Child Protection and Safeguarding Policy

Berkhamsted Prep and Pre-Prep

Berkhamsted Senior Schools & Sixth

Heatherton

Charlotte House

Berkhamsted Day Nursery Ltd.

Berkhamsted School Enterprises Ltd.

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Scope of the policy

1 Safeguarding

Berkhamsted Schools Group (The School) recognises its responsibility to safeguard and promote the welfare of the children and young people in its care. In formulating these policies and procedures, the School has taken due regard of Keeping Children Safe in Education (2026) (KCSIE), Working Together to Safeguard Children (2026) and the National Minimum Standards for Boarding (2026). All pupils have the right to protection, regardless of age, gender, ethnicity, disability, sexuality or beliefs. The School recognises its legal duty to work with, and in accordance with, locally agreed inter-agency procedures. Children include anyone under the age of 18. This responsibility is underpinned by the following aims:

1.1.1 To protect children from maltreatment, whether this is within or outside the home, including online

1.1.2 Providing help and support to meet the needs of children as soon as problems emerge

1.1.3 To prevent impairment of children's mental and physical health or development;

1.1.4 To ensure children grow up in circumstances consistent with the provision of safe and effective care;

1.1.5 To take action to enable all children to have the best outcomes.

1.2 The School addresses their commitment to these aims through:

2 Prevention

2.1 By ensuring all reasonable measures are taken to minimise the risk of harm to children's welfare, including:

2.1.1 Appointing Designated Senior Leads (DSL) (the Vice Principal for Senior & Sixth, and the Chief People Officer for Preps and Enterprises), called a DSL in Working Together to Safeguard Children (2026), and at least one Designated Senior Person (DSP) in every School (see list in Appendix 1, Table 2 and job description / outline of role of DSL at Appendix 2).

2.1.2 Ensuring safer recruitment practice.

2.1.3 Ensuring through training that all staff and supply staff are aware of and committed to the Policy and Procedures for Safeguarding and Child Protection including online safety (see Appendix 3)

2.1.4 Adopting a supportive, open and accepting attitude towards children so that they feel valued, listened to and respected. Ensuring there is effective opportunity for pupil voice to be heard. For example, through the operation of Whisper, though School councils and prefect/house captains, and by having pupils attend the safeguarding committee.

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2.1.5 Establishing a positive and secure environment, in which children can learn and develop.

2.1.6 Including in the curriculum, activities and opportunities for Relationships Education (at primary level), Relationships and Sex Education (at secondary level) and Health Education which equip pupils with the skills they need to stay safe from abuse, and which will help them develop realistic attitudes to the responsibilities of adult life. These activities and opportunities will include coverage of Online Safety and Cyber Bullying and the risks of radicalisation.

2.1.7 Providing pastoral support that is accessible and available to all pupils and ensuring that pupils know to whom they can talk about their concerns both within and beyond school.

2.1.8 Ensuring that every member of staff (both teaching and support) understand that "safeguarding and promoting the welfare of children is everyone's responsibility throughout the school and the boarding facilities" (taken from National Minimum Standards in Boarding 2026). However, staff should note the restrictions on entering boarding accommodation outlined at section 19 of the National Minimum Standards and section 30 of this policy which are necessary to protect boarding students and their privacy.

3 Protection

3.1 By ensuring all appropriate actions are taken to address concerns about the welfare of a child or children, working with agreed local policies and procedures in full partnership with other local agencies, especially the Police and Local Authority Children's Social Care. This may include:

3.1.1 Sharing information about concerns with agencies that need to know and involving children and their parents/carers appropriately.

3.1.2 Monitoring children known or thought to be at risk from harm and contributing to assessments of need and support packages for those children.

3.1.3 Safeguarding children from potentially harmful and inappropriate online material, (see Online Safety and IT Policies).

3.1.4 Safeguarding children from child-on-child abuse

4 Reporting

4.1 All concerns should be recorded on CPOMS. Details of referrals and other paperwork are also held on CPOMS and will be shared with colleagues and external agencies as deemed appropriate by the DSL and/or DSPs.

4.2 The School, under inter-agency procedures, will report complaints that raise Child Protection issues. If the parents are unhappy with the School's response they should contact the nominated officer for Child Protection within the Local Education Authority and ask for the Duty Social Worker (See Appendix 1).

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4.3 The School will report to the Disclosure and Barring Service (DBS) as soon as possible, and ordinarily on conclusion of an investigation, any person (whether employed, contracted, volunteer or student) whose services are no longer used because they are considered unsuitable to work with children. The School will also report to the Teaching Regulation Agency (TRA) when appropriate to do so.

4.4 Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

4.5 Please see Appendix 4 for a summary of what any individual should do if they have concerns about a child.

Child Protection Policy and Procedures

The contents of this policy are applicable to every school in Berkhamsted Schools Group, however, interim differences to the day-to-day operations and systems used at Charlotte House are detailed in the table found in Appendix 12 and documentation found in Appendix 13

5 Introduction

5.1 Child protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. The term 'significant harm' was defined by The Children Act of 1989 as the threshold that justifies compulsory intervention in family life in the best interests of children, and gives Local Authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

5.2 Whilst there are no absolute criteria on which to rely when judging what constitutes significant harm, the following factors are used by the DSP and DSL and, where appropriate, the Local Authorities, in assessing any case:

5.2.1 The degree and extent of physical harm.

5.2.2 The duration and frequency of abuse and neglect.

5.2.3 The extent of premeditation.

5.2.4 The presence and degree of threat, coercion, sadism.

5.3 Sometimes, a single traumatic event may constitute significant harm (e.g. a violent assault, suffocation or poisoning), but more often, it is the consequence of a compilation of significant events (both acute and long-standing) which interrupt, change or damage the child's physical and psychological development. (Taken from Working together to Safeguard Children (2026)

5.4 Staff should be clear that they must not make judgements or carry out investigations. The information in these procedures must be read in the context of the specific advice

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offered herein, in terms of how to act in cases where safeguarding and/or child protection issues are suspected.

6 Role of the Designated Senior Lead/Person

6.1 The DSLs (overall Designated Senior Leads) for Child Protection in the School are the Vice Principal (**Andrew Mair**) for the Senior & Sixth and the Chief People Officer (**Tracey Evans**) for the Preps and Enterprises. The DSLs are appointed by the Governing Body and take joint lead responsibility for Safeguarding and Child Protection in the relevant part of the School, see Appendix 2 for DSL Job Description. References to the DSL in this policy refer to the relevant DSL for the part of the School concerned.

6.2 The DSLs (and any Deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

6.3 There is also a Designated Senior Person (DSP) who takes responsibility for child protection matters in each school within Berkhamsted Schools Group. (In the event of the absence of any DSP another DSP within the organisation will be empowered to deal with matters in the relevant school). It is the expectation of the role that the DSL is the primary communicator with the Designated Officer(s) at the Local Authority, formerly known as Local Authority Designated Officer (LADO). They will contact the Designated Officer(s) at the Local Authority or Local Safeguarding Children Partnership or Board (as applicable) within 24hrs of a disclosure or suspicion of abuse. All paperwork will be held by the DSL.

6.4 The DSLs and any Deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NSPCC guidance When to call the Police should help DSLs understand when they should consider calling the police and what to expect when they do.

6.5 The DSLs will contact Designated Officer(s)at the Local Authority in the event of safeguarding concerns and allegations being made against staff and supply staff and in consultation with the Principal, and informing the safeguarding governor, a referral must be made to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate in circumstances such as "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to a TRA referral.

6.6 Ensure all staff implement the Child Protection and Safeguarding Policy effectively.

6.7 Ensure all staff receive termly training, in safeguarding practice and procedures. Our safeguarding training includes training relating to the Prevent Duty under the Counter-Terrorism and Security Act (CTSA) 2015.

6.8 Receive appropriate higher level training in line with Local Safeguarding Child Protection Partnership / Board (LSCP/LSCB) procedures, including the LSCP/LSCB Prevent Duty procedures.

6.9 Work with the Safeguarding Governor to undertake a full review of all aspects of

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safeguarding annually and provide a comprehensive written report for the Governing Body.

6.10 A detailed job description for the DSL can be found in Appendix 2.

6.11 The role and requirements for DSLs are set out fully in Keeping Children Safe in Education 2026 at Annex B.

7 Names of the DSPs (see Appendix 1 for contact details)

Designated Safeguarding Leads (DSLs)	
Andrew Mair (DSL Senior & Sixth)	Vice Principal of Berkhamsted Schools Group
Tracey Evans (DSL Preps and Enterprises)	Chief People Officer of Berkhamsted Schools Group
Additional members of the Safeguarding Team (cross-school)	
Jo Hughes	Group Director Ed Tech
Emily Kenefick	School Psychologist
Rachel Jenkins	Senior School Nurse
Designated Senior Persons for each school (DSPs)	
Karen O'Connor	Headteacher of Berkhamsted Prep, Pre-Prep and BDNL
Nick Cale	Headteacher of Berkhamsted Sixth
Jo Vila	Headteacher of Berkhamsted Girls
Alice Fletcher	Headteacher of Heatherton
Tom Hockedy	Headteacher of Berkhamsted Boys
Tracy Johnson	Deputy Headteacher of Charlotte House
Deputy DSPs for each School	
Debbie Cooper	Deputy Headteacher of Berkhamsted Pre-Prep (BDNL/Stepping Stones)
Charley Stevens	Day Nursery Co-Manager, BDNL

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Ryan Eggleton	Day Nursery Co-Manager, BDNL
Katie McNicholl	Deputy Headteacher of Berkhamsted Pre-Prep (Rec/KS1)
Camilla Spurr	Deputy Headteacher, Berkhamsted Prep
Paul Whitby	Deputy Headteacher, Berkhamsted Prep
Becky Miles	Deputy Headteacher of Berkhamsted Sixth
Sarah Gledhill	Deputy Headteacher of Berkhamsted Girls
Richard Mackay	Deputy Headteacher of Berkhamsted Boys
Andrew Manley	Deputy Headteacher of Heatherton
Penny Woodcock	Headteacher of Charlotte House

7.1 Together, the DSLs and the DSPs hold the responsibilities listed below.

7.1.1 Raising Awareness

7.1.2 The School, through the DSLs and DSPs, undertakes:

7.1.2.1 To monitor and review annually (in conjunction with the Governing Body), the effectiveness of the Safeguarding Policy and Child Protection Procedures, to ensure they comply with current best practice.

7.1.2.2 To ensure the policies and procedures adopted by the Governing Body are fully implemented and followed by all staff, and to take appropriate action where this is found not to be the case.

7.1.2.3 To ensure parents have access to the Procedures for Safeguarding and Child Protection (available on the website and hard copy provided on request).

7.1.2.4 To ensure, where necessary, that records are passed on to the receiving school if a pupil transfers.

7.1.2.5 To ensure the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback.

8 Training and Support

8.1 The School, through the DSLs, undertakes:

8.1.1 To ensure that all DSPs receive refresher training (Level 3, including inter-agency working) at three yearly intervals in addition to the regular annual

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safeguarding training undertaken by all staff. This training covers inter-agency working, participation in child-protection case conferences, supporting children in need, record keeping and promoting a culture of listening to children and ensuring they are safe online.

8.1.2 To ensure all staff and the Principal have read and understood Part 1 of Keeping Children Safe in Education (2026), and receive appropriate age-related safeguarding and child protection training, including on-line safety which is updated. Staff working in the EYFS setting are trained in accordance with the EYFS framework Annex C. In addition, all staff members should receive safeguarding and child protection updates (via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. To ensure that new staff receive a safeguarding children induction within 7 working days of commencement of their employment, via the Chief People Officer or a delegated DSP which will include the early help process and their role in it. Early help or family help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse, and includes: identifying emerging problems, liaising with the DSP/DSL and sharing information with other professionals to support early identification and assessment.

8.1.3 To ensure that all staff and volunteers are provided with Induction Training regarding the school's arrangements for safeguarding children within 7 working days of their commencement of work. This training will include provision of this document which includes the Staff Code of Conduct, the Whistleblowing Policy, the Pupil Behaviour and Discipline Policy, the name and contact details of the DSLs (Vice Principal & Chief People Officer) and all the DSPs across the Schools Group, whose details can be found in Appendix 1. Induction will also ensure that staff understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring of the School's network and devices[1]. In the event of the absence of any DSP, another DSP within the organisation will be empowered to deal with matters in the relevant school. Staff are also informed of the requirement to read and understand at least part 1 and Annex A of Keeping Children Safe in Education (2026) and sign to say that they have done so on appointment and thereafter undertake the annual safeguarding on-line training and test.

8.1.4 To ensure that all School staff follow the Staff Code of Conduct as detailed in Appendix 5.

8.1.5 To ensure sufficient resources and time are allocated to enable the DSLs, DSPs and other staff to discharge their responsibilities, including taking part

[1] Schools can use the department's tool to self-assess against filtering and monitoring standards - plan technology for your school

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in strategy discussion and other inter-agency meetings, and contributing to the assessment of children.

8.1.6 To ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to safeguarding children, and to treat such concerns sensitively and effectively in a timely manner in accordance with the school's Whistle Blowing Policy. Information can also be found on the NSPCC whistleblowing helpline - https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/

8.1.7 To hold and be conversant with the School's Child Protection procedures.

8.1.8 To access the current Hertfordshire, Buckinghamshire, Bedford Borough, Central Bedfordshire and Luton and London Safeguarding Children Partnerships' procedures and be fully conversant with these.

9 Referrals

Referrals are made where a child is suffering or is likely to suffer from harm; it is important that a referral to local authority children's social care and if appropriate the police is made immediately. when-to-call-the-police--guidance-for-schools-and-colleges.pdf (npcc.police.uk)

9.1 The School, through the DSLs, undertakes:

9.1.1 To ensure that the School operates within the legislative framework and recommended guidance, in accordance with locally agreed inter-agency procedures.

9.1.2 To develop effective working relationships with other agencies and services.

9.1.3 To decide upon the appropriate level of response to specific concerns about a child, referring to local guidance on thresholds and obtaining information on borderline cases. Responses may include discussions with parents, assessment under Families First procedures and/or the Common Assessment Framework (CAF) or referral to Children, Schools and Families social care.

9.1.4 To liaise and work with Children's Services, reporting cases of suspected child abuse immediately to the Local Safeguarding Children Partnership or Board (as applicable) (see Appendix 1 for contact numbers)

9.1.5 To ensure that the Principal is kept fully informed of any referrals.

9.1.6 To ensure that accurate safeguarding records relating to individual children are kept separate from the academic file with the relevant DSL, marked 'Strictly Confidential' and are passed on securely should the child transfer to a new educational provider.

9.1.7 To submit reports and ensure the school's attendance at child protection conferences.

9.1.8 To contribute to decision making and delivery of actions planned to safeguard the child.

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9.1.9 To ensure that the school effectively monitors children about whom there are concerns, including notifying Children's Services: Safeguarding and Specialist Services when there is an unexplained absence of more than two days for a child who is the subject of a child protection plan.

9.1.10 To notify local protection agencies of any serious incident or injury (or death), of any child while in the care of the school, and to act upon any advice from those agencies.

10 Alternative Provision

10.1 The School recognises that any pupils in alternative provision often have complex needs, and supports these pupils appropriately. Whilst all children should be protected we recognise that some groups of children are potentially at greater risk of harm. For Children in need and those with a child protection plan, children missing from education, children requiring mental health support, home educated, and looked after and previously looked after children, the following guidance is used in the school setting: https://www.gov.uk/government/publications/alternative-provision

11 EYFS

11.1 Within the EYFS settings, the DSPs are:

11.1.1 Pre-Preparatory School and BDNL - Karen O'Connor, Headteacher of Berkhamsted Prep, Pre-Prep and BDNL

11.1.2 Heatherton – Alice Fletcher, Headteacher of Heatherton

11.1.3 Charlotte House – Hannah Cowen Early Years Co-ordinator of Charlotte House

11.2 They will inform the Principal of any serious safeguarding concerns and allegations of harm or abuse, by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these safeguarding concerns and allegations.

11.3 The School would inform Ofsted of the above as soon as is reasonably practicable, but within fourteen days at the latest.

11.4 The Early Years Foundation Stage settings within Berkhamsted Schools Group are within the scope of **whole Group policies** relating to Safeguarding, for example:

11.4.1 First Aid

11.4.2 Administration of Medicines

11.4.3 Behaviour and Discipline

11.4.4 Health and Safety

11.4.5 Allergy Safety

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11.4.6 Staff and Visitors Smoke and Vape Free

11.4.7 Risk Assessment

11.4.8 Equal Opportunities

11.4.9 Attendance

11.5 In addition, the EYFS settings have a number of **site-specific procedures** relating to Safeguarding as required, including at BDNL a Key Person Procedure and a Behaviour Management Procedure.

11.6 The Attendance Policy for BDNL, as required by the EYFS Statutory Framework, is included in the whole Berkhamsted Schools Group Attendance Policy as an appendix.

11.7 The use of mobile phones, cameras and any other electronic devices with imaging and sharing capabilities in EYFS settings is covered in section 31.2 below and also in the Staff Code of Conduct found at Appendix 5 of this Policy.

12 Role of Governors

12.1 The Governing Body appoint a designated Safeguarding Governor **(Jacqui Brabazon)** to have an overview of this area but recognise that Leadership responsibility for the school's safeguarding arrangements rests with the whole Governing Body, including the Chair of Governors (Carol Copland). The Governing Body facilitate a whole school approach to safeguarding, undertaking various activities to underpin all relevant aspects of process and policy, and by ensuring they operate with the best interests of the child at the heart.

12.2 All Governors receive appropriate safeguarding and child protection (including online safety) training at induction and at regular intervals throughout their time on the Board. This training is designed to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place that The School are effective and support the delivery of a robust whole school approach to safeguarding. Training is also designed to make governors aware of; their obligations under the Human Rights Act 1998; the Equality Act 2010; and local multi-agency safeguarding arrangements.

12.3 The designated Safeguarding Governor will attend the (minuted) half-termly meetings of the Safeguarding Team (DSPs and DSLs), and – with the assistance of the DSLs – ensure that the Governors fulfil their safeguarding responsibilities, as summarised below:

12.3.1 Children who are or have been looked after by a Local Authority and/or have a social worker can be particularly vulnerable. The Governors ensure that relevant staff have the skills, knowledge and understanding necessary to meet the particular needs of these children. The process is fully discussed with the Vice Principal to ensure that staff have the relevant and appropriate information they need, and that the School complies with relevant legislation and guidance.

12.3.2 The responsibilities of the Governing Body include:

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12.3.2.1 Testing the school's policies and procedures around Safeguarding and Child Protection through the **Risk and Regulatory** Committee.

12.3.2.2 Keeping abreast of Safeguarding and Child Protection issues and trends through the **Education** Committee.

12.3.2.3 Maintaining and enhancing knowledge and understanding of Safeguarding and Child Protection Policy/Procedures through standing training items at **Full Governor** meetings.

12.3.2.4 Ensuring that the School has Policies and Procedures for Safeguarding and Child Protection, known to all staff and governors, which are in accordance with Local Authority, and inter-agency procedures and that these are made available to all parents.

12.3.2.5 Ensure that the school has a procedure in place for seeking assurance on child protection and safeguarding procedures being in place for when services or activities are delivered by another body but using the school site, via a hire or rental agreement.

12.3.2.6 Working with the DSLs and the Governing Body to carry out an annual review and audit to judge the efficiency with which the procedures have been implemented and to ensure that any deficiencies are remedied immediately.

12.3.2.7 Submission of annual reports to the Hertfordshire Safeguarding Children Partnership (for Berkhamsted School) and the Buckinghamshire Safeguarding Children Partnership (for Heatherton).

12.3.2.8 Regular checking of the Single Central Register.

12.3.2.9 Ensuring that the School provides a safe online environment for children to learn by doing all they reasonably can to limit children's exposure to risks from the School's IT system. As part of this process, the governing body should ensure that the School has appropriate filters and monitoring systems in place on school devices and school networks and regularly reviews their effectiveness. (Advice on this can be found in Part two of KCSIE 2026).

13 Reviews

13.1 The School reviews its Child Protection and Safeguarding Policy and procedures annually and the Governing Body actively discusses the procedures and their implementation through the termly reports to the Governors' Education Committee meeting. Governors also undertake engagement days that focus either wholly, or in part on safeguarding, child protection and pupil wellbeing.

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14 Safeguarding Children: Information and Guidance for Staff

14.1 All staff are required to have read Part 1 of Keeping Children Safe in Education (2026) and to confirm they have understood and will comply with its contents. Completion of the annual on-line KCSIE update training provided by Veale Wasbrough Vizards captures this confirmation.

15 Support for Children

15.1 The School recognises that:

15.1.1 A child who is abused or witnesses violence may find it difficult to develop and maintain a sense of self-worth.

15.1.2 A child in these circumstances may feel helpless and humiliated and may feel self-blame.

15.1.3 The School may provide the only stability in the lives of children who have been abused or who are at risk of harm.

15.1.4 Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal, to aggression or withdrawal.

15.1.5 The School has a duty of care towards both victims and alleged perpetrators of child-on-child abuse.

15.2 The School will support all pupils by:

15.2.1 Encouraging self-esteem and self-confidence whilst not condoning aggression or bullying.

15.2.2 Promoting a caring, safe and positive environment within the School.

15.2.3 Working sensitively with pupils who disclose safeguarding concerns to ensure that they are taken seriously, kept safe and never made to feel like they are creating a problem for making a disclosure.

15.2.4 Work proactively with alleged perpetrators of child-on-child abuse, recognising that abusing others can be caused by abuse that they themselves have suffered.

15.2.5 Liaising and working closely together with all other support agencies involved in the safeguarding of children.

15.2.6 Notifying Social Care Services as soon as there is a significant concern.

15.2.7 Providing continuing support to a pupil about whom there have been concerns, who leaves the school (other than at the end of Y13) by ensuring that appropriate information is forwarded under confidential cover to the pupil's new school.

15.3 **Children with Special Educational Needs and disabilities (SEND) or health issues**

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15.3.1 The School recognises that children with SEND can face additional safeguarding challenges both online and offline. For example, additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

15.3.1.1 assumptions that indicators of possible abuse such as behaviour, mood or injury relate to the child's condition without further exploration;

15.3.1.2 these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;

15.3.1.3 that these children could be dependent on adults for care;

15.3.1.4 the need for intimate care or that they are isolated from others;

15.3.1.5 children with SEND can be disproportionally impacted by things like bullying without outwardly showing any signs;

15.3.1.6 communication barriers and difficulties in overcoming these barriers.

15.3.1.7 cognitive understanding – being unable/less able to understand the difference between fact and fiction in online content and then repeating the content/behaviour in School or the consequences of doing so.

Further safeguarding support for SEND children can be found in Part two of KCSIE 2026

15.4 **Children who are lesbian, gay, bisexual or gender questioning (LGBTQ+)**

15.4.1 A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are. The School should consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place.

15.4.2 Children who are questioning their gender: When supporting a gender questioning child, the School will not initiate any action. The School will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious about the full range of the child's experiences.

15.4.3 Staff should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. In making decisions about supporting social transitions, staff will comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law. The DSL will be involved in all cases where a child is questioning their gender. Staff will not adopt any changes relating to social transition unless a decision has been made by a school or college and a

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child's parents or carers have been involved. Parents will be involved in the vast majority of cases. In the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the DSL will determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

15.4.4 The School complies with its obligations under the Education (Independent School Standards) Regulations 2014 regarding the provision of toilets and washing facilities. The School does not permit children to use toilets designated for the opposite biological sex. The School has regard to the provisions set out in Part two of KCSIE regarding single-sex spaces, changing rooms, and (where applicable) boarding and residential accommodation.

15.4.5 Further guidance on single-sex spaces, sport, and boarding accommodation is set out in Part two of KCSIE (September 2026).

15.4.6 LGBTQ+ inclusion is taught as part of the PSHE (PD) curriculum and there is a range of support available to pastoral leaders to help them counter homophobic, biphobic and transphobic bullying and abuse. The Safeguarding Committee track and monitor such bullying to identify patterns.

16 Abuse and neglect & Exploitation

16.1 All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

In all cases, if staff are unsure, they should also speak to the DSP or DSL

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

16.3 **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child, including by fabricating the symptoms of, or deliberately causing, ill health to a child.

16.4 **Emotional abuse:** 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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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**.**

16.5 **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) 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 and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

16.6 **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development, such as failing to provide adequate food, shelter and clothing, or neglect of, or being unresponsive to, a child's basic emotional needs.

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16.7 Circumstances where a child may be vulnerable to abuse and / or neglect include: Child abduction and community safety incidents, Children and the court system, Children with family members in prison, Modern slavery and the National Referral Mechanism, Cybercrime, Homelessness, Channel.

16.8 **Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)** Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern slavery Statutory Guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

16.9 Staff should be aware that pupils who are the (alleged) perpetrators of criminal acts may also be the victims of CSE or CCE and remain professionally curious about the root cause of problematic behaviours.

17 Child-on-Child Abuse (including child-on-child harassment and violence).

17.1 **Child-on-child abuse** is a safeguarding issue for both victim and alleged perpetrator, it is preventable by recognising behaviors and indicators of risk early. Child on Child abuse is any form of physical, sexual, emotional, or financial abuse, or coercive control exercised between children and within children's relationships, (both intimate and non-intimate), it is most likely to include, but not limited to: bullying (including cyber bullying), sexual violence/assault and sexual harassment, discriminatory behaviour including racism, faith-targeted abuse, other prejudice based incidents, making or sharing of nude and semi-nude images, initiation/hazing type violence and rituals and upskirting (as covered by the Voyeurism (Offences) Act which came into force on 12 April 2019). As set out in part one of KCSIE 2026, all staff working with children are advised to maintain an attitude of "it could happen here". Addressing inappropriate behavior (even if it appears to be relatively innocuous) can be an important intervention that helps prevent abusive and/or violent behavior in the future. Whilst **any** report of sexual violence or harassment should be taken seriously, staff should be aware that it is more likely that girls will be victims and boys perpetrators. All child-on-child abuse is unacceptable and will be taken seriously. Child-on-child abuse must never be passed off as "just banter," "just having a laugh," "part of growing up" or "boys being boys." In the case of abuse by a pupil, or group of pupils, the key indicators that may identify abuse (as opposed to adolescent misbehaviour, to be handled within the school's normal sanctions framework) are:

17.1.1 the frequency, nature and severity of the incident(s)

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17.1.2 whether the victim was coerced by physical force, fear, or by a pupil or group of pupils significantly older than them, or having power or authority over them.

17.1.3 whether the incident involved a potentially criminal act.

17.1.4 whether if the same incident (or injury) had occurred to a member of staff or other adult, it would have been regarded as assault or otherwise actionable

17.2 We use the term 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18[2]. We have nonetheless chosen not to restrict our approach to child-on-child abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all pupils, regardless of age. Although the starting point is that the School's response to child-on-child abuse should be the same for all pupils, regardless of age, there may be some additional considerations in relation to a pupil aged 18 or over or where there is a significant age gap between the pupils in terms of how local agencies and/or partners respond. This, for example, is likely to be different on the part of local authorities, given that their safeguarding duties are limited, in the case of children's social care services - save for a number of specific exceptions[3] - to children and, in the case of adult social care services, to adults with care and support needs. Similarly, the School's response to incidents involving the making or exchanging of Nude or Semi-nude images will need to differ depending on the age of the pupils involved. There is also likely to be a more significant criminal justice response in relation to any pupil responsible for abuse who is aged 18 or over;

17.3 These types of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, sexual bullying in schools and other settings can result in the sexual exploitation of children by their peers. For 16 and 17 year olds who are in abusive relationships, what may appear to be a case of domestic violence may also involve sexual exploitation. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to child-on-child abuse therefore needs to consider the range of possible types of child-on-child abuse set out above and capture the full context of children's experiences[4]. This can be done by adopting a Contextual Safeguarding approach and by ensuring that our response to incidents of child-on-child abuse takes into account any potential complexity.

17.4 All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

17.5 Children's sexual behaviours exist on a wide continuum, from normal and

[2] The United Nations Convention on the Rights of the Child (1989) (ratified by the UK in 1991); the Children Act (1989); and Department for Education, *Keeping Children Safe in Education: Statutory guidance for schools and colleges* (September 20264) all define "*child*" as a person aged under 18

[3] For example, young people aged 18 or over who are eligible for care leaving services

[4] Carlene Firmin and George Curtis, MsUnderstood Partnership (2015), Practitioner Briefing #1: What is peer-on-peer abuse? (MSU 2015)

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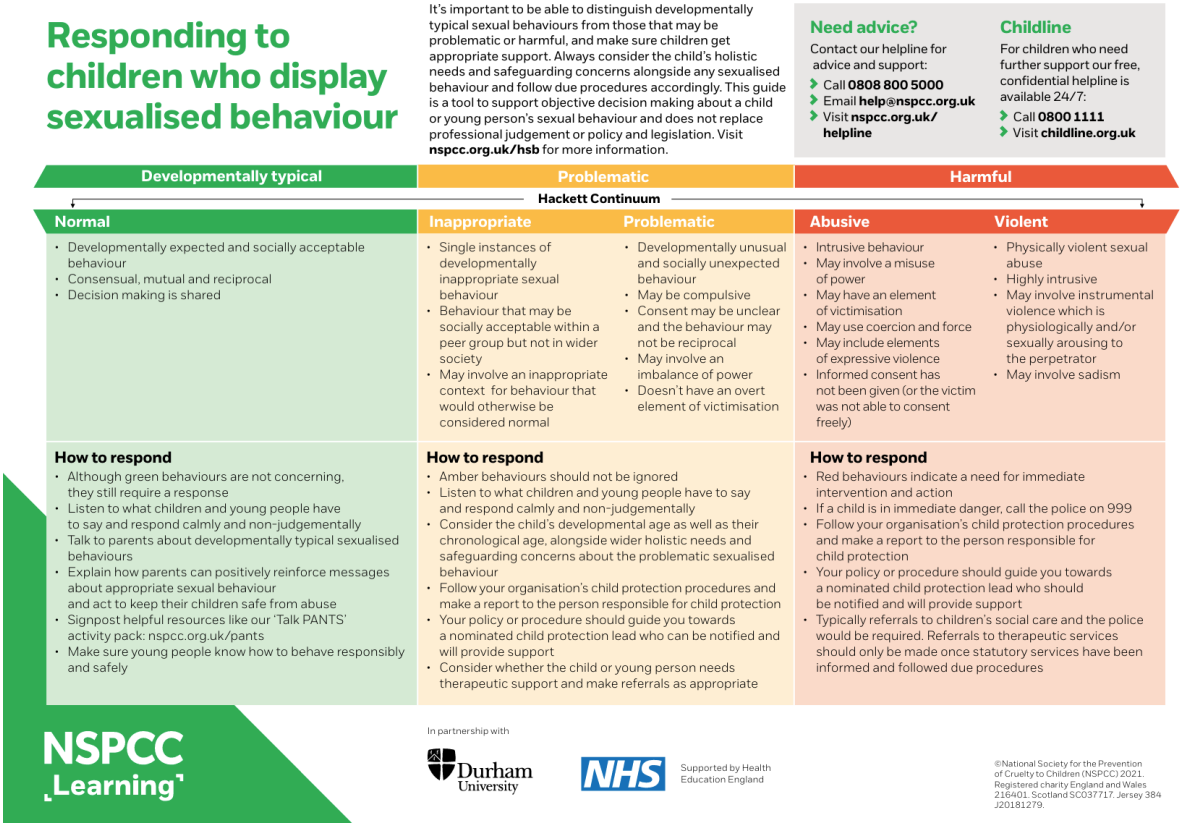
developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour, as both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage. A useful umbrella term is harmful sexual behaviours or "HSB." This term has been adopted widely in the field, and is used throughout the NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework, as well as this policy

17.6 At Berkhamsted we use the Simon Hackett continuum model which demonstrates the range of sexual behaviours presented by children, which may be helpful when seeking to understand a pupil's sexual behaviour and deciding how to respond to it:



When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and decide how to respond. This could include, but is not limited to, whether it:

17.6.1 is socially acceptable

17.6.2 involves a single incident or has occurred over a period of time

17.6.3 is socially acceptable within the peer group

17.6.4 is problematic and concerning

17.6.5 involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual

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vulnerability

17.6.6 involves an element of coercion or pre-planning

17.6.7 involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power

17.6.8 involves a misuse of power

17.7 The School has drafted a statement on Sexual relationships between pupils – this can be found at Appendix 11 of this policy. The School recognises that children can be particularly vulnerable in residential settings and is alert to the potential for child-on-child abuse. The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

17.8 It should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider in response to other alleged behaviour involving reports of other types of abuse. For example, the issue of consent and the nuances around it, is unlikely to apply in the same way in cases where the alleged behaviour is reported to involve emotional and/or physical abuse, as it could in cases of alleged sexual behaviour which is reported to involve harmful sexual behaviour.

17.9 In addition, the School could be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional, physical behaviour and digital behaviour. It should also be recognised that the same behaviour presented by different children may be understood at different points on a spectrum, depending on the particular context. For example, an incident involving nude or semi-nude images may be inappropriate in one context, for example, when exchanged between two children in a consenting relationship, and abusive in another, for example, when it is (a) shared without the consent of the child in the image; (b) produced as a result of coercion; or (c) used to pressure the child into engaging in other (sexual) behaviours.

17.10 Behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital, and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies. For example, a physical fight between two children may not constitute child-on-child abuse where the fight is a one-off incident, but may be abusive where the child's/children's behaviour subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership – including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child. The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual pupil basis, but could also apply across the pupil body. Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which schools need to take a whole-school approach in order to prevent escalation. For example, where multiple pupils of one gender are making inappropriate comments about pupils of another gender, one-off sanctions are unlikely to be effective and wider actions should be considered, such as arranging for an external person to deliver a year group intervention exercise; revising the School's RSE programme; and/or

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a discussion around whether anything is happening within the wider community that might be affecting the pupils' behaviour. It will also be important to consider the wider context in which the alleged behaviour is reported to have occurred, and which may trigger the need for a referral. For example, some behaviour that is considered inappropriate may be capable of being dealt with internally. However, if there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject of the concern(s)/allegation(s) is considered or suspected by the DSL to constitute child-on-child abuse, the School will follow the procedures set out below

17.11 All staff should be alert to the well-being of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ. Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse and can include:

17.11.1 failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected;

17.11.2 physical injuries;

17.11.3 experiencing difficulties with mental health and/or emotional wellbeing;

17.11.4 becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much;

17.11.5 broader changes in behaviour including alcohol or substance misuse;

17.11.6 changes in appearance and/or starting to act in a way that is not appropriate for the child's age;

17.11.7 abusive behaviour towards others[5].

17.12 Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by another child) and, if so, what the concern is and how the child can be

[5]It should be noted that there is currently no definitive list of indicators of peer-on-peer abuse. The above list has been drawn from *Signs, symptoms and effects of child abuse and neglect (NSPCC)*: https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/, and cases of peer-on-peer abuse

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supported going forwards.

17.13 Staff should be aware of:

17.13.1 Procedures to minimise the risk of child-on-child abuse

17.13.2 How safeguarding concerns and allegations of child-on-child abuse will be recorded, investigated and dealt with - see Appendix 6

17.13.3 The process involved in supporting any child affected by child-on-child abuse (including victims and alleged perpetrators).

17.13.4 The need to reassure all victims and take them seriously, regardless of how long it has taken them to come forward.

17.13.5 The need to not downplay or treat less seriously abuse that occurs online or outside of school.

17.13.6 The need to ensure that a victim is not given the impression that they are creating a problem by reporting child-on-child abuse, sexual violence, or sexual harassment. That a victim should never be made to feel ashamed for making a report. It is important that staff explain that the law is in place to protect children and young people rather than criminalise them; this should be explained in such a way that avoids alarming them or distressing them.

17.14 The School recognises the unique nature of boarding accommodation and is aware that child-on-child abuse could take place in a boarding house where children share accommodation and that child-on-child abuse could occur between any pupils in the boarding houses, whether full, weekly or flexi boarders. The School ensures that there are appropriate levels of supervision and encourages an open safeguarding culture in the boarding houses. Each student is required to sleep in their own bed and no pupil is allowed to be in another pupil's bedroom after lights out. No pupil is allowed to issue a punishment to any other pupil and no induction rituals or hazing are allowed.

18 Sexual Violence and Sexual Harassment

18.1 Sexual Violence and Sexual Harassment is a serious issue that all staff at The School should have a zero-tolerance attitude towards and so respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have taken place outside of school and online. By "zero-tolerance" the School means that we will never tolerate acts of misogyny or let it pass, even in minor forms. We will use a scale of consequences with perpetrators so that we have a proportionate response and aim for lessons to be learnt. The intention is to reduce the risk that offences are repeated and to ensure that every member of community feels safe and supported.

18.2 Sexual violence and/or harassment can take place between two children of any age and sex, whether primary or secondary stages. As set out in KCSIE 2026, staff must adopt an attitude of "it could happen here" and acknowledge that unfortunately this is a

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widespread problem in our society[6]. Staff must take all reports seriously, reassure victims, take them seriously and ensure they are supported and kept safe. A victim should never be given the impression that they are creating a problem. Staff should also be mindful that children might not tell staff directly about their abuse and it maybe that staff overhear a conversation or the child's behaviour changes etc.

18.3 All reports of sexual violence and/or harassment (both online and offline) should be reported to the DSL via CPOMS. This will allow the DSL and/or DSP to perform a risk assessment, identity patterns of inappropriate behaviour and decide on the best course of action. KCSIE 2026 sets out that there are four likely scenarios to consider when dealing with such reports; to manage internally, seek early help, make a referral to Local Authority Children's Social Care and/or report to the police.

18.4 If the allegation is found to be unsubstantiated, unfounded, false, or malicious the DSL should consider whether the child and/or the person who made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to the Local Authority Children's Social Care may be appropriate. If the allegation is found to be invented or malicious, the School should consider whether disciplinary action is appropriate.

18.5 The School recognises that victims of sexual violence/harassment may need ongoing support long after the incident(s) and will work with the victim, family, and other agencies to ensure that the needs and wishes of the victim are met. Sexual assault can result in a range of health needs, and the School will support victims as appropriate. In recent years, the School has trained a number of Sexual Misconduct Liaison Officers (SMLOs) to help us carry out this work. These colleagues are known to staff and pupils in the Senior School to be able to support those who are reported for, or who report, Sexual violence/harassment.

18.6 The School also recognises that it has safeguarding and supporting duties to the alleged perpetrator(s) and, if they are found to be guilty of the alleged abuse, will work to ensure that they are given the correct support and education to try and stop them from reoffending, balancing this with the need to sanction them for their misbehaviour. Links to support can be found in part five and Annex A of KCSIE 2026

19 Other specific safeguarding issues

19.1 **Honour-based abuse -** So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family

[6] Indeed, the Ofsted Report (Review of sexual abuse in schools and colleges) published in June 2021 suggests that "even where school and college leaders do not have specific information that indicates sexual harassment and online sexual abuse are problems for their children and young people, they should act on the assumption that they are". Therefore, the School goes further than KCSIE26 and adopts an attitude that it "is happening here"

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and/or the community, including female genital mutilation (FGM), forced marriage[7], and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

19.2 **Female Genital Mutilation (FGM)** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. PLEASE NOTE: Whilst all staff should speak to the DSLs (or deputy) with regards to concerns about FGM, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

19.3 **Low levels of Attendance and Children missing from education.** All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude, and any special educational needs they may have. Low levels of attendance may represent a safeguarding concern. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area, particularly on repeat occasions and/or for prolonged periods. A child with unexplainable and/or persistent absences from education is a potential indicator of abuse or neglect Staff should be aware that there is greater potential for children who are missing from education to be exploited. Staff must be familiar with our process for monitoring unauthorised absence (see the Attendance Policy) and children missing from education procedures below.

19.3.1 Staff should follow the school's procedures for dealing with children that have unexplainable and/or persistent absences from education , to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

19.3.2 If a child has been absent without the School's permission for a period of ten School days or more, the School must inform the relevant Local Authority. Further information can be found in KCSIE 2026

19.3.3 The School is required to notify the relevant Local Authority when a pupil joins or leaves the School at a non-standard transition point. Further information can be found in the School Attendance (Pupil Registration)

[7] Since February 2024 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

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(England) Regulations 2024 as well as in DfE statutory guidance 'Working together to improve school attendance' (updated July 2026; this includes information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

19.3.4 When a pupil leaves the School and the School is informed that the pupil is leaving to attend another school, the relevant Headteacher should establish the pupil's new home address (where applicable), the name and address of the pupil's new school and the date the pupil will start there.

19.3.5 If the Headteacher is concerned about any aspect of a transfer, if the pupil leaves but the new school is not known or if a pupil has "disappeared", the matter must be drawn without delay to the attention of the Children Missing Education Officer at the relevant Local Authority. These include: Hertfordshire - csf.cme@hertscc.gov.uk, Buckinghamshire - childrenmissingeducation@buckscc.gov.uk, Central Bedfordshire 0300 300 6479 / 0300 300 6220

19.4 **Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology or being drawn into terrorism. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. The school is subject to the Prevent Duty under section 26 of the Counterterrorism and Security Act 205 (the CTSA 2025), and understands its function to have due regard to the need to prevent people from being drawn into terrorism. Staff are alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

19.5 Risk Assessment on Radicalisation and Extremism:

The School recognises that Radicalisation and Extremism can be religious, political, or focused around single issue groups. Whilst the overall risk is low in relative terms, awareness and vigilance are expected at all times, and staff receive on-going training and support, including guidance on Visiting Speakers (see Appendix 7) and the importance of raising pupil awareness.

Appendix 1 has contact details and telephone numbers where advice is required.

19.6 **Serious Violence** which includes but is not limited to knife crime, gun crime, corrosive substance attacks and homicide, are often linked to drug and/or alcohol abuse. The School recognises the threat of County Lines and the impact on individuals, families, and communities. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL (or a deputy), who will assess the risk and take appropriate action. Depending on

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the level of risk the DSL (or deputy) may put in place a safety support plan and where appropriate consider action to de-escalate peer conflict.

19.7 Domestic Abuse - The Domestic Abuse Act 2021 states that: "Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn." Domestic abuse is an abhorrent crime perpetrated on victims and their families by those who should love and care for them. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result, and therefore children are victims of Domestic Abuse in their own right. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Operation Encompass operates in the majority of police forces across England (including Hertfordshire and Buckinghamshire). It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the Designated Safeguarding Lead) in school before the child or children arrive at school the following day.

19.8 Making or Sharing of nudes or semi-nudes including AI generated

19.8.1 Sharing of nude and semi-nude images (which includes all visual content, such as photographs, videos and livestreams generated:

19.8.1.1 By children under the age of 18 or,

19.8.1.2 Of children under the age of 18 that are of a sexual nature

19.8.2 All incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether they are consensual or non-consensual.

19.8.3 It is important to be aware that young people involved in sharing sexual videos and pictures may be committing a criminal offence. Specifically, crimes involving sexual imagery (including pseudo images) of a person under 18 years of age fall under Section 1 of the Protection of Children Act 1978, Section 160 Criminal Justice Act 1998 and Sections 45-46 of the Sexual Offences Act 2003. Under this legislation it is a crime to:

19.8.3.1 Take an indecent photograph or allow an indecent photograph to be taken;

19.8.3.2 Make an indecent photograph (this includes downloading or opening an image that has been sent via email);

19.8.3.3 Distribute or show such an email;

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19.8.3.4 Possess with the intention of distributing images;

19.8.3.5 Advertise; and

19.8.3.6 Possess such images.

19.8.1 Any decision to charge individuals for such offences is a matter for the Crown Prosecution Service, and whilst it is unlikely to be considered in the public interest to prosecute children, young people need to be aware that they may be breaking the law.

19.8.2 Staff should respond to any disclosure relating to nude and semi-nude images in the same way they would in any other safeguarding disclosure (See Section 27, below). However, the following points should also be noted:

19.8.2.1 Staff may **confiscate** an electronic device if they think there is good reason for doing so (see Behaviour and Discipline Policy section 4 for more details), however any **search** of that device should be conducted by a Headteacher or Deputy Headteacher (in his/her role as a DSP or Deputy DSP) in the case of suspected illegal images who is also a member of the same sex. Devices may need to be handed over to the police and therefore the device would remain secure at all times.

19.8.2.2 Material should not be moved from one device to another (e.g., via email), printed out, saved

19.8.2.3 An image that has been **shared across a personal mobile device** should not be viewed unless there is a clear reason to do so (such as a belief that a young person is at risk of physical or emotional harm); an image that has been **shared across a school network, a website or a social network** should only be viewed within the protocols outlined herein

19.8.3 If indecent images of a child are found, the relevant DSP and DSLs will agree a course of action, which may include some or all of the following:

19.8.3.1 Store the device securely

19.8.3.2 Carry out a risk assessment in relation to the young person

19.8.3.3 Contact the police (if appropriate) - NSPCC guidance When to call the Police should help staff understand when they should consider calling the police and what to expect when they do.

19.8.3.4 Make a referral if needed

19.8.3.5 Put the necessary safeguards in place for the pupil (which may include counselling)

19.8.3.6 Inform parents and/or carers about the incident and how it is being managed (although this will depend on the nature of the image and the family circumstances of the young person).

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19.9 Adolescent Mental Health

Staff should be aware of the possible signs of Adolescent Mental Health and sign post them to the DSP via CPOMS, as in some cases mental health problems can develop into safeguarding concerns including
self-harm, suicidal ideation or risk of suicide. They can also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals can diagnose a mental health problem; staff are trained to recognise changes in behaviour. if the School believes a child to be in danger, they should call 999 or arrange for them to be taken to A&E immediately.

19.10 Young carers:

A young carer is a person under 18 who provides or intends to provide care for another person. Young carers may face additional safeguarding challenges and may be more vulnerable due to the responsibilities they carry. Staff should be alert to signs that a child is taking on caring responsibilities that are inappropriate for their age and which may be impacting on their attendance, attainment, or wellbeing. Concerns about young carers should be discussed with the DSL.

19.11 **Safeguarding children with medical conditions:** The fact that there has been an incident relating to the management of a child's medical condition or allergy would not in itself warrant a referral to local safeguarding partners. The DSL will consider a safeguarding referral where an incident highlights concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to the School, or where they are repeatedly sent without essential medication, thereby putting the child at risk. The School will work collaboratively with healthcare professionals to ensure that any safeguarding concerns arising from a child's medical condition are identified and addressed promptly.

19.12 Further information can be found in the DfE statutory guidance on Supporting Pupils at School with Medical Conditions and Allergy Safety in schools.

20 Staff awareness of signs of abuse

20.1 The signs of child abuse aren't always obvious, and a child might not feel able to tell anyone what's happening to them. Sometimes, children don't even realise that what's happening to them is abuse.

20.2 Some common signs that there may be something concerning happening in a child's life include:

- 20.2.1 unexplained changes in behaviour or personality
- 20.2.1 becoming withdrawn
- 20.2.2 seeming anxious
- 20.2.3 becoming uncharacteristically aggressive

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20.2.4 lacking social skills and having few friends, if any

20.2.5 poor bond(s) or relationship(s) with a parent(s)

20.2.6 knowledge of adult issues inappropriate for their age

20.2.7 running away or going missing

20.2.8 always choosing to wear clothes which cover their body.

20.3 Alongside the list above, Staff should be aware of the specific types of abuse and their indicators; these can be found HERE

Role of Staff

21 Concerns about a child (including abuse by a pupil or group of pupils)

21.1 Staff who notice injuries that appear to be non-accidental, a significant change in a pupil's behaviour, or who are told anything significant related to child protection by another pupil, must report their concerns immediately to the relevant Designated Senior Person. A concern must also be reported using CPOMS. Whilst the DSLs will generally lead on liaising with other agencies, all staff must be aware of the importance of early help, and understand their role in identifying emerging problems, liaising with the DSP/DSLs and sharing information with other professionals to support, and in some cases act as the lead professional in early identification and assessment.

21.2 If a member of staff has concerns about any pupil which may indicate physical, emotional or sexual abuse or neglect (whether the suspected perpetrator(s) is/are other pupils or adults), they must discuss them with the relevant Designated Senior Person immediately. Departmental advice https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2 provides more information on understanding identifying abuse and neglect.

21.3 ALL staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

21.4 Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. The school will be proactive in sharing information as early as possible with local agencies to help identify, assess and respond to risks or concerns about the safety and welfare of students,

21.5 It is important to recognise that safeguarding and child protection can relate to abuse of one pupil by another. Where there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm (see 2.1), by one or more pupil, the member

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of staff must make a written record of their concern and ensure this is shared with the relevant DSP immediately.

21.6 All staff should be aware safeguarding issues can manifest themselves via child-on-child abuse. **See Section 17 above and Appendix 6 for further information and guidance**.

21.7 The relevant Designated Senior Person will liaise with the Designated Safeguarding Lead and local and specialist agencies as appropriate and ensure that accurate records relating to child protection are kept secure. (See action of DSP below). Options will then include:

21.7.1 Managing any support for the child internally via the school's own pastoral support processes

21.7.1 An early help assessment, or

21.7.2 A referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm

21.8 If, at any point, there is a risk of immediate danger to a child a referral should be made to the Local Authority Children's Social Care immediately. Anyone can make a referral. The Local Authority should decide within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome. Please refer to KCSIE (September 2026) for details of possible outcomes. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

21.9 Staff should be clear about the distinction between 'Children at risk' and 'Children in need':

21.9.1 Children at risk are those who have suffered or are likely to suffer significant harm. Concerns about children at risk should be reported to the Local Authority Children's Social Care immediately (see Appendix 1).

21.9.2 Children in need are children who may need additional support from one or more agencies (e.g. children who have a disability or who act as carers for a relative). Inter-agency assessments should be carried out (such as use of the common assessment framework, or CAF, and team around the child approaches), where appropriate. Staff who have concerns about children in need should report them in the usual way, using CPOMS.

21.10 Staff and any person who comes into contact or works with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interest of the child.

22 Early Help and Family Help

22.1 Early help means the support available to all children and families through universal and community-based services, including schools, health services, and other local provision. Its purpose is to improve resilience and outcomes or to reduce the chance of problems

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getting worse. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement as association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of, or has been permanently excluded from schools, or is in Alternative Provision or a Pupil Referral Unit
- Is misusing drugs and other alcohol themselves
- Is at risk of modern slavery, trafficking, and/or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Has been repeatedly removed from the classroom
- Is on a part-time timetable
- Is a privately fostered child
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage

22.2 Where a child's needs go beyond what universal early help services can address for example, where a child has multiple and/or complex needs, or where their circumstances make them more vulnerable the child may require targeted support through Family Help.

22.3 The School has effective measures in place to identify emerging problems and potential unmet needs of individual pupils. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

23 Procedure following a disclosure

23.1 A child must be reassured that they are being taken seriously and that they will be supported and kept safe, It is important that a child is never given the impression that they are creating a problem by making a disclosure, nor should they be made to feel ashamed. If a child discloses that he or she has been abused in some way**,** the member of staff/volunteer should:

23.1.1 Listen to what is being said without displaying shock or disbelief;

23.1.2 Accept what is being said;

23.1.3 Allow the child to talk freely;

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23.1.4 Reassure the child but not make promises which it might not be possible to keep;

23.1.5 Not promise confidentiality – it might be necessary to refer to the relevant DSP, Children's Services: Safeguarding and Specialist Services;

23.1.6 Reassure that what has happened is not the child's fault;

23.1.7 Reiterate the point that it was the right thing to tell;

23.1.8 Only ask questions when necessary for the purpose of clarification, without asking any leading questions;

23.1.9 Not criticise the alleged perpetrator;

23.1.10 Explain what has to be done next and who has to be told;

23.1.11 Record details of the concern and action taken on CPOMS;

23.1.12 Pass the information to the relevant Designated Senior Person without delay.

23.1.13 All staff will aim to ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

23.1.14 If a crime has been committed, the matter should be reported to the police (see Appendix 1)

23.2 NB - school staff do not carry out investigations themselves, nor decide whether children have been abused.

23.3 See summary sheet for staff in Appendix 8.

24 Record Keeping

24.1 All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing (CPOMS). The member of staff to whom a disclosure has been made should:

24.1.1 Make brief notes as soon as possible after the conversation, and as soon as possible afterwards log onto CPOMS and record the disclosure following instructions.

24.1.2 Record the date, time, place and any noticeable words or non-verbal behaviour used/demonstrated by the child through CPOMS.

24.1.3 Draw a diagram to indicate the position of any visible injuries and scan this as an attachment to CPOMS.

24.1.4 Record statements and observations rather than interpretations or assumptions.

24.2 Records must include:

24.2.1 A clear and comprehensive summary of the concern

24.2.2 Details of how the concern was followed up and resolved

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24.2.3 a note of any action taken, decisions reached and the outcome

24.3 By using CPOMS ALL records will to be given to the relevant Designated Senior Person promptly. No copies should be retained by the member of staff or volunteer.

24.4 If in doubt about recording requirements, staff should discuss this with the relevant DSL (or relevant DSP)

25 Action by the Designated Senior Person

25.1 When considering concerns that may reach the threshold of *Child Protection*, the Designated Senior Person will:

25.1.1 Discuss the concern with the DSL to decide if the risk requires an immediate referral.

25.1.2 Meet with the child, following the guidance on questioning pupils.

25.1.3 Seek a medical examination or treatment for the pupil, if appropriate.

25.1.4 Take steps to protect the informing pupil as appropriate. Ensure that the pupil is aware that confidentiality cannot be guaranteed but that the matter will be disclosed only to people who need to know, and the child will know who these people are. If the allegation involves abuse by other pupils, it is likely that the pupils against whom the allegation has been made will need to be told, subject to any advice from relevant external agencies.

25.1.5 (Subject to any advice from relevant external agencies) meet with any pupils against whom an allegation has been made and follow the interview protocols as outlined above to develop an understanding of what has happened and to provide pastoral care to support these pupils too, and coordinate further actions and involvement of other professionals.

25.1.6 (Subject to any advice from relevant external agencies) ensure the parents of any of the pupils involved are aware of the allegation.

25.1.7 Refer the matter to the Local Safeguarding Authority for all of the children involved, as appropriate.

26 Information Sharing and Data Protection

26.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.

26.2 Where Pupils leave the School before the end of year 13, the DSL will ensure their safeguarding file is transferred to the new school or college as soon as possible, ensuring secure transit and confirmation of receipt. This should be transferred separately from the main pupil file.

26.3 On receipt of a child protection file relating to incoming pupils, key staff e.g DSP, SENCO will be made aware of relevant information.

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26.4 The DSL will also consider where it is appropriate to share information in advance of the pupil leaving, e.g information that will allow the new school or college to continue supporting victims of abuse and have that support in place for when the pupil arrives.

26.5 The School has due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and UK GDPR.

26.6 The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

26.7 Advice on Data Protection, how to protect data properly and prevent data breaches can be found in the Government's Data Protection in School's Toolkit

27 Staff Safety

27.1 Teachers are expected to fulfill many roles in and out of the classroom and will work with large and small groups of pupils. In addition, the teacher may often find themselves 'in loco parentis.'

27.2 Particular care must be taken when dealing with pupils on a one-to-one basis (such as individual lessons). See Useful Information – Guidance on one-to-one meetings and car journeys.

27.3 The law is weighted in favour of the child, applying a burden on staff to safeguard children's welfare and providing for the child's protection rather than protecting the adult. Because of the requirement for schools and agencies to share information about safeguarding concerns and allegations, there is little anonymity once an allegation has been made, even if it turns out to be false in the end. The burden of evidence is to disprove rather than prove the allegation. Given the risk of false alarms and even deliberate hoaxes on the part of pupils, staff are advised to think carefully about the setting and nature of their varied relationships with their pupils so as not to lay themselves open to undue suspicion or accusation. See Staff Safeguarding Code of Conduct in Appendix 5.

27.4 Coping with concerns about the possible abuse of a child can be very stressful for all involved, however the first responsibility is to the child. The member of staff/volunteer should therefore, consider seeking support for him/herself and discuss this with the relevant Designated Senior Person in school. The School's counselling team is also available to staff (Contact numbers: 01442 358258/358261). Additional support may be available from the Hertfordshire and Buckinghamshire Safeguarding Team and other outside agencies (See Appendix 1).

28 Pastoral role

28.1 Pastoral interaction between teachers and pupils is an intrinsic part of the School's educational provision; however, the following points are worth bearing in mind:

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If engaging with pupils in a non-public setting, it is prudent follow the School's guidance on one-to-one meetings. See Useful Information – Guidance on one-to-one meetings and car journeys.

28.1.2 There are circumstances when it is appropriate for staff to use 'reasonable force' to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Please see the Physical Contact and Intervention Policy for further information.

28.1.3 The following is a (non-exhaustive) list of examples of appropriate physical contact and 'non-abusive' actions:

28.1.3.1 Applying restraint to prevent a pupil self-harming or harming another person.

28.1.3.2 Removing, with reasonable force, potentially dangerous items from a pupil's possession, or a pupil from a dangerous location.

28.1.3.3 Upon obtaining permission from the pupil, an instrumental teacher may at times need to aid the pupil in the playing of an instrument.

28.1.3.4 Shepherding pupils, for example with a hand on back or shoulder.

28.1.3.5 Comforting, for example with a hand on shoulder, back or arm; and

28.1.3.6 Securing attention by tapping a pupil's shoulder.

28.2 It is always unacceptable to harm a pupil.

29 Pastoral Notes

29.1 Accusations by staff and supply staff against pupils, beyond the trivial, should be recorded through the normal channels for reporting pupil issues. If the need to question a pupil about any serious or potentially delicate matter arises, it is advisable to do so in the presence of an adult witness, with a written (dated) record of the interaction.

29.2 Staff are asked to bear in mind that a pupil's Head of House or Form Tutor should be kept properly informed of any interaction with a pupil that might have subsequent repercussions (e.g., actions, conversations or questioning).

30 Boarding

30.1 Staff, with the exception of the residential boarding staff, do not have right of access to the boarding houses – if a member of staff or supply staff needs to visit the boarding

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house they must follow the same procedures as other visitors.

30.2 Boarding pupils have private areas and these would include their study bedrooms. Although boarding house tutors have full right of access to these school rooms, it is prudent to respect courtesies such as knocking on the door before entering.

30.3 Wherever possible, boarding house tutors should not talk to pupils on a one-to-one basis in their rooms with the door closed.

30.4 Rules for pupils visiting Boarding staff accommodation can be found at Appendix 10 of this policy.

30.5 The School has drafted a statement on Sexual relationships between pupils – this can be found at Appendix 11 of this policy. The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child on child abuse. The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

30.6 Boarding pupils can be vulnerable to child-on-child abuse; boarding house tutors should be particularly aware of and report any issues to the relevant Houseparent or DSP.

30.7 The school recognises that boarders may bring electronic devices to school which already contain harmful content and that students can use 3,4 and 5G networks to bypass the School's filtering and monitoring systems. The School reserves the right to confiscate such devices from students if there are concerns about the student's welfare. Devices may also be searched where there are any suspicions that harmful content may have been downloaded or viewed on a device. Where devices are confiscated, students will still be able to make contact with their guardian or family by using the House 'phone or the school-provided device which is monitored by the School's systems.

31 Activities, visits, and supervision

31.1 Staff are expected to adhere to the policy on Visits and Activities out of School about supervision, security, and safety.

31.2 Staff should ensure that if they are in charge of any school activity or facilities where safety regulations and precautions are required, these are clearly published and the attention of pupils is drawn to them from time to time. Any accidents or other untoward incidents should always be recorded, signed, and dated and a written record sent to the School Medical Centre, following completion of accident form.

31.3 It is important not to place pupils of the same or differing age groups in situations which might make bullying, intimidation, or other pupil-to-pupil abuse more likely and, where such situations might arise, it is important that proper adult supervision be arranged. Senior pupils, assisting the supervision of junior ones, should also be aware of this precaution.

32 Acceptable use of IT

32.1 Staff are expected to follow the IT Acceptable Use and AI Policy and be fully aware of

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the Online Safety Policy. In particular they should not share personal contact details with a pupil.

32.2 Use of mobile phones, cameras and any other electronic devices with imaging and sharing capabilities in EYFS settings – personal mobile phones, personal cameras and any other personal electronic device with imaging and sharing capabilities must not be used in the EYFS settings and must be locked away during working hours, with the exception of a smart watch.

32.3 Staff are permitted to use a mobile phone (school provided or personal phone) during the School day and if necessary, in front of pupils for the sole purpose of school operational need, see appendix 5 staff code of conduct

32.4 In all parts of the Berkhamsted Schools Group, in order to prevent safeguarding concerns and allegations of inappropriate activity, staff may not store images of pupils on personal devices. Any images taken on personal devices must be downloaded to School systems as soon as is reasonably possible and the personal copy permanently removed.

33 Medicines

33.1 Under no circumstances should any staff advise on the taking of medicines, or their increased/decreased use. This is fully documented in the Administration of Medicines Policy.

34 Missing Pupils

34.1 All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting any pupil missing from the School. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.

34.2 Please see the School's separate Missing Persons Policy for further details.

35 Secure School premises

35.1 The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.

35.2 The School keeps a visitors book at Reception. All visitors sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a security badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst in the School premises.

35.3 All visitors to the boarding houses must report to the house reception immediately on arrival, and must observe the necessity to be kept under sufficient staff supervision during their visit.

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Safeguarding concerns and allegations made about staff, including supply teachers, trainee teachers, volunteers, contractors and those using the School premises for activities

36 Duties of The School as an employer

36.1 The school promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately. Staff should feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children.

36.2 Schools must follow the procedures for handling allegations made against staff, supply staff, trainee teachers, contractors and/or volunteers as set out in Part 4 of Keeping Children Safe in Education. The School has a duty of care to their employees. They will provide effective support for any employee facing an allegation and a named contact if they are suspended.

36.3 The School also has a duty of care should it receive an allegation relating to an incident that happened when an individual or organisation was using the School premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School should follow safeguarding policies and procedures, including informing the LADO and advice in KCSIE 2026.

36.4 For ease of reference, the Principal, where mentioned in this section, is acting in his capacity as Headteacher of Berkhamsted Schools Group.

36.5 In line with advice set out at Part 4 of Keeping Children Safe in Education 2026, the School considers allegations/concerns against members of staff as either:

36.5.1 Allegations that may meet the harm threshold; or

Allegations/concerns that do not meet the harm threshold – referred to for the purposes of this Policy as "low level concerns"

36.6 An allegation that may meet the harm threshold is one that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity which children in a school or college. An allegation may be made against a teacher (including a trainee teacher) or member of staff (including volunteers and supply staff) if he/she has:

36.6.1 behaved in a way that has harmed a child or may have harmed a child.

36.6.2 possibly committed a criminal offence against or related to a child.

36.6.3 behaved towards a child or children in a way that indicates he or she may pose a risk of harm by working regularly or closely with children.

36.6.4 Behaved or may have behaved in a way that indicates that they may not be

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suitable to work with children

36.7 **Where a safeguarding-related allegation or cause for concern is made against any member of staff, supply staff, trainee teachers, contractor or volunteer (including the Designated Safeguarding Lead), the matter should be reported immediately to the Principal** (unless the allegation relates to the Principal or there is a conflict of interest in reporting the matter to the Principal). Contact with the Principal can be made via Email or Teams. The Principal should **not** speak to the member of staff who is the subject of the allegation at this point. In the absence of the Principal the allegation should be reported either to the DSL or the Chief People Officer.

36.8 Where a safeguarding related allegation or cause for concern is made against the Principal, or there is a conflict of interest in reporting the matter to the Principal, it should be reported immediately to the Chair of Governors, contact can be made via clerk@berkhamsted.com.

36.9 Where a safeguarding allegation or cause for concern is made against the Chair of Governors, this should be reported to the Principal or to the LADO.

36.10 Where the Principal judges that the harm threshold may have been met, immediate contact should be made with the LADO to discuss the allegation. Consideration will also be given to whether the Charity Commission needs informing.

36.11 The School will endeavour to ensure that any allegation of abuse made against a teacher or other member of staff, supply staff, volunteer or contractor is dealt with quickly, in a fair and consistent way that provides effective protection for the child whilst at the same time supporting the subject of the allegation. The school will follow a procedure for investigating and determining an outcome of an allegation, this can be found in Appendix 9.

36.12 A decision as to how to proceed and eventually whether or not to suspend a member of staff or volunteer will be taken by the Principal following consultation with the LADO (and, in the most serious cases, the police).

36.13 In cases deemed borderline, informal discussions will be held with the Designated Officer(s) at the Local Authority without naming the individual.

36.14 Where an allegation relates to a member of supply staff provided by an agency, the agency will be fully involved.

36.15 Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed. Suspension is not an automatic response, and the decision will be taken according to the circumstances of each particular case, giving due weight to the views of the LADO, and guidance in *Keeping*

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Children Safe in Education and *Working Together to Safeguard Children.*

36.16 Staff following procedures for dealing with allegations must be aware that they need to be applied objectively and with common sense.

36.17 The School will remain mindful of the five possible outcomes to an investigation detailed in section 37.1 below, which include a finding that the allegation is malicious, false or unfounded.

36.18 If there has been a substantiated allegation against a member of staff, supply staff, trainee teacher, volunteer or contractor the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

36.19 Some cases may well either not meet the criteria set out above at all or may do so without warranting consideration of a police investigation or enquiries by Local Authority children's services. In these cases, the School's disciplinary procedures should be followed to resolve cases quickly and without delay.

37 Definitions used when determining outcomes

37.1 The following definitions should be used when determining the outcome of allegation investigations:

Substantiated: there is sufficient evidence to prove the allegation

37.1.2 Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

37.1.3 False: there is sufficient evidence to disprove the allegation

37.1.4 Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term therefore does not imply guilt or innocence

37.1.5 Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

38 Consideration of referral

38.1 Where a teacher (including agency staff), is dismissed or the School ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

38.2 The school will refer to the Disclosure and Barring Service (DBS) anyone (whether paid staff or a volunteer), who has harmed, or poses a risk of harm, to a child. The referral

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will be made as soon as possible, and ordinarily on conclusion of investigation, when the individual is removed from regulated activity.

39 Low-level Concerns

39.1 A low-level concern about the behaviour of a member of staff is one where such behaviour does not meet the 'harms threshold' and yet appears to be inconsistent with the Staff Code of Conduct (see Appendix 5) or professional boundaries.

39.2 It is crucial that any such concerns should be shared. This will maintain an open and transparent culture within the school, reinforcing its ethos and values; ensure that adults working in the school act within professional boundaries; and enable concerning, problematic or inappropriate behaviour to be identified and addressed early, minimising the risk of abuse.

39.3 The school operates a system for employees to report low level concerns, these concerns can be reported if they do not meet the threshold as outlined 35.4.1 through 35.4.4, or a colleague feels that their a member of staff's behaviour is inconsistent with the Staff Code of Conduct including inappropriate conduct outside of work. This can either be done by making direct contact with the Principal or through the Staff "Whisper" platform which is found on the Hub. The Whisper account is monitored by the DSLs and low-level concerns recorded there will be assessed by the DSLs and shared with the Principal in a timely fashion according to the nature of each particular low-level concern.

39.4 The DSLs will record all low-level concerns in writing, including details of:

- 39.4.1 The concern and the context in which the concern arose
- 39.4.2 Date of the concern
- 39.4.3 Details of action taken and the rationale for this
- 39.4.4 The name of the individual sharing the concern (requests for anonymity should be respected as far as reasonably possible)

39.5 In cases deemed borderline, informal discussions will be held with the Designated Officer(s) at the Local Authority without naming the individual.

39.6 Records of low-level concerns are reviewed periodically in order to identify any patterns of concerning, problematic or inappropriate behaviour. Should a pattern of behaviour be identified, the School will decide on a course of action depending on the nature of the concerns. This will include referral to the LADO if the harms threshold is met. The review of records will also consider whether these indicate any wider cultural issues in the School which should be addressed by revising school policies or providing further training.

39.7 Low-level concerns relating to supply staff and contractors will be reported to their employers, so that any potential patterns of inappropriate behaviour can be identified.

39.8 Further guidance on low level concerns can be found in Keeping Children Safe in Education part 4.

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Recruitment

40 Safer Recruiting

40.1 The Recruitment, selection and vetting procedures of the School are outlined in the Teaching and Support Staff Recruitment Policies and Procedures and follows guidelines given in the "safer recruitment" training developed by the Teaching Regulation Agency (TRA) and the School Staffing (England) Regulations 2009, which requires schools to ensure that at least one person conducting an interview has completed safer recruitment training. We practise safer recruitment in checking the suitability of staff and volunteers (including members of the governing body and staff employed by another organisation) to work with children and young people in accordance with the guidance given in Keeping Children Safe in Education (2026) and the Education (Independent Schools Standards) (England) Regulations 2014 (as amended). This ensures due regard to the protection of our children by ensuring the eligibility and suitability of all staff before appointment.

40.2 In addition, as part of the shortlisting process, the school's HR department will carry out an online search as part of our due diligence on the shortlisted candidates. The School informs candidates that online searches may be done as part of due diligence checks.

40.3 DBS checks/Vetting and Barring procedures are followed for the appointment of all staff and volunteers together with anyone involved in the teaching of children requiring an additional check to ensure they are not prohibited from teaching and those engaged in management roles an additional check is required to ensure they are not prohibited under section 128 provisions, and assurance is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation who will work with our pupils.

40.4 Prospective Governors will be subject to the school confirming the individual's identity and be subject to an enhanced DBS and Section 128 check, prior to appointment in the event that a prospective governor is barred as a result of a Section 128 direction the School will contact the Teaching Regulation Agency for advice.

41 Additional Information

41.1 This policy takes into account the following legislation:

41.1.1 The Children Act 1989

41.1.2 Section 175 of the Education Act 2002 (local authorities, governing bodies of maintained schools and institutions in the further education sector)

41.1.3 Section 157 of the Education Act 2002 and the Education (Independent School Standards) (England) Regulations 2014

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41.1.4 The Children Act 2004

41.1.5 Section 11 of the Children Act 2004 (other agencies).

41.2 We have also taken into consideration the following guidance:

41.2.1 Keeping Children Safe in Education (2026)

41.2.2 Working Together to Safeguard Children (2026)

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Appendix 1 – Contact Details

1 DSLs

Andrew Mair – Vice Principal of Berkhamsted Schools Group	01442 358005 – 07484 968941
Tracey Evans – Chief People Officer Berkhamsted Schools Group	01442 358121 – 07984 428071

2 Additional members of the Safeguarding Team (cross school)

Jo Hughes	Group Director Ed Tech	01442 358019
Emily Kenefick	School Psychologist	01442 358000
Rachel Jenkins	Senior School Nurse	01442 358088 – 07817 341908

3 DSPs for each School (DSP)

Karen O'Connor	Headteacher of Berkhamsted Prep, Pre-Prep and BDNL	01442 358188 – 07557 970380
Nick Cale	Headteacher of Berkhamsted Sixth	01442 358052 – 07738 822660
Jo Vila	Headteacher of Berkhamsted Girls	01442 358161 – 07817 341921
Alice Fletcher	Headteacher of Heatherton	01494 726433 - 07867 940228
Tom Hockedy	Headteacher of Berkhamsted Boys	01442 358030 – 07968 471751
Tracy Johnson	Deputy Headteacher of Charlotte House	01923 772101

4 Deputy DSPs for each School

Debbie Cooper	Deputy Headteacher of Berkhamsted Pre-Prep (BDNL / Stepping Stones)	01442 358278 – 07701 398424
Charley Stevens	Day Nursery Co-Manager, BDNL	01442 358276

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Ryan Eggleton	Day Nursery Co-Manager, BDNL	01442 358276 - 07483 315343
Katie McNicholl	Deputy Headteacher of Berkhamsted Pre-Prep (Rec/KS1)	01442 358188
Camilla Spurr	Deputy Headteacher, Berkhamsted Prep	01442 358201 - 07825 846532
Paul Whitby	Deputy Headteacher, Berkhamsted Prep	01442 358204 – 07814 731653
Becky Miles	Deputy Headteacher of Berkhamsted Sixth	01442 358143 – 07562 210895
Sarah Gledhill	Deputy Headteacher of Berkhamsted Girls	01442 358272 – 07483 346293
Andrew Manley	Deputy Headteacher of Heatherton	01494 726433
Richard Mackay	Deputy Headteacher of Berkhamsted Boys	01442 358037 – 07970 688872
Penny Woodcock	Headteacher of Charlotte House	01923 772101

Clerk to the Governors of Berkhamsted Schools Group 01442 358119

5 Helplines and Referrals

A referral can be made by a staff member or parent. The referral should be made to the Safeguarding Children Partnership / Board (as applicable) of the County in which the School resides.

Hertfordshire

Hertfordshire Safeguarding Children Partnership	01992 588757 – 0300 123 4043 https://www.hertfordshire.gov.uk/services/Childrens-social-care/Child-protection/Hertfordshire-Safeguarding-Children-Partnership/hscp.aspx
Local Education Authority CSF Social Care (Duty Social Worker)	0300 123 4043
Designated Officer(s) at the Local Authority (DOLA) formerly known as	LADO.Referral@hertfordshire.gov.uk

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Local Authority Designated Officer (LADO)	(No phone number is currently available).
Herts Police – Local Police Liaison	101 and ask for Herts Police
Child Protection	01992 555980
Schools' Consultation Service / Early Help Advice	01438 737511

Buckinghamshire

Education Safeguarding Advisory Service	01296 382912
Education Safeguarding Advisor	01296 382732
First Response Team (including Early Help)	01296 383962
RU Safe? (Barnardos - Child Sexual Exploitation Service)	01494 461112
Buckinghamshire Safeguarding Children Partnership	https://www.buckssafeguarding.org.uk/childrenpartnership/ 01296 383 962
Buckinghamshire Family Information Service	0845 688 4944
Social Care, Out of Hours:	0800 999 7677
Local Education Authority Customer Services (Duty Social Worker)	08453 708090
Designated Officer (s) at the Local Authority formerly known as Local Authority Designated Officer (LADO)	01296 382070 (Secure email address: secure-LADO@buckinghamshire.gov.uk
Bucks Police – Local Police Liaison	101

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UK

Social Services (Careline)	0800 137 915
Child Protection and Sexual Crime Unit	01628 816935
NSPCC	0808 800 5000
NSPCC Report Abuse in Education helpline	0800 136 663 help@nspcc.org.uk
Ofsted	0845 601 4771
NCMA Helpline	0800 169 4486
Childline Freepost NATN111, London, E1 6BR	0800 1111
The Line	0800 4444
The Police	999
Family Lives	0808 800 2222
DFE Helpline – Radicalisation and Extremism	020 7340 7264 counter.extremism@education.gsi.gov.uk
Gingerbread	0800 802 0925
CFAB – Children and Families across boarders	CFAB | Advice Line
"What To Do If You're Worried That A Child Is Being Abused" DfES Publications (You can download this publication or order copies online at. https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2 Tel: 0845 60 222 60.	

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Appendix 2 – Outline of role of Vice Principal as DSL for Senior & Sixth and Chief People Officer as DSL for Preps and Enterprises and DSL Job Description

Outline of Designated Safeguarding Lead Role

1. Managing referrals

   1.1. Prompt referral of all cases of suspected abuse to the Local Authority children's social care and where appropriate, the Designated Officer(s) at the Local Authority; DBS and/or the Police.

   1.2. Liaise with the Principal/Headteacher to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

   1.3. Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether or not to make a referral by liaising with relevant agencies.

2. Training

   2.1. The DSLs should undergo the following training:

      2.1.1. Level 3 training every two years

      2.1.2. Safer recruitment training every five years

      2.1.3. Prevent awareness training

   2.2. The purpose of this training is to ensure the DSLs:

      2.2.1. Understands the assessment process for providing early help and intervention.

      2.2.2. Has a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

      2.2.3. Ensures each member of staff has access to and understands the school's or college's child protection policy and procedures.

      2.2.4. Is alert to the specific needs of children in need, those with special educational needs and young carers.

      2.2.5. Is able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

      2.2.6. Understands and supports the School with regards to the requirements of the Prevent Duty under section 26 of the CTSA 2015, and is able to provide advice and support to staff on protecting children from the risk of radicalisation.

      2.2.7. Is able to understand the unique risks associated with on-line safety and be confident

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that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School.

2.2.8. Can recognise the additional risks that Children with Sen and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and is confident they have the capability to support SEND children to stay safe online.

2.2.9. Obtain access to resources and attend any relevant or refresher training courses.

2.2.10. Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them

3. Raising Awareness

3.1. Ensure the school's Child Protection and Safeguarding policies are known and used appropriately by ALL staff.

3.2. Ensure that staff are regularly updated and reminded about the School's policies and procedures relating to Child Protection and Safeguarding.

3.3. Ensure the child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governors regarding this.

3.4. Ensure the child protection policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the school in this.

3.5. Link with the local LSCB/Local Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

3.6. Where children leave the school ensure their child protection file is transferred to any new school or college as soon as possible but transferred separately from the main pupil file.

4. On-Line Safety

4.1. The DSLs have responsibility for on-line safety in school and this forms part of the half termly Safeguarding committee agenda. The Director of Digital Learning attends these meetings, and provides feedback and discussion points following her interactions with the IT strategy committee.

4.2. DSLs also have responsibility to ensure that effective filtering and monitoring of our network, systems and devices is in place and processes are in place to detect misuse and address it.

5. Communications and Support

5.1. Termly meetings with all DSPs.

5.2. Termly meetings with the School Well-Being Group (Chaplain, Counsellors, Senior

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Nurse, Head of Learning Support and Head of Personal Development).

5.3. Regular meetings with Principal who will provide a supervisory role and support in relation to management of safeguarding.

5.4. Termly reporting to the Governors' Education Committee.

6. Action to provide sufficient time to undertake the role

6.1. In the event of time needed for the Senior Schools DSL to deal with a concern or allegation the Deputy Head Curriculum and Assessment or the Deputy Head Teaching, Learning and Innovation will cover Vice Principal duties to allow sufficient time for necessary procedures to be followed.

6.2. In the event of time needed for the Prep Schools DSL to deal with a concern or allegation the HR Manager will cover the Chief People Officer duties to allow sufficient time for necessary procedures to be followed.

6.3. Any teaching duties will be covered by the School as required.

7. Review

7.1. The annual Appraisal of SMT includes a review of the performance of all DSPs.

Designated Senior Lead Job Description

The DSL will refer all cases of suspected abuse to either/or;

- The Local Authority children's social care unit.
- The Local Authority designated officer (LADO) for child protection concerns (particularly all cases which concern a staff member).
- The Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child).
- In consultation with the Headteacher, and informing the safeguarding governor, consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate in circumstances such as "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Where a referral has been made to the DBS, it is unnecessary to contact TRA, as information is shared between the two bodies. Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to a TRA referral.
- The police (cases where a crime may have been committed).
- Instances of suspicion of Female Genital Mutilation will be referred to the police and LA Prevent officer immediately.
- Instances of political indoctrination and suspected radicalisation will be reported to the LA Prevent officer, senior managers, and the police.

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The DSL will;

- Ensure that the school operates within legislative frameworks and recommended guidance.
- Liaise with the Headteacher regarding;
    - ongoing enquiries under section 47 of the Children Act 1989 and police investigations
    - referring of cases of suspected abuse regarding children in need to the Local Authority children's social care unit
    - referring child protection concerns (all cases involving a staff member or a member of supply staff) to the Local Authority designated officer (LADO)
    - referring cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service
    - referring cases where a crime may have been committed to the police
    - inform the Headteacher of contact with the LA Prevent officer and police re suspicion of female genital mutilation, political indoctrination, or radicalisation.
- Liaise with parents, informing the Headteacher (and if appropriate the LADO, Local Authority Children's Social Care unit or police) of all meetings and discussions.
- Ensure records of all meetings are clear, comprehensive, and dated.
- Act as a source of advice and expertise to staff on matters of safety and safeguarding.
- When deciding whether to make a referral always liaise with relevant agencies for advice.
- Cooperate with the safeguarding governor in the annual check of the safeguarding policy and procedures to ensure they are in line with statutory regulations and implemented correctly.
- Work closely with senior mental health leads when necessary.
- Be continually aware of any changes in statutory requirements and alter school documentation accordingly, informing governors and staff of any changes.
- Undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.
- Undertake Prevent awareness training.
- Refresh knowledge and skills at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to the role.
- Ensure all school records re safeguarding are comprehensive, updated, and accessible.
- Ensure children receive the right help at the right time by the right people, in order to address risks and prevent issues escalating.
- Help promote educational outcomes by working closely with their teachers and sharing information about their welfare, safeguarding and child protection concerns.
- Understand the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to views of the child and reassessing concerns when situations do not improve.
- Monitor the effectiveness of policies and procedures, and the implementation of such, annually in cooperation with the governors safeguarding representative.

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- Act as a support to pupils and staff, follow up and document progress re all concerns regularly.
- Ensure the records of any pupil who leaves the school (including in-year transfers) and has a child protection file are transferred to the new school and the child protection file is transferred separately from the main pupil file.
- Ensure child protection files are full, informative and contain all the information (duly dated) appertaining to the child in question, plus details of all communications with external agencies, parents, and carers.
- Ensure that accurate safeguarding records are kept in a secure location, separate from pupils' academic files, and marked 'Strictly Confidential'.

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Appendix 3 – Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

- contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.

- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, including those generated using AI), sharing other explicit images and online bullying. Staff should also be aware of the dangers associated with harmful online challenges and hoxes[8]; and

- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

Berkhamsted Schools Group works to ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement. Through training, including induction, the School ensures that staff have an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring of the School's network and devices.

The School is in regular contact with parents about this matter; communications aim to reinforce the importance of children being safe online. Information about how the School systems such filters and monitoring software act to keep children safe is shared along with advice about the role they have to play in this area.

[8] Advice for Schools can be found here: Harmful online challenges and online hoaxes - GOV.UK (www.gov.uk) (Accessed on 09/08/22)

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Please see the School's Online Safety Policy and the Staff and Pupil IT Acceptable Use and AI Policies for more information.

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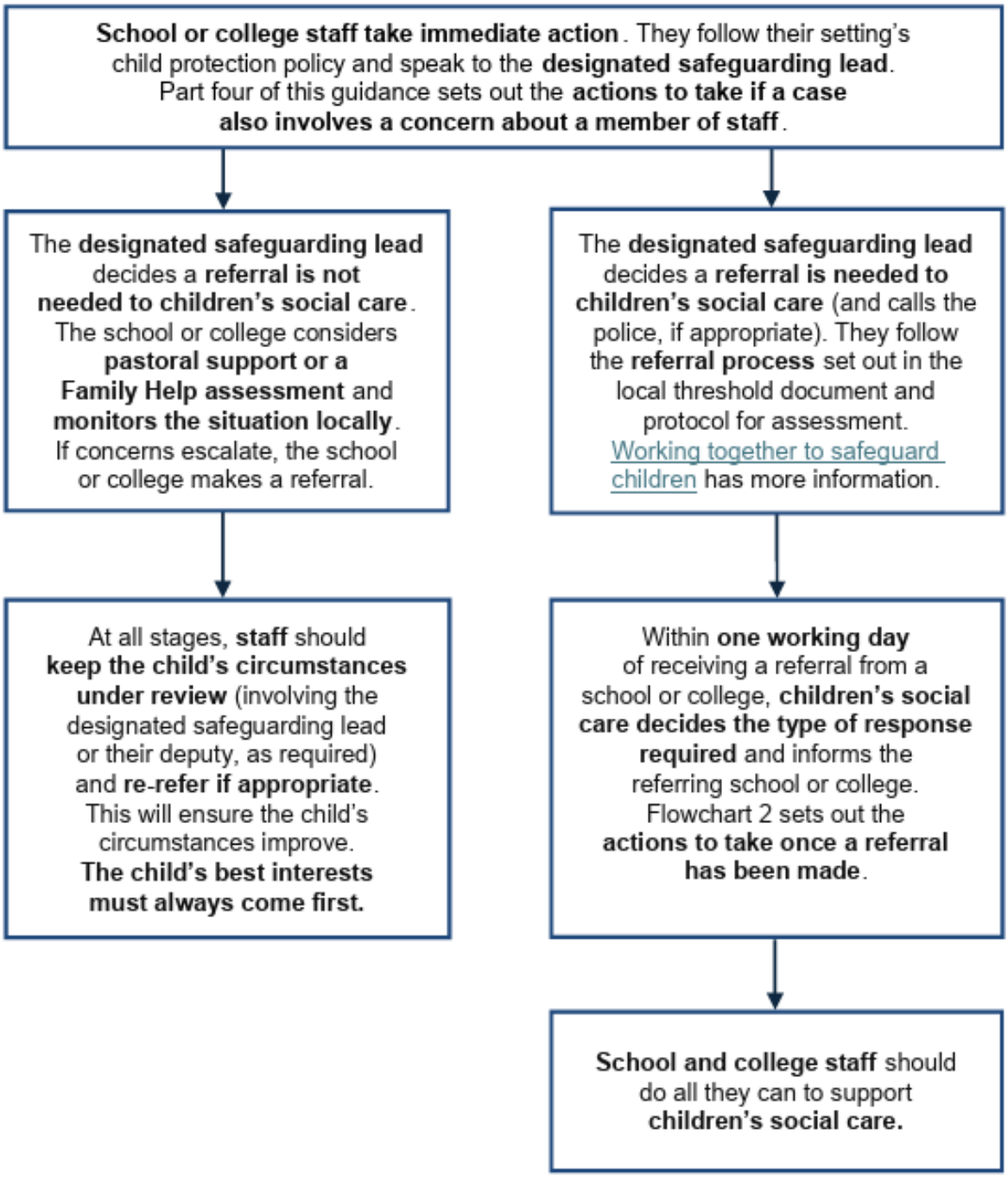
Appendix 4 - Concerns about a child action flowcharts

Flowchart 1: actions taken by a school or college when there are concerns about a child



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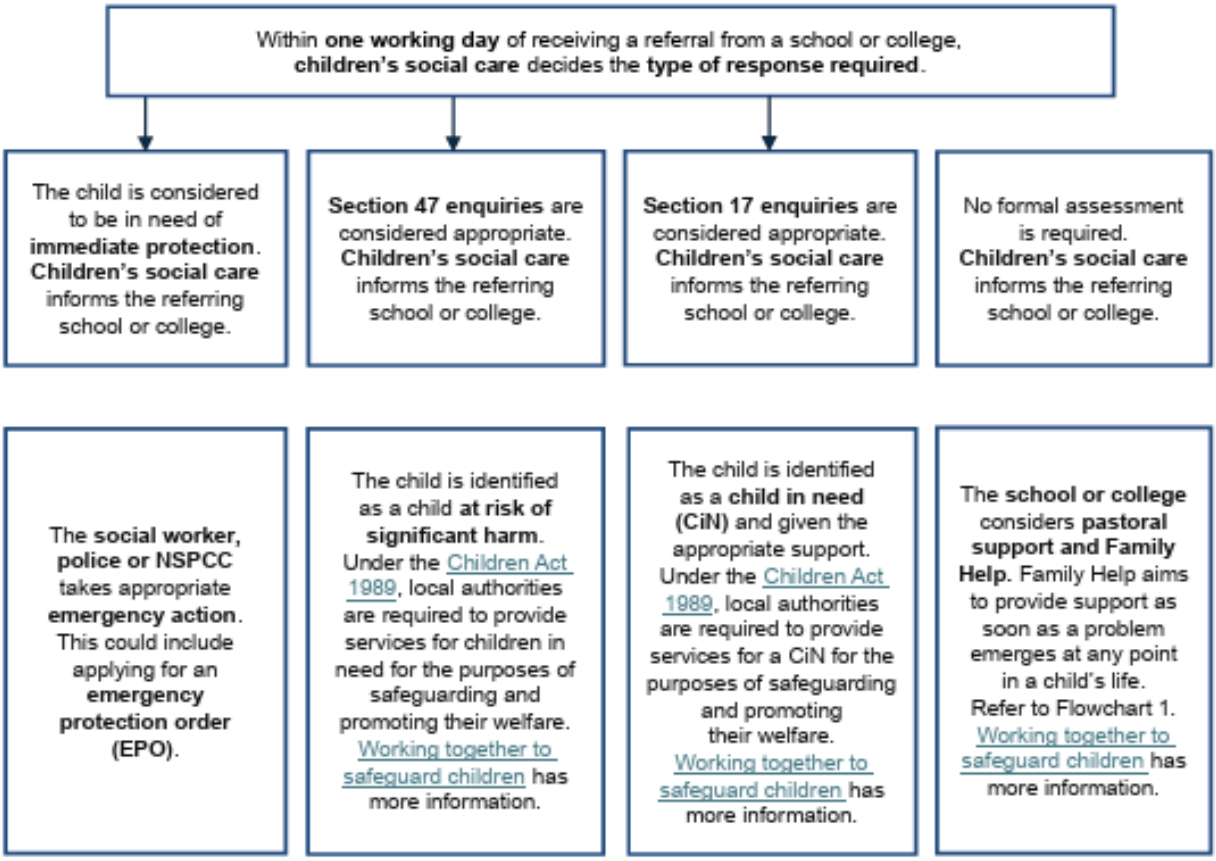
Flowchart 2: actions taken once a referral has been made to children's social care



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Appendix 5 - Staff Code of Conduct

STAFF CODE OF CONDUCT

Berkhamsted Schools Group is committed to providing a high quality all-round education to its pupils, based on the fulfilment of academic, sporting, cultural potential through the provision of a happy, purposeful living and working environment. Just as the very highest standards of courtesy, behaviour and endeavour are expected from pupils, staff, in return, are committed to providing pupils with the very best care, attention and education. Staff set the standards, and all have a part to play in ensuring the ethos of the School is maintained.

School staff should not tolerate behaviour from colleagues or pupils which is contrary to the School's values or breaches this Code of Conduct. Staff should challenge such behaviour and, if appropriate, inform their line manager or the appropriate member of staff (which is the Principal if the matter is a safeguarding concern) if they are aware of behaviour, whether their own, of pupils, colleagues or parents, which is **clearly** contrary to the School's values or Code of Conduct of the school. In this context, inaction may constitute a breach of the Code of Conduct.

School Policies provide specific guidance and procedures for staff to follow, many of which are reflected in the list below. However, this list is not exhaustive and staff are expected to follow all school procedures. Failure to follow the Code of Conduct or all School procedures may result in formal disciplinary procedures being instigated.

All Staff should:

1. Actively support and promote the School's values (Aim High with Integrity, Be Adventurous, Serve Others).
2. Conduct themselves in a professional manner and provide a good role model for emerging adults, both in School, whilst online, and out of School.
3. Be of smart appearance in keeping with the School's Dress and Appearance Policy.
4. Exercise their duty of care towards pupils and take all reasonable steps to ensure the safety of pupils and other staff by following the Health and Safety Policy and the Policy and Procedures for Safeguarding and Child Protection. All staff are expected to read these two policies annually to ensure they are up to date with their requirements. In addition, all members of staff should read, understand and comply with Annex B of the Statutory Guidance "Keeping Children Safe in Education".
5. Acknowledge that this duty of care extends to off-site activities and visits (both residential and non-residential). In particular, staff should ensure that there is adequate and responsible supervision at all times (See the Supervision & Visits and Activities out of School Policies for more information).
6. Consider carefully the physical setting and nature of any interaction with pupils so as not to lay themselves open to any undue suspicion or accusation.
7. Show respect for pupils, parents and colleagues through trust, integrity, honesty and courtesy and tolerance and consideration for all without prejudice towards any protected characteristic (such as creed, disability, age, gender, orientation or race).

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8 Fulfil an appropriate pastoral role and support pupils on their emotional, intellectual, physical, social and spiritual development putting the wellbeing, development and progress of the child first.
9 Ensure all day-to-day communication about pupils goes through Class/Form Teachers (Preps), Heads of House or tutors (Senior and Sixth). NB - situations of a sensitive nature (e.g. divorce, bereavement) may need to be communicated to the Head or Deputy Head of the School in the first instance.
10 Communicate effectively and work collaboratively and supportively with colleagues as part of a team.
11 Use professional discretion regarding information about pupils, parents and colleagues, particularly in line with the Policy and Procedures for Safeguarding and Child Protection.
12 Maintain and respect School property, restricting the use of School equipment and resources to professional use, unless specific permission is given by the relevant member of staff.
13 Declare any conflict of interest if and when appropriate.
14 Adhere to the rules, regulations and guidelines contained in their contract of employment and staff handbook.
15 Ensure that any one-to-one interaction with pupils follows good safeguarding practice in accordance with training provided by the School (see Appendix 2 in the Child Protection and Safeguarding Policy).
16 Ensure that personal social media accounts are not used for Berkhamsted School communications, at the same time consider the use of 'Berkhamsted' in their personal Bio (see IT Acceptable Use Policy (Staff) for more information).
17 Consistently enforce the School's policies, including (among others) the School's policy on the use of mobile phones.

In conjunction with individual job descriptions, teaching staff should:

1 Take responsibility for reflecting on and constantly seeking to improve the quality of their teaching. Teachers should model learning to pupils.
2 Prepare lessons thoroughly and assess and monitor 'pupils' progress' carefully – where appropriate staff should record progress of pupils in a way that can easily be shared with others, for example in a digital markbook.
3 Develop children's metacognition skills to help pupils to become confident and successful learners.
4 Be accessible and welcoming to parents as appropriate to their role in the School and the meeting with the parents.
5 Collaborate with external professional bodies as appropriate.

Staff must not:

- act in any way that brings the School into disrepute, including but not limited to public criticism of any part of the School, its policies or practice;
- make statements to journalists/media concerning the School without the express permission of the Principal;
- take illegal drugs or any other illegal substances;
- be under the influence of alcohol while teaching, on duty, or in professional capacity;
- use abusive/derogatory language or bullying tactics;
- condone any illegal drinking, drug taking, smoking or other breaches of School rules by pupils;

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- conduct any form of physical or intimate relationship (including online) with a pupil or with a former pupil that had its grounding in a staff-pupil connection;
- use corporal punishment or unreasonable restraint in dealings with pupils;
- view, download or send pornographic, racist, or violent material whilst at work;
- abuse privileges or opportunities provided by the School. (School property and materials must not be appropriated for personal use and events and trips organised for pupils must not involve any personal gain to the organiser);
- The School policy of allowing easy access to telephones and computers must not be abused by running up large bills for communications of a personal nature;
- accept gifts or gifts in kind which have a value greater than £350 from pupils or parents without consulting the Principal or COO or accept gifts or gifts in kind from suppliers which have a value of more than £75 without consulting the Principal or COO. Such gifts should be declared using the form available on Berkhamsted Hub. Please see the Anti-corruption and Bribery Policy;
- issue their network passwords to pupils or colleagues or allow others to access the network in their name;
- breach any of the rules or regulations detailed in the School's Grievance and Disciplinary Policy;
- use their own mobile phone or School issued digital device for personal reasons in front of pupils throughout the school day (to facilitate effective enforcement of the prohibition of mobile phones for pupils below Sixth Form) or when supervising pupils at other times. However, for clarity, use of mobile devices that form part of the tools for work is allowed, and it is accepted that there may be occasions where it is appropriate for a member of staff to use a mobile phone or similar device in front of pupils, e.g., to take a register, set Teams assignments, issue rewards and sanctions or use multi-factor authentication;
- allow mobile devices to disturb lessons or meetings – they must be turned off or on silent;
- have any personal electronic devices with imaging and sharing capabilities on their person if they work with 7 year olds or under as per EYFS regulations;
- communicate with pupils by personal e-mail, personal mobile phones or personal social media.

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Appendix 6 – Procedures for dealing with Child-on-child Abuse

How will the School respond to concerns or allegations of child-on-child abuse?

- The DSL (or relevant DSP) will communicate with the member of staff who has raised a concern and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.
- The DSL/DSPs should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required.
- Where the DSL considers or suspects that the behaviour in question might be abusive or violent on the spectrum (as opposed to inappropriate or problematic – see Hackett's continuum, at 17.7 above), the DSL should contact the relevant local authorities immediately, and in any event within 24 hours of the DSL becoming aware of it.
- The DSL will discuss the allegations/concerns and agree on a course of action, which may include:

    - Scenario A - Manage internally with help from external specialists where appropriate and possible - Where behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the School may need to handle allegations/concerns internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector) trained with the School.

    - Scenario B - Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family - These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services

    - Scenario C- Refer child/children to children's social care for a section 17 and/or 47 statutory assessment - As a matter of best practice, if an incident of child-on-child abuse requires referral to and action by the Local Authority Children's Social Care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.

    - Scenario D - Report alleged criminal behaviour to the Police - Alleged criminal behaviour will ordinarily be reported to the Police. However, there are some circumstances where it may not be appropriate to report such behaviour to the Police. For example, where the exchange of youth produced sexual imagery does not involve any aggravating factors. All concerns/allegations will be assessed on a case by case basis, and in light of the wider context.

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Individual risk and needs assessment

Where there is an incident of child-on-child abuse, the School will carry out a robust risk and needs assessment in respect of each child affected by the abuse. These risk assessments will:

- assess and address the nature and level of risks that are posed and/or faced by the child;
- engage the child's parents and draw upon local services and agencies to seek to ensure that the child's needs are met in the long-term.
- Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child; and
- be reviewed at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.

If at any stage the child's needs escalate, the DSL should contact the relevant authorities to determine the appropriate course of action.

Disciplinary action

- The School will consider whether disciplinary action may be appropriate for any child/children involved – any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour; (b) to demonstrate to the child/children and others that child-on-child abuse can never be tolerated; and (c) to ensure the safety and wellbeing of other children. However, these considerations must be balanced against the child's/children's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action the School will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.
- The School will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or sanctions (suspension or expulsion) as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. Suspension or expulsion will only be considered where necessary to ensure the safety and wellbeing of the other children in the School.
- Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the School will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

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On-going proactive work to a contextual whole-school approach

The School's response to concerns/allegations of child-on-child abuse should be part of on-going proactive work by the School to embed best practice and take a contextual whole-school approach to such abuse. As such the School's response can become part of its wider prevention work. This response may include the School asking itself a series of questions about the context in which an incident of child-on-child abuse occurred in the School, the local community in which the School is based, and the wider physical and online environment - such as:

- what protective factors and influences exist within the School (such as positive peer influences, examples were child-on-child abuse has been challenged etc.) and how can the School bolster these?
- how (if at all) did the School's physical environment contribute to the abuse, and how can the School address this going forwards, for example by improving the School's safety, security and supervision?
- did wider gender norms, equality issues and/or societal attitudes contribute to the abuse?
- what was the relationship between the abuse and the cultural norms between staff and pupils, and how can these be addressed going forwards?
- does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse?
- how have similar cases been managed in the past and what effect has this had?
- does the case or any identified trends highlight areas for development in the way in which the School works with children to raise their awareness of and/or prevent child-on-child abuse, including by way of the School's Personal Development curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work?
- are there any lessons to be learnt about the way in which the School engages with parents to address child-on-child abuse issues?
- are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?
- does this case highlight a need to work with certain children to build their confidence and teach them how to identify and manage abusive behaviour? and
- were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the School?

Answers to these questions can be developed into an action plan that is reviewed on a regular basis by school leadership and the safeguarding team.

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Appendix 7 – Visiting Speakers

The *Prevent Duty* (under section 26 of the CTSA 2015) statutory guidance (*Prevent Duty Guidance: Guidance for specified authorities in England and Wales* Home Office, 2023) requires all schools to have clear protocols for ensuring that any visiting speakers (whether invited by staff or pupils) are suitable and appropriately supervised.

It is important to make every effort to ensure the suitability of a visiting speaker, whether they are known to the School, have been seen before by a member of staff elsewhere, or have been recommended by an external individual / another school.

Protocols

Arranging a visiting speaker

- All visiting speakers must have a staff member who is their nominated point of contact at the School ("the Organiser").
- The Organiser must complete and submit, as soon as possible and at least 7 days in advance of the event, the Visiting Speaker Form (a Microsoft Form which can be found on Berkhamsted Hub in the Staff / Safeguarding section). This information will be used to compile a Log of Visiting Speakers (see further below).
- If the event is being held at very short notice such that the Visiting Speaker Form cannot be submitted at least 7 days beforehand, the Organiser must seek special permission from the DSL or, if the DSL is unavailable, from one of the DSPs.
- To be able to complete the Visiting Speaker Form, the Organiser will need to have obtained an outline of what the visiting speaker intends to cover, and have satisfied themselves that it is appropriate to the age group of the audience, and does not undermine British Values or the ethos and values of the School.
- If the visiting speaker is not already known to the School, the Organiser must conduct research on the person / their organisation to establish whether they have demonstrated extreme views / actions or there is any other cause for concern.
- In general, there is no requirement for a visiting speaker to undergo a DBS check, as it is not classed as a regulated activity. Indeed an internet search (including social media) on the individual / their organisation if applicable may be more instructive than formal vetting checks, and highlight contra indicators as to the suitability of the person to visit our School. However, if the general search flags up any concerns (e.g., refers to allegation(s), criminal record etc), the School may decide to conduct formal vetting checks and record these in the Single Central Register (SCR).
- The same procedures for arranging a visiting speaker apply whether they are invited by staff or pupils. Where pupils wish to invite a visiting speaker, a member of staff must take on the role of the Organiser and act as a liaison between the pupils and the proposed visiting speaker, as well

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as being responsible for completing the Visiting Speaker Form, carrying out research into the proposed visiting speaker's suitability as required, and discussion with the DSL and / or relevant DSP where necessary.

On the day

- The Organiser should inform the relevant Reception **in advance** that a visiting speaker is expected, providing the speaker's name, the date and approximate time of expected arrival and any other practical information such as parking requirements.
- As part of the signing in process, the member of Reception staff is responsible for checking the visiting speaker's photographic ID (both that the person signing in is the person whose photographic ID has been presented, and that the person is who we are expecting). The member of Reception staff should make a note in the signing in book recording that the speaker's photographic ID has been checked, including what type of photographic ID was seen (e.g., passport, photo driving licence, employer-issued security pass with photo).
- The Organiser (or an appropriate colleague to whom this function has been delegated by the Organiser) is responsible for collecting the visiting speaker from Reception.
- In the event that Reception is closed (for example where a guest speaker is attending an evening event the audience of which will include pupils), the organiser should check the photographic ID and send an email to the Reception on the relevant campus for recording in the signing in book. This email should include the details listed above (name, event, time arrived/left and type of photographic ID seen).
- The visiting speaker must be accompanied by the Organiser or another member of staff at all times and must never be left unsupervised with pupils.
- If there is any cause for concern, the Organiser and other members of staff present have the right and responsibility to interrupt and / or stop the event.
- If the content of an event proves to be highly contentious or is outside the School's expectations for the event, the Organiser must report this to the relevant DSP or the DSL without delay.

Monitoring

- A Log of Visiting Speakers will be maintained and will be regularly monitored by the Safeguarding Team as part of the Berkhamsted Schools Group's ongoing safeguarding practices.
- Visiting speakers will be a standing item on the agenda for Safeguarding Meetings.

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Appendix 8 - Guidance on how to respond to a child wanting to make a disclosure

Working Together to Safeguard Children places a greater emphasis on the voice of the child, and includes as a list of requests that children made when asked what they wanted from an effective safeguarding system. These include:

- 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 reasons 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.

Working Together to Safeguard Children makes clear that these requests should guide the behaviour of all practitioners working with Children.

The following is a non-exhaustive list of suggestions on how to respond to a disclosure from a child:

GENERAL POINTS	**DON'T SAY**
• Show acceptance of what the child says (however unlikely the story may sound). All children should be taken seriously, kept safe and never made to feel like they are	• Why didn't you tell anyone before? • I can't believe it! • Are you sure this is true? • Why? How? When? Who? Where?

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creating a problem for disclosing a problem. • Keep calm. • Look at the child directly. • Be honest • Tell the child you will need to let someone else know – **don't promise confidentiality.** A useful distinction to make when explaining this to pupils is between **privacy** and **confidentiality:** you cannot promise to keep a conversation private but confidentiality means only informing the people who need to know in order to help the pupil. • Even when a child has broken a rule, they are not to blame for the abuse. • Be aware that the child may have been threatened or bribed not to tell. • Never push for information. If the child decides not to tell you after all, then accept that and let them know that you are always ready to listen.	• Never make false promises. • Never make statements such as 'I am shocked, don't tell anyone else.

Helpful things you may say or show	**Concluding**
• I understand what you are saying. • Thank you for telling me. • It's not your fault. • I will help you.	• Again, reassure the child that they were right to tell you and show acceptance. • Let the child know what you are going to do next and that you will let them know what happens. • Contact the appropriate senior member of staff or agency. • Consider your own feelings and seek pastoral support if needed.

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Appendix 9 - Procedure following an allegation of abuse against a member of staff

1. Initial contact

1.1. The Principal/DSL will discuss the allegation with the Designated Officer(s) at the Local Authority immediately.

1.2. The purpose of this initial discussion is for the Designated Officer(s) at the Local Authority, Principal/DSL to consider the nature, content and context of the allegation and agree a course of action. The DSL may need to provide or obtain additional information which may be relevant, such as previous history, whether the child or their family have made similar allegations and the individual's current contact with children.

1.3. If the allegation is against one of the DSLs, the Principal will take on the role outlined in 1.1 and 1.2 above. If the Principal is unable to do this for whatever reason, the Chair of Governors will take on the Principal's role in this procedure.

1.4. If the allegation is against the Principal, the Chair of Governors (or designated nominee in his/her absence), would take on the Principal's role in this procedure. The Principal should not be informed of the allegation before contact is made with the Chairman (or his/her deputy) and the Designated Officer(s) at the Local Authority

1.5. If the allegation is against a member of the Governing body, then the Chair of Governors would liaise with the Local Authority with guidance from the DSL/Principal

1.6. If the allegation is against the Chair, the Vice Chair would liaise with the Local Authority with guidance from the DSL/Principal

1.7. For matters detailed in 1.4 to 1.6 above, contact can be made with the Governors via the Clerk to the Governors. See Appendix 1.

1.8. If it is not possible to report to the Principal, DSL or Chair of Governors in the circumstances set out above, a report should be made immediately to the nearest Designated Senior Person. The Designated Senior Person will take action in accordance with these procedures and will as soon as possible inform the Principal, DSL or, where appropriate, the Chair of Governors.

2. Further Investigation

2.1. The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern. In such a scenario, this decision and a justification for it should be recorded (by both the DSL and the Designated Officer(s) at the Local Authority), and agreement reached as to what information should be put in writing to the member of staff concerned (and by whom). The DSL should then consider with the Designated Officer(s) at the Local Authority what action should follow in respect of the member of staff and those who made the initial allegation.

2.2. Where further investigation is deemed necessary, the Principal/Headteacher should inform the member of staff about the allegation as soon as possible after consulting the DSL and

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Designated Officer(s) at the Local Authority, providing as much information as permissible. If a strategy discussion is needed however, or police or Local Authority's social care services need to be involved, this will not happen until those agencies have agreed what information can be disclosed to the person.

2.3. In some cases, further enquiries will be needed to inform the decision about how to proceed. If so, the Designated Officer(s)at the Local Authority will discuss with the DSL and Principal, how and by whom the investigation will be undertaken. In straightforward cases the investigation should normally be undertaken by a senior member of the school. However, the nature or complexity of the allegation may require an independent investigator.

3. Communications with parents

3.1. Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, the police or Local Authority Children's social care services need to be involved, the Principal will not do so until those agencies have agreed what information can be disclosed to the parents. They will 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. Suspension

4.1. The Principal, in consultation with the DSL, will consider carefully whether the circumstances of a case warrant the member of staff being suspended from contact with children at the school until the allegation or concern is resolved. Suspension is not the default position – an individual will only be suspended if there is no reasonable alternative, such as moving to another area of the School or removing them from specific types of duties which have contact with children. In the case of residential boarding staff, the School will ensure that the member of staff concerned will be accommodated elsewhere (away from pupils of the School).

4.2. Where it has been deemed appropriate to suspend the person, written confirmation will be sent within one working day, giving the reasons for the suspension. The person will be informed at that point who their named contact is within the School organisation and provided with their contact details.

4.3. If the allegation is not demonstrably false or unfounded, and there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion will be convened in accordance with the procedures of local inter-agencies.

4.4. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take account of the fact that teachers and other school staff are entitled to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour.

4.5. Where it becomes clear that an investigation by the police or Local Authority Children's social care services is unnecessary, or the strategy discussion or initial evaluation decides

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that is the case, the Designated Officer(s)at the Local Authority will discuss the next steps with the DSL and the Principal. The Chair of Governors will be kept informed. In these circumstances the options depend on the nature and circumstances of the allegation and the evidence and information available, and could range from taking no further action to summary dismissal or a decision not to use the person's services in future.

5. Timescales

5.1. The School recognises that it is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. All allegations will be investigated as a priority so as to avoid any delay. The time taken to investigate and resolve individual cases will depend on a variety of factors including the nature, seriousness and complexity of the allegation, but it is expected that the case should be resolved in one – three months. In truly exceptional cases this may take up to twelve months.

5.2. For those cases where it is clear immediately that the allegation is unfounded or malicious then it is expected that they should be resolved within one week.

5.3. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the School as the employer to deal with, although if there are concerns about child protection, the DSL should discuss action with the Designated Officer(s) at the Local Authority.

5.3.1. In such cases, if the nature of the allegation does not require formal disciplinary action, the Principal will initiate appropriate action within 3 working days.

5.3.2. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

6. Supporting Staff

6.1. The School will act to manage and minimise the stress inherent in the allegations and disciplinary process.

6.2. The member of staff will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the Local Authority social care services or the police.

6.3. The member of staff will be advised to contact their trade union representative, if they have one, and/or a colleague for support. He/she will also be given access to a senior member of staff as a named contact to provide information regarding the progress of the case and any current work related issues.

6.4. Social contact with colleagues and friends will not be prevented unless there is an indication that that such contact is likely to be prejudicial to the gathering and presentation of evidence.

7. Confidentiality

7.1. When an allegation is made, the School will make every effort to maintain confidentiality

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and guard against unwanted publicity while investigations are carried out, in accordance with the reporting restrictions introduced by the Education Act 2002

7.2. The School will take advice from the Designated Officer(s) at the Local Authority, police and Local Authority social care services to agree the following:

7.2.1. Who needs to know and, importantly, exactly what information can be shared;

7.2.2. How to manage speculation, leaks and gossip;

7.2.3. What if any information can be reasonably given to the wider community to reduce speculation; and

7.2.4. How to manage press interest if and when it should arise.

7.3. In accordance with the Authorised Professional Practice published by the College of Policing (May 2017) the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence.) (In exceptional cases where the police might depart from that rule, e.g. an appeal to trace a suspect, they must apply to a magistrate court to request that reporting restrictions be lifted the reasons should be documented and partner agencies consulted beforehand.)

8. Resignations, Dismissal, ceasing to provide services, 'Settlement Agreements' and References

8.1. If a member of staff tenders his/her resignation, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with these procedures.

8.2. Ceasing to use a person's services includes: dismissal; non-renewal of a fixed term contract; not continuing with the employment of a probationer, no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial training, or volunteering.

8.3. Every effort will be made to reach a conclusion in all cases where allegations relating to the safety or welfare of children are concerned.

8.4. Wherever possible the member of staff will be given the opportunity to answer and make representations with regard to the allegation. However, the investigative processes outlined above will continue in cases where this does not happen for whatever reason.

8.5. A 'Settlement Agreement', by which a person agrees to resign if the School agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, must not be used in these cases. No such agreement will prevent a thorough police investigation or override the statutory duty to make a referral to the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (TRA), where appropriate.

8.6. Cases in which an allegation was proven to be unsubstantiated, unfounded or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. will also not be included in

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any reference.

9. Record keeping

9.1. Cases in which an allegation is proven to be unfounded, 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 unfounded, false, unsubstantiated or malicious should also not be included in any reference. Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, 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, will be kept on a member of staff's confidential personnel file, and a copy provided to the person concerned.

9.2. The purpose of this record is to enable accurate information to be given in response to any future request for a reference, where appropriate. (It could provide clarification in cases where future DBS Disclosures reveals information from the police about an allegation that did not result in a criminal conviction and it could help to prevent unnecessary re-investigation if an allegation re-surfaces after a period of time).

9.3. The record will be retained on the School Child Protection file for a period of 10 years from the date of leaving the employment of The School. This follows published guidance from the Information Commissioner in its Employment Practices Code.

10. Action on conclusion of a case

10.1. The police or the Crown Prosecution Service (CPS) will inform the school and Designated Officer(s) at the Local Authority straight away when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after person has been charged. In these circumstances the Designated Officer(s) at the Local Authority will discuss with the Principal and Chair of Governors whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or the Local Authority social care services can inform that decision. The options will depend on the circumstances of the case and the consideration will need to take account of the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

10.2. If the allegation is substantiated and the person is dismissed or the School ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the Designated Officer(s) at the Local Authority should discuss with the school and its Chief People Officer whether a referral to the Disclosure and Barring Service (DBS) for consideration of inclusion on the barred lists is required.

10.3. There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct (including inappropriate sexual conduct) that harmed (or is likely to harm) a child or if a person otherwise poses a risk of harm to a child.

10.4. In such circumstances, the duty to refer an individual to the DBS arises where an employer

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has removed the individual from relevant work with children (which includes dismissal, suspension or redeployment to work that is not regulated activity) or the person has chosen to cease relevant work in circumstances where they would have been removed had they not done so. The School will also make a referral to the DBS and TRA where a teacher has been dismissed (or would have been dismissed had they not resigned) for reasons of unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence. Referrals will be made as soon as possible, and ordinarily on conclusion of an investigation.

10.5. In cases where it is decided on the conclusion of the case that a person who has been suspended can return to work, the School will consider how best to facilitate this, bearing in mind that most people will benefit from some help and support to return to work after a very stressful experience.

10.6. 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 School will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the School.

11. Action in respect of unfounded or malicious allegations

11.1. If an allegation is determined to be unfounded or malicious, the Designated Officer(s) at the Local Authority will refer the matter to the Local Authority Children's social care services to determine whether the child concerned is in need of services, or may have been abused by someone else.

11.2. In the event that an allegation is shown to have been deliberately invented or malicious, the Principal/Headteacher will consider whether any disciplinary action is appropriate against the pupil who made it, or the police could be asked to consider whether any action might be appropriate against the person responsible, even if he or she was not a pupil of the School.

11.3. Where a parent has made a deliberately invented or malicious allegation the Principal/Headteacher will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

11.4. Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

12. Learning lessons

12.1. At the conclusion of a case in which an allegation is substantiated the Designated Officer(s) at the Local Authority will review the circumstances of the case with the Principal/Headteacher and DSP, to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This will include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

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Appendix 10 - Rules for Pupils visiting Boarding Staff's Accommodation

Staff should be aware of the National Minimum Standards for Boarding 2026. In this context, standard 20.10 is relevant: "No boarders have access to staff residential accommodation, other than in exceptional circumstances. Where this occurs a one-to-one situation should be avoided with boarders with another adult always present. There is no inappropriate favouritism or inappropriate one-to-one contact between staff and boarders."

The following rules are to keep boarding pupils, staff and staff's children safe and to maintain the highest safeguarding standards possible whilst simultaneously enabling effective pastoral care to be provided within the boarding houses.

Generally speaking, there is no reason for pupils to spend time in the private residence of boarding staff with the following exceptions:

1. A boarder may visit a friend (that is children who live in private boarding accommodation).
2. A member of boarding staff is entertaining a group of pupils in the staff accommodation. For example, a group of pupils may be invited to the staff accommodation for a meal or to have hot chocolate. Under such circumstances, the pupils must remain in the areas which have been declared as "public or shared-use space". This must have been explained to the pupils.
3. There are exceptional circumstances which mean that having a pupil in the boarding staff's accommodation would mitigate the immediate risk of harm to that pupil. This could be in a situation where a pupil has been threatened with physical violence and there is reason to believe that their safety is in danger. Under such circumstances:
    a. the pupil should firstly be made safe.
    b. The member of staff should consider whether it is necessary to 'phone the police. If the police are contacted, the relevant Head, the Vice Principal and the Principal should be informed.
    c. the pupil must remain in areas which have been declared as "public or shared-use space". This must be clearly explained to the pupil.
    d. The member of staff must **immediately** inform the relevant Head and the Vice Principal that a pupil is in their accommodation.
    e. the member of staff with the pupil must then contact another member of staff and have them come to their accommodation as soon as possible so that they are not alone with the pupil.
    f. the parents and/or guardian must be informed of the risk and the steps that have to mitigate the risks unless there is good reason to believe that this would increase the risk to the pupil.
    g. the pupil should not stay in the staff accommodation for longer than is necessary.

Residential boarding staff whose premise have any "public or shared-use space" must have a sign/signs which make it clear to pupils where they are not allowed to go in private staff accommodation.

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Public or shared-use space:

In St John's House the following areas have been declared as public or shared-use space:

The **kitchen, lounge** and the **garden.** (NB! in case of a fire one route passes through the staff accommodation).

In Incents House, the following areas have been declared as public or shared-use space:

The **living room, kitchen** and the **garden**.

Noting the exceptions above, if a pupil goes beyond one of these signs and enters an area that is not "public or shared-use space", that is a serious breach of the school rules. Staff can make a neutral notification that this has occurred.

If the above rules are broken in any way, this would be considered a serious disciplinary and safeguarding matter.

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Appendix 11 - Rules for Sexual Relationships at School

1. The School has a separate Relationships and Sex Education Policy.

2. Sexual Relationships in School
   2.1. Pupils may not engage in sexual activity with another pupil when they are at school. This applies to both boarding and day school pupils on all school property and at all times.
   2.2. Whilst the School's response to pupils having sexual relationships at school will always consider the welfare of the pupils, it is important that pupils realise that there could also be serious consequences; the contextual information of any case would be carefully considered. The School would consider what support and advice pupils may need alongside any sanctions that may be appropriate.

3. Sexual Relationships outside of School
   3.1. The School recognises that some pupils may enter into active sexual relationships away from School and outside of School time.
   3.2. The School has a duty of care towards pupils and the School Medical Centre can provide advice on contraception and sexually transmitted diseases.
   3.3. Appointments can be arranged for boarders at sexual health clinics.

4. Confidentiality regarding sexual relationships
   4.1. Medical confidentiality will be respected and information will not be shared with other members of staff unless there is a safeguarding concern and it is believed that a student is at risk of harm.
   4.2. Parents of pupils who are deemed to be "Gillick competent" will not normally be informed about a known sexual relationship unless there is a safeguarding or child protection risk.

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Appendix 12 – arrangements and systems at Charlotte House

	BSG	**Charlotte House**
Safeguarding Responsibilities	Tracey Evans – DSL for Prep Schools and Enterprises	Tracy Johnson – DSL for Charlotte House
Safeguarding reporting	Staff member to report concern immediately to the relevant DSP **and** log concern via CPOMS. Records of concern, actions taken etc stored electronically via CPOMS.	Staff member who has a concern or to whom a disclosure is made informs the DSP or DDSP and completes the Safeguarding Record Form - proforma at Appendix 13a All concerns should be recorded electronically on Admin share in a password protected Safeguarding file that only the Headteacher and DSL have access to. Details of referrals and other paperwork are also held within this file and will be shared with colleagues and external agencies as deemed appropriate by the DSL and/or DSPs.
Reports of sexual violence and / or harassment	Staff member to report concern immediately to the **DSL and** log concern via CPOMS. Records of concern, actions taken etc stored electronically via CPOMS.	All reports of sexual violence and/or harassment (both online and offline) should be reported to the DSL via password protected email by the DSP or DDSP
Online reporting system for pupils	Whisper (via Berkhamsted Hub)	Not yet available at CH

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Offline reporting system for pupils	Disclosure to a member of staff	Disclosure to a member of staff
Reporting of serious concerns about staff conduct by a member of staff	Report immediately to the Principal via email or Teams or telephone call. Recorded electronically either on low-level concern spreadsheet or via personal file in conjunction with LADO if harm threshold is met	Concerns shared with the Headteacher – written record made – proforma at Appendix 13b
Reporting of low-level concerns by staff	Direct contact with DSL or the Principal via Whisper (via the Hub), email, Teams or telephone call	Concerns shared with the Headteacher – written record made – proforma at Appendix 13c
Visiting Speakers	BSG CP&S Policy Appendix 7 Visiting Speaker Form / Visiting Speaker Log	CH Procedure for visiting speakers is set out at Appendix 13d
Safeguarding risk and needs assessment	Template at Appendix 5 of the BSG Risk Assessment Policy Stored electronically on CPOMS	CH to use BSG Safeguarding Risk Assessment proforma from September 2026 to be stored in pupil's electronic Safeguarding file
Filtering and monitoring	BSG Child Protection and Safeguarding Policy BSG Online Safety Policy BSG Filtering and Monitoring Overview Flowchart (accessed via Safeguarding section of the Hub)	CH Internet and online safety policy

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Appendix 13a – Charlotte House Proforma for Logging a Safeguarding Concern

Logging a Safeguarding Concern at Charlotte House Prep School

Date:

Time:

Name of Child:

Reminder: Use direct quotes, if relevant.

Who is/has been involved?

What happened?

Where did it take place?

Have you taken any action? If so what?

Name of person you are passing this information to

Your signature

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Appendix 13b – Charlotte House Proforma for sharing serious concerns about staff conduct

Proforma for sharing serious concerns about staff conduct

Date of report……

Name of reporting member of staff …….

Name of person of concern …….

Nature of the Allegation: (delete as appropriate) Physical/Emotional/Sexual/Neglect

If Physical – did it follow an authorised physical intervention or restraint? Yes/No

Date of alleged incident:

Where did the alleged incident take place?

Further details of the allegation.

Please include in your report –

- Name/s of child/children.
- If any, names of witnesses.
- Details of any injuries

This record will be held securely. This report may be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

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Appendix 13c – Charlotte House Proforma for sharing low level concerns about staff conduct

Proforma for sharing low level concerns about staff conduct

Please use this form to share any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

• is not consistent with our staff Code of Conduct, and/or

• relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

Date ……

Name of reporting member of staff …….

Name of person of concern …….

Dates and further details of concern

Signed by …….

This record will be held securely. Please note that low-level concerns will be treated in confidence as far as possible, but we may, in certain circumstances, be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

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Appendix 13d – Charlotte House Visiting Speaker Procedure

Arrangements for visiting speakers at Charlotte House

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and the British values of democracy.

The School will undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

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