnerable adults. To this end it contributes to multi-agency working in line with statutory guidance, including *Working Together to Safeguard Children*, and also in relation to the new safeguarding partner arrangements.
- 2.4.2 The three safeguarding partners, identified above, should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under section 17 and 47. Local authorities, with their partners, should also develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child/ student is referred into local authority children's social care. The Designated Safeguarding Lead and Deputy should ensure they have access to the above information to inform them in their decision making. This should also be available to support any other members of staff who may be required, in exceptional circumstances, to make a referral. In addition to this any relevant information, which may support other staff in their role in safeguarding students at Harington, should also be shared with them.

Local authorities have similar processes to the above in place to safeguard vulnerable adults.

2.5 Data Protection and GDPR

- 2.5.1 In addition to the information provided in Part One regarding information sharing, the Designated Safeguarding Lead and Deputy should be confident of the processing conditions under the Data Protection Act 2018 and GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'. Harington should not, under the GDPR as supplemented by the Data Protection Act 2018, provide students' education data where the serious harm test under the above legislation is met. The Designated Safeguarding Lead and/or Deputy should familiarise themselves with the detail of this this legislation.

- 2.5.2 The Designated Safeguarding Lead or Deputy should ensure that when they or, where required other staff, need to share 'special category personal data' they are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a student at risk.
- 2.5.3 Where students leave Harington the Designated Safeguarding Lead or Deputy should ensure their child protection file is transferred to the new education provider as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained. This should be transferred separately from their main student file.
- 2.5.4 When a new student is joining Harington the Designated Safeguarding Lead or Deputy should ensure:
- the child protection/ safeguarding file is securely received,
 - the student is set up on CPOMS,
 - relevant information transferred onto Harington's safeguarding recording system, CPOMS.

In addition to the transference of the child protection/safeguarding file, the Designated Safeguarding Lead or Deputy should also ensure that key information regarding safeguarding/ well-being needs are used to support induction, prepare support plans, identify initial supervision ratios, and for relevant information to be shared on a need to know basis.

2.6 Concerns about a member of staff who may pose a risk of harm to children

- 2.6.1 If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children, then this should be referred, without delay, to the Scheme Manager. Where the concerns/ allegations are in relation to the Scheme Manager, then this should be referred to the Chair of Trustees. In all such cases, the relevant leader will be responsible, working as required with the Designated Safeguarding Lead or Deputy, to carry out initial fact finding (not investigating) to ascertain the facts around the allegation, and once these have been gathered, unless it is found that the allegation is unfounded this should be referred to the designated officer(s) at the local authority.
- 2.6.2 Harington recognise the legal duty to refer relevant staff or volunteer concerns to the Disclosure and Barring Service (DBS) and that failure to do this, when referral criteria are met, is a criminal offence. The Designated Safeguarding Lead or Deputy are responsible for ensuring that a referral to the Disclosure and Barring Service (DBS) if a member of staff or volunteer has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. [Refer to Part Four for more detailed information].

2.7 Looked After Children

- 2.7.1 Looked After Children means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the local authority. Where Harington students' are classed as a Looked After, Harington will work with all relevant agencies to ensure prompt action is taken to safeguard these children, who are a particularly vulnerable group, and to support their wider needs. In such cases the Designated Safeguarding Lead or Deputy will take on the lead role for the student.
- 2.7.2 The identified lead for the Looked After Student will work with the local authorities to promote their educational achievement. They will also take on responsibility for promoting the educational achievement of any student who has left care through adoption, special guardianship or a child

arrangement order, or who were adopted from state care outside England and Wales. The Scheme Manager will be responsible for ensuring, in such cases, that the identified lead is provided with appropriate training to support them in this role. In all cases, Harington will work in line with the statutory guidance – *Promoting the Education of Looked After Children*.

2.8 Public Sector Equality Duty

- 2.8.1 Compliance with the Public Sector Equality Duty (PSED) is a legal requirement for organisations carrying out public functions. The Equality and Human Rights Commission provides general guidance for educational organisations. PSED is focused on ensuring elimination of any unlawful discrimination, harassment and victimisation, and all managers and staff within Harington should ensure they are working in line with PSED requirements.

2.9 Physical Intervention - Reasonable Force

- 2.9.1 Within Harington the use of reasonable force by any member of staff to safeguard the students, is expected to be rare. The term reasonable force covers the broad range of actions used by staff that involve a degree of physical contact or 'passive contact' to control or restrain a student. It is recognised that under this broad term this may include guiding a student to safety by the arm, standing between students to block a student's path, and in more extreme circumstances involve breaking up a fight or where a learner needs to be restrained to prevent violence or injury. In all these circumstances 'reasonable' means using no more force than is needed. These should be recorded and reported in line with Positive Handling and Behaviour Policy expectations.
- 2.9.2. Where it is believed that a student joining Harington may be required to be restrained on a regular basis then as part of the planning for the student joining Harington, the relevant leader for behaviour will be responsible for ensuring relevant staff have training in relation to how to manage such situations, and a physical intervention plan should be put in place with parents or carers. Where it is not expected that this is required, and therefore has not been planned for, the decision on whether or not to use reasonable force to control or restrain the student will be down to the professional judgement of the staff concerned and should always depend on individual circumstances, and the safety of the student and other students. In all such cases staff should consider how they can keep themselves safe, and where additional support can be accessed.
- 2.9.3 When using reasonable force in response to risks presented by incidents involving students within Harington, who have SEN or disabilities or with medical conditions, Harington should, in considering the risks of the use of intervention, carefully recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty.

2.10. Ofsted Inspection

- 2.10.1 From September 2019, Ofsted's inspections of early years, schools and post-16 provision will be carried out under: Ofsted's Education Framework. Inspectors will always report on whether or not arrangements for safeguarding children and students are effective. In addition to the Framework and Inspections Handbooks, Ofsted publishes specific guidance in relation to the safeguarding criteria of Ofsted Inspections.

3. PART THREE: Safer Recruitment

3.1 General Information

3.1.1 Harington Trustees, through the Senior Leaders, will adhere to the statutory responsibilities to check staff, as part of the recruitment procedures at Harington. In order to prevent people who pose a risk of harm from working with the students, managers must ensure all our staff are appointed in line with Safer Recruitment expectations and that volunteers are DBS checked prior to carrying out their volunteering roles, and that any visitors are appropriately supervised at all times. In line with Harington's recruitment and selection policies and procedures, we will ensure at least one of the interview panel has completed safer recruitment training. Within Harington we currently have three managers who have completed this training, and aim to have at least one trustee who has completed this training. This training will be updated every two years.

3.2 Recruitment, selection and pre-employment vetting procedures

- 3.2.1 We recognise the requirement placed on us to ensure recruitment, selection and pre-employment vetting procedures are in place, in order to create a culture of safe recruitment and, as part of this that we adopt recruitment procedures that help deter, reject or identify people who might abuse children.
- 3.2.2 We will ensure that in relation to any individual working in any capacity that appropriate checks have taken place. As the majority of staff engage in regulated activity, an enhanced DBS certificate, which includes barred list information, will be required for appointments to Harington.
- 3.2.3 In addition to this all Trustees, any contractors who work on a temporary basis, or our volunteers, will also be required to have an enhanced DBS certificate, unless the volunteer is carrying out a short-term volunteering role, or awaiting DBS clearance, and in such cases they must not engage in any unsupervised work with students.
- 3.2.4 In addition to obtaining any DBS certificate, any member of staff who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching. By virtue of the conditions of Funding in respect of funding received from the Education and Skills Funding Agency, before employing a person to carry out teaching work we will take reasonable steps to establish whether that person is subject to a prohibition order made under section 141B of the Education Act 2002. Where this is found to be the case then the member of staff will not be appointed.
- 3.2.5 In relation to all staff we will ensure the relevant pre-appointment checks are carried out. Harington will make arrangements for DBS checks to be carried out, promptly, and for ensuring these are reviewed at least every 5 years.
- 3.2.6 It is sometimes necessary to allow individuals without DBS checks access to Harington during normal operating hours eg visitor and contractors. These individuals will be prohibited from having unsupervised contact with the students. Where they will have contact with students the individuals will be supervised by Harington staff. The relevant member of staff will ensure that any visitor arriving on site is greeted and escorted to the main office (or gardener office if visiting that site) where they will sign in and receive a visitor's badge. If the visitor is only attending for a short time (for example a parent dropping off) they will not be required to sign in, but will be supervised by a member of staff. Visitors requiring a toilet will be asked to use the office or Harington Gardeners facilities.
- 3.2.7 Any students who are volunteering at public events, sales etc or engaging in work experience will be supervised at all times by staff. Such events will be risk assessed in line with Off-Site Visits

procedures, taking account of safeguarding needs, and appropriate control measures will be put in place.

3.2.8 Any offer of appointment made by Harington, to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks. These will include:

- Verifying a candidate's identify. Identification checking guidelines can be found on the GOV.UK website
- Obtain (via the applicant) an enhanced DBS certificate (including barred list information)
- Verify the candidate's mental physical fitness to carry out their work responsibilities. (a job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role)
- Verify the person's right to work in the UK. If any doubts arise then advice will be sought from the GOV.UK website.
- Further checks if the person has lived or worked outside the UK to ensure any employment history gaps are explained.
- Employment references
- Verify professional qualifications, as appropriate.

References will always be obtained from the candidate's current employer, and this will normally take place only in relation to the successful candidate, but prior to their appointment being confirmed. Where a candidate is not currently employed, then verification of their most recent period of employment and reasons for leaving will be obtained. In some cases, references will be requested prior to interview, and in such cases prospective candidates will be informed of this. In such cases this will enable any concerns raised in the reference to be explored further with the referee and taken up with the candidate at interview.

3.2.9 Whenever references are taken they should always be requested directly from the referee and preferably from a senior person with appropriate authority, not just a colleague. Open references, for example in the form of 'to whom it may concern' testimonials, will not be accepted. Where electronic references are received, relevant managers will be required to check that these originate from a legitimate source.

3.2.10 On receipt of references, relevant managers should check these to ensure that all specific questions have been answered satisfactorily, and where it is felt that the referee has been vague or provided insufficient information, they should be contacted to provide further clarification as appropriate. Additionally, references should be compared with key information provided by the candidate, in particular on their application form, to ensure consistency. Where any discrepancies are identified then these should be taken up with the candidate.

3.2.11 Any information about past disciplinary action or allegations that are disclosed should be considered carefully, and discussed with members of the interview process, including trustees, to ensure that a shared and balanced response is provided, prior to a final decision being made, including in relation to internal candidates.

3.3 Single Central Record

3.3.1 Harington maintains a single central record of relevant pre-appointment checks for all the following:

- All staff, agency and third-party supply staff

- Volunteers who engaged in unsupervised activities with students, and volunteers who support students in supervised situations
- Trustees

4. PART FOUR - Managing Allegations of abuse made against staff

4.1 General Information

4.1.1 In line with Keeping Children Safe in Education there are specific duties required by Trustees, Harington Managers and other staff, where there has been an allegation that might indicate a teacher, staff member or volunteer would pose a risk of harm if they continue to work in regular or close contact with students in their present position or any capacity. Examples of this may be where the teacher, staff member or volunteer has:

- Behaved in a way that has harmed a student, or may have harmed a student;
- Behaved towards a child/children outside of Harington, in a way that indicates he or she may pose a risk of harm to children/students;
- Behaved towards a learner/ students in Harington, in a way that indicates he or she may pose a risk of harm to students;
- Possibly committed a criminal offence against or related to a child outside of Harington or student within Harington

Allegations against a teacher, member of staff or volunteer who are no longer within the organisation should be referred to the police. In the case of teachers, staff or volunteers currently working at Harington, irrespective of whether the alleged abuse took place within Harington and/or in relation to a student/students at Harington, the following action should be taken.

4.1.2 It is also important to note that employers also have a duty of care to their employees and in relation to this should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact within Harington if they are suspended. The named contact will be responsible for keeping in regular contact with the employee, on a support/ duty of care basis, and should also be there to respond to the support / duty of care needs identified by the member of staff. In order to minimise any unnecessary distress Harington will aim to deal with any allegation of abuse made against a teacher, other staff member or volunteer as quickly as possible and in a fair and consistent way that provides effective protection for the student, and at the same time supports the person who is the subject of the allegation.

4.2 Procedures for dealing with allegations against staff

4.2.1 The identified procedures for dealing with allegations need to be applied by relevant managers with common sense and judgement, while ensuring they listen to the student. Many cases where an allegation is made may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's (or adult's) social care services. In these cases, Harington will deal with the matter internally, in order to resolve the case without delay.

4.2.2 In rare cases, an allegation is considered to be so serious they require immediate intervention by children's (or adult's) social care services and /or police, will be reported to the Designated Safeguarding Lead who will consult police and children's (or adult's) social care services as appropriate.

- 4.2.3 If an allegation against a member of staff or volunteer is made the Scheme Manager, supported by the Chair of Trustees or other relevant Trustee, should discuss the allegation immediately with the Designated Safeguarding Lead or Deputy. The purpose of an initial discussion is to enable the nature and context of the allegation to be considered, applying collective common sense and judgement, and to agree a course of action, In some cases it may be necessary for additional fact finding information to be gathered prior to the course of action being agreed, which may include any key information about the incident, any previous history such as previous allegations either against the member of staff or volunteer, or by the student or their family. The initial decision will be whether the allegation is considered that it is serious enough, and meets the criteria to involve children's (or adult's) social care and/or police, or that, at this stage it is not considered to meet the criteria and therefore will be managed by Harington. Where any of the key people identified are not available then this should not hold up the decision-making process, as it is important that any serious concerns are reported promptly.
- 4.2.4 Once the decision has been made that the allegation will be managed by Harington then the decision will need to be made, through sharing of information whether:
- It is felt that the allegation could be considered a serious breach of Harington Safeguarding Policy, which may include Harington Code of Conduct, and therefore a full investigation is required, in line with Harington Disciplinary Policy, which may be carried out by an independent investigator
 - It is felt that the allegation is not serious but requires further evidence gathering to decide what support/ action is required, which may include disciplinary action It is expected that this evidence gathering will be carried out internally, and the findings will be used to inform any decision regarding disciplinary action and any support and/or training
 - It is felt that sufficient information is already known about the incident, and relevant learning from the incident has already taken place or will be used to support and/or training
 - It is felt that no further action is to be taken in regarding the individual facing the allegation or concern.
- 4.2.5 Where the decision is made to refer to children's (or adult's) social care and/or police, it is important that early investigations do not take place, including discussions with those who have made the allegation or the staff or volunteer accused, until those agencies have been consulted, and have agreed what information can be disclosed to the accused.
- 4.2.6 Employers must also consider carefully whether the circumstances of a case warrant a person being suspended from contact with the students or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step, while ensuring the safeguarding of the students remains the priority. If as part of the decision making process the decision has been made to refer the allegation to children's (or adult's) social care and/or police, then it will be through this process that the decision will be made, as to whether or not the member of staff needs to be suspended, taking account of the nature of the allegation. However, it is important to note that when making this decision it still remains Harington's decision, and that children's (or adult's) social care services or the police cannot require the Scheme Manager to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice . Where the allegation is being dealt with by Harington then the decision to suspend or not will depend on the nature and circumstances of the allegation, the evidence and information available, consideration of the options available to avoid suspension, and most importantly the safety of the students.

- 4.2.7 In cases where there has been an allegation against a member of staff, this may lead to consideration of the allegation in line with the disciplinary policy. This will also include those that have been referred to social services, once they have investigated.
- 4.2.8 In all of the above cases, including where the decision has been made not to take any further action, the recorded outcome should use one of the definitions and supported justifications below:
- Substantiated: there is sufficient evidence to prove the allegation
 - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
 - False: there is sufficient evidence to disprove the allegation
 - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation, the term, therefore does not imply guilt or innocence
 - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- 4.2.9 In addition to identifying the definition and justification for the outcome, any action, including training or whether the matter was dealt with in line with disciplinary procedures, should also be recorded, and the accused member of staff or volunteer, should be informed in writing of the outcome and any additional training.
- 4.2.10 In addition to this, through discussion, a decision should be made regarding what information should be provided for the student, parent or other party who made the allegation, to ensure they are aware that this has been taken seriously by Harington. If it is felt that the allegation was malicious then this may also include some action / discussion with the student and/or parent.
- 4.2.11 In line with our responsibility to ensure duty of care to our employees, we will aim to minimise the stress inherent in the allegations process. In response to this we will ensure individuals are informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless, the allegation has been referred to children's (or adult's) social care services or the police, and they have an objection to this. We will ensure appropriate advice is given, including that they may wish to contact their trade union representative, if they have one, or a colleague for support.
- 4.2.12 We will take particular care to ensure any employee suspended is kept informed of both the progress of their case and current work-related matters. We will encourage the employee to continue with social contact with colleagues and friends unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.
- 4.2.13 Where the allegation is made by a student, we will ensure parents or carers of the student or students involved will be informed of the allegation as soon as possible, unless where the allegation has been referred to children's (or adult's) social care services and/or the police, agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.
- 4.2.14 The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed but the parents or carers of the child should be told the outcome in confidence. Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against staff or volunteers whilst investigations are ongoing as set out in section 141F of the Education Act 2002. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice. Where a student may have suffered significant harm, or there may be a criminal prosecution, children's (or

adult's) social care services, or the police as appropriate, will decide what information is provided for parents or carers.

- 4.2.15 In deciding what information to disclose, careful consideration should be given to the provisions of the Data Protection Act 2018, the law of confidence and, where relevant, the Human Rights Act 1998.

4.3 Support for the Student

- 4.3.1 It is extremely important that when an allegation is made, managers within Harington make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. We will work in line with the Education Act 2002, which identified reporting restrictions preventing the publication of any material that may lead to the identification of a teacher in an educational establishment who has been accused by, or on behalf of, a student from the same establishment (where that identification would identify the teacher as the subject of the allegation), until the point where an accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves.
- 4.3.2 Take advice from children's (or adult's) social care services and / or police regarding:
- Who needs to know and importantly, exactly what information can be shared;
 - How to manage speculation, leaks and gossip;
 - What if any information can be reasonably given to the wider community to reduce speculation;
 - How to manage press interest if, and when, it should arise.
- 4.3.3 If, in response to the allegation being made the accused staff member or volunteer resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this policy. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of students at Harington and other children/ vulnerable adults, including any in which the person concerned refuses to cooperate with the process. Wherever possible, the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

4.4 Record Keeping

- 4.4.1 Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an

allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

4.4.2 Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. To support us in relation to this we will work in line with the Information Commissioner guidance on employment records in its ***Employment Practices Code and supplementary guidance***, which provides some practical advice on record retention.

4.4.3 A referral to the DBS and consideration should be made as to whether a referral to the Secretary of State is appropriate. If the accused person resigns or their services cease to be used and the criteria are met, a settlement/ compromise agreement must not be made as this would prevent Harington from making a DBS referral where the criteria for referral are met, is likely to result in a criminal offence being committed, as Harington would not be able to comply with its legal duty to make the referral.

4.5 References

4.5.1 Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

4.5.2 When requesting references Harington should ensure references include questions in line with safer recruitment requirements, including questions specifically relating to whether the member of staff is suitable to work with children and vulnerable adults.

4.6 Oversight and monitoring

4.6.1 The Designated Safeguarding Lead and Deputy have overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners. The Designated Safeguarding Lead and Deputy will provide advice and guidance to the Scheme Manager (if they are not the Designated Safeguarding Lead), in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.

4.6.2 In cases where Harington is made aware that the Secretary of State has made an interim prohibition order in respect of an individual who works at Harington, immediate action should be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work. In such cases Harington Manager, should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements.

- Redeployment within Harington so the individual does not have direct contact with the student or students concerned;
- Providing an assistant to be present when the individual has contact with students;
- Redeploying to alternative work in Harington so the individual does not have unsupervised access to students;
- Moving the student or students to classes where they will not come into contact with the member of staff making it clear that this is not a punishment and parents have been consulted;

- Temporarily redeploying the member of staff to another role in a different location.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The Scheme Manager/ Designated Safeguarding Lead, with support from the Chair of Trustees or other relevant Trustee should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

- 4.6.3 If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the Scheme Manager/ Designated Safeguarding Lead and the Designated Deputy Safeguarding Lead. This should also include what alternatives to suspension have been considered and why they were rejected. Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched in line with Harington’s disciplinary policy, but it is expected that this will be within one working day. This written confirmation should provide as much detail as appropriate for the reasons for the suspension. They should also be informed who their named contact will be within Harington and their contact details.

4.7 Specific Actions

- 4.7.1 Following a criminal investigation or a prosecution the Designated Safeguarding Lead and Deputy should discuss with the Scheme Manager, supported by the Chair of Trustees or other relevant Trustee, whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children’s social care services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.
- 4.7.2 If the allegation is substantiated and the person is dismissed or the employer ceases to use the person’s services, or the person resigns or otherwise ceases to provide his or her services, the Designated Safeguarding Lead or Deputy should discuss with the Scheme Manager, with any relevant external support, whether Harington will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; and, any required reporting in line with qualified teachers. When making this decision full consideration of the legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child, will be taken into account. .
- 4.7.3 Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Scheme Manager should consider how best to support this process, for the member of staff or volunteer. Depending on the individual’s circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The Scheme Manager should also consider how the person’s contact with the student or students who made the allegation can best be managed if they are still a student at Harington.

5. PART FIVE: Child on Child Sexual Violence and Sexual Harassment

5.1 Managing Reports of child on child sexual violence and sexual harassment

- 5.1.1 This part of the guidance is about managing reports of child on child sexual violence and sexual harassment. The Trustees and Harington Managers, including the Designated Safeguarding Lead

and Deputy, will take note of the guidance document - ***Sexual Violence and Sexual Harassment Between Children in Schools and Colleges***, in supporting Harington in dealing with any child on child sexual violence and sexual harassment incidents. This guidance includes information about:

- what sexual violence and sexual harassment look like;
- important context to be aware of, related legal responsibilities for Harington;
- advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment.

- 5.1.2 Trustees and Managers within Harington recognise that reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Within Harington we believe that preplanning, effective training and effective policies will enable us to deal with such incidents calmly, but responsively, on a case by case basis, with the Designated Safeguarding Lead and/or Deputy taking a lead role and using their professional judgements, supported by other agencies such as children's social care and the police, as required.
- 5.1.3 Within Harington we believe the initial response to any report from a student is important and that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. We want to ensure that a victim is never given the impression that they are creating a problem by reporting sexual violence or sexual harassment or made to feel ashamed for making a report.
- 5.1.4 As identified in Part One of this policy, all staff should be trained to manage such a situation and report from a student, and this will include:
- not promising confidentiality;
 - recognising that a student is more likely to disclose to someone they trust – and therefore this student has placed them in a position of trust;
 - if possible and appropriate, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy), however in most cases this will not be possible;
 - being supportive and respectful of the student;
 - listening carefully to the student, being non-judgemental;
 - not ask leading questions and only prompting the student where necessary with open questions – where, when, what etc, only taking key notes if this is not intrusive;
 - Informing the victim, who what they have reported will be passed on to, and what may happen next;
 - at the end immediately writing down a summary of what the student told them, only recording the facts as presented by the student (the notes should not reflect the personal opinion of the note taker) NB it is important to note that this summary could become part of a statutory assessment by children's social care and/ or part of a criminal investigation;
 - promptly, without delay, passing the written summary to the Designated Safeguarding Lead and/or Deputy manually, to avoid any breach of confidentiality (this is not reported by the online recording and reporting system – CPOMS), if the Designated Safeguarding Lead or Deputy were not involved in the initial reporting. If neither the Designated Safeguarding Leader or Deputy are available then it must be passed to the most senior and appropriate person available;
 - only sharing what has been reported to them on a need to know basis.
- 5.1.5 The Designated Safeguarding Lead or Deputy will be responsible for considering the information provided, alongside the full picture of information already identified on CPOMS, and for then engaging with children's (or adult's) social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. While making these decisions the Designated

Safeguarding Lead or Deputy, supported by the member of staff trusted by the student, where appropriate, should taking into account:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment.
- When to inform the alleged perpetrator, taking account of the fact that while the facts of the case are being established and liaising with children's social care and police, Harington will wait for guidance from them regarding when and how the perpetrator will be informed.

The Designated Safeguarding lead is also responsible for ensuring relevant information is recorded and stored on Harington's online recording and reporting system (CPOMS), ensuring confidentiality to be maintained.

5.1.6 In making the decision regarding what action to take when managing any reports of sexual violence and/or sexual harassment, including whether to report to children's (or adult's) social care or police the following four likely scenarios will be considered by the Designated Safeguarding Lead and/or Deputy:

1. Manage internally

- in some cases of sexual harassment eg one-off incidents, Harington may take the view that the students concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, including through use of behaviour management approaches to manage inappropriate behaviour, and through student support

2. Early help

- In line with 1 above, Harington may decide that the students involved do not require statutory interventions, but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a student's life. Providing early help is more effective in promoting the welfare of students than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.
- The Designated Safeguarding Leader and/or deputy will be responsible for activating Early help
- Where Early help is identified Harington will work alongside any identified multi-agency early help, supporting preventative education and effective engagement and partnership working with parents and carers
- The Early help provided will be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated

3. Referrals to children's (or adult's) social care

- Where a student has been harmed, is at risk of harm, or is in immediate danger, the Designated Safeguarding Lead and/or Deputy will make a referral to local children's (or adult's) social care;
- At the referral to children's (or adult's) social care stage, Harington will generally inform parents or carers, unless there are compelling reasons not to eg if informing a parent or carer is going to put the student at additional risk. The Designated Safeguarding Lead and/or Deputy will make this decision with the support of children's (or adult's) social care;
- If a referral is made, the Designated Safeguarding Lead or Deputy, will provide relevant information to children's (or adult's) social care to support them in determining whether any of the students involved are in need of protection or other services

- When statutory assessments are appropriate the Designated Safeguarding Lead, will work alongside, and co-operate with the relevant lead social worker in order to help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other students require support
- Harington will not wait for the outcome (or even the start) of a children's (or adult's) social care investigation before protecting the victim and other students (see Risk Assessments 5.3);
- The Designated Safeguarding Lead or Deputy will work closely with children's (or adult's) social care (and other agencies as required) to ensure any actions taken by Harington will not jeopardise a statutory investigation. The risk assessment (refer to 5.3) will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator, and other students directly involved in the safeguarding report and all other students in the school will be immediate;
- Where children's social care decide that a statutory intervention is not appropriate the Designated Safeguarding Lead or Deputy will consider a further referral if they believe the student remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the Designated Safeguarding Lead or Deputy will consider other support mechanisms such as early help, specialist support and pastoral support.

4. Reporting to the Police

- Where Harington inform the police of a report this will generally be in parallel with a referral to children's (or adult's) social care,
- The Designated Safeguarding Lead and Deputy will ensure they are clear about the local process for referrals and follow the process
- Where there is a report of rape, assault by penetration or sexual assault, this will be passed on to the police.
- At this stage, the Designated Safeguarding Lead or Deputy will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a student at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that support is being provided for the student and that the student is being supported in any decisions they take. The Designated Safeguarding Lead will make the relevant decisions with the support of children's (or adult's) social care and any appropriate specialist agencies.
- Where a report has been made to the police the Designated Safeguarding Leader and/or Deputy will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. The Designated Safeguarding Lead will also discuss the best way to protect the victim and their anonymity
- The Designated Safeguarding Lead and Deputy will be aware of the local police force arrangements, including contact details which should be clearly identified within this Safeguarding Policy
- If the decision is made by the Police not to take further action, the Designated Safeguarding Lead and /or Deputy will be required to continue to engage with specialist support for the victim

Whatever the response made at Harington, in line with the above options, the decision will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns and decision making will be recorded and reported on Harington's online recording system, CPOMS, ensuring confidentiality.

5.1.7 Managing police bail

- Due to the fact that police bail has been dramatically reduced, and the vulnerability of the students who attend Harington, it is highly unlikely that a student attending Harington will be on police bail with conditions attached to mitigate any risks;
- In the absence of these, while any criminal investigation is taking place, early engagement and joined up working between Harington and children's social care and the police will ensure support for the victim, alleged perpetrator and other students involved. Where required, the Designated Safeguarding Lead and/or Deputy will seek advice from the police to support Harington in managing their safeguarding responsibilities;
- In any case where a student is on bail, due to this being deemed proportionate and necessary, the Designated Safeguarding Lead and/or Deputy will work with children's social care and the police to manage any implications to ensure all learners are safeguarded. An important consideration will be the expectation that the victim will be able to continue in their normal routine, including continuing to receive suitable education.

5.1.8 Managing any delays in the criminal process

- It is recognised that there may be delays in any case that is being progressed through the criminal justice system and therefore Harington will ensure appropriate risk assessments are in place to protect the victim, perpetrator and other students
- Whilst protecting the student and/or taking any behaviour management measures against the alleged perpetrator the Designated Safeguarding Lead and/or Deputy will work closely with the police (and other agencies as required) to ensure any actions do not jeopardise the police investigation

5.1.9 The end of the criminal process

- If a student is convicted or receives a caution for a sexual offence, the Designated Safeguarding Leader and/or Deputy will be responsible for updating its risk assessment, ensuring relevant protections are in place for all students, and if not already in place, consider any suitable action in light of Harington's Behaviour Policy, including whether a permanent exclusion from Harington is required.
- The Scheme Manager, supported by the Chair of Trustees or other identified Trustee, and the Designated Safeguarding Lead and/or Deputy identify how they will manage any public interest, taking account of legal anonymity reporting restrictions, and that they ensure both the victim and alleged perpetrator remain protected, especially from any bullying or harassment, including online;
- Harington will continue to provide support for the victim and the alleged perpetrator for as long as this is required, where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict. Within Harington it is recognised that a not guilty verdict or decision not to progress with the case will likely be traumatic for the victim, and that this may require additional support for the victim, at this time. The alleged perpetrator will also require ongoing support for the difficulties they will have experienced through the process. It is also recognised that, the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded.

5.2 Ongoing response – Safeguarding and supporting the victim

- 5.2.1 The following principles which are based on effective safeguarding practice will help shape and decisions regarding safeguarding and supporting the victim, in the case of any allegations of sexual violence and sexual harassment within Harington
- Consider the age, development stage and SEND of the student;
 - Consider the nature of the allegations and potential risk of further abuse;
 - Consider whether there is any known or possible power imbalance is likely to have been created between the victim and the alleged perpetrator;
 - Ensure the needs and wishes of the victim are paramount in any response;
 - Enable the student, taking account of their SEND and vulnerabilities feel as much in control of the process as is reasonably possible;
 - Wherever possible, the victim if they wish, should be able to continue in their normal routine, keeping the victim's daily experiences as normal as possible, so that they feel Harington is a safe space for them;
 - Ensure the victim is never made to feel they are the problem for making a report or made to feel ashamed for making a report;
 - Ensure in deciding what support is required that this is proportional and is considered on a case-by-case basis. The support required regarding a one-off incident or sexualised name-calling is likely to be vastly different from that for a report of rape.
- 5.2.2 Support can include access to the following
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim;
 - Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the student or Harington. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust;
 - Child and adolescent mental health services (CAMHS);
 - Rape Crisis Centre's can provide therapeutic support for students who have experienced sexual violence;
 - Internet Watch Foundation (to potentially remove illegal images).
- 5.2.3 At Harington we recognise that victims may not disclose the whole picture immediately and that they may be more comfortable providing information on a piecemeal basis. For this reason it is essential that the opportunity for dialogues is kept open, and if it is identified that ongoing support will be required that the Designated Safeguarding Lead identifies a trusted member of staff, chosen by the victim, to meet with them regularly and talk about their ongoing needs.
- 5.2.4 We also recognise that a victim of sexual violence may be traumatised and, in some cases, may struggle in a normal classroom environment, and therefore opportunities will be provided for the student to have some time withdrawn from lessons and activities, if they wish this, but in all such cases Harington will work to avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups.

5.2.5 Harington, in line with its behaviour and anti-bullying policies will do everything it reasonably can to protect the victim from bullying and harassment, as a result of any report they have made. Whilst they will be given all the necessary support to remain at Harington, it is recognised that if the trauma results in the victim being unable to do this, Harington Managers will work with the Local Authority to identify an alternative provision to enable the student to continue to receive suitable education and training. Where this is the case this will be at the request of the victim (and following discussion with their parents or carers). Should the victim move to another educational institution (for any reason), then the Designated Safeguarding Lead and /or Deputy will ensure the new educational and/or training organisation is made aware of any ongoing support needs, having considered the most appropriate way to do this with the student and parents/carers, and also for transferring the child protection file.

5.3 Risk Assessments

5.3.1 When there has been a report of sexual violence, the Designated Safeguarding Lead and/or Deputy must 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 and needs assessment should consider:

- the victim, especially their protection and support
- the alleged perpetrator
- the other students at Harington, especially any actions that are appropriate to protect them.

5.3.2 Risk Assessments should be recorded and filed on CPOMS as an attachment linked to the reported incident. Harington risk assessments are not intended to replace the detailed assessments of expert professionals, but these should be used to inform Harington's approach to supporting and protecting the students and the updating of the risk assessments

5.3.3 Where there is a serious report, while the facts of the case are being established and liaising with children's social care and the police is taking place, Harington recognise that the perpetrator and his/her parents may not be initially aware of the allegation, and that until this has taken place they will ensure the safety of the victim and other students, which may initially require the victim to be working separately and include increased vigilance with regards the perpetrator. However, when the alleged perpetrator has been informed this may lead to the alleged perpetrator being removed from any classes they share with the victim and appropriate planning to ensure reasonable distance between the victim and perpetrator at all times while on Harington premises, and where relevant in relation to travel. In doing this Harington will ensure that the perpetrator and his/her parents, understand that this done to ensure safety, is done in the best interests of both students, and that it should not be perceived to be a judgement of guilt

5.3.4 For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, use of the premises and transport arrangements, should be considered immediately, with appropriate arrangements, identified on a case by case basis being put in place.

5.3.5 When making the risk assessment decisions the Designated Safeguarding Lead and/or Deputy should take account of the wishes of the victim, the nature of the allegations and the protection of other students in Harington.

5.3.6 At all times Harington will be vigilant regarding potential risks and be responsible for putting adequate measures in place to protect the victim, the perpetrator, and keep all students safe.

6. PART SIX: Summary Action

6.1 Monitoring and Evaluation

6.1.1. Implementation of this policy will be monitored by the Designated Safeguarding Lead and /or Deputy and this will include:

Monitoring

- monitoring that staff are effectively carrying out their support and supervision responsibilities
- monitoring through CPOMS that staff are effectively, appropriately and consistently recording and reporting safeguarding concerns and wider 'at risk concerns', including behaviour and attendance concerns
- monitoring the progress of students, in particular students identified 'at risk'
- monitoring of recruitment procedures and appropriate checks
- check on the Single Central Record

Evaluation

- analysis of safeguarding incidents and actions taken;
- evaluation of the impact of student support plans, and external support plans;
- evaluation of the effectiveness of the Code of Conduct Policy;
- evaluation of the effectiveness of the Safeguarding and Child Protection Policy, at least annually;
- evaluation of the impact of support for learners on the child protection list or those identified as at risk.

6.2 Overall Reporting

6.2.1 In line with the monitoring and evaluation data relevant reports will be provided for the Trustees on a quarterly basis and an annual safeguarding report will be provided.

Appendix 1: Possible signs of Neglect and Abuse

Additional information to support staff in understanding signs of Neglect and/or Abuse

Possible signs of Physical Abuse

- Unexplained injuries or burns, particularly if they are recurrent, and refusal to discuss injuries
- Parental refusal to discuss or inconsistent explanations offered or improbable excuses given to explain injuries
- Untreated injuries or delay in reporting them
- Excessive physical punishment
- Arms and legs kept covered in hot weather
- Fear of returning home or of parents being contacted or running away
- Aggression towards other

Possible signs of Neglect

- Constant hunger/ tiredness, poor personal hygiene or poor state of clothing
- Frequent lateness and/or unexplained non-attendance
- Untreated medical problems
- Low self-esteem
- Poor peer relationships
- Stealing.

Possible signs of Emotional Abuse

- Low self-esteem
- Continual self-deprecation
- Sudden speech disorder
- Significant decline in concentration
- Socio-emotional immaturity
- 'Neurotic' behaviour eg rocking, head banging
- Self-mutilation
- Drug or solvent abuse or eating problems
- Compulsive stealing
- Extremes of passivity or aggression
- Indiscriminate friendliness
- Running away.

Possible signs of sexual abuse

Behavioural

- Lack of trust in adults or over-familiarity with adults or withdrawal from friends or poor peer relationships or fear of a particular individual
- Social isolation – withdrawal or introversion or developmental regression
- Sleep disturbance (nightmares, irrational fears)
- Running away from home
- Reluctance or refusal to participate in physical activity or to change clothes for physical activities or fear of medical examinations
- Low self-esteem
- Drug, alcohol or solvent abuse

- Display of sexual knowledge beyond their years, or unusual interest in the genitals or adults, children or animals, or expressing affection in inappropriate ways e.g 'French kissing' or over-sexualised behaviour, compulsive masturbation or sexual promiscuity
- Abnormal sexualised drawing
- Fear of bathrooms, showers, closed doors
- Stealing
- Psychosomatic factors e.g. recurrent abdominal pain or headache.

Physical / Medical

- Sleeplessness, nightmares, fear of the dark
- Bruises, scratches, bite marks on top of the thighs or genital areas
- Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
- Pain on passing urine or recurrent urinary infection or sexually transmitted diseases
- Stained underwear or unusual genital odour
- Anxiety/ depression or self-mutilation/ suicide attempts
- Eating disorder e.g. anorexia nervosa or bulimia
- Discomfort/difficulty in walking or sitting
- Pregnancy – particularly when reluctant to name father
- Soiling or wetting
- Drug or alcohol abuse.

Possible signs of Child Sexual Exploitation

- Underage sexual activity or inappropriate sexual or sexualised behaviour or sexually risky behaviour, 'swapping' sex
- Repeat sexually transmitted infections
- In girls, repeat pregnancy, abortions, miscarriage
- Receiving unexplained gifts or having affordable new things (clothes, mobile) or expansive habits (alcohol, drugs), changes in the way they dress
- Having multiple mobile phones and worrying about losing contact via mobile
- Going to hotels or other unusual locations to meet friends or seen at known places of concern or getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends or hanging out with anti-social groups or contact with known perpetrators
- Involved in abusive relationships, intimidated/fearful of certain people or situations
- Truancy, exclusion, disengagement, opting out of education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual), mood swings, volatile behaviour, emotional distress, or injuries
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- Drug or alcohol misuse
- Getting involved in crime, police involvement, police records
- Involved in gangs, gang fights, gang membership

Signs that may indicate the female learner has undergone FGM

- Prolonged absences from learning and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable or complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about

- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection.

Appendix 2: Additional Information - The Prevent Duty and Radicalisation

The Prevent Duty is part of the Counter Terrorism and Security Act 2015. Section 26 of the Act places a duty on educational institutions to have, due regard to the need to prevent people from being drawn into terrorism. Radicalisation is the process of causing someone to become a supporter of terrorism, or forms of extremism that lead to terrorism.

Prevent is one strand of the Government's counter terrorism Strategy. Its main aim is to prevent people from becoming terrorists or supporting terrorism. The three main objectives are:

- Terrorist ideas should be identified and challenged
- Vulnerable people should be supported and protected from becoming terrorists or supporting terrorism
- Communities, institutions and the Government should all work together to tackle the problem of extremism.

Any evidence of extremism must be **reported immediately**, and in Harington is considered a serious concern. Staff and learners must be vigilant for comments made or comments on social media which may indicate vulnerability to radicalisation.

Those who are most vulnerable to radicalisation (but not limited to) are:

- People with learning difficulties and/or mental health issues
- Younger people from age 13 upwards
- Those experiencing an identity or personal crisis
- Individuals with feelings of un-met aspirations or a sense of injustice
- People with a need for adventure or excitement
- Those with a pre-existing conviction that their religion or culture is under threat
- Individuals who feel socially isolated, and possibly, suffer from depression
- Those who have a history of criminal behaviour.

Some potential indicators:

- Change in appearance
- Recent religious conversion, a search for answers – identity, faith and belonging
- Desire for adventure/ excitement or to enhance self-esteem
- Sense of grievance triggered by personal experience or racism, discrimination, aspects of government policy etc
- Isolated from peers or associating with only one group of people, and withdrawal from family members
- A series of traumatic events – global, national or personal

Some potential warning signs:

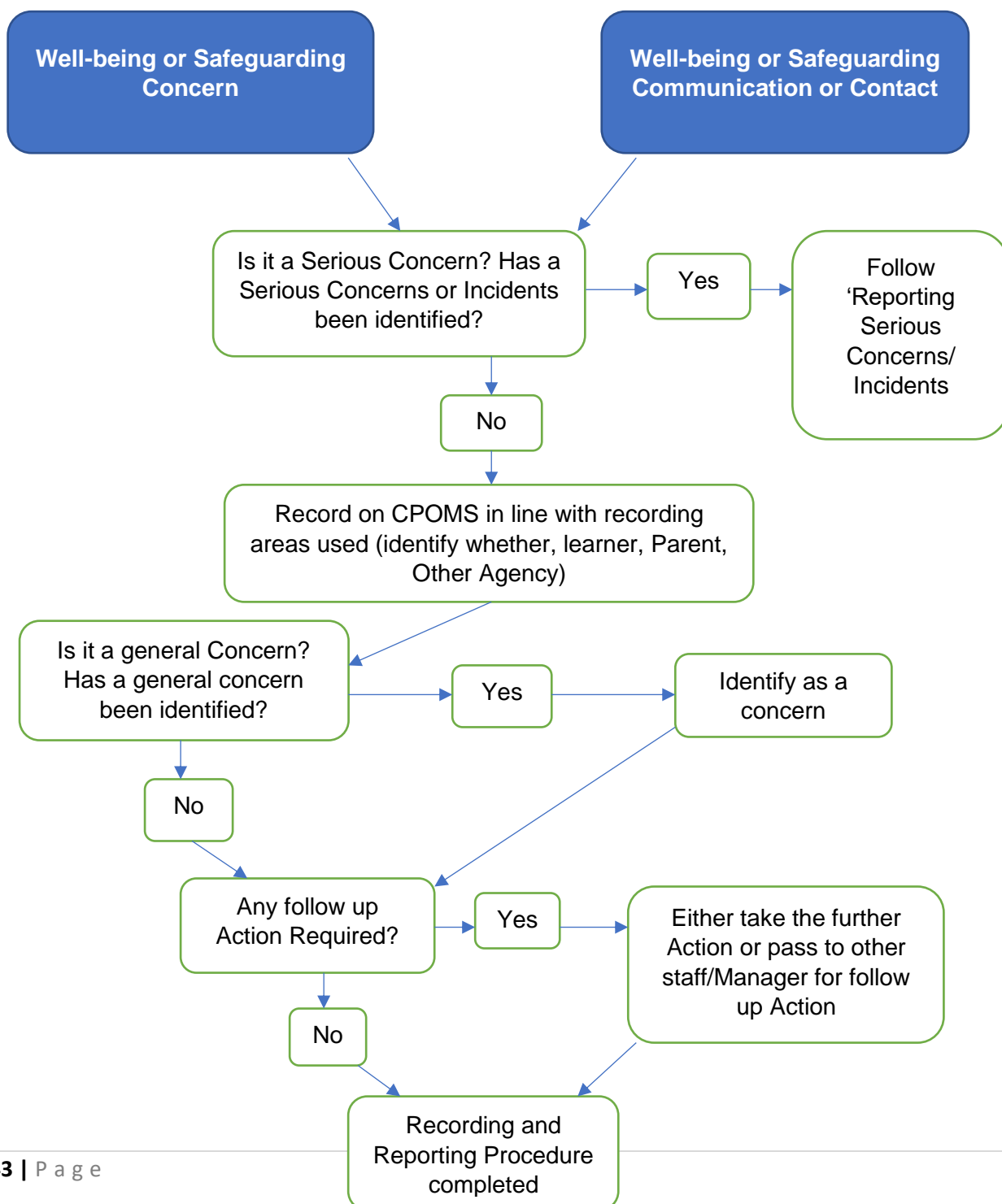
- Graffiti, symbols or artwork promoting extremist messages
- Accessing extremist material online or possessing literature relating to extreme views
- Voicing opinions drawn from extremist ideologies or narratives
- Use of extremist or hate terms to exclude other or incite violence.

Those who are risk of being drawn into terrorist activity can be supported through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

Harrington rules regarding use of ICT are included in the Acceptable Use of ICT policy. Internet usage at Harrington is monitored and any concerns raised through safeguarding.

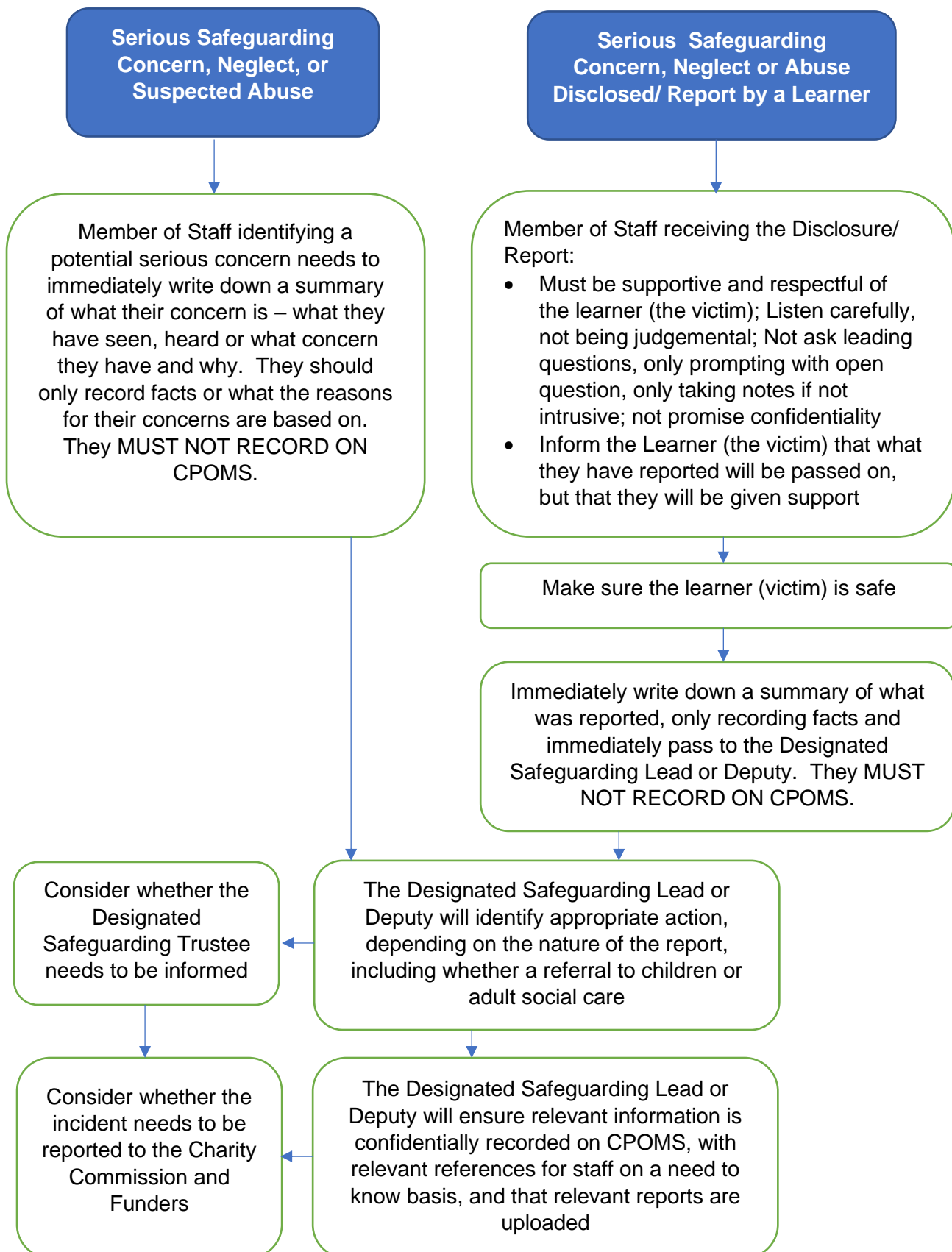
Appendix 3: Recording and Reporting Flowchart

It is the duty of all staff to record and report both general well-being, neglect concerns, and serious well being, neglect and abuse concerns. All staff are also expected to report general well-being communication with learners, parents and other agencies.



Appendix 4: Recording and Reporting Flowchart – Serious Safeguarding Incident, Concern or Disclosure

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



Appendix 5: Additional Information for staff – Dealing with as Disclosure

Dealing with a Disclosure of Abuse

Staff must not question a student, however if a student makes a disclosure to a member of staff about possible abuse there are a number of things that should be done to support the student:

- React calmly and be available to listen;
- Keep your responses short, simple, slow, quiet and calm;
- Inform the student that this information will now have to be passed on - DO NOT promise confidentiality;
- Let the student know that you understand how difficult it is to talk about the experience and that she/he is brave to tell;
- Reassure the student that he/she has done the right thing by disclosing;
- Do not interrogate the student or put words into the student's mouth, but note the main points carefully;
- Make accurate notes as soon as possible about what you have been told, seen or heard;
- Reassure the student and let them know they were right to inform us;
- DO NOT remove a student's clothing to 'examine' him/her for any marks. Note any marks that you have noticed or have been brought to your attention by the student;
- Do not stop a student who is freely recalling significant events;
- Do not judge the abuser
- Immediately inform the Designated Safeguarding Lead or Deputy.

Some key suggested words to use:

- You are very brave.....I believe you
- It is not your fault
- In order to keep you safe I will need to talk to someone else about what do next.

Safeguarding and Child Protection issues are always treated as a priority.

Failure to pass this information on could put the student at further risk.

General Guidelines for staff

- Never promise a student to keep a secret;
- Take note of remarks made by a student of untoward experience and pass this on to the Designated Safeguarding Lead or Deputy – remember questioning is NOT ALLOWED;
- Take a note of and report to the Designated Safeguarding Lead or Deputy any untoward marks on the student;
- Take every opportunity to preserve dignity when dealing with students;
- Staff working with individual students are advised to keep the door open, stay in sight of other adults, or to inform other staff where they will be, with whom and for how long;
- The Designated Safeguarding Lead or Deputy will liaise with children's (or adult's) social care when necessary, and will do so before the end of the school day, by phone with a written confirmation of the allegation following promptly;
- The Designated Safeguarding Lead or Deputy will inform the Designated Safeguarding Trustee, as appropriate;
- Senior Leaders, lead by the Designated Safeguarding Lead or Deputy, will promptly consider any measures which need to be put in place to protect the student following an allegation of abuse;
- The Designated Safeguarding lead will be responsible for reporting to the Charity Commission and Funders in line with reporting requirements.

Respect Confidentiality

Although staff have a 'duty of care' to pass on any information regarding concerns about abuse or suspected abuse to the Designated Safeguarding Lead or Deputy staff must also respect the individual right to confidentiality and therefore must not share information of the disclosure unnecessarily to other staff unless they have been directed to do so by the Designated Safeguarding Lead or Deputy.

The disclosure MUST ONLY BE SHARED ON A NEED TO KNOW BASIS.

Appendix 6 – Guidance – Reporting to the Charity Commission (and Funders)

The responsibility to report

The Charity Commission requires charities to report serious incidents. If a serious incident takes place within your charity, it is important that there is prompt, full and frank disclosure to the Commission. You need to report what happened and, importantly, let the Commission know how you are dealing with it, even if you have also reported it to the police, donors or another regulator.

This guidance helps charity trustees identify serious incidents. It also explains how to report them and what to report.

What is a serious incident?

A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to your charity's beneficiaries, staff, volunteers or others who come into contact with your charity through its work (who are collectively referred to throughout this guidance as people who come into contact with your charity through its work)
- loss of your charity's money or assets
- damage to your charity's property
- harm to your charity's work or reputation

For the purposes of this guidance, "significant" means significant in the context of your charity, taking account of its staff, operations, finances and/or reputation.