



HARROW
SCHOOL

ONLINE

**SAFEGUARDING AND
CHILD PROTECTION
POLICY**



POWERED BY  Pearson

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INTRODUCTION

Harrow School Online (the School) is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

Harrow School Online professionals follow Pearson's global [Safeguarding Principals](#) and are additionally required to commit to implementing Harrow School Online's Safeguarding and Child Protection Policy. This policy sets out how pupils and prospective pupils at Harrow School Online will be safeguarded including what to do if staff, contractors, volunteers or third-party partners have safeguarding concerns about pupils.

SCOPE OF THIS POLICY

This policy relates to all situations in both the UK and internationally, in which professionals working for Harrow School Online, including teachers, support staff, contractors, and suppliers, come into contact with children and vulnerable adults through the course of their work, either online or in person.

Members of staff refers to all those working for or on behalf of the School, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

A child is a person under the age of 18. However, the School's duty is to promote the welfare and health and safety of all the pupils in its care whether they are under or over the age of 18.

A vulnerable adult can be defined as an individual aged 18 or over who may be in need of care services by reason of mental or other disability, age or illness. For these reasons, the individual may need safeguarding services to protect them against significant harm or exploitation.

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

Mentors refers to the nominated adult who speaks English and plays a role in the pupil's education by liaising with School staff and taking an active interest in the pupil's progress and achievement.

PURPOSE OF THIS POLICY

The purpose of this policy is to provide help and guidance so that we act prudently to ensure the safeguarding of children and vulnerable adults.

Policy aims

- To provide all members of staff with the necessary information to enable them to meet their child protection responsibilities;
- To ensure consistent good practice;
- To demonstrate the School's commitment with regard to child protection to students, parents and other partners.

CHILD PROTECTION STATEMENT

Harrow School Online fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all pupils. The School endeavours to provide a safe and welcoming environment where pupils are respected and valued. Members of staff should be alert to the signs of abuse and neglect and follow procedures to ensure that pupils receive effective support, protection and justice. All members of staff have equal responsibility to act on any suspicion or disclosure that may suggest a pupil is at risk of harm.

SAFEGUARDING LEGISLATION AND POLICY

Harrow School Online is a global online school with headquarters in England. Under our founding contract we commit that even where English law and regulation does not apply to Harrow School Online, the School shall be operated as if the laws and regulations for an independent, physical school in England shall apply (and reference to laws and regulations or legal and regulatory requirements are to such requirements as if they applied). Harrow School Online is therefore mindful of UK Safeguarding Legislation and Guidance.

- All staff must have read, understood and then act in accordance with Part One and Annex A of Keeping Children Safe in Education ([Department for Education, September 2019](#)) – often abbreviated as ‘KCSIE’.

PROMOTING PUPIL WELFARE

Harrow School Online recognises our responsibility to promote the well-being of children, protect them from harm and be proactive in responding to any safeguarding concerns. This duty has informed the design of our School.

- Our School ethos promotes a supportive and safe environment where pupils are listened to and feel valued. We have a zero-tolerance approach to bullying, harassment, discrimination and abuse.
- Our School curriculum promotes pupil well-being and supports our pupils’ development of healthy mindsets and habits. We teach our pupils to develop resilience and realistic attitudes to the responsibilities of adult life.
- Our School policies which set out our expectations for the behaviour of our pupils are designed to support and educate rather than punish, with a focus on tackling the factors which are driving poor behaviour.
- Our Recruitment, Selection & Disclosure Policy outlines the rigorous safer recruitment guidelines we follow for the recruitment and selection of staff and volunteers to ensure that those who work at Harrow School Online are suitable to work with children.
- Our staff induction and annual training ensure that all members of staff are aware of how and when to act on concerns that they have, and how to work in a safe and appropriate manner at all times.
- We liaise regularly with parents and mentors to ensure every effort is made to establish effective working relationships to support their child.

OUR SCHOOL

Harrow School Online is a British School which serves British and international students. Our pupils live in a range of jurisdictions which are governed by laws and cultural expectations that differ from one country to the next. We welcome the chance to forge an international School community of academically minded pupils and champion the diversity of our student-body and staff team. We expect the behaviour of staff and pupils within our community to be governed by the expectations laid out in our policies, which are informed by British values and English law.

- In the UK it is against the law to discriminate against someone because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation (known as 'protected characteristics'). We expect our pupils to be respectful to all members of our School community and will take any incidents of discrimination against these protected characteristics extremely seriously.
- Where we have concerns about a pupil we will follow up on those concerns as per our safeguarding policy regardless of the jurisdiction in which the pupil is resident.

KEEPING OUR PUPILS SAFE ONLINE

We take a robust approach to online safety, both to protect and educate our pupils in responsible use of technology, and to establish mechanisms which can identify, intervene and escalate any safeguarding incident.

We ensure our staff and pupils are educated about four areas of risk:

- content: being exposed to illegal, inappropriate or harmful material;
- contact: being subjected to harmful online interaction with other users;
- conduct: personal online behaviour that increases the likelihood of, or causes, harm;
- design: where the system itself may cause harm.

The School's online safety policy is incorporated in the Pupil Information and Communication Technology (ICT) Acceptable Use Policy. Harrow School Online seeks to adopt a responsible but proportional approach towards the promotion of online safety and to promote safeguarding by design. The following measures are in place:

- Our Pupil IT Acceptable Use Policy protects all parties by clearly stating what is acceptable and what is not. Pupils are required to sign up to this policy at the start of each academic year and before access can be given to the School's learning platform.
- All our pupils are inducted in appropriate use of the School's platform and our expectations for their conduct. Subsequently pupils are reminded at the start of each academic year about these expectations. Our students receive lessons on digital citizenship as part of the Skills and Mindset programme taught by our Success Coach.
- Harrow School Online exercises its right to monitor and filter the use of our IT systems, including the recording and monitoring of live lessons, monitoring and interception of emails sent from School email accounts and the deletion of inappropriate materials. In circumstances where the School believes unauthorised use of the IT system is, or may be taking place, or the system is, or may be, being used for unlawful purposes, the School reserves the right to inform appropriate authorities and provide documentary evidence.
- All staff, adhere to '[Teaching online safety in school](#)'. This guidance from England's Department for Education (DfE) outlines how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum

requirements. Our policies and practice for teaching online safety are in line with this guidance.

- Most of our applicants are 16 years old, but we additionally welcome pupils who will be 15 or 17 years old at the point of joining Harrow School Online. We review applications from younger pupils on a case by case basis, and where such pupils are enrolled, arrange their provision in such a way as to ensure an age-appropriate environment. Classes including pupils spanning more than 3 years in age are avoided.
- Our learning management platform is password protected and our virtual classrooms are set up with waiting rooms to ensure only verified pupils may enter. Pupils may be removed from a classroom for poor behaviour and are unable to re-join without the permission of their teacher.
- All live lessons are recorded. Our recordings are normally available to pupils to review for two academic years while they remain enrolled in the School, facilitating revision of material. Our lesson recordings allow us to conduct quality assurance checks on the course delivery and serve as evidence should any concerns about behaviour or safeguarding during lessons be raised. Recordings are password protected.
- We encourage use of pupil webcam in lessons and meetings, helping to create a positive rapport and ensuring teachers can see their pupils regularly. If a teacher becomes concerned about anything they see, they have means of communicating individually with a pupil even in a group lesson using direct chat or a Q&A pod, and can follow up with an individual meeting with that pupil.
- If any bullying or safeguarding incident occurs during a class, the recording will be passed to the Designated Safeguarding Lead. Before it is made available to pupils for academic purposes it will be edited to remove any segment of the lesson which could cause distress. The original recording will be kept as part of the dossier of evidence on the incident.
- All our classrooms and meeting rooms are set up with the Principal, Designated Safeguarding Lead and Deputy Designated Safeguarding Lead as co-hosts. This means that they can enter the room at any point to observe a segment of the lesson or coaching session. The Principal regularly visits both live lessons and one-to-one tutorials and coaching sessions to assure quality of provision.

Our staff also receive advice regarding the use of social networking and electronic communication with pupils, which follows the guidance given in the document [Guidance for safer working practice for those working with children and young people in education settings May 2019](#).

This means that staff:

- ensure that personal social networking sites are set at 'private' and that pupils are never listed as approved contacts;
- never use or access pupils' social networking sites;
- avoid giving their personal contact details to pupils, including their mobile telephone number, except in emergencies or for specific safety purposes on School expeditions;
- only use equipment e.g. mobile phones, provided by the School to communicate with pupils;
- only make contact with pupils for professional reasons and in accordance with the School's policy;
- recognise that text messaging should only be used as part of an agreed protocol and when other forms of communication are not possible; and
- not use online communication channels to send personal messages to pupils.

EQUALITY OF SAFEGUARDING PROVISION

Some pupils may be at an increased risk of abuse or face additional barriers which make them less likely to disclose abuse. Harrow School Online is committed to ensuring that all

pupils in the School receive equal protection regardless of their circumstances or the barriers they face. We therefore give special consideration to a pupil who:

- is disabled or has specific additional needs;
- has special educational needs;
- is a young carer at home;
- shows signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- frequently misses school or goes missing from care or from home;
- is misusing drugs or alcohol;
- is in a family circumstance presenting challenges, such as substance abuse, adult mental health problems or domestic abuse;
- is showing early signs of abuse and/or neglect;
- is at risk of modern slavery, trafficking, FGM, sexual exploitation, forced marriage, or being radicalised;
- is or has previously been fostered or looked after;
- is vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality; or who
- does not have English as a first language.

LIASON WITH NATIONAL AGENCIES

We liaise with national agencies that support our pupils. In the UK this includes Children's Social Care (CSC), Child and Adolescent Mental Health Service (CAMHS), the education welfare service and educational psychology service. We are committed to contributing to inter-agency working and providing additional support to children who have been identified to us as vulnerable, for example, pupils who are subject to Child Protection plans or an overseas equivalent. Should a pupil who has a child protection plan (or equivalent) leave Harrow School Online for an alternative School, their information is transferred to the new school immediately. In the UK and where possible overseas we will inform the local authority and the child's social worker or equivalent.

Harrow School Online liaises with parents or mentors to ensure that the relevant Local Authority is informed where Elective Home Education is taking place in the UK. Harrow School Online will proactively contact Local Authorities during the registration of a new pupil resident in the UK or when pupils aged under 18 resident in the UK leave our provision. We recognise that children may be at risk from parents or carers who choose online schooling for their children in order to hide abuse and informing the Local Authority will allow for effective sharing of information between the Local Authority and Harrow School Online and enable us to better fulfil our duty to safeguard all children in our School community.

Harrow School Online will inform the relevant Children and Family Services team should we have to exclude a pupil on the child protection register (whether fixed term or permanently) or if there is an unexplained absence of a pupil on the child protection register of more than one day. For more information see our Missing Pupils Procedures in Appendix B.

RECOGNISING ABUSE

All members of staff have a responsibility to identify the symptoms and triggers of abuse and neglect, and to report any concerns they may have about a pupil's wellbeing. These symptoms of abuse can be found in KCSIE, and in the Pearson Safeguarding Policy, and are reviewed in induction training and annual safeguarding training. Appendix 1 sets out some

particular types of abuse that staff should be aware of. In the UK abuse is defined as per the following categories:

PHYSICAL ABUSE

Physical abuse is any form of threatened or actual violence, which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

EMOTIONAL ABUSE

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

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

NEGLECT

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. This form of abuse may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

CULTURAL CONTEXT

When identifying abuse, staff should be mindful of the need consider the context of the culture, law and guidance of the relevant jurisdiction of the pupil. It is important to consider whether the pupil, their family and their society view the behaviour as unacceptable, as this will be a determining factor in whether the pupil experiences the behaviour as abusive. Where staff are unfamiliar with the expectations of behaviour in a particular jurisdiction, they are encouraged to report the behaviour in line with expectations of behaviour in the UK.

INDICATORS OF ABUSE

It is the responsibility of all members of staff to report any and all niggling worries or concerns over safeguarding and welfare via CPOMS. It is not your responsibility to

investigate or decide whether a child has been abused. A child who is being abused or neglected may:

- be reluctant to turn on their webcam;
- have visible bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- look unkempt and uncared for;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- show signs of not wanting to be at home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their schoolwork;
- be constantly tired or preoccupied;
- be involved in, or particularly knowledgeable about drugs or alcohol; or
- display sexual knowledge or behaviour beyond that normally expected for their age.

You may also find you see or hear behaviour in the pupil's background which raises your concern. If you have concerns about a pupil you should report these concerns even if you have no conclusive evidence of abuse.

CHILD PROTECTION PROCEDURES

The School will track any concerns reported and use these to help build up a better understanding of pupil welfare. It will act on identified concerns and provide early help to prevent concerns from escalating.

RESPONDING TO IMMEDIATE DANGER

If you believe a pupil is in immediate danger or is at risk of harm, you must take appropriate action to address this, which could include contacting the pupil's parents and/or calling the police or emergency services in the country in which the pupil is resident. When reporting any such concern you should ensure that the parent or criminal justice agency give you feedback on what actions they will take.

After taking initial action, you should speak to the Designated Safeguarding Lead (DSL) or in their absence to the Deputy Designated Safeguarding Lead (DDSL). You should complete a written incident report to submit to the DSL. Any verbal contact with the parent or criminal justice agency should be followed up in writing within 24 hours; the DSL or DDSL will liaise with you on this.

RESPONDING TO CRIME

If you believe a crime has been committed, you should report this to the DSL or in their absence to the DDSL who will liaise with the Pearson Global Director of Safeguarding to determine the most appropriate course of action. This is likely to involve reporting the crime to the law enforcement agency of the jurisdiction in question. You will be asked to complete a written incident report and you may be required to assist in making the report to the law

enforcement agency. When you make this report, you should request a crime reference number or equivalent and ask for feedback on what actions they will take. Any verbal contact with the parent or criminal justice agency should be followed up in writing within 24 hours; the DSL or DDSL will liaise with you on this.

REPORTING SAFEGUARDING CONCERNS

If you are concerned a pupil is suffering or likely to suffer abuse or harassment, you should speak to the DSL or in their absence to the DDSL. You will be asked to complete a written incident report detailing your concerns. The DSL will consider your concerns and additionally take into account any previously tracked information about the pupil. They will normally confer with the DDSL and Principal before deciding on a course of action and may refer to a national statutory agency for advice before making a referral. They may decide to contact the pupil's parents where the concern relates to wellbeing issues or where the concern relates to abuse outside of the home. If they feel the concern meets the threshold of significant harm, they will liaise with the Pearson Global Director of Safeguarding. They may contact a Safeguarding or Criminal Justice organisation where there is an appropriate national organisation and it is believed that the pupil is suffering or at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the pupil or confidentiality issues pertain.

Any first contact with the parent or a safeguarding or criminal justice agency will normally be by telephone and will include a discussion of what actions that person or organisation will take and be followed up in writing within 24 hours.

A course of action will normally be decided upon and implemented within the working day that the concern is raised. Where a pupil's situation does not appear to be subsequently improving, staff will press for re-consideration by those who have been referred to. Concerns should always lead to help for the pupil at some point.

ASKING A PUPIL IF THEY ARE OKAY

If you suspect that a pupil may be at risk but have no 'real' evidence, where possible you should give the pupil an opportunity to talk. It is fine to ask the pupil if he or she is okay, or if you can help in any way. Following an initial conversation with the pupil, if you remain concerned, you should discuss your concerns with the DSL.

IF A PUPIL MAKES A DISCLOSURE

It takes courage for a pupil to disclose that he or she is being or has been abused. If a pupil talks to you about any risks to their safety or wellbeing, you should:

- allow the pupil to speak freely;
- remain calm and avoid overreaction;
- offer reassurance and general words of comfort;
- not be afraid of pauses or silences;
- not ask investigative questions;
- explain at an appropriate time that, in order to help, the information must be passed on to relevant people in positions of responsibility;
- not reprimand the pupil for failing to disclose earlier;
- establish next steps (agree to talk with the DSL) and let the pupil know that someone will be in touch with them within 24 hours;
- report verbally to the DSL, even if the pupil has promised to do it by himself;

- write up an incident report on CPOMS including a record of the conversation as soon as possible and submit it to the DSL; and
- seek support, if distressed.

SECURING EVIDENCE

Lessons and meetings held at Harrow School Online are recorded. If an incident or disclosure occurs in a recorded lesson or meeting, the following files should be secured:

- the recording of the lesson or meeting
- any written communication related to the incident in the chat pod, Q&A pod or elsewhere.

These files should be passed to the DSL who will ensure they are copied onto the pupil's child protection file, which is separate to their academic record.

ESCALATING CONCERNS

Members of staff should normally follow the reporting procedures outlined in this policy. However, they should escalate their concerns if:

- the situation is an emergency and the DSL, DDSL and Principal are all unavailable;
- their concern involves the DSL, DDSL or Principal;
- they have reported their concern to the DSL or DDSL and feel their concern has not been adequately addressed; or
- they make a judgement that an escalated report is in the best interests of the pupil.

Staff can escalate a concern by reporting their concern directly to Pearson's DSL. If after escalation they remain concerned, they should report their concern via one of the following means:

- reporting to Children's Services or equivalent organisation local to the local authority or region in which the child is resident; or
- reporting to the NSPCC.

CONFIDENTIALITY

Harrow School Online recognises that all matters relating to child protection are sensitive and confidential. Information is shared only on a 'need to know, what and when' basis. Concerns about individuals should never be discussed elsewhere, inside or outside the School, unless in confidential meetings for the purpose of safeguarding. This is not only to respect any individuals involved but also to ensure that information released into the public domain does not compromise evidence.

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

Child protection records will be stored securely online in a partitioned limited access area of the network and only made available to relevant individuals. Child protection records are normally exempt from the disclosure provisions of the Data Protection Act. This means that pupils and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Principal who will be guided by advice from the Data Privacy Officer.

SUPPORT FOR CHILDREN INVOLVED

We recognise that children who are abused or witness abuse can find it difficult to develop a sense of self-worth and may feel helplessness, humiliation and a sense of self-blame. Our curriculum, ethos and policies are designed to provide a school environment which will support our pupils. We also work with agencies and parents to ensure any specialist support needed by the child is accessible.

CONCERNS OR ALLEGATIONS RELATING TO PUPILS

All members of staff should be alert to the risk of peer-on-peer abuse and understand their role in preventing, identifying and responding to it.

Peer-on-peer abuse may take different forms. In an online school, the most pertinent are sexual harassment, sexting (also known as youth produced sexual imagery), use of hate language and bullying. There are three likely routes to consider when managing a report of peer-on-peer abuse:

- **Managing Internally:** Incidents where there is no risk of significant harm will normally be managed internally using the School's Counter-Bullying Policy and Behaviour Policy. If the bullying-type behaviour is particularly serious, or the counter-bullying procedures are deemed ineffective, the Principal and the DSL will consider implementing child protection procedures.
- **Referrals to Children's Services:** In cases where there has been harm, or there is an immediate risk, a referral will be made to Children's Services or to an equivalent national agency. The School will follow advice on the investigation of such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved, including the pupil or pupils accused of abuse. A pupil against whom an allegation of a child protection nature has been made may be suspended from the School during the investigation. The School's policy on behaviour, discipline and sanctions will apply.
- **Reporting to Police:** In cases where a crime may have been committed, this will be reported to the Police. If it is necessary for a pupil to be interviewed by the Police or other authorities in relation to allegations of abuse, the School will ensure that, subject to advice from external agencies, parents are informed as soon as possible, and that the pupil is supported during the interview by an appropriate adult. The School will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other children in the school. The DSL will work closely with the Police to ensure that the School's actions do not jeopardise any police investigation. The School's policy on behaviour, discipline and sanctions will apply.

Any incident involving youth produced sexual imagery should be reported to the DSL immediately. In the case of pupils based in the UK the DSL will follow the guidance set out in [Sexting in schools and colleges: responding to incidents and safeguarding young people \(UK Council for Child Internet Safety\)](#).

In the case of pupils based overseas the DSL will liaise with the Pearson Global Director of Safeguarding to ensure the response is mindful of the legal jurisdiction in which the pupils involved are resident.

Young people who abuse others may be victims of abuse themselves, and the child protection procedures will be followed for victims and perpetrators. It is important to ensure

that victims and perpetrators are supported and protected, especially from bullying and harassment.

CONCERNS OR ALLEGATIONS RELATING TO STAFF

When an allegation is made against a member of staff or a concern expressed about their conduct relating to children, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can happen, and a child may make an allegation against an innocent party because they are too afraid to name the real perpetrator.

REPORTING CONCERNS

A member of staff who is concerned about the conduct of a colleague towards a pupil must remember that the welfare of the child is paramount. No member of staff will suffer a detriment for raising a genuine concern.

- Allegations or concerns against members of staff including the DSL should be reported directly to the Principal. If the Principal is absent, allegations against or concerns about members of staff should be reported to the Director of Harrow School Online.
- Allegations against or concerns about the Principal or Director of Harrow School should be reported to the Pearson Global Director of Safeguarding without the Principal or Director being informed.
- Staff may also report any allegations or concerns directly to the police if they believe direct reporting is necessary to secure action and they feel a crime has been committed.
- Staff may alternatively use the NSPCC whistleblowing helpline number, 0800 028 0285 if they feel that staff conduct may not have passed the threshold for a criminal offence but raises concerns which are not being addressed within the internal reporting mechanisms.
- Allegations against a former member of staff no longer working at Harrow School Online should be referred to the police.

Reports can be made verbally but should be supported by a dated and timed note of what has been disclosed or noticed, said or done.

It is vital that expressions of concern that do not necessarily amount to 'allegations' are reported, particularly if there are repeated reports of such concerns and/or questionable conduct. It may be that the concern expressed has been raised by another party. If there are repeated reports of such concerns and/or questionable conduct, a pattern of unacceptable behaviour may be identified.

Harrow School Online accepts that some professionals can pose a serious risk to the pupils and will act on every allegation or concern that a person working with or who is in contact with pupils may have:

- behaved in a way that has harmed a child;
- committed a criminal offence against or related to a child; or
- behaved in a way that calls into question their suitability to work with children

If the concerns raised do not meet these criteria, the School will resolve the matter as quickly as possible, and where more appropriate, may use the Complaints Procedure instead. A record of the concern will be kept to allow any patterns of unacceptable behaviour to be identified.

RESPONDING TO CONCERNS

The full procedures and statutory guidance for dealing with allegations against staff can be found in [Keeping Children Safe in Education](#) (DfE, September 2019).

Staff, parents and members of the Governing Body are reminded not to investigate the matter themselves; not to make assumptions or offer alternative explanations for behaviours; or to promise confidentiality to the alleged victim(s).

On receiving a reported concern, the case manager (whether the Principal, Director or Pearson Global Director of Safeguarding) will proceed as follows:

- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- Notify the Local Authority Designated Officer (LADO) on the same day and send copies of any documentation concerning the allegation.
- If the report is made to the Principal or Director, notify each other and the Pearson Global Director of Safeguarding on the same day.
- The Principal, Director or Pearson Global Director of Safeguarding may ask to clarify details or circumstances of the allegation, but this must not amount to an investigation.
- Liaise with the LADO and co-operate with the investigating agencies as appropriate; consider employment issues and possible disciplinary action where the investigating agencies take no further action.

The Education Act 2011 prohibits the publication of material that may lead to the identification of a member of staff who is the subject of an allegation. 'Publication' includes verbal conversations or writing, including content placed on social media sites. The School will comply with the provisions of the Act at all times.

MANAGING ALLEGATIONS

Upon receiving an allegation or concern about a staff member, the case manager will immediately discuss the allegation with the LADO. The purpose of an initial discussion is for the LADO and the case manager to consider the nature, content and context of the allegation and agree a course of action. In the process of this liaison, the case manager and LADO will:

- share what information is available, both from the source of the allegation and also from Personnel files;
- identify what other information might be needed;
- consider whether the alleged perpetrator should continue working or remain in contact with pupils;
- consider whether suspension is appropriate advice to the School on this aspect;
- decide what information and/or advice is to be given to the case manager, including whether the member of staff should be informed of the allegation at this stage; and
- decide what action is needed, and who needs to be involved and informed (including the Disclosure and Barring Service [DBS] and/or Teaching Agency).

Decisions about the course of action is taken on a case by case basis, bearing in mind the paramount importance of the safety of any child(ren) involved but also remembering that the member of staff, against whom an allegation has been made, has the right to remain anonymous and to expect any allegations to be investigated as expeditiously as possible. Any course of action is subject to a risk assessment. Decisions would also follow the guidance of the LADO and/or police.

If the parties involved in these discussions consider it necessary, a Strategy Meeting is arranged, usually by Social Services, which will involve representatives from the LADO, the police and the School (e.g. the Principal, DSL or Chair of Management Board, as appropriate). From the above discussions, there are three possible courses of action:

- It may be the subject of a police and/or joint police and Social Services investigation and possible action through the courts; or
- It may be the subject of a disciplinary investigation; or
- The matter may be remitted to the School to be dealt with.

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

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either to prove or disprove the allegation; the term, therefore, does not imply guilt or innocence;
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If Social Services and the police decide to take no action, the School will still need to consider what further investigation is necessary. If there is a case to answer, a disciplinary hearing will be called, which could lead to dismissal.

Where a criminal investigation has taken place and either (i) a trial has resulted, (ii) the investigation has been closed without charge or (iii) a decision has been taken not to prosecute a case after charge, the case manager will discuss with the LADO what, if any, further action is required as regards the member of staff concerned and the sharing of information obtained by the agencies involved in assisting any further action to be taken by the School.

Where a disciplinary investigation is required, the investigation should be conducted in accordance with the School's disciplinary procedure. 'Settlement agreements' (by which contract a person agrees to resign, the School agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference), will not be used in these cases.

SUPPORTING THOSE INVOLVED

Every effort will be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the pupil(s), parent(s)/guardian(s) and the person about whom the allegation has been made (in cases when this would not place the pupil at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries or manage related disciplinary processes.

As an employer, Harrow School Online has a duty of care towards its employees. The School provides effective support for anyone facing an allegation and provides staff members with a named contact if they are suspended. Social contact with School colleagues will not be prevented, unless there is evidence to suggest that it is likely to be prejudicial to the gathering and presentation of evidence.

Parent(s) or guardian(s) of a pupil involved will be told about the allegation if appropriate as soon as possible, if they do not already know of it. They will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution. However, where a strategy discussion is required, or police or other agencies need to be involved, this should not take place unless or until those agencies have been consulted and have agreed what information can be disclosed to the parent(s)/guardian(s). That includes the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parent(s)/guardian(s) of the boy will be told the outcome.

ACTION UPON CONCLUSION OF A CASE

The School will refer to the DBS (following consultation with the LADO) any person who has been removed from working (paid or unpaid) in regulated activity, or would or might have been so removed had he/she not resigned or left of his/her own accord, and it believes the person may have harmed, attempted to harm, incited another to harm or put a child at risk of harm or if there is reason to believe the person may have committed one of a number of offences listed under the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009.

'Removal from working' for these purposes will include dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation or voluntary withdrawal from any of the above.

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. The School appreciates that most people would benefit from some help and support when returning to work after a very stressful experience. 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 pupils who made the allegation can best be managed if they are still attending the School.

If an allegation is determined to be false, the case manager may refer the matter to Children's Services to determine whether the pupil concerned is in need of services or may have been abused by someone else.

In the event that an allegation is shown to have been deliberately invented or malicious, the Principal will consider whether any disciplinary action is appropriate against the pupil who made it. This may include permanent exclusion from Harrow School Online.

A referral will 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. The reasons such an order would be considered are 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

RECORDS

A central record of all allegations and concerns (and connected documents) against members of staff will be kept securely by the Principal (or the Pearson Global Director of Safeguarding, if it involves the Principal), separate from normal staff and pupils records, and with access limited to the DSL and DDSL, as well as Pearson Human Resources representatives and officers who may be key workers for cases. The only exception to this

requirement for permanent recording is where allegations have been found to be malicious. In such cases, all records will be removed from staff personnel files.

The record of allegations may provide clarification in cases where a future DBS disclosure reveals information from the police about an allegation that did not result in a criminal conviction. It will also help to prevent unnecessary re-investigation if, as occasionally happens, an allegation re-surfaces after a period. The record will be retained at least until the member of staff involved has reached normal retirement age, or for a period of 10 years from the date of the allegation if that is longer.

An allegation which was proven to be false, unsubstantiated or malicious will not be included in references for staff.

Where there have been concerns about a member of staff and he or she leaves the School to work elsewhere, the Principal (or the Pearson Global Director of Safeguarding if it involves the Principal) will consider the question of passing the concerns to the new employer or authority.

The DSL and the Principal will pass allegations or concerns affecting a pupil on to his or her next school, if applicable.

POLICY DEVELOPMENT AND REVIEW

This procedure is designed to set good practice standards. However, the School recognises that best practice develops over time and, as such, will update it regularly in the light of experience and as a result of changes in legislation or its own internal organisation and policies. The procedure will be subject to a comprehensive review on an annual basis.

Policy created:	September 2020
Review date:	September 2021
Policy authors:	Dale Krause, James Healey, Heather Rhodes
Policy review, Harrow School:	Peter Bieneman

APPENDIX A: SPECIFIC SAFEGUARDING ISSUES

Staff should be aware of the following specific safeguarding issues. These are issues are presented based on the legal and social context of the UK. For pupils outside the UK we understand that there may be differences in approach in defining these safeguarding issues and in supporting pupils subject to them. We follow the UN convention on the rights of the child and work with the Pearson Global Director of Safeguarding to ensure our approach to each pupil is consistent with their legal and social framework.

GANG INVOLVEMENT AND CRIMINAL ACTIVITY

Staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime, either through participation in or as victims of gang violence. These may include:

- becoming withdrawn from family;
- a change in friendships or relationships with older individuals or groups;
- a sudden loss of interest in school – decline in attendance or academic achievement;
- using new or unknown slang words;
- holding unexplained money or possessions;
- staying out unusually late without reason;
- a sudden change in appearance, including dressing in a particular style or ‘uniform’;
- a new nickname;
- signs of assault or unexplained injuries;
- increased use of social networking sites;
- starting to adopt codes of group behaviour e.g. ways of talking and hand signs;
- expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past;
- expressing fear about entering certain areas or being concerned by the presence of unknown youths in their neighbourhood.

Staff need to be able to identify the signs and indicators of these and share their concerns immediately with the DSL. The DSL will normally consult the child’s parents. If the child is based in the UK, the DSL will contact the Local Authority’s Children’s Social Care Service or police for the area in which the child is currently located. For children based overseas, an equivalent organisation may be sought.

CHILD CRIMINAL EXPLOITATION

Harrow School Online staff are aware that the criminal exploitation of children is a geographically widespread form of harm which:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and

- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources

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

If a staff member develops concerns that a pupil is being drawn into criminal exploitation, this should be reported to the DSL who will, where appropriate, make referrals through the National Referral Mechanism in the UK, or an equivalent mechanism overseas.

SEXUAL EXPLOITATION OF CHILDREN

Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage of increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact. It can also occur with technology.

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

- children who have unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older girlfriends or boyfriends;
- children who suffer from sexually transmitted infections;
- children who suffer from changes in emotional wellbeing;
- children who misuse drugs or alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

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

RADICALISATION

Harrow School Online recognises its duty to help prevent young people to be drawn into extremist viewpoints and radicalisation. In the UK, the [Prevent Duty](#) is the duty in the [Counter-Terrorism and Security Act 2015](#) on specified authorities including schools to have due regard to the need to prevent people from being drawn into terrorism.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation, but there are number of early indicators of radicalisation or extremism, which may include:

- showing sympathy for extremist causes;
- glorifying violence, especially to other faiths or cultures;
- making remarks or comments about being at extremist events or rallies;
- evidence of possessing illegal or extremist literature;

- advocating messages similar to illegal organisations or other extremist groups;
- out of character changes in dress, behaviour and peer relationships;
- secretive behaviour;
- online searches or sharing extremist messages or social profiles;
- intolerance of difference, including faith, culture, gender, race or sexuality;
- artwork or writing that displays extremist themes;
- attempts to impose extremist views or practices on others;
- verbalising anti-Western or anti-British views; and
- advocating violence towards others.

Members of staff who have concerns about a pupil will make these concerns known to the DSL at the earliest opportunity. The DSL will then make a judgement as to the most appropriate course of action, which is likely to involve informing the parent or guardian of the child. For pupils in the UK, the DSL may make a referral to the Channel programme, which is a programme that focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. For pupils overseas, an equivalent organisation may be identified.

The School will work more generally to ensure the fundamental British values of democracy, rule of law, mutual respect and tolerance are celebrated and not undermined. Non-emergency advice for staff is available via the DfE's helpline +44 (0)20 7340 7264 and by email at counter-extremism@education.gsi.gov.uk.

GUEST SPEAKERS

On occasions, external guest speakers will be invited to address pupils. Harrow School Online welcomes different insights and perspectives from guest speakers. Our external speakers are briefed in advance with regards to our expectations of what is suitable, and advised not to encourage any form of extremism or radicalisation. Speakers are reminded that children are impressionable and that the speakers need to be respectful of the School's support of British values. Where appropriate, the School will request that visiting speakers provide copies of materials they will use to the School in advance of the talk. Staff arranging such talks should speak with the Principal and/or the DSL if they have any reservations about the appropriateness of a speaker. A risk assessment may be drawn up, as appropriate, and while most speakers will be invited to speak in live sessions, speakers deemed high risk may be invited to speak in recorded sessions which can be reviewed before release.

HONOUR BASED VIOLENCE

So-called 'honour based' violence encompasses crimes which have been committed to protect and defend the honour of the family and/or a community. These crimes should be dealt with as part of existing child safeguarding/protection structures, policies and procedures. The following practices are illegal in England:

- **Female Genital Mutilation:** Honour based violence includes the physical act of Female Genital Mutilation (FGM). This is a form of child abuse and a method of violence against women and girls which is recognised by UNICEF as an internationally recognized human rights violation. More information on this can be found on the [UNICEF website here](#). Members of staff are alert to the mandatory reporting requirement for suspected cases of FGM in England, Wales and Northern Ireland.
- **Forced Marriage:** A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of free and full consent can be where a person does not consent or where they cannot consent (if they have

learning disabilities, for example). Forcing a person into a marriage is a crime in the United Kingdom. School staff can also contact the Forced Marriage Unit, if they need advice or information: contact +44 (0)20 7008 0151 or email fm@fco.gov.uk.

PRIVATE FOSTERING

Private fostering is when a parent makes arrangements for their child (who is under 16, or under 18 if they are disabled) to live with someone who isn't an aunt/uncle, grandparent, brother/sister or step-parent, for longer than 28 days. The person who has been asked to look after the child is known as a private foster carer. Harrow School Online has a legal duty to tell the relevant Local Authority if it becomes aware of any private fostering arrangement in the UK or if it suspects that a child is subject to a private fostering arrangement in the UK. The Local Authority is then able to check that the child is safe and being well looked after and that the accommodation and care being given is satisfactory.

LOOKED AFTER CHILDREN

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

APPENDIX B: MISSING PUPILS PROCEDURE

Harrow School Online recognises that a child going missing from education could be a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. Therefore, members of staff will respond promptly to absences and follow the procedures detailed below.

ENROLMENTS

The School will enter pupils on the admission register at the beginning of the first day on which the School has agreed, or been notified, that the pupil will attend the School. If the pupil fails to attend on the agreed or notified date, the School will undertake reasonable enquiries to establish the child's whereabouts.

For pupils resident in the UK, the School will notify the appropriate local authority within five days of adding a pupil's name to the admission register. This notification will include all details contained in the admission register for the new pupil.

ATTENDANCE

The School has an Attendance Policy with robust systems in place for registering pupils, recording absences and notifying staff, mentors and parents/guardians of concerns about a pupil's attendance. Attendance at live lessons and a pupil's completion of self-study lessons is tracked, and the pupil's mentor is informed of any non-attendance. Should a pupil's attendance record raise concerns, both the mentor and parents/guardians are invited to discuss reasons for non-attendance with the Success Coach.

For pupils resident in the UK, the School will inform local authorities of the details of pupils resident in the UK who fail to attend regularly or have missed ten school days without permission. Where a pupil has not returned to School for ten days after an authorised absence, or is absent from School without authorisation for twenty consecutive school days, the pupil will be removed from the admission register when the School to establish the whereabouts of the child. In the UK these enquiries will be made jointly with the local authority for the pupil. This only applies where the School does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause.

LEAVING THE SCHOOL

For pupils resident in the UK, the School will notify the local authority it is about to remove a pupil's name from the School's admission register under any of the fifteen grounds set out in the DfE regulations, when this removal is outside of the standard transition points – when the pupil has completed the final year of education normally provided by the School.

Where a parent notifies the School in writing that they are home educating, the School will delete the child's name from the admission register and inform the local authority. However, where a parent verbally indicates that they intend to withdraw their child to be home educated, the School will consider notifying the local authority at the earliest opportunity.

The School provides the local authority with a return of information for non-standard transitions.



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