The Harington Scheme

Safeguarding Children, Young People and Adults at Risk Policy 2026-27

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Designated Safeguarding Lead (DSL)	Student Support & Safeguarding Manager- Barbara Erskine
Safeguarding Trustee	Alison Kelly
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1. Policy Statement

The Harington Scheme is committed to safeguarding and promoting the welfare of every student and expects all staff, trustees, volunteers, contractors and others working on behalf of the organisation to share this commitment.

Safeguarding is everyone's responsibility. Harington works with students aged 16-25 and therefore operates one integrated safeguarding framework which addresses both the statutory child protection duties

applying to students under 18 and the adult safeguarding duties that may apply to students aged 18 and over.

Harington recognises that all students have the right to learn in a safe environment and to be protected from abuse, neglect, exploitation, discrimination and other forms of harm, whether these occur within the family, community, college, workplace, online or elsewhere.

Our safeguarding arrangements are child-centered where the student is under 18 and person-centered for all students. They are informed by the particular needs, wishes, communication methods and vulnerabilities of the young people and adults we support.

Harington provides education and training for young people aged 16-25, many of whom have special educational needs and disabilities (SEND) and Education, Health and Care Plans (EHCPs). We recognise that disability, communication needs, dependence on others for support, reduced understanding of risk and difficulties recognising or reporting abuse may increase safeguarding vulnerability.

Safeguarding practice at Harington will therefore be accessible, responsive to individual communication needs and based on professional curiosity. Staff must never assume that changes in behaviour, presentation, attendance, communication or emotional regulation are simply a consequence of a student's disability or additional needs.

For a student under 18, the welfare and best interests of the child will be a primary consideration. For an adult student, safeguarding practice will promote the person's wellbeing, rights, wishes and desired outcomes while taking proportionate action to prevent or stop abuse or neglect.

2. Purpose

This policy sets out Harington's arrangements for safeguarding all students aged 16-25. It provides a single framework for identifying and responding to concerns about children, young people and adults who may be at risk of abuse, neglect, exploitation or other harm.

The policy explains how Harington will recognise concerns, provide accessible ways for students to raise them, respond promptly, make appropriate referrals, work with families and external agencies, share information lawfully, maintain safeguarding records and manage concerns about adults working with students. It also covers child-on-child abuse, abuse between adults, sexual harassment and harmful sexual behaviour, online safety, Prevent, safer recruitment, allegations and low-level concerns, and safeguarding in work experience, supported internships and off-site provision.

Harington does not operate a separate safeguarding adults policy. The adult safeguarding requirements of the Care Act 2014, associated statutory guidance, the Mental Capacity Act 2005 and relevant local Safeguarding Adults Board procedures are incorporated into this policy alongside the requirements of Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026.

3. Statutory and Guidance Framework

This policy has been developed with regard to relevant legislation and statutory guidance, including Keeping Children Safe in Education 2026 (KCSIE), Working Together to Safeguard Children 2026, the Children Acts 1989 and 2004, Education Act 2002, Children and Social Work Act 2017, Care Act 2014 and Care and Support Statutory Guidance, Mental Capacity Act 2005 and its Code of Practice, Equality Act 2010, Human Rights Act 1998, Counter-Terrorism and Security Act 2015 and Prevent Duty Guidance,

Domestic Abuse Act 2021, Female Genital Mutilation Act 2003, Serious Crime Act 2015, Modern Slavery Act 2015, Sexual Offences Act 2003, Data Protection Act 2018, UK General Data Protection Regulation, Data (Use and Access) Act 2025, Crime and Policing Act 2026, relevant London Child Protection Procedures, Pan-London safeguarding adults procedures and local safeguarding partnership arrangements.

Harington will also have regard to current guidance issued by the Department for Education, Department of Health and Social Care, Home Office, local safeguarding children partnerships, Safeguarding Adults Boards and other relevant statutory bodies. Where guidance or legislation changes during the life of this policy, Harington will apply the current legal and statutory requirements.

4. Scope and Definitions

Children and adults at risk

For the purposes of KCSIE and child protection legislation, a child is anyone who has not yet reached their 18th birthday. KCSIE therefore applies to Harington students who are under 18.

An adult is a person aged 18 or over. The Care Act 2014 safeguarding duties apply where an adult has needs for care and support, whether or not the local authority is meeting those needs; is experiencing or at risk of abuse or neglect; and, as a result of those care and support needs, is unable to protect themselves from the abuse or neglect or the risk of it. This policy uses the term 'adult at risk' as a practical description of an adult who may meet, or may potentially meet, these criteria.

Not every Harington student aged 18 or over will automatically meet the Care Act adult safeguarding threshold. Staff must nevertheless report concerns about any adult student to the Designated Safeguarding Lead (DSL). The DSL will consider the person's circumstances, risk, care and support needs, capacity, wishes and the appropriate safeguarding or support pathway.

When a student turns 18 while attending Harington, safeguarding support will not stop or be artificially interrupted. From the age of 18, any safeguarding issue must be considered through adult safeguarding arrangements, while relevant children's services and other partners may remain involved where appropriate.

Where an incident or relationship involves both a child and an adult, Harington will consider the safeguarding needs of each person separately and together. This may require simultaneous use of child protection and adult safeguarding procedures and liaison with more than one local authority or safeguarding service.

5. What Safeguarding Means

For children, safeguarding and promoting welfare means providing help and support as soon as problems emerge; protecting children from maltreatment whether within or outside the home, including online; preventing impairment of mental or physical health or development; ensuring that children grow up in circumstances consistent with safe and effective care; and taking action to enable them to have the best outcomes.

For adults, safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. Adult safeguarding is concerned with preventing and stopping both the risk and experience of abuse or

neglect while promoting the adult's wellbeing and, wherever possible, taking account of their views, wishes, feelings, beliefs and desired outcomes.

Under section 42 of the Care Act 2014, the local authority's adult safeguarding duty applies where it has reasonable cause to suspect that an adult has needs for care and support, whether or not those needs are being met; is experiencing or is at risk of abuse or neglect; and, because of those care and support needs, is unable to protect themselves from the abuse or neglect or the risk of it.

Safeguarding is broader than child protection or a statutory section 42 enquiry. At Harington it includes prevention, early identification, accessible support, proportionate intervention, protection from harm and effective multi-agency working for all students.

6. Safeguarding Principles

Safeguarding is everyone's responsibility. Every member of staff has a responsibility to notice concerns, take them seriously, record them and act promptly.

The student is at the center of safeguarding practice. For children, practice must be child-centered and guided by their best interests. For adults, Harington will follow the principles of Making Safeguarding Personal, seeking to understand what the adult wants to happen and supporting them to have choice and control wherever this can be achieved safely and lawfully.

Staff must work on the basis that *'it could happen here'*. Professional curiosity is essential and staff should never assume that abuse, neglect or exploitation could not affect a Harington student.

Early action is important. Concerns should be identified and addressed before they escalate wherever possible, while recognising that immediate referral or emergency action may sometimes be required.

Students must be listened to and supported to participate in decisions. A student's communication method, disability, cognitive ability or level of understanding must not prevent them from being heard. Advocacy or other communication support should be considered where necessary.

Adult safeguarding responses should be proportionate to the risk and should balance safety with the adult's rights, autonomy and wellbeing. A capacitated adult may make decisions that others consider unwise; this does not, in itself, mean that they lack capacity or that their wishes can be overridden.

Safeguarding concerns are rarely isolated. Staff should consider the wider context, including family circumstances, relationships, online activity, community risks, exploitation and the possibility that different forms of harm may overlap.

Professional challenge is part of safeguarding. Staff should respectfully challenge decisions or escalate concerns where they remain worried that a student is unsafe or that an appropriate response has not been made.

7. Roles and Responsibilities

7.1 Board of Trustees

The Board has strategic responsibility for ensuring Harington complies with its safeguarding duties, including ensuring Harington has an open and positive safeguarding culture that puts students safety and wellbeing first.

The Board is responsible for ensuring that appropriate safeguarding policies, procedures and arrangements are in place and are consistently and effectively implemented across Harington.
This policy will be reviewed at least annually.
The Board will ensure that a suitably senior member of staff is appointed and directly accountable to the CEO, as the Designated Safeguarding Lead (DSL), supported by appropriately trained deputies and effective arrangements for DSL cover.
Safeguarding will be embedded within strategic decision-making, with the Board maintaining oversight of safer recruitment, staff safeguarding training, online safety, filtering and monitoring, referrals made to local authorities, open cases, students with mulit-agency plans, students missing from education, students at risk of abuse and neglect, and the procedures for managing allegations and low-level concerns.
The Board will also ensure that students are supported to understand how to keep themselves and others safe and that safeguarding arrangements recognise and respond to the additional vulnerabilities of students with SEND.
The effectiveness of safeguarding practice will be monitored and quality assured, with appropriate challenge and oversight provided by the Board at least on a termly basis, using an agreed report framework to ensure trustees are provided with comprehensive up-to-date information.
Trustees will all receive safeguarding training on appointment. Updated safeguarding training will be delivered in response to any changes in statutory guidance.
A trustee will be nominated to take a lead role in safeguarding oversight.

7.2 CEO/Principal

The CEO/Principal is responsible for ensuring this policy and associated procedures are implemented effectively throughout Harington. The CEO/Principal will work closely with the DSL and the lead Trustee for safeguarding, and the Board to maintain an effective safeguarding culture. The CEO/Principal will normally act as case manager where an allegation concerns a member of staff. Where an allegation concerns the CEO/Principal, it must be reported directly to the Chair of Trustees.

7.3 Designated Safeguarding Lead

The DSL holds lead responsibility for safeguarding across Harington, including child protection for students under 18 and the coordination of adult safeguarding concerns for students aged 18 and over.

The DSL will provide safeguarding advice, support and expertise to staff and will maintain oversight of safeguarding concerns across Harington. They are responsible for managing safeguarding referrals and ensuring that concerns are responded to appropriately, including where concerns escalate or require external intervention. This will include liaison with children's social care, adult social care, the police, Prevent and Channel, the LADO and other relevant agencies, as well as supporting staff who need to make referrals.

The DSL will ensure that safeguarding records are accurate, secure and kept up to date, and that relevant information is shared appropriately to support the safety and wellbeing of students. They will work closely with colleagues responsible for SEND, attendance, curriculum, pastoral support, online safety and student wellbeing, including students missing from education, to ensure that safeguarding is considered across all aspects of a student's experience at Harington.

Students' wishes, feelings and communication needs will be considered when safeguarding decisions are made, and the DSL will promote appropriate engagement with parents and carers while recognising that

there may be circumstances where information cannot safely be shared with them. The DSL will also ensure that safeguarding is considered during transitions between education, services and placements, and will maintain oversight of the safeguarding and educational outcomes of students who have, or have previously had, a social worker.

As safeguarding lead, the DSL will contribute to staff training, maintain an up-to-date understanding of local safeguarding arrangements and ensure that appropriate DSL cover is available. They will report regularly to the CEO/Principal, the lead trustee for safeguarding, and the Board to provide assurance, including data about safeguarding practice, emerging themes, risks and areas requiring further action or improvement at least on a termly basis.

The DSL and deputies will receive role-specific training at least every two years.

7.4 Deputy DSLs

Deputy DSLs are trained to the same standard as the DSL and may undertake safeguarding functions delegated by the DSL. Ultimate lead responsibility remains with the DSL.

7.5 All Staff

All staff have a responsibility to understand and follow Harington's safeguarding arrangements and must read and understand Part One of KCSIE 2026 and attend all required safeguarding training. Staff should remain alert to possible indicators of abuse, neglect and exploitation, maintain professional curiosity and recognise that safeguarding concerns can arise both online and offline. They should be particularly aware that students may not always recognise that they are being harmed or may find it difficult to communicate or disclose their experiences, particularly where they have SEND or additional communication needs.

Staff must listen carefully to students, take concerns seriously and report and record them promptly and accurately in accordance with Harington's safeguarding procedures. They must never promise confidentiality and should understand that relevant information may need to be shared in order to protect a student or others from harm.

All staff must also understand their responsibilities in relation to child-on-child abuse, adult safeguarding and the Prevent duty. They are expected to maintain appropriate professional boundaries, follow the Staff Code of Conduct and report any concerns about the conduct or suitability of an adult working with students. No member of staff should assume that someone else will take responsibility for reporting or responding to a safeguarding concern.

No member of staff should assume that somebody else will take action.

8. Safeguarding Training

All staff will receive safeguarding training at induction covering both child protection and adult safeguarding responsibilities relevant to Harington's 16-25 student population.

Training will include KCSIE and child protection requirements; the Care Act adult safeguarding framework; the Mental Capacity Act and consent; Harington's reporting procedures; recognising abuse, neglect, selfneglect and exploitation; child-on-child and adult safeguarding concerns; sexual harassment and sexual violence; SEND-specific safeguarding vulnerabilities; online safety; filtering and monitoring; Prevent and radicalisation; reporting and recording concerns; whistleblowing; staff conduct; allegations and low-level concerns; and the identity and role of the DSL and deputies.

Safeguarding and online safety updates will be provided regularly and at least annually.

From September 2026, all staff, including those who do not work directly with children, are expected to read Part One of KCSIE 2026.

Staff understanding will be checked through induction, training, supervision, briefings, audits or other appropriate quality-assurance activity.

9. Safeguarding Students with SEND

Harington recognises that children and young people with SEND may face additional safeguarding risks. Students with SEND may face additional safeguarding risks for a range of reasons. Indicators of abuse or neglect can sometimes be incorrectly attributed to a student's disability or additional needs, while communication difficulties may make it harder for a student to recognise, describe or report what has happened to them. Some students may also be more dependent on adults for support or personal care, increasing their vulnerability and the importance of maintaining appropriate professional boundaries. Students with SEND may experience difficulties understanding relationships, consent and appropriate boundaries and may have fewer opportunities to develop healthy peer relationships. Social isolation can increase vulnerability to bullying, grooming and exploitation, both in person and online. Students may also find it difficult to recognise when a relationship or situation is exploitative or unsafe.

Staff must be alert to the possibility that changes in behaviour, communication or emotional presentation could indicate a safeguarding concern rather than being assumed to be part of a student's SEND. Particular care must also be taken to ensure that communication difficulties do not prevent students from being heard or believed. Disclosures and other indicators of harm must always be taken seriously and considered within the wider context of the student's individual needs and circumstances.

Staff must avoid diagnostic overshadowing. Changes in behaviour, attendance, emotional regulation, communication, presentation or engagement must be considered within a safeguarding context where appropriate.

Students must be provided with communication methods appropriate to their needs. These may include speech, symbols, visual prompts, photographs, communication aids, signing, written communication, advocacy or other personalised approaches.

Staff should work with families and professionals to understand how individual students communicate discomfort, distress, fear or disclosure.

The absence of a verbal disclosure does not mean that abuse has not occurred.

Where an adult has substantial difficulty being involved in a safeguarding enquiry or review and there is no appropriate person to support their involvement, the local authority must consider its Care Act duty to arrange independent advocacy. Harington will support access to advocacy where appropriate.

Capacity is decision-specific and time-specific. Staff should not make blanket assumptions about capacity because a student has a learning disability, autism, communication difficulty or EHCP. Where capacity is in doubt in relation to a safeguarding decision, the DSL will seek appropriate professional advice and ensure that the student is supported to participate as fully as possible.

The Mental Capacity Act 2005 applies to people aged 16 and over, although the Care Act adult safeguarding framework applies from age 18. Staff must presume capacity unless there is evidence to the

contrary, provide all practicable support to help the person make their own decision, recognise that an unwise decision does not by itself demonstrate lack of capacity, and ensure that any act or decision made on behalf of a person who lacks capacity is in their best interests and is the least restrictive option.

Consent should normally be sought before sharing information or making an adult safeguarding referral where the adult has capacity to make that decision. However, information may be shared without consent where there is an overriding safeguarding or public-interest justification, including where others may be at risk, a serious crime may have been committed, coercion or undue influence is suspected, the adult may lack capacity in relation to the decision, or there is a significant risk of serious harm. The rationale for sharing or not sharing information must be recorded.

Adult safeguarding at Harington will follow the principle of Making Safeguarding Personal. Wherever possible, staff and the DSL should establish what the adult wants to happen, what being safe means to them and what outcomes they want from any safeguarding response. The adult should be involved in decisions and kept informed, using communication support or advocacy where needed.

10. Recognising Abuse, Neglect and Exploitation

Physical abuse

Including hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm.

Emotional abuse

Including persistent criticism, humiliation, belittling, verbal abuse, threats, intimidation, rejection, isolation, inappropriate expectations or preventing a child from expressing their views.

Sexual abuse

Including contact and non-contact sexual activity, sexual assault, grooming, exploitation, involving children in sexual imagery or activity, and abuse facilitated through technology.

Neglect

Including persistent failure to meet physical or psychological needs, inadequate food, clothing, shelter, supervision, healthcare, emotional care or protection from harm.

Exploitation

Children may be exploited sexually, criminally, financially or in other ways.

Exploitation may involve individuals, groups, gangs or organised networks and can occur online and offline.

Staff must recognise that a child may have been coerced into activity which appears criminal or consensual.

10.1 Abuse and Neglect of Adults at Risk

Adult safeguarding applies regardless of whether the adult has a formal diagnosis, receives funded care or support, has eligible Care Act needs, or has capacity to make the particular decision in question. The focus is on the person's care and support needs, the abuse or neglect experienced or at risk of being experienced, and their ability to protect themselves from that harm.

A safeguarding response should not be delayed because it is uncertain whether the section 42 threshold is met. Staff must report concerns to the DSL, who will consider whether the matter requires an adult safeguarding referral, other adult social care support, police involvement, health intervention, a Person in a Position of Trust process, Prevent referral or another proportionate response.

Harington applies the Care Act 2014 adult safeguarding framework to students aged 18 and over where appropriate. The local authority has a duty to make, or cause to be made, whatever enquiries it considers necessary where the section 42 criteria are met. Harington's role is to recognise concerns, take immediate protective action where required, report and refer concerns appropriately, cooperate with enquiries and contribute relevant information and professional expertise.

10.2 Making Safeguarding Personal, Consent and Mental Capacity

Adults may also experience exploitation, coercive control, sexual harassment, hate crime, mate crime, cuckooing, forced marriage, honour-based abuse, radicalisation or abuse within intimate or family relationships. The fact that a student appears to have agreed to a relationship, transaction or activity does not remove the need to consider coercion, undue influence, grooming, exploitation, capacity or abuse.

Financial or material abuse may include theft, fraud, scams, coercion in relation to money or property, misuse of benefits or possessions, exploitation through online activity, or pressure to make financial decisions. Organisational abuse may arise from poor or abusive practice within an organisation or service. Neglect and acts of omission may include ignoring medical, emotional or physical care needs, failing to provide access to appropriate support, or withholding necessities. Self-neglect may include serious neglect of personal hygiene, health or surroundings and may include hoarding.

Staff must be able to recognise the forms of abuse and neglect that may affect adults. These include physical abuse; domestic abuse; sexual abuse; psychological or emotional abuse; financial or material abuse; modern slavery and trafficking; discriminatory abuse; organisational or institutional abuse; neglect and acts of omission; and self-neglect. Abuse may be a single act, repeated acts, deliberate or unintentional, and may occur in person or online.

11. Specific Safeguarding Issues

Staff should be alert to safeguarding issues including, but not limited to child sexual exploitation, child criminal exploitation, county lines, financial exploitation, serious violence, gang involvement, modern slavery and trafficking, domestic abuse, teenage relationship abuse, stalking, child-on-child abuse, sexual harassment, sexual violence, harmful sexual behaviour, bullying and cyberbullying, prejudice-based and discriminatory bullying, racism, misogyny and misandry, hate-related abuse, radicalisation, female genital mutilation, forced marriage, honour-based abuse, faith-based abuse, fabricated or induced illness, children missing from education, homelessness and temporary accommodation, substance misuse, young carers, mental health concerns linked to safeguarding, online abuse, image-based abuse, sharing or creation of nudes or semi-nudes, AI-generated sexual imagery or deepfakes, cybercrime, abuse within intimate relationships, private fostering, and abuse occurring outside the family or college environment.

Staff are not expected to become experts in each area. Their responsibility is to recognise concerns, respond appropriately and report them.

12. Responding to a Safeguarding Concern

Where a member of staff has a concern about a student, they must act promptly.

The member of staff should:

1. ensure immediate safety where necessary.
2. listen carefully to the student.
3. remain calm and non-judgmental.
4. take the student seriously.
5. avoid leading questions.
6. not investigate the concern themselves.
7. explain that information may need to be shared to keep them or others safe. 8. report the concern to the DSL or deputy as soon as possible; and

9. make an accurate safeguarding record (on Databridge).

If there is an immediate risk of serious harm, emergency services should be contacted. Staff must not wait until they have proof before reporting a safeguarding concern.

13. Responding to a Disclosure

When a student discloses abuse or harm, staff should listen, allow the student to communicate in their preferred way, avoid expressing shock or disbelief, not interrogate the student, not ask the student to repeat their account unnecessarily, reassure them that they have done the right thing by telling someone, explain what will happen next, never promise secrecy, record what was said accurately, distinguish fact from opinion, and report immediately to the DSL/deputy.

Where possible, the student's own words should be recorded. The student's communication needs must be taken into account when interpreting and recording a disclosure.

14. Recording Safeguarding Concerns

All safeguarding concerns must be recorded on Harington's designated safeguarding recording system (Databridge).

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Records should be factual, clear, dated and timed, attributed to the person making the record, sufficiently detailed, explicit about actions and decisions, clear about the rationale for decisions, and updated following subsequent action.

Records should distinguish between what was directly observed, what was reported, professional opinion, and historical information. The DSL is responsible for ensuring safeguarding records are appropriately maintained, reviewed and stored securely.

15. Referrals and Escalation

The DSL will consider safeguarding concerns and determine the appropriate response. Depending on the nature and level of concern, this may include support within Harington, universal or community-based services, early help or Family Help, or referral to an appropriate external agency such as children's social care, adult social care, the police, LADO, Prevent or Channel, health services or another relevant service.

Safeguarding concerns should normally be reported to the DSL in the first instance. If the DSL is unavailable, staff should report the concern to a Deputy DSL and/or the CEO/Principal. The absence or unavailability of the DSL must never result in a safeguarding concern being left unaddressed or necessary action being delayed.

Where there is an immediate risk of significant or serious harm, appropriate action must be taken without delay. This may include contacting the police or emergency services and, where necessary, making a direct referral to children's social care or adult social care. Although external referrals will normally be coordinated by the DSL, Deputy DSL or CEO/Principal, any member of staff may make a direct referral where they believe this is necessary to safeguard a student and appropriate safeguarding action would otherwise be delayed. The DSL, Deputy DSL or CEO/Principal should be informed as soon as practicable.

Where a referral has been made, Harington will follow up the response and remain actively involved as appropriate. If a member of staff remains concerned that a student is at risk and believes that appropriate action has not been taken, they must raise this with the DSL, Deputy DSL or CEO/Principal so that the concern can be reviewed and, where necessary, escalated with the relevant agency.

Professional disagreement, uncertainty about thresholds or the absence of a response from another agency must never prevent Harington from taking further action where there are continuing concerns about a student's safety or welfare.

16. Family Help and Early Support

Harington recognises the importance of providing support as soon as difficulties emerge.

Staff should be alert to students who may benefit from universal services, community-based early help, targeted Family Help, and statutory intervention.

Particular consideration should be given to students who have SEND, have mental health needs, are young carers, are pregnant or parents, are experiencing domestic abuse, are affected by parental offending, misuse substances, are missing from education, are at risk of exploitation, have experienced trauma, are at risk of homelessness, have a social worker, and are experiencing other circumstances affecting their safety or wellbeing.

Harington will work collaboratively with students, families and partner agencies.

17. Child-on-Child Abuse

Harington operates a zero-tolerance approach to child-on-child abuse (previously referred to as peer-onpeer abuse).

All staff must understand that abuse between students is a safeguarding issue and must never be dismissed as banter, joking, part of growing up, having a laugh, and normal behaviour.

Child-on-child abuse can include physical abuse, bullying, cyberbullying, sexual violence, sexual harassment, harmful sexual behaviour, abuse within intimate relationships, stalking, upskirting, initiation or hazing, prejudice-based abuse, discriminatory abuse, coercion, threats, violence involving weapons, sharing sexual images, AI-generated sexual images or deepfakes, and abuse through social media or messaging platforms.

Harington recognises that child-on-child abuse can be a safeguarding issue for both the student experiencing harm and the student displaying harmful behaviour.

Each student's needs, vulnerabilities and risks will be assessed separately.

The fact that an incident occurred outside college does not remove Harington's safeguarding responsibility.

18. Sexual Harassment, Sexual Violence and Harmful Sexual Behaviour

All reports of sexual harassment, sexual violence and harmful sexual behaviour will be taken seriously.

Harington will not normalise sexualised behaviour or dismiss incidents as banter.

Responses will be proportionate, child-centered, risk assessed, sensitive to SEND and communication needs, supportive of the person reporting harm, mindful of the needs of the alleged perpetrator, and informed by external safeguarding agencies where appropriate.

Staff must understand that harmful sexual behaviour exists on a continuum.

Students should be supported to understand consent, healthy relationships, personal boundaries, online behaviour and how to seek help.

19. Nudes and Semi-Nudes, AI and Digitally Manipulated Images

Any incident involving the creation or sharing of nude or semi-nude images by a person under 18 must receive a safeguarding response. This includes images that are self-generated, taken by another person, shared consensually or without consent, digitally altered, or wholly or partly generated using artificial intelligence.

Where an incident involves a student aged 18 or over, it should be considered as a safeguarding concern where there are indications of coercion, exploitation, abuse, harassment, grooming, undue influence, lack of consent, impaired or uncertain capacity, non-consensual sharing, or any other factor that may place the adult at risk of harm. An adult who has capacity may make their own decisions about consensually creating or sharing intimate images, and this does not in itself constitute a safeguarding concern.

Staff should be particularly alert to the additional vulnerabilities of students with SEND, including difficulties understanding consent, relationships, privacy, exploitation and the potential consequences of creating or sharing intimate images. Where there is uncertainty about a student's capacity to make a particular decision, this should be considered in accordance with the Mental Capacity Act 2005.

Staff must not view, copy, print, forward, save or otherwise share intimate imagery as part of investigating a concern. All concerns involving intimate images of students must be reported promptly to the DSL or a Deputy DSL, who will determine the appropriate child or adult safeguarding response and whether referral to an external agency is required.

Concerns must be reported immediately to the DSL.

20. Online Safety

Online safety is an integral part of safeguarding. Harington recognises four broad areas of online risk:

Content – exposure to harmful or inappropriate material.

Contact – harmful interaction with other people.

Conduct – behaviour that may increase harm to the student or others.

Commerce – risks including scams, gambling and inappropriate advertising or financial exploitation.

Staff should recognise that online and offline harm frequently overlap.

Students will receive appropriate education about online safety through the curriculum and wider personal development programme.

Online safety education will be adapted to students' SEND, communication needs and levels of understanding.

21. Generative Artificial Intelligence

Harington recognises both the educational benefits and safeguarding risks associated with generative AI.

Risks can include generation of harmful or inappropriate content, misinformation, grooming, impersonation, deepfakes, creation of sexual imagery, bullying and harassment, privacy and data protection risks, and manipulation or exploitation.

Harington will ensure that the use of generative AI is considered within its online safety, data protection, curriculum and safeguarding arrangements.

Staff must report safeguarding concerns involving AI in the same way as other safeguarding concerns.

22. Filtering and Monitoring

Harington maintains appropriate filtering and monitoring systems to support the safe and responsible use of its IT systems and internet-connected devices. All internet-connected devices used through Harington's systems are subject to monitoring by Smoothwall, including devices used by both staff and students. Filtering arrangements are designed to restrict access to harmful or inappropriate online content while ensuring that they do not create unreasonable barriers to teaching, learning, accessibility or the appropriate use of technology by students with SEND.

Monitoring systems identify and generate alerts where potentially harmful, inappropriate or concerning online activity is detected. Alerts relating to improper or potentially unsafe use are reported to the DSL and CEO/Principal, who will review the information and determine whether further investigation, safeguarding action, staff management action or referral to an external agency is required. Where an alert relates to a

safeguarding concern, it will be recorded and managed in accordance with Harington's safeguarding procedures.

The effectiveness of Harington's filtering and monitoring arrangements will be reviewed regularly and at least annually. The DSL will work with the CEO/Principal and appropriate IT support to ensure that systems remain effective, proportionate and responsive to emerging online risks. This will include consideration of whether filtering and monitoring operate appropriately across Harington's sites, networks and relevant internet-connected devices.

Filtering and monitoring arrangements, including the outcomes of reviews, significant issues or concerns and assurance regarding their effectiveness, will be reported to the Board. This will enable trustees to maintain appropriate strategic oversight of online safety and provide challenge where improvements or further action are required.

23. Mobile Phones and Personal Devices

Harington maintains clear expectations regarding mobile phones and personal devices.

Personal devices must not be used in ways that compromise safeguarding, photograph or record students without authorisation, enable inappropriate contact, expose students to harmful material, breach confidentiality, and undermine professional boundaries.

Detailed expectations are contained within Harington's Mobile Device Responsible Use Policy and Employee Handbook.

24. Prevent and Radicalisation

Harington recognises its duty under the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.

Radicalisation is treated as a safeguarding issue.

Staff will receive appropriate Prevent awareness training and should report concerns to the DSL.

The DSL will consider whether additional internal support, a Prevent referral, a Channel referral, a children's social care referral; and/or, and police involvement. is required. The DSL will maintain awareness of local Prevent arrangements.

25. Mental Health and Safeguarding

Mental health concerns may sometimes indicate that a student has experienced or is experiencing abuse, neglect or exploitation.

Staff are not expected to diagnose mental health conditions.

Where a mental health concern may also represent a safeguarding concern, staff must report it to the DSL.

Harington will consider the impact of trauma, adversity, abuse and exploitation on behaviour, attendance, emotional regulation, engagement and educational outcomes.

26. Domestic Abuse

Domestic abuse can include physical, sexual, emotional, psychological, controlling, coercive or economic abuse.

Children may experience domestic abuse directly or through seeing, hearing or experiencing its effects.

Young people may also experience abuse within their own intimate relationships.

Staff must report concerns to the DSL.

27. Child Criminal Exploitation, Child Sexual Exploitation and County Lines

Staff should recognise that exploitation may occur without the child recognising themselves as a victim, involve apparent consent, involve exchange for money, status, affection, protection or goods, be facilitated online, involve gangs or organised networks, involve coercion, intimidation, violence or debt, overlap with trafficking and modern slavery, and result in children being criminalised for actions undertaken through coercion or exploitation.

Students with SEND may be particularly vulnerable to grooming and exploitation. Concerns must be reported immediately.

28. Serious Violence

Staff should be alert to indicators that a student may be at risk from or involved in serious violence.

These may include increased absence, changes in friendship groups, unexplained injuries, unexplained money or possessions, declining engagement, association with gangs, threats or intimidation, carrying weapons, and significant behavioural changes.

Concerns must be reported to the DSL.

29. Female Genital Mutilation, Forced Marriage and Honour-Based Abuse

Female genital mutilation (FGM) forced marriage and other forms of so-called ‘honour’-based abuse are serious forms of abuse and safeguarding concerns. They may affect children and adults and can involve physical, sexual, psychological, emotional or financial abuse, coercion, controlling behaviour and restrictions on an individual's freedom.

FGM comprises procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. Staff should be alert to indicators that a student may be at risk of FGM, that preparations may be being made for FGM to take place, or that FGM may already have occurred. Any concern must be reported immediately to the DSL or a Deputy DSL.

Teachers must also understand the mandatory reporting duty relating to FGM. Where, in the course of their professional duties, a teacher discovers a known case of FGM having been carried out on a girl under the age of 18, they have a personal statutory duty to report this directly to the police. The DSL should also be informed in accordance with Harington's safeguarding procedures, but the responsibility for making the mandatory report rests with the individual teacher.

A forced marriage is a marriage in which one or both people do not consent to the marriage and pressure, or abuse is used to cause the marriage to take place. This is different from an arranged marriage, where

both parties freely consent. Pressure may be physical, emotional, psychological, sexual or financial and may include threats, coercion or restrictions on a person's freedom. For some students with learning disabilities, concerns may also arise about whether they have the capacity to consent to marriage. It is a criminal offence to force someone to marry, and it is also an offence to arrange the marriage of a person who lacks capacity to consent to marriage, whether or not coercion is used.

So-called 'honour'-based abuse describes incidents or patterns of abuse committed to protect or defend the perceived 'honour' of a family or community. It can include FGM, forced marriage, domestic abuse, coercive control, threats, intimidation, sexual or physical abuse and other forms of harm. Harington recognises that there is no justification for abuse on the basis of culture, religion, tradition or perceived honour.

Where staff have concerns about FGM, forced marriage or honour-based abuse, they must not approach the student's family or members of their community, attempt to mediate, or investigate the concern themselves, as doing so could increase the risk to the student. The concern must be reported immediately to the DSL or a Deputy DSL, who will consider the appropriate child or adult safeguarding response and seek specialist or statutory advice where necessary.

This is especially important for Harington because the policy covers both under-18s and adults at risk. The point about capacity to consent to marriage is particularly relevant in a SEND setting and is worth making explicit.

30. Attendance and Absence

Regular attendance supports students' education, wellbeing and safety. Harington recognises that repeated, prolonged or unexplained absence, a significant change in a student's usual pattern of attendance or engagement, or a student being missing from education can be an important safeguarding warning sign.

Attendance and absence are monitored and followed up in accordance with Harington's Attendance Policy. Staff should remain professionally curious where patterns of absence, lateness, loss of contact or reduced engagement cause concern and should consider attendance information alongside other information known about the student. Absence from education may be associated with abuse, neglect, sexual or criminal exploitation, bullying, domestic abuse, coercive or controlling relationships, radicalisation, mental health or wellbeing concerns, homelessness, trafficking, difficulties within the home environment or other circumstances affecting a student's safety.

For students under 18, staff must be particularly alert to children missing from education, including students who are absent repeatedly or for prolonged periods and those whose whereabouts cannot be established. A child being missing from education may indicate that they are at increased risk of harm and must be considered as a potential safeguarding concern. Harington will follow its Attendance Policy and relevant local authority procedures, including making appropriate referrals or notifications where required.

The additional vulnerabilities and individual circumstances of students with SEND must be taken into account. While disability, anxiety, communication needs or difficulties with emotional regulation may contribute to attendance difficulties, these should not automatically be assumed to explain a significant or unexplained change in attendance. Staff should consider whether there may be an underlying safeguarding concern and ensure that the student's voice and circumstances are understood.

Where an absence, pattern of attendance, loss of contact or concern that a student may be missing from education gives rise to a safeguarding concern, this must be reported promptly to the DSL or a Deputy DSL, in addition to the actions required under the Attendance Policy. The DSL will consider the concern alongside any other information known about the student and determine whether further safeguarding action or referral to children's social care, adult social care, the police, the relevant local authority or another agency is required.

For students aged 18 or over, the statutory children missing from education framework does not apply. Harington nevertheless recognises that unexplained or prolonged absence or loss of contact with an adult student may indicate abuse, neglect, self-neglect, exploitation, coercion or another safeguarding risk. Where there are concerns about the student's safety or their ability to protect themselves from harm, these will be considered through Harington's adult safeguarding arrangements.

The detailed procedures for recording, monitoring, following up and escalating student absence are set out in Harington's Attendance Policy. Safeguarding concerns identified through attendance monitoring must not be managed solely as attendance matters.

31. Work Experience, Supported Internships and Off-Site Provision

Harington's safeguarding responsibilities extend to students undertaking work experience, supported internships, community learning, external placements and other off-site provision. Appropriate safeguarding and risk arrangements will be considered before a placement begins, taking account of the student's age, SEND, communication needs, individual vulnerabilities, the activities involved and the level of supervision provided.

Students will be supported to understand appropriate workplace relationships and boundaries, how to recognise behaviour that makes them feel uncomfortable or unsafe, and how to report concerns. Employers and placement providers will be made aware of Harington's safeguarding expectations and the arrangements for reporting concerns. Harington will maintain appropriate contact with students and placement providers throughout the placement.

Any safeguarding concern arising during a placement must be reported promptly to the DSL or a Deputy DSL. Where a concern relates to an employee, supervisor, volunteer or other adult within a placement organisation, Harington will consider whether referral through LADO, adult safeguarding/Person in a Position of Trust (PIPOT), police or other relevant arrangements is required. Harington will not rely solely on the placement provider to manage a safeguarding concern involving one of its students.

Where a concern arises, Harington will consider whether it is safe for the placement to continue and may suspend or end the placement where necessary. Safeguarding responsibility remains with Harington throughout the placement, and the use of an external employer or provider does not remove Harington's responsibility to respond appropriately to concerns about a student's safety or welfare.

32. Educational Visits and Community Activities

Educational visits and community-based activities form an important part of Harington's curriculum and Preparation for Adulthood. Activities must be planned and managed in a way that enables students to participate safely while supporting the development of independence, confidence and appropriate risk awareness.

Safeguarding considerations should form part of the visit risk assessment, with particular attention given to known individual vulnerabilities, medical or behavioural risks, the environment being visited and any risks associated with public spaces, transport or interaction with members of the public. Staff should be clear about supervision arrangements while ensuring these are proportionate to students' needs and do not unnecessarily restrict their independence.

Students should be prepared for activities in a way that is appropriate to their communication and learning needs. This should include knowing what to do if they become separated from the group, feel unsafe, encounter inappropriate behaviour or need help.

Any safeguarding concern arising during an educational visit or community activity must be responded to promptly in accordance with this policy. Where there is an immediate risk, staff should prioritise the student's safety and seek emergency assistance where necessary.

Detailed arrangements for the planning, approval, risk assessment and management of educational visits are set out in Harington's Educational Visits procedures.

33. Allegations Against Staff, Volunteers, Contractors and Others

Harington takes seriously any allegation or concern about a member of staff, volunteer, contractor, agency worker or other person working with students. This includes concerns that an individual may have harmed a student, committed an offence against or related to a child, behaved towards a child in a way that indicates they may pose a risk of harm, or behaved in a way that raises concerns about their suitability to work with children or adults at risk.

Any such concern must be reported immediately to the CEO/Principal, who will act as case manager and determine the appropriate next steps in accordance with statutory and local safeguarding procedures. Where the concern relates to the CEO/Principal, it must be reported directly to the Chair of Trustees. Staff must not investigate allegations themselves or discuss them more widely than is necessary.

Where a concern involving a child may meet the harm threshold, the case manager will seek advice from the Local Authority Designated Officer (LADO). Where the concern relates to an adult at risk, Harington will consider whether an adult safeguarding referral and/or Person in a Position of Trust (PIPOT) process is required. Where an individual works with both children and adults at risk, both processes may need to be considered. Harington will cooperate with the LADO, adult safeguarding services, police and other relevant agencies and will take proportionate action to safeguard students while the concern is considered.

Concerns about an individual's conduct that do not meet the harm threshold will be considered under Harington's low-level concerns arrangements and, where appropriate, relevant staff management procedures.

This process is distinct from whistleblowing. The allegations process should be used where there is a safeguarding concern about the behaviour or suitability of a particular person working with students. Whistleblowing is intended for concerns about wider unsafe practice, wrongdoing, failures in safeguarding arrangements or circumstances where a member of staff believes that a concern has not been responded to appropriately. Whistleblowing concerns should be raised in accordance with Harington's Whistleblowing Policy.

34. Low-Level Concerns

A low-level concern is any concern about an adult's behaviour that is inconsistent with Harington's Staff Code of Conduct, including inappropriate conduct outside work, but which does not appear to meet the harm threshold.

Examples may include inappropriate familiarity, favouritism, inappropriate communication, use of personal social media, inappropriate one-to-one situations, inappropriate use of personal devices, and conduct which could reasonably be considered inconsistent with professional boundaries.

Low-level does not mean insignificant. All low-level concerns should be reported, recorded and reviewed so that patterns can be identified.

35. Whistleblowing

Harington is committed to an open culture in which staff feel able to raise concerns about unsafe practice, wrongdoing or failures in safeguarding arrangements without fear of unfair treatment.

Whistleblowing may be appropriate where safeguarding procedures are not being followed, concerns have not been acted upon appropriately, or wider organisational practice may place students at risk. Staff must not allow concerns about internal processes or management responses to prevent them from raising or escalating a safeguarding concern.

Concerns should be raised and managed in accordance with Harington's separate Whistleblowing Policy, which sets out the appropriate reporting and escalation arrangements.

36. Safer Recruitment

Harington is committed to ensuring that recruitment and selection are undertaken in accordance with safer recruitment principles and KCSIE 2026. Safeguarding and suitability to work with children, young people and adults at risk will be considered throughout the recruitment process.

Staff involved in recruitment will receive appropriate safer recruitment training, refreshed in line with Harington's requirements and changes to statutory guidance. Recruitment panels will include at least one member who has completed safer recruitment training.

Appropriate pre-employment checks will be completed according to the role, including identity and right-to-work checks, scrutiny of employment history and gaps, references, appropriate DBS and barred-list checks, verification of qualifications where required, and overseas checks where applicable. Required checks will be recorded on Harington's Single Central Record (SCR). Harington will also consider carrying out an online search of shortlisted candidates as part of its due diligence, in line with KCSIE 2026.

Appropriate checks will also be undertaken for volunteers, agency staff, contractors and others working with students. Volunteer roles will be assessed to determine the appropriate level of safeguarding checks and whether the activity constitutes regulated activity.

From 1 September 2026, the supervision exemption for regulated activity with children is removed. This means that a volunteer who teaches, trains, instructs, cares for or supervises children frequently enough to meet the regulated activity criteria may be in regulated activity even when supervised. Harington will assess volunteer roles accordingly and undertake the appropriate DBS and Children's Barred List checks where required.

37. Contractors, Agency Staff and Third Parties

Harington will ensure appropriate safeguarding checks are undertaken in relation to agency workers, contractors and other third-party staff.

Safeguarding responsibility is shared with employing organisations and does not transfer entirely to the agency or contractor.

Concerns about third-party staff must be reported through Harington's safeguarding procedures.

38. Visitors

Visitors will be managed in accordance with Harington's safeguarding and site-security arrangements.

Visitors will sign in, wear appropriate identification, receive relevant safeguarding information, be supervised where required, and have appropriate checks where their role requires them.

The level of supervision will reflect the purpose of the visit and the visitor's safeguarding status.

39. Information Sharing

Safeguarding information will be shared, when necessary, proportionate and relevant to protecting a student.

Data protection law does not prevent appropriate information sharing for safeguarding purposes.

Staff should not allow uncertainty about data protection to prevent them from sharing information necessary to protect a child or vulnerable adult.

Decisions about information sharing should consider what information is required, why it is needed, who needs it, the risks of sharing, the risks of not sharing, and whether sharing is proportionate.

Where appropriate, decisions and their rationale will be recorded.

40. Confidentiality

Safeguarding information is confidential but not secret.

Information should be shared on a need-to-know basis.

Staff must never promise a student complete confidentiality where safeguarding concerns are disclosed.

Where possible, students should be informed about what information will be shared and why.

41. Safeguarding Records and Transfers

Safeguarding records will be maintained separately from general student records and stored securely on Databridge.

When a child moves to another education provider, safeguarding information will be transferred securely and promptly.

For children, child protection files should normally be transferred within five days for an in-year transfer and within the first five days of the start of a new term. Receipt should be confirmed. Where appropriate, the DSL will speak directly with the receiving DSL.

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Transfers should include a clear structured summary identifying current safeguarding concerns, relevant context, ongoing support, current risk, and relevant historic information.

Historic information should be presented with appropriate context and should not disadvantage the young person.

42. Parents and Carers

Harington aims to work openly and constructively with parents and carers. Parents and carers should understand that Harington has a statutory responsibility to safeguard children and vulnerable adults and may need to make referrals without consent where necessary.

Parents/carers will normally be informed of concerns unless doing so increases risk to the student, increases risk to another person, compromises an investigation, and is otherwise contrary to safeguarding advice.

The student's age, capacity, wishes and circumstances will always be considered.

43. Student Voice and Accessible Safeguarding

Students must know what safeguarding means, who they can speak to, who the safeguarding staff are, how to report concerns, that they will be listened to, that abuse is never acceptable, and how to seek help outside Harington.

Safeguarding information will be provided in accessible formats where required.

Students will have regular opportunities to discuss safety, relationships, online safety and wellbeing in PSHE sessions and as part of the wider curriculum.

Student feedback will inform safeguarding practice.

44. Curriculum and Prevention

Safeguarding education is an important part of Harington's preventative approach.

Through Personal Development, PSHE, EDI, Preparation for Adulthood and the wider curriculum, students will develop knowledge and skills relating to healthy relationships, consent, personal boundaries, online safety, mobile phones and social media, exploitation, grooming, bullying, discrimination, sexual harassment, financial safety, radicalisation, personal safety, community safety, recognising unsafe situations, seeking help, and reporting concerns.

Content will be differentiated according to students' needs and levels of understanding.

45. Safeguarding Culture

Harington is committed to maintaining a strong and open safeguarding culture in which the safety and wellbeing of students are understood to be everyone's responsibility. Safeguarding should be visible throughout the organisation, and students should feel confident that they can raise concerns, will be listened to and will receive an appropriate response.

Staff are expected to maintain professional curiosity, recognise and respond to potential safeguarding concerns and challenge poor or unsafe practice. Clear professional boundaries must be maintained, and

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behaviour that is discriminatory, abusive, harassing or inconsistent with Harington's values and safeguarding expectations will be addressed.

Harington recognises the importance of creating an environment in which students with SEND can communicate concerns in ways that are accessible to them. Staff should understand individual communication needs and ensure that difficulties with communication do not prevent a student from being heard or taken seriously.

Safeguarding will be embedded across Harington's work, including curriculum planning, recruitment, staff development, risk management and quality assurance. Leaders will promote an open culture in which safeguarding practice can be discussed and challenged appropriately, and learning from concerns, incidents and safeguarding reviews is used to strengthen practice.

46. Monitoring and Quality Assurance

The DSL and senior leadership team will monitor the effectiveness of safeguarding arrangements through activities which may include safeguarding audits, review of safeguarding records, analysis of concerns and referrals, monitoring attendance, review of child-on-child incidents, review of low-level concerns, staff training records, student feedback, parent/carer feedback, staff confidence surveys, filtering and monitoring reviews, Single Central Record checks, safer recruitment audits, safeguarding trustee visits, review of external referrals and outcomes, and analysis of safeguarding themes and patterns.

The DSL will provide appropriate safeguarding reports to the Board.

Reports will maintain confidentiality while enabling trustees to understand safeguarding activity, themes, risks and the effectiveness of Harington's arrangements.

47. Local Safeguarding Arrangements

Harington will work in accordance with the safeguarding procedures for the local authority in which a child lives and with Haringey safeguarding arrangements where relevant to Harington's provision.

For concerns involving children resident in Haringey:

Haringey Multi-Agency Safeguarding Hub (MASH)

Professional consultation/urgent safeguarding referral: 020 8489 4533

MASH: 020 8489 4470

Out-of-hours: 020 8489 0000

Where a child is in immediate danger or a crime is in progress, call 999.

Local Authority Designated Officer (LADO)

Concerns about adults working with children which may meet the harm threshold must be referred to the appropriate LADO.

Haringey LADO

Telephone: 020 8489 2968

Email: lado@haringey.gov.uk

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Haringey requires concerns involving possible harm by a member of staff or volunteer to be reported to the LADO promptly and within 24 hours.

Where a concern relates to a person who works with adults with care and support needs and indicates that they may pose a risk to adults at risk, the DSL/CEO will consider the relevant Person in a Position of Trust (PIPOT) process and Haringey Safeguarding Adults Board procedures. Where the person also works with children, both LADO and adult safeguarding/PIPOT processes may need to be considered.

Haringey Adult Safeguarding

For adult safeguarding concerns involving a Haringey resident, professionals can contact the Haringey Safeguarding Adults Team at SafeguardingAdultDuty@haringey.gov.uk. Adult Social Care can also be contacted on 020 8489 1400; the out-of-hours number is 020 8489 0000. Where there is immediate danger, call 999.

Prevent

Prevent concerns should be reported internally to the DSL.

Where external referral is appropriate, Harington will follow current Haringey and National Prevent referral procedures.

Where a Prevent concern relates to a child, consideration will also be given to whether a children's social care referral is required.

48. Students Aged 18–25

Harington's adult safeguarding responsibilities are an integral part of this policy. A student aged 18 or over is legally an adult, even where they remain in education, have an EHCP, receive children's services during transition, or have significant learning disabilities.

Where a safeguarding concern arises about an adult student, staff must follow the same immediate internal reporting route as for any other student: ensure immediate safety, report promptly to the DSL or deputy and make an accurate safeguarding record. The DSL will then apply the appropriate adult safeguarding framework.

The DSL will consider the Care Act section 42 criteria, the adult's wishes and desired outcomes, mental capacity in relation to relevant decisions, the level and immediacy of risk, whether other people are at risk, and whether there may have been a criminal offence. Depending on the circumstances, action may include an adult safeguarding referral, other adult social care referral, police or health involvement, a Person in a Position of Trust process (PIPOT), Prevent referral, internal risk management or other support.

Safeguarding an adult does not mean automatically removing their autonomy or making decisions on their behalf. Harington will seek to balance protection with rights, choice, independence and wellbeing, while acting decisively where there is an immediate danger, a risk to others, concerns about coercion or exploitation, or another lawful basis for intervention.

Where the adult lacks capacity to make a relevant decision, action will be taken in accordance with the Mental Capacity Act 2005. Where the adult has capacity, their decisions and wishes will carry significant weight, including where they choose an option that professionals consider unwise, unless there is another lawful reason to act.

49. Multi-Agency Working

Harington recognises that no single professional or organisation will always have a complete picture of a student's circumstances.

Harington will work appropriately with children's social care, adult social care, local safeguarding partnerships, police, health services, local authorities, education providers, employers, supported internship partners, Prevent and Channel, LADO/PIPOT services, families and carers, and other relevant organisations.

Staff will support external safeguarding assessments and processes where required.

50. Review of Policy

This policy will be reviewed at least annually.

It will also be reviewed whenever KCSIE is revised, Working Together to Safeguard Children is revised, legislation changes, local safeguarding arrangements change, learning from a safeguarding incident indicates a need for change, and monitoring identifies weaknesses in safeguarding practice.

The DSL will ensure that operational procedures remain current between formal policy reviews.

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Appendix 1 Immediate Safeguarding Response

If you are concerned about a student

Recognise → Respond → Record → Report

Recognise: Notice signs, behaviour, communication or information that may indicate a concern.

Respond: Listen, take the concern seriously and ensure immediate safety.

Record: Make a clear, factual and timely safeguarding record.

Report: Report immediately to the DSL or Deputy DSL.

Do not:

- investigate.
- promise confidentiality.
- confront an alleged perpetrator.
- wait for proof.
- assume somebody else has reported it; or
- delay because the DSL is unavailable.

If a child is in immediate danger, contact emergency services.

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Appendix 2 Responding to a Disclosure

When a student tells you something concerning:

DO

- listen carefully.
- remain calm.
- take them seriously.
- use their preferred communication method.
- reassure them that they were right to tell you.
- explain that you may need to share information. • record their words accurately; and
- report promptly.

DO NOT

- promise secrecy.
- ask leading questions.
- investigate.
- express disbelief.
- make judgements.
- ask them to repeatedly recount events; or
- contact the alleged perpetrator.

Appendix 3 Safeguarding Contacts

Role	Position	Name	Contact
Designated Safeguarding Lead	Student Support & Safeguarding Manager	Barbara Erskine	Barbara.Erskine@harington.org.uk
Deputy DSL	Recruitment & Progression Manager	Michelle Besant	Michelle.Besant@harington.org.uk
Deputy DSL	Education & Training Manager	Louise Workman-Dent	louise.workmandent@harington.org.uk

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Deputy DSL	Retail Operations Manager	Elena Alberti	Elena.Alberti@harington.org.uk
Deputy DSL	Horticulture Operations Manager	Saman Shahabi	Saman.Shahabi@harington.org.uk
CEO/Principal		Jacqui Steel	Jacqui.Steel@harington.org.uk
Safeguarding Trustee		Alison Kelly	amckelly@outlook.com
Chair of Trustees		Alison Kelly	amckelly@outlook.com
Haringey MASH			020 8489 4470
Professional safeguarding consultation/urgent referral			020 8489 4533
Haringey Emergency Duty Team			020 8489 0000
Haringey LADO			020 8489 2968
Emergency services			999

Appendix 4 KCSIE 2026 Key Changes Reflected in this Policy.

The 2026/27 policy has been specifically updated to reflect the principal changes within KCSIE 2026, including:

- all staff reading Part One of KCSIE.
- revised Family Help arrangements.
- strengthened multi-agency working.
- strengthened information-sharing expectations.
- revised safeguarding terminology.
- modern slavery.
- financial exploitation.
- child-to-parent/caregiver abuse.
- strengthened child-on-child abuse requirements.
- misogyny and misandry.
- Violence Against Women and Girls considerations.
- strengthened serious violence guidance.

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- strengthened mental health guidance.
- SEND-specific safeguarding barriers.
- young carers.
- children with medical conditions.
- online safety.
- generative AI.
- AI-generated/deepfake sexual imagery.
- mobile phone considerations.
- annual filtering and monitoring effectiveness review.
- revised safeguarding record-transfer expectations.
- revised sexual harassment, sexual violence and harmful sexual behaviour guidance.
- safeguarding response to all incidents involving nudes/semi-nudes.
- strengthened DSL cover arrangements.
- revised safer recruitment requirements.
- removal of the previous supervision exemption from regulated activity for relevant volunteers.
- strengthened arrangements for agency, trainee, contractor and third-party staff.
- Data (Use and Access) Act 2025 considerations; and
- strengthened safeguarding expectations across the organisation.

Appendix 5 Related Policies and Procedures

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- Staff Code of Conduct
- Whistleblowing Policy
- Behaviour Policy
- Online Safety Policy
- Mobile Device Responsible Use Policy
- Equality, Diversity and Inclusion Policy
- Safer Recruitment procedures
- Data Protection Policy
- Attendance procedures
- Health and Safety Policy
- Educational Visits procedures
- Complaints Policy • Prevent procedures.
- Low-Level Concerns procedure
- Allegations Against Staff procedure

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- Student Risk Assessment procedures

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