HARROW
SCHOOL

SAFEGUARDING POLICY

SEPTEMBER 2026

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KEY CONTACTS

Harrow School

Harrow School Safeguarding Email Address	safeguarding@harrowschool.org.uk
Director of Safeguarding and Designated Safeguarding Lead (DSL)	David Wendelken, History and Politics Master 07848 444896 (Mobile) 020 8872 8136 (Office)
Lead Deputy Designated Safeguarding Lead (Lead Deputy DSL)	Rob Robson, HRC School Staff Instructor, House Visitor 07872 562691 (Mobile) 020 8872 8221 (Office)
Deputy Designated Safeguarding Leads (Deputy DSLs)	Stephen Harrison, Senior Deputy Head 07848 007140 (Mobile) 020 8872 8039 (Office) Simon Taylor, Deputy Head Pastoral 07848 007139 (Mobile) 020 8872 8233 (Office) Laurence Hedges, Art Master Peter Davison-Reiber, Mathematics and Computer Science Master Ben Mayhew, Head of PSHE Education
Corporation Safeguarding Manager	Maya Jadav 020 4551 8309
Advanced Level Trained	Alastair Land, Head Master 020 8872 8003 (Office)
Nominated Safeguarding Governor	Sue Hammond HammondS@johnlyonsfoundation.org.uk
Head Master	Alastair Land 020 8872 8003 (Office)
Chair of Governors	David Eyton via Andrew Millett, Clerk to the Governors and General Counsel 07976 797387 milletta@johnlyonsfoundation.org.uk

Child and Family Services of the London Borough of Harrow

Children's Access Team	Golden Number 020 8901 2690
Emergency Duty Team	(24 hours) 020 8424 0999
Harrow Safeguarding Children Partnership	Second Floor, Civic Centre, Station Road, Harrow, Middlesex HA1 2UL 020 8424 1147 / 020 8736 6939 duty&assess@harrow.gov.uk
Allegations Manager/LADO	Rosalind South 07871 987254 rosalind.south@harrow.gov.uk
Education Lead, MASH Team	Gavin Baker 07927 548070 Gavin.Baker@harrow.gov.uk

National Contacts

ISI (Independent Schools Inspectorate)	CAP House, 9-12 Long Lane, EC1A 9HA 020 7600 0100 info@isi.net
Crimestoppers	0800 555 111 crimestoppers-uk.org
NSPCC	Weston House, 42 Curtain Road, EC2A 3NH 0808 800 5000
NSPCC Whistleblowing Helpline (for staff)	0800 028 0285 help@nspcc.org.uk
Childline	0800 1111
National Bullying Helpline	0300 323 0169
National Domestic Abuse Helpline	0808 2000 247
Samaritans	116 123 / 0330 094 5717
OFSTED	0300 123 1231

Children's Commissioner for England	Rachel de Souza 020 7783 8330 childrenscommissioner.gov.uk

POLICY STATEMENT AND PRINCIPLES

KEY POINTS

- Harrow takes a whole-School approach to safeguarding and child protection and this will be at the forefront and underpin all relevant aspects of process and policy development at the School.
- This policy applies to all boys in the School. Any boy, whether under or over the age of 18, will be regarded as a child for the purpose of this policy.
- All members of staff have a responsibility for the implementation of this policy.
- Any concerns regarding child protection and/or safeguarding must be reported immediately to the Designated Safeguarding Lead (DSL) (who at Harrow School is the Director of Safeguarding, David Wendelken), or, in his absence, to one of the Deputy Designated Safeguarding Leads (Deputy DSLs).
- All members of staff should be alert to identifying children who may benefit from early help or the more targeted early help level of Family Help.
- If, at any point, a child is in immediate danger or is at risk of harm, a referral should be made to Children's Services and/or the police immediately.
- If a crime has been committed, it should be reported to the police.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful (they may feel embarrassed, humiliated, or be being threatened). Staff should speak to the Director of Safeguarding if they have concerns about a child.
- All members of staff must have read and understood and must then act in accordance with Part One and Annex B (when appropriate) of Keeping Children Safe in Education (DfE, September 2026) – often abbreviated as KCSIE. All members of staff must also read this policy and the Staff Code of Conduct.
- All members of staff must know who the trained DSL and Deputy DSLs are.
- All concerns of a safeguarding or child protection nature must be treated in the utmost confidence.
- Where there is a safeguarding concern, the Governing Body and SMT should always ensure that a boy's wishes and feelings are taken into account when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously and that they can safely express their views.
- The DSL or a Deputy DSL must report all concerns in line with local authority thresholds to Children's Services.
- Allegations of abuse in relation to adults must be dealt with in line with the associated policy.

INTRODUCTION

Harrow School recognises that it has a duty to ensure that safeguarding permeates all activities and functions and expects all members of staff, volunteers and other third parties to share its commitment to safeguarding and promoting the welfare of children. Adults at Harrow take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We always aim to act in the best interests of the child. This policy therefore complements and supports a range of other policies including Code of Conduct with Specific Regard to Safeguarding, Complaints, Behaviour (Existing Customs), Expeditions, Health and Safety, Visitors Policy, The Use of Reasonable Force, Alcohol and Drugs. When the School undertakes development or planning of any kind, it will give careful consideration to safeguarding aspects.

The School's safeguarding arrangements are Inspected by the Independent Schools Inspectorate (ISI) under the "Framework for the inspection of association independent schools, including residential (boarding) schools and registered early years settings" and the National Minimum Standards for Boarding Schools 2022 for compliance purposes, and under the judgements for the quality of pupils' personal development in Educational Quality Inspections. The effectiveness of governance, leadership and management is judged in both compliance and quality inspections.

THE SCHOOL'S CORE SAFEGUARDING PRINCIPLES

- The School's responsibility to safeguard and promote children's welfare is paramount.
- It is everyone's responsibility to safeguard children. Everyone who comes into contact with children and their families has a role to play in keeping children safe.
- Safer children make more successful learners.
- Representatives of the whole School community will be involved in the development and review of the Safeguarding Policy.
- The School's Safeguarding Policy will be reviewed at least annually by the Director of Safeguarding and by the Governors, unless an incident, new legislation or guidance suggest the need for an interim review.

TERMINOLOGY

Safeguarding and **promoting the welfare of children** refers to the process of providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment (whether that is within or outside the home, including online), preventing the impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

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

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. This includes supply staff, trainee teachers, peripatetic staff, contractors' employees working regularly on the School's premises and volunteers working with children.

CONTEXTUAL SAFEGUARDING

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

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

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

ADULTIFICATION AND PARENTIFICATION

Harrow School is committed in its approach to safeguarding in combatting and supporting boys who are subject to adultification and parentification.

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

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

SAFEGUARDING STATEMENT

Harrow School fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all the boys. The School endeavours to provide a safe and welcoming environment where boys are respected and valued. Members of staff should be alert to the signs of abuse and neglect and follow procedures to ensure that boys receive effective support, protection and justice.

The procedures contained in this policy apply to all members of staff, Governors, volunteers and visitors and are consistent with those of the Harrow Safeguarding Children Partnership (HSCP) (https://harrowsafeguarding.org.uk/scp/guidance-for-practitioners/)

SAFEGUARDING IN HARROW SCHOOL

This includes:

- ensuring boys' health and safety;
- referring concerns or allegations about a child to the local authority promptly;
- preventing bullying;
- preventing all forms of abuse;
- preventing harassment and discrimination;
- using physical intervention where necessary;
- meeting the needs of pupils with medical conditions;
- having an awareness of the link between mental health and safeguarding;
- providing first aid and medical support;
- preventing alcohol, drug and substance misuse;
- ensuring educational visits are conducted appropriately;
- providing intimate care where necessary;
- monitoring online safety;
- considering issues specific to the local area (for example road safety or gang activity); and
- providing School security.

GUIDING PRINCIPLES

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

POLICY AIMS

- To provide all members of staff with the necessary information to enable them to meet their safeguarding and 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; and
- To contribute to the School's portfolio of safeguarding policies.

THE SCHOOL'S COMMITMENT

The School adopts an open and accepting attitude towards boys as part of its responsibility for pastoral care. We hope that boys and parents will feel free to talk about any concerns and see the School as a safe place when there are difficulties. Boys' worries and fears will be taken seriously. Boys are encouraged to seek help from members of staff.

Harrow School will therefore:

- establish and maintain an ethos where boys feel secure, are encouraged to talk, and are listened to;
- ensure that boys know that there are adults in the School whom they can approach if they are worried or are in difficulty;
- include in the curriculum, activities and opportunities that equip boys with the skills needed to stay safe from abuse and which will develop resilience and realistic attitudes to the responsibilities of adult life;
- ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies;
- operate safer recruitment procedures and make sure that all appropriate checks are carried out on new members of staff and volunteers who will work with the boys; and
- ensure that all members of staff are aware of how and when to act on concerns that they have and work in a safe and appropriate manner at all times.

CONFIDENTIALITY

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

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

SAFEGUARDING LEGISLATION AND GUIDANCE

- Section 94 of the Education and Skills Act 2008 requires the Secretary of State to prescribe standards for independent educational institutions to safeguard the welfare, health and safety of children. The relevant standards are set out in the Education (Independent School Standards) Regulations 2014 (the ISS Regulations 2014).
- Keeping Children Safe in Education (KCSIE) (DfE, September 2026) is statutory guidance issued under Section 175 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014. The guidance is applicable to all schools in England. Schools and colleges must have regard to it when carrying out their duties to safeguard and promote the welfare of

children. This means that they should comply with it unless exceptional circumstances arise. The document contains information on what schools and colleges should do and sets out the legal duties with which schools and colleges must comply in order to keep children safe. It should be read alongside Working Together to Safeguard Children (DfE, 2026) and department advice.

- Under the Equality Act 2010 schools must not unlawfully discriminate against pupils because of their protected characteristics. The School carefully considers how it supports pupils with particular protected characteristics. Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with certain protected characteristics in order to meet their specific need. There is also a duty to make reasonable adjustments for disabled children and young people.
- Being subjected to harassment, violence and or abuse, may breach a pupil's rights, as set out in the Human Rights Act 1998.
- All members of staff must read in full, as a minimum, Part One of Keeping Children Safe in Education (KCSIE) (DfE, September 2026). School leaders and those members of staff who work directly with children are additionally required to read Annex A (Further information). All members of staff will be required to electronically confirm they have completed the required reading and also complete a short assessment to demonstrate their understanding of the content.
- The Teachers' Standards 2012 states that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- The statutory guidance Working Together to Safeguard Children (DfE, 2026) covers the legislative requirements and expectations on individual services to safeguard and promote the welfare of children. The guidance applies to all local authorities, Integrated Care Boards (ICBs), and police, as well as all other organisations and agencies whose work brings them into contact with children and families. It applies, in its entirety, to all schools. It applies to all children up to the age of 18 years whether living with their families, in state care, or living independently.
- What to do if you are worried a child is being abused –- Advice for practitioners (DfE, March 2015) provides more information on understanding and identifying abuse and neglect. Examples of potential signs of abuse and neglect are highlighted throughout the advice. The NSPCC website also provides useful additional information on types of abuse and what to look for.
- The Prevent Duty: from 1 July 2015 all schools became subject to a duty under Section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have 'due regard to the need to prevent people from being drawn into terrorism'. The School recognises that safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm. A Prevent e-learning package was made available in March 2016 and all-staff training on the Prevent Duty was provided in September 2022.
- Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium, February 2022), while not safeguarding guidance, provides advice for all members of staff working with children regarding illegal, unsafe, unprofessional or unwise behaviour and advises members of staff to monitor their own standards and practice.
- In the light of Everyone's Invited and the subsequent Review of sexual abuse in schools and colleges (OFSTED, June 2021), KCSIE 2026 details what sexual violence and harassment is, schools' and colleges' legal responsibilities, a whole-school approach to safeguarding and child protection, and how to respond to reports of sexual violence and sexual harassment.
- Criminal Exploitation of Children and Vulnerable Adults guidance outlines what county lines (and associated criminal exploitation) is, signs to look for in potential victims, and what to do about it. The document is a supplement to existing safeguarding policies, to help identify and protect those exploited through this criminal activity.
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers is advice for practitioners and senior managers. It helps them decide when and how to share personal information legally and professionally. It might also be helpful for practitioners working with adults who are responsible for children who may be in need.

CHILD PROTECTION PROCEDURES

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

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

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

The School will act on identified concerns and provide early help or Family Help to prevent concerns from escalating. This includes accessing support from universal services and community based early-help or the more targeted early help level of Family Help (which brings together more targeted early help and support services delivered under section 17 of the Children Act 1989 (Children in Need) support). Any child may benefit from early help or Family Help, but members of staff should be particularly alert to the potential need for early help for children who may be deemed particularly vulnerable because of the reasons outlined in paragraph 18 of Keeping Children Safe in Education (KCSIE) (DfE, September 2026).

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

RECOGNISING ABUSE

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

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

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused or exploited in a family or in an institutional or extra-familial context 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. This includes in teenage relationships, or under the guise of 'honour' based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

There are four principal categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect. The definitions are taken from Keeping Children Safe in Education (KCSIE) (DfE, September 2026).

PHYSICAL ABUSE

A form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Children can be subject to serious violence involving assault and the use of weapons. This violence can be organised or based on gang conflict. This presents a serious threat to wellbeing and disrupts education

EMOTIONAL ABUSE

The persistent emotional or psychological maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include 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 them. It may include verbal abuse (e.g. criticism, belittling or name-calling). It may

feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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, rape (including assault by penetration of the vagina, anus or mouth and 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 in family settings, in institutional settings and online, and technology can be used to facilitate offline abuse. Child sexual abuse material available online may have been generated in a family environment. Online abuse can also take the form of cyber-grooming or self-generated sexual content under coercion. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all members of staff should be aware of it and of the School's policy and procedures for dealing with it. A child or any age or gender can be a victim of sexual abuse.

Misogyny can help to create a culture in which sexual abuse of girls becomes normalised. It is also important to recognise the escalatory nature of misogyny and the benefits of early identification to support the risk of harmful sexual behaviour. It is therefore important for members of staff to be aware that, even if there are no reports of harmful sexual behaviour, it does not mean it is not happening.

NEGLECT

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result 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.

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 to the Director of Safeguarding, a Deputy DSL, the boy's House Master, a line manager, or via CPOMS. It is not their responsibility to investigate or decide whether a boy has been abused. A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or others' safety;
- self-harm;

- show other signs of deterioration in mental health;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become uninterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about, drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age; or
- be showing signs of being drawn into anti-social or criminal behaviour including gang involvement and association with organised criminal groups.

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

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

All members of staff should have awareness of safeguarding issues in the broad. In particular, they should know that behaviours linked to drug taking, alcohol abuse, unexplained and/or persistent absences from education, serious violence, radicalisation and consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI (e.g. deepfakes) put children in danger: Sharing nudes and semi-nudes (UKCIS, March 2024)

CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. It can be committed by parents, or other family members; by people known but not related to the victim; and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns among children and parents, for example people loitering nearby or unknown adults engaging children in conversation. Incidents of this type should be reported either direct to the police on 999 or to Harrow School Security on 07766 688597.

Boys are given advice on how to keep themselves safe as part of the PSHEE Education programme.

CHILD CRIMINAL EXPLOITATION, INCLUDING COUNTY LINES

Child criminal exploitation (CCE) is where an individual or group takes advantage of an imbalance in power to coerce, control, manipulate or deceive a child into any form of criminal activity in 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. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. The victim may have been criminally exploited even if the activity appears consensual. Harrow is aware of the reality that the experience of girls who are criminally exploited can be very different from that of boys. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

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

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional wellbeing;
- children who misuse drugs and 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

Child sexual exploitation (CSE) is a form of sexual abuse. It occurs when an individual or an organised network takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in 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. The victim may have been sexually exploited even if the sexual activity appears consensual.

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

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. It can affect any child, including 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. Some children may not realise they are being exploited, for example they believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion.

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

- children who appear with unexplained gifts, money or new possessions;
- children who have associations with gangs and/or are isolated from their peer networks;
- children who associate with other young people involved in exploitation;
- children who have older girlfriends or boyfriends or controlling individuals;
- children who suffer from sexually transmitted infections or become pregnant, display evidence of physical or sexual abuse or who behave in an excessively sexualised manner for their age;
- children who suffer from changes in emotional wellbeing or display signs of self-harm;
- children who misuse drugs or alcohol;
- children who frequent areas known for sex work;
- children who display increasing secretiveness or concerning use of the internet;

- children who receive excessive texts/phone calls;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

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

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

CHILDREN AND THE COURT SYSTEM

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

CHILDREN WHO HAVE A SOCIAL WORKER

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

CHILDREN WITH FAMILY MEMBERS IN PRISON

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

DOMESTIC ABUSE

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

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse (behaviours that interfere with an individual's ability to acquire, use and maintain economic resources such as money, transportation and utilities); and
- psychological, emotional or other abuse.

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

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

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

Operation Encompass
Harrow School is a part of Operation Encompass.
Operation Encompass operates in every police force in England and Wales, the Isle of Man, Jersey, Guernsey, Scotland, Northern Ireland and Gibraltar. It is a national police and education early intervention safeguarding partnership which supports children who experience domestic abuse. 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 DSL) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. We recognise the immediate and long-term impact of domestic abuse on a child's development and emotional wellbeing. All members of staff will remain vigilant to identify the signs so that early help or Family Help and protective action can be instigated where appropriate. The DSL and Lead Deputy DSL have completed the key adult training. The Operation Encompass notification will be stored in line with all other confidential safeguarding and child protection information.

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

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

MENTAL HEALTH
All members of staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a boy has suffered, or is at risk of suffering, abuse, neglect or exploitation.

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

Only appropriately trained professionals should attempt to diagnose mental health conditions. Other members of staff are, however, well placed to observe boys day to day and to identify those whose behaviour suggests that they may be experiencing or be at risk of developing a mental health problem. Any member of staff who has a concern about the mental health of a boy that might also be a safeguarding concern should speak to the Director of Safeguarding or a Deputy DSL straight away. More guidance can be found in the Mental health and behaviour in schools (DfE 2018). Detailed information can also be found in the School's Mental Health and Wellbeing Policy.

MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM
Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. 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, Further information on the indicators that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance (Home Office 2025).

CHILD-ON-CHILD ABUSE (INCLUDING HARASSMENT AND VIOLENCE)

Child-on-child abuse can occur both online and offline (including technology-assisted abuse) and may take place inside or outside school. Harrow School has a zero-tolerance and whole-School approach

to child-on-child abuse. Consequently, it seeks to educate all governors, members of staff, volunteers, parents and boys about the issue and to follow local criteria for action and local protocols for assessment.

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

All members of staff should:

- be aware that children can abuse other children at any age;
- be aware that this can happen both inside and outside School and online, sometimes involving pupils at other schools;
- be aware that it is more likely that girls will be victims and boys perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously;
- recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports;
- understand that even if there are no reports in their school it does not mean it is not happening, it may just be that it is not being reported;
- speak to the Director of Safeguarding (or a Deputy DSL) straight away if they have **any** concerns regarding potential child-on-child abuse;
- understand the importance of challenging inappropriate behaviours between children as such behaviours can actually be abusive in nature;
- avoid downplaying certain behaviours, for example dismissing sexual harrassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for boys and, in worst-case scenarios, a culture that normalises abuse, leading to boys accepting it as normal and not coming forward to report it;
- be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator; and
- be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harrassment. Nor should a victim ever be made to feel ashamed for making a report.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- physical abuse and harm such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- serious physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, sexual violence and sexual harassment – which may be driven by misogyny or other discriminatory attitudes
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence) – see separate section 'Sexual violence and sexual harrassment between children';
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harrassment, which may be standalone or part of a broader pattern or abuse – see separate section 'Sexual violence and sexual harrassment between children';
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

- online sexual harassment which might include consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI (e.g. deepfakes) – further information and guidance can be found in Sharing nudes and semi-nudes (UKCIS, March 2024). The School will follow guidance and procedures in this document when dealing with such incidents;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing-type violence and rituals (this could include activities involving harrassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

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

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

Members of staff will refer such abuse to an external agency where there is a risk of significant harm. The Director of Safeguarding will refer serious allegations of child-on-child abuse to Children's Services.

Boys are able freely to report instances of child-on-child abuse through any of the full range of pastoral support mechanisms in place at the School, including (but not limited to) House Masters, Assistant House Masters, Matrons, Chaplains, medical staff, counselling staff and senior boys. All such reports will be taken seriously, investigated and recorded centrally using the School's pastoral management systems.

The School will work to put in place appropriate support for all those involved – victims, perpetrators and any other boys affected – and this support will be managed via the Pastoral Support Committee, chaired by the Director of Safeguarding.

ALLEGATIONS AGAINST PUPILS

A boy 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.

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

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 boy or boys accused of abuse.

If it is necessary for a boy 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 boy is supported during the interview by an appropriate adult.

SEND

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

- assumptions that indicators of possibile abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges; and
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

At Harrow, we provide additional pastoral support and attention for these boys, along with ensuring any appropriate support for communication is in place. The Director of Safeguarding liaises closely and directly with the Head of Learning Skills regarding all boys with SEND at Harrow. Resources and guidance can be found on the NSPCC website: Safeguarding children with special educational needs and disabilities (SEND) and Safeguarding/deaf and disabled children and young people.

SERIOUS VIOLENCE

Members of staff should:

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

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

The School adopts a zero-tolerance approach to sexual violence and sexual harassment. It adheres to the guidance in Keeping Children Safe in Education (KCSIE) (DfE, September 2026) and recognises that:

- schools must also protect any adult students (i.e. aged 18 and above) and engage with adult social care, support services and the police as required;
- members of staff need to choose terminology carefully (for example the use of 'victim' and 'perpetrator') on a case by case basis;
- a boy abusing another boy may have been abused himself and may also need support;
- sexual violence and sexual harassment can be driven by wider societal factors such as everyday sexist stereotypes and everyday sexist language;
- sexual violence and sexual harrassment can happen both in and out of School as well as online, and often occurs in a mixture of environments;

- it is important to explain to children they will be taken seriously and that the law is in place to protect rather than criminalise them;
- schools should understand intra-familial harms and put in place any necessary support for siblings following incidents;
- the scale of the problem nationally is considerable and has probably been underestimated;
- sexual assault can result in a range of health needs, both mental and physical, including unwanted pregnancy;
- boys might not find it easy to talk about their abuse verbally so might not tell a member of staff about abuse; it may be that a member of staff might overhear a conversation regarding the abuse or a boy's behaviour changes etc.;
- the definition of 'consent', including reference to an individual having the 'freedom and capacity to choose', needs to be included in the School's curriculum;
- all members of staff, particularly the Director of Safeguarding, need to adopt a contextual safeguarding approach to incidents, which involves considering the context in which incidents or behaviours occur;
- assessments of boys need to consider wider environmental factors present in a child's life that are a threat to their safety or welfare;
- information sharing and effective multi-agency working are important, especially where boys involved in allegations of sexual violence or sexual harassment attended two or more different schools or colleges;
- in cases where police will not take further action, the School will continue to engage with specialist support for the victim (and perhaps also for the perpetrator), as required;
- issues and actions are regularly reviewed in order to ascertain patterns of behaviour and to look for further ways to improve procedures and practices; and
- how a School responds to an incident will impact future victims of sexual violence or sexual harrassment.

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk assessment should consider the factors in Keeping Children Safe in Education (KCSIE) (DfE, September 2026) and be kept under review.

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

- Managing internally: in some cases of sexual harassment (such as one-off incidents) the School may manage the incident internally;
- Early help/ Family Help: this is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation. Please refer to the section "Family Help/Early Help For Children Who May Be Particularly Vulnerable";
- Referrals to Children's Services: in cases where a boy has been harmed, is at risk of harm, or is in immediate danger, a referral should be made to Children's Services;
- Reporting to police: in cases where rape, assault by penetration or sexual assault is reported, the starting point is that this should be passed on to the police. The School will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other boys in the School. The Director of Safeguarding will work closely with the police to ensure that the School's actions do not jeopardise the police investigation. If a boy is convicted or cautioned, the School will update its risk assessment and consider suitable action through its Behaviour Policy and Existing Customs.

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

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

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

The management of children and young people with sexually harmful behaviour is complex and the School will follow guidance set out in Keeping Children Safe in Education (KCSIE) (DfE, September 2026). The School will work with other relevant agencies to maintain the safety of the whole School community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Members of staff who become concerned about a boy's sexual behaviour should speak to the Director of Safeguarding as soon as possible.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour (Keeping Children Safe in Education (DfE, September 2026),

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

BULLYING

The School's Counter-Bullying Policy should be read alongside this document.

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

All incidences of bullying, including cyber-bullying and prejudice-based and discriminatory bullying, should be reported via CPOMS (Child Protection Online Monitoring System). The School's Counter-Bullying Policy is reviewed annually and published to all boys and members of staff at the start of each academic year. The Living Together Survey, which is completed by all boys, offers valuable insight into trends in bullying-type behaviour and provides a means of monitoring the effectiveness of policy, procedures and recent pastoral initiatives. The subject of bullying is addressed at regular intervals via the PSHE Education Programme for all year groups, within Flocks in Houses and in the Peer Mentoring programme, which is introduced in the Lower Sixth. If the bullying-type behaviour is particularly serious, or the counter-bullying procedures are deemed ineffective, the Senior Deputy Head and the Director of Safeguarding will consider implementing child protection procedures.

CONCERNS ABOUT A BOY'S WELFARE

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

Members of staff should report their concerns to the boy's House Master or a member of the safeguarding team. Boys complete a weekly well-being assessment via the Pulse online well-being

monitoring system. Data from this should also be analysed. If the boy starts to reveal that he is being (or has been) harmed, members of staff should follow the advice below. Following an initial conversation with the boy, if the member of staff remains concerned, he/she should discuss their concerns with the Director of Safeguarding or with one of the Deputy DSLs.

IF A BOY MAKES A DISCLOSURE

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

During such conversations with the boys, members of staff will:

- allow the boy to speak freely;
- remain calm and avoid overreaction;
- offer reassurance and general words of comfort (rather than physical touch);
- not be afraid of pauses or silences;
- not ask investigative or leading questions;
- explain at an appropriate time that, in order to help, the information must be passed on to relevant people in positions of responsibility;
- not reprimand the boy for failing to disclose earlier;
- establish next steps (agree to go to see his House Master or the Director of Safeguarding) but let the boy know that someone will come to see them before the end of the day;
- report verbally to the Director of Safeguarding, even if the boy has promised to do it by himself;
- write up the conversation as soon as possible as a record of concern, ideally using CPOMS; and
- seek support, if distressed.

NOTIFYING PARENTS

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

REFERRAL TO POLICE AND HARROW CHILDREN'S SERVICES

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

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

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

The Director of Safeguarding will make a referral to Children's Services MASH if it is believed that a boy is 'suffering or is at risk of suffering significant harm'. The boy (subject to his 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 boy or issues of confidentiality pertain. First response will be by telephone to Harrow Children's Services MASH team and then followed with written confirmation on the appropriate Inter-Agency Referral Form within 24 hours. There may be need for a subsequent referral to the Children's Services local to the boy's home, if his family lives outside the Harrow area.

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

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

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

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

COUNTY LINES

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

Children can be targeted and recruited into county lines in a number of locations including schools. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

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

- goes missing and is found in areas away from home;
- has been involved with serious violence, either as a victim or as a perpetrator;
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs ;
- are exposed to techniques such as "plugging", where drugs are concealed internally to avoid detection;
- is found in accommodation with which they have no obvious connection, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters; or
- have their bank accounts used to facilitate drug dealing.

SELF-GENERATED INTIMATE IMAGES AND/OR VIDEOS

This refers to the consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI (e.g. deepfakes). Any incidents of this nature should immediately be reported to the Director of Safeguarding who will follow the guidance set out in

Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, March 2024).

AI-generated intimate images can amount to child-on-child abuse and may constitute a safeguarding concern even where no original image existed.

Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes', whether or not the child depicted created or shared the image themselves.

The School is alert to the safeguarding risks arising from artificial intelligence in this context, including the generation of deepfake intimate images using AI tools and the use of AI to create child sexual abuse material. Making and sharing AI-generated intimate images of those aged under 18 is a criminal offence. Members of staff should be aware that incidents involving AI-generated imagery should be treated with the same seriousness as those involving real images and referred to the DSL immediately.

It should be noted that all incidents of sharing or making nudes should be treated as a safeguarding concern and require a safeguarding response. That response should be proportionate to the relevant circumstances, including age, development, any element of coercion, exploitation or vulnerability.

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

LOOKED AFTER CHILDREN

A looked after child is a child who is looked after by a local authority, is subject to a care order or who is voluntarily accommodated by a local authority, commonly as a result of abuse or neglect. Where a member of staff 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 Director of Safeguarding takes the lead on all looked after children and will hold details of and liaise with the child's social worker and the Virtual School Headteacher.

PRIVATE FOSTERING

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

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

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

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

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

Any member of staff should notify the Director of Safeguarding when they become aware of private fostering arrangements. The Director of Safeguarding will speak to the family of the boy involved to check that they are aware of their duty to inform the local authority. The School itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the School, we will take steps to verify the relationship of the adults to the boy who is being registered.

CONFIDENTIALITY AND SHARING INFORMATION

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

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

Members of staff should only discuss concerns with the Director of Safeguarding or a Deputy DSL, the Head Master, Senior Deputy Head or Chair of Governors (depending on whom the subject of the concern is). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following a number of highly publicised cases where senior leaders in schools failed to act upon concerns raised by staff, Keeping Children Safe in Education (KCSIE) (DfE, September 2026) emphasises that any member of staff can make a referral to Harrow Children's Services if they are concerned about a child. If anyone other than the Director of Safeguarding makes the referral, he/she should inform the Director of Safeguarding as soon as possible.

Child protection information will be stored and handled in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025. Information is processed fairly and lawfully and 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 and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. The School's ICT Acceptable Use Policy will be adhered to, and every effort will be made to prevent unauthorised access. Records should include:

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

Child protection records will consist of sensitive personal data and will be subject to special rules under the Data Protection Act 1998, the UK GDPR and the Data (Use and Access) Act 2025. This means that boys and parents do not have an automatic right to see them. If any member of staff receives a request from a boy or parent to see child protection records, they will refer the request to the Head Master.

The Data Protection Act 1998, the UK GDPR and the Data (Use and Access) Act 2025 do not prevent any member of staff from sharing information with relevant agencies, where that information may help to protect a child. When boys move to new schools, their child protection records will be transferred securely, and a confirmation of receipt requested, within 5 days of the start of a new term or, if the transfer occurs mid-year, within 5 days.

REPORTING DIRECTLY TO CHILD PROTECTION AGENCIES

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

- the situation is an emergency and the Director of Safeguarding, the Deputy DSLs, the Head Master and the Chair of Governors are all unavailable;
- they are convinced that a direct report is the only way to ensure a boy's safety; or
- for any other reason they make a judgement that direct referral is in the best interests of the boy.

CHILDREN AND FAMILIES REQUIRING EARLY HELP, FAMILY HELP AND ADDITIONAL SUPPORT

Members of staff should be able to identify boys in need of Family Help and/or early help support and to distinguish these from boys in immediate danger or at risk of significant harm. As distinct from cases where a boy has suffered or is likely to suffer significant harm, where boys and families need support from agencies beyond our School, we will respond according to the Harrow Safeguarding Children Partnership (HSCP) procedures to ensure there is an appropriate multi-agency assessment and co-ordinated package of support. Family Help is intended to provide children and families with the right support at the earliest opportunity and to prevent needs from escalating. . The School will work closely with local safeguarding partners and other relevant agencies to identify and respond to emerging needs, and may contribute to Family Help assessments, plans and reviews where appropriate. We will liaise closely with the HSCP, including acting as lead professional to co-ordinate support, with the agreement of the boy and his parent/carer(s), and in accordance with local procedures. This will include working with the three safeguarding partners: the HSCP, Integrated Care Board (ICB) and the police. It is to be hoped that, in each case, Family Help and/or early help interventions or additional services will improve the welfare of the boy. However, each case will be kept under review and consideration given to a formal referral to Children's Services if the boy's situation does not appear to be improving or where there is reasonable cause to suspect that the child is suffering, or is likely to suffer, significant harm.

PREVENT DUTY, HONOUR-BASED VIOLENCE AND FORCED MARRIAGE

THE PREVENT DUTY

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

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

Terrorism refers to an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

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

VISITING SPEAKERS

Visiting speakers regularly come into the School to address boys. Harrow welcomes different insights and perspectives from visitors to the School but is mindful of the Prevent duty. The School will

consider whether the views being expressed, or likely to be expressed, constitute views that are used to encourage people into participating in or supporting terrorism, or are shared by terrorist groups. The School will do its own due diligence to understand any risks around a particular speaker, including, where appropriate, requesting that visiting speakers provide copies of materials they will be using in advance of their visit.

Visiting speakers will, be briefed with regard to our expectations of what is suitable. Speakers will be reminded not to encourage any form of extremism or radicalisation. Speakers will be reminded that pupils are impressionable and that they need to be respectful of the School's support for British values.

Masters arranging such talks will speak with the Senior Deputy Head and/or the Director of Safeguarding if they have any reservations about the appropriateness of a speaker. A risk assessment may be drawn up, as appropriate.

SIGNS OF VULNERABILITY

Radicalisation is a personal and individual process, which will look different from person to person. There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are number of signs that together increase the risk. Signs of vulnerability include:

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

RECOGNISING EXTREMISM

Early indicators of radicalisation or extremism may include:

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

- verbalising anti-Western or anti-British views; and
- advocating violence towards others.

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

HONOUR-BASED ABUSE

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

Where any member of staff is concerned that a boy might be at risk of HBA, they must contact the Director of Safeguarding as a matter of urgency.

FEMALE GENITAL MUTILATION

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

Members of staff recognise the possibility that a pupil may disclose information relating to a sibling or close friend who has suffered abuse in the form of honour-based or faith-based abuse, including FGM. Members of staff are alert to the mandatory reporting requirement for suspected cases of FGM, which became a statutory duty from October 2015. Any teaching staff member or regulated healthcare professional who, in the course of their professional duties, discovers that an act of FGM appears to have been carried out on a person under the age of 18 is legally required to report this directly to the police. This duty applies to the individual professional and should not be delegated to the Director of Safeguarding or another member of staff. Any other member of staff who is concerned that a boy may have knowledge of someone who has suffered, or might be vulnerable to FGM should contact the Director of Safeguarding (or one of the Deputy DSLs) immediately.

FORCED MARRIAGE

Another component to honour-based or faith-based abuse is forced marriage; forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of free and full consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found at paragraph 2.11 of the Multi-Agency Guidelines: Handling cases of forced marriage 2023. Members of staff can also contact the Forced Marriage Unit if they need advice or information: contact 020 7008 0151 or email fmu@fco.gov.uk.

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

ROLES AND RESPONSIBILITIES

PROFESSIONAL EXPECTATIONS

Everyone who encounters our boys and their families has a role to play in safeguarding children. We place a high priority on identifying concerns early and provide help for the boys to prevent concerns from escalating. We do this because we are aware that we play a vital role in the wider safeguarding system for children. Together with our colleagues in the police, health and other children's services,

we promote the welfare of children and protect them from harm. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The School recognises it has clear powers to share, hold and use information for these purposes.

Members of teaching staff are aware that Teachers' Standards 2011 states that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. These standards also apply to trainees, inductees and newly qualified teachers and we fully adhere to these standards, applying the School's disciplinary procedures, where appropriate, in cases of misconduct.

THE DIRECTOR OF SAFEGUARDING (WHO IS THE DESIGNATED SAFEGUARDING LEAD (DSL):

- is responsible for safeguarding and child protection at Harrow School, including online safety and understanding the filtering and monitoring systems and processes in place;
- has a job description consistent with Annex C of Keeping Children Safe in Education (KCSIE) (DfE, September 2026) and ensures all members of staff are aware of his role;
- has the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other members of staff;
- is a member of the Senior Management Team, can delegate activities to appropriately trained deputies, but cannot delegate the ultimate lead responsibility for child protection;
- receives child protection training every two years in addition to an update at least yearly;
- receives regular safeguarding supervision;
- manages referrals from School staff or any others from outside the School;
- acts as a source of support and expertise to the School community;
- encourages a culture of listening to boys and taking account of their wishes and feelings;
- is alert to the specific needs of children in need or those with Special Educational Needs, those with relevant health conditions and young carers;
- has a working knowledge of Harrow Safeguarding Children Partnership's procedures;
- has been trained in the Prevent Duty and how to make referrals to Harrow's MASH (Multi-Agency Safeguarding Hub) or Channel;
- has an understanding of locally agreed processes for providing early help and/or Family Help intervention;
- keeps detailed and accurate written records of all concerns, discussions and decisions made including the reationale for those decisions (including instances where referrals were or were not made to another agency) and ensuring that such records are stored securely and flagged on, but kept separate from, the boy's general file;
- immediately refers cases of suspected abuse to Harrow Children's Services or the police as appropriate;
- when boys leave the School, ensures the child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file;
- communicates with our feeder schools and requests child protection files for boys joining Harrow, and where there are significant issues or concerns, the Director of Safeguarding will have a direct conversation with the receiving school's DSL;
- where a boy transfers from another school to the School and the Director of Safeguarding is alerted to safeguarding concerns or issues, they will assess the risk and put in place a safety and support plan or risk assessment for the transferring pupil and ensure key members of staff such as SENCOs are aware as required;.
- attends and/or contributes to child protection conferences;
- co-ordinates the School's contribution to child protection plans;

- develops effective links with relevant statutory and voluntary agencies including the Harrow Safeguarding Children Partnership;
- ensures that all members of staff confirm using iProtectu that they have read and understood the required sections of Keeping Children Safe in Education (KCSIE) (DfE, September 2026) and this Safeguarding Policy and that mechanisms are in place to help members of staff understand and discharge their responsibilities thereunder;
- ensures that the Safeguarding Policy is annually reviewed by the Governing Body;
- liaises with the Nominated Governor and the Head Master as appropriate;
- ensures that a record of staff attendance at child protection training is kept;
- makes the Safeguarding Policy available publicly, on the School's website or by other means;
- ensures parents are aware of the School's role in safeguarding and that referrals about suspected abuse and neglect may be made;
- in the Head Master's absence, ensures cases concerning a member of staff are referred appropriately to the Local Authority Designated Officer (LADO) and/or the DBS, and submits a termly report to the Governing Body about how the School's duties have been carried out. Any reported weaknesses will be rectified by the Director of Safeguarding without delay; and
- during term time will be in School during normal school hours or, if not, will ensure that one of the Deputy DSLs is in School. During term time, outside normal school hours, the Director of Safeguarding and Deputy DSLs will be available by phone (see contact details at the front of this policy).
- The School has a dedicated safeguarding email address, which is monitored by designated members of the safeguarding team who work both during and outside of term time. This enables safeguarding matters, including reports, concerns and disclosures, to be triaged and responded to promptly, with information handled confidentially and shared only with those who need to know.
- The Corporation Safeguarding Manager will also provide support when the DSL is not available and during school holidays.

THE DEPUTY DESIGNATED SAFEGUARDING LEADS (DEPUTY DSLS):

- are appropriately trained in safeguarding every two years and in addition receive an update at least annually. In the absence of the Director of Safeguarding carry out those functions necessary to ensure the on-going safety and protection of the boys;
- have the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other members of staff;
- should have an understanding of locally agreed processes for providing early help and/ or Family Help intervention;
- in the event of the long-term absence of the Director of Safeguarding, the Deputy DSLs will assume all the functions as for the Director of Safeguarding above; and
- has access to suitable safeguarding supervision

THE GOVERNING BODY:

- will meet its duties as set out in Part Two of Keeping Children Safe in Education (KCSIE) (DfE, September 2026) will ensure that all Governors and Trustees receive appropriate safeguarding and child protection (including online) training at induction and at regular intervals.
- will conduct a review of safeguarding and child protection policies and the effectiveness of their implementation at least annually;
- will appoint a Governor for safeguarding who will undertake training in inter-agency working, in addition to safeguarding training;
- will ensure that the School has a Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (Deputy DSLs), whose roles are explicit in the role holder's job description;

- will ensure that the School has a safeguarding policy and safeguarding procedures, including a Staff Code of Conduct, that are consistent with HSCP and statutory requirements, and that these are reviewed annually and then signed off by the Chair of Governors;
- will ensure that the School's Safeguarding Policy and procedures are made available publicly on the School's website or by other means;
- will ensure that the School has procedures for dealing with concerns that meet the harm threshold or allegations of abuse made against members of staff, including concerns or allegations made against the Head Master and concerns or allegations against other children;
- will ensure that the School follows safer recruitment procedures that include statutory checks on staff suitability to work with children;
- will ensure that the School develops a training strategy that ensures all members of staff, including the Head Master, receive information about the School's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated (at least annually) in line with any requirements of the local safeguarding partnership;
- will ensure that the School makes all temporary staff and volunteers aware of the School's arrangements for child protection;
- will ensure that the School contributes to inter-agency working and plans;
- will ensure that the School provides a co-ordinated offer of early help and/or Family Help when additional needs of boys are identified;
- will ensure that the School considers how boys may be taught about safeguarding, including online, as part of a broad and balanced curriculum;
- will consider a whole-School approach to online safety, which will include a clear policy on the use of mobile technology in the School;
- will ensure that the School processes personal information fairly and lawfully keeps the information it hold safe and secure;
- will ensure that the School has appropriate IT filters and monitoring systems in place to limit boys' exposure to risk (informed in part by the risk assessment required by the Prevent Duty) without over-blocking or placing unreasonable restrictions upon what the boys can be taught;
- will regularly review the effectiveness of school filters and monitoring systems at least annually, and ensure that the leadership team and relevant members of staff are aware of and understand the systems in place, manage them effectively and know how to escalate concerns when identified;
- will review the filtering and monitoring standards set out by the Department of Education and discuss with IT staff and service providers what needs to be done to support the School in meeting this standard;
- will ensure the School uses communications with parents to reinforce the importance of children being safe online and ensure the School shares with parents what systems they have in place to filter and monitor online use, what they are asking children to do online, including the sites they will be asked to access and who from the School (if anyone) their child is going to be interacting with online; and
- will address and rectify without delay any deficiencies or weaknesses in the School's Safeguarding Policy and procedures, which are brought to the attention of the Governing Body.

The Governing Body nominates a member (normally the Chair) to be responsible for liaising with the local authority and other agencies on strategic issues of child protection, and in the event of an allegation being made or concerns being raised against the Head Master or a member of the Governing Body.

It is the responsibility of the Governing Body to ensure that the School's safeguarding, recruitment and managing allegations procedures are in accordance with the Independent Schools Standards Regulations, Boarding Schools National Minimum Standards and local safeguarding partnership and national guidance.

THE HEAD MASTER:

- ensures that the Safeguarding Policy and procedures are implemented and followed by all members of staff;
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the Director of Safeguarding and Deputy DSLs to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings;
- ensures that all members of staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures;
- ensures that boys are provided with opportunities throughout the curriculum and in PSHE Education to learn about safeguarding, including keeping themselves safe online;
- liaises with the Local Authority Designated Officer (LADO) where concerns meet the harm threshold or an allegation is made against a member of staff or of the Governing Body; and
- ensures referrals are made to the DBS and TRA as appropriate.

THE PASTORAL ADVISORY COMMITTEE

The Pastoral Advisory Committee (PAC) is chaired by the Deputy Head Pastoral and comprises the Senior Deputy Head, the Director of Safeguarding, the Deputy Head Academic , the Senior House Master, the chair of the Boys' Pastoral Committee, the Lead Chaplain, the School Psychologist, the Head of Learning Skills, the Head of PSHE Education, the School Doctor, the Lead Nurse in the Medical Centre, the Senior Matron, a representative of the House Masters, a representative of the Assistant House Masters, and a representative of the Tutors. The representatives of the House Masters, Assistant House Masters and Tutors rotate annually. The PAC meets twice a term to develop the School's pastoral strategy and advises the Head Master on matters of pastoral policy.

THE PASTORAL SUPPORT COMMITTEE

The Pastoral Support Committee (PSC) is chaired by the Director of Safeguarding and meets three times a week (across four teaching periods) to review and triage cases for further work as necessary. Casework meetings are led by members of the PSC and involve members of the relevant House teams working with individual boys to develop strategies to support them.

The PSC comprises the Director of Safeguarding, the Senior Deputy Head (Deputy DSL), the Deputy Head Pastoral (Deputy DSL), the Lead Deputy DSL, the two full-time School Chaplains, the Head of Learning Skills and the School Psychologist. They will review or raise safeguarding issues as part of their work. The PSC:

- will help to co-ordinate arrangements for the longer-term protection and support of each boy who has made allegations of abuse, or is alleged to have suffered from abuse, taking his wishes into account;
- will make arrangements, where feasible and appropriate, for any boy who has been the subject of abuse to receive necessary counselling and support by agreement with his parents;
- will support any boy who is subject to a Child Protection Plan; and
- will ensure, through the relevant House Master, that appropriate support and safeguards are in place together with a Care Plan.

THE IT SAFEGUARDING COMMITTEE

This meets to discuss all aspects of IT filtering and monitoring as well as regularly updating the School's Online Safety Policy. It meets once a term or as needed. It comprises of the Safeguarding Governor, the Director of Safeguarding, the Director of IT, the IT Service Desk Manager and two Deputy DSLs.

RESIDENTIAL BOARDING STAFF (HOUSE MASTERS, MATRONS AND ASSISTANT HOUSE MASTERS)

All residential staff, principally House Masters, Matrons and Assistant House Masters, will be trained to Designated Safeguarding Lead Level (formerly Level 3 Safeguarding) in multi-agency safeguarding procedures, including multi-agency working with HSCP.

Harrow recognises that, as a full-boarding School, House Masters, Assistant House Masters and Matrons are likely to be on the frontline in terms of safeguarding and child protection. House Masters, Assistant House Masters and Matrons will report all child protection and safeguarding concerns immediately to the Director of Safeguarding.

Harrow has a procedure for dealing with a lost, persistently absent or missing boy. A House Master, or a duty member of the boarding staff, is most likely to deal with such instances. The procedure is contained in the House Masters' and Masters' Handbooks.

SENIOR BOYS IN POSITIONS OF RESPONSIBILITY

Senior boys who hold positions of responsibility over other boys (for example School or House Monitors) will be briefed before they assume office on appropriate action to take should they have concerns of a safeguarding nature or receive any allegations of abuse. School Monitors will receive additional on-going support and training from members of the Pastoral Support Committee during the course of the academic year.

Peer Mentoring training for boys in the Lower Sixth takes place in the Autumn term in order to enhance awareness and empower senior boys in carrying out their pastoral responsibilities. Each Lower Sixth boy acts as a mentor to a Remove boy in his House. Upper Sixth boys act as mentors to Shell boys.

SCHOOL DOCTORS AND MEDICAL CENTRE STAFF

The Medical Centre will hold copies of Working Together to Safeguard Children (DfE, 2026) and Keeping Children Safe in Education (KCSIE) (DfE, September 2026) and have its own protocols for recognising and acting upon signs of child abuse. These will include RCN Safeguarding children and young people 2014.

Nurses will work in accordance with the Nursing & Midwifery Council's Code of Conduct. They will liaise closely with the School doctors, the Director of Safeguarding, and other members of the School's safeguarding team.

The School doctors will have their own legal and contractual obligations to report the same, either to the Head Master or, if necessary, to Harrow Children's Social Care in accordance with the London Safeguarding Children Board procedures. Medical Centre staff will be invited to participate in any School INSET concerned with the welfare and protection of boys.

GOOD PRACTICE GUIDELINES AND STAFF CODE OF CONDUCT

The School publishes professional guidelines in relevant handbooks alongside the Staff Code of Conduct with specific regard to Safeguarding to ensure that members of staff meet and maintain their responsibilities towards the boys. These include policies such as the Behaviour Policy (which includes an outline of the structures for rewards and sanctions), the Counter-bullying Policy, the Searching, Screening and Confiscation Policy, the Alcohol Policy, the Drugs Policy, the Smoking and Vaping Policy, and the Use of Reasonable Force Policy. It also includes guidance on one-to-one contact, dealing with homesickness, responding to a concern that a boy is missing etc.

Members of staff are expected to follow the guidance given in the document Working Together to Safeguard Children (DfE, 2026).

ABUSE OF TRUST

All members of staff are aware that inappropriate behaviour towards boys is unacceptable and that their conduct towards the boys must be beyond reproach.

In addition, members of staff should understand that, under the Sexual Offences Act 2003 (sections 16-21, it is an offence for a person over the age of 18 to have any kind of sexual relationship with a child under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a boy at Harrow would be a criminal offence, even if that child were over the age of consent or over the age of 18.

STAFF RESIDENTIAL ACCOMMODATION

The Boarding Schools National Minimum Standards make it clear that no boarders should have access to staff residential accommodation, other than in exceptional circumstances. They also make it clear that where this occurs, one-to-one situations with boarders should be avoided and another adult should always be present. Therefore, members of staff must not see boys in their own residence unless clear and prior approval has been given for a specific reason by the Senior Deputy Head. However, separate guidelines are in place for House Masters, Assistant House Masters and Matrons, who are resident within the boarding Houses and directly responsible for the boys' day-to-day welfare. Full details are contained within the Pupil Access to Staff Accommodation Policy. All members of staff must adhere to this policy.

EARLY HELP / FAMILY HELP FOR CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

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

To ensure that boys in the School receive equal protection including from universal services and community-based Early Help, or the targeted early help level of Family Help, special consideration will be given to a boy who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not he has a statutory education, health or care plan);
- has a mental health need;
- is a young carer at home during exeats and holidays;
- is an expectant parent or parent themselves
- shows signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county and / or serious violence, including knife crime;
- frequently misses school or goes missing from school, care or from home;
- has experienced multiple suspensions, or is at risk of being permanently excluded;
- has been repeatedly removed from the classroom, experienced multiple suspensions or at risk of being permanently excluded
- is misusing drugs or alcohol himself;
- is at risk of modern slavery, trafficking and/ or exploitation;

- is in a family circumstance presenting challenges for the boy, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to his family from care;
- has a parent or carer in custody or is affected by parental offending;
- shows early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child;
- is vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality; or who
- does not have English as a first language.

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

GENDER QUESTIONING CHILDREN

The School will respond to any request from a boy or his parent/carer relating to social transition in accordance with the relevant provisions of Keeping Children Safe in Education 2026. The School will not initiate action in relation to a boy's gender questioning. Where a boy raises a request for support with social transition, the School will consider his welfare and best interests, together with the impact on other boys, and will comply with its safeguarding, equality and human rights obligations. Any decision will be informed by the individual circumstances and may not necessarily accord with the boy's wishes. Members of staff should be aware of the potential vulnerabilities of boys who are questioning their gender, including the possibility of complex mental health and psychosocial needs, issues with interpersonal relationships and discriminatory bullying. Parents/carers will normally be involved in discussions about social transition as a matter of priority and their views will carry great weight and will be properly considered; however, in the rare circumstances where there is a concern that sharing information with parents/carers may place a boy at risk of harm, the Director of Safeguarding will be consulted and appropriate safeguarding advice sought. The School will seek advice from relevant professionals, including appropriate statutory agencies, where necessary.

ELECTIVE HOME EDUCATION

The School is aware that although many children have positive experiences of home education, for some children it means they are not in receipt of suitable education and are less visible to services that are there to keep them safe and supported. Where a parent or carer has expressed their intention to remove a boy from the School with a view to educating at home, the School will work with the LA and other key professionals to co-ordinate a meeting with parents or carers where possible to ensure the parents or carers have considered what is in the best interests of each boy, ideally before a decision is made.

MISSING AND PERSISTENTLY ABSENT BOYS

The School will comply with the statutory guidance Working together to improve school attendance (2026), and will follow its robust procedures for registration and attendance to ensure the safety of the boys and to carry out its duty of care. The School recognises that a child who has unexplainable and/ or persistent absences from education, particularly for prolonged periods, or a child going missing from education could be a potential indicator of abuse or neglect, including sexual abuse, sexual exploitation or criminal exploitation, particularly county lines. It may indicate mental health problems, risk of substance abuse or risk of travelling to conflict zones etc. The School has high expectations for the attendance and punctuality of all pupils, so it is important that members of teaching staff are aware of the School's Registration and Attendance policies and the Missing Boy Procedure.

It is important that the School's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them

becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Therefore, teaching members of staff will respond promptly to absences and follow the School's Missing Boy Procedures which are in accordance with the requirements of Keeping Children Safe in Education (KCSIE) (DfE, September 2026) and guidance Working together to improve school attendance (2026) as appropriate. The Director of Safeguarding, through the House Masters, will monitor any unauthorised absence at the start or end of any leave period, and will be particularly cautious if a boy goes missing on repeated occasions.

Whenever possible, the School holds more than one emergency contact number for its pupils.

The School recognises the duty to inform the local authority about any boy who fails to attend School regularly (Children missing education/CME) or has been absent without the School's permission for a continuous period of ten school days or more, at such intervals as are agreed between the School and the local authority, or in default of such agreement, no less frequently than once per calendar month.

The School also recognises the duty to inform the local authority when removing a boy from the roll.

The Governing Body recognises that it should put in place appropriate safeguarding responses to boys who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

HELPING BOYS TO KEEP THEMSELVES SAFE

Boys are taught to understand and manage risk through numerous programmes, for example counter-bullying workshops, the PSHE Education programme for all year groups, training in Peer Mentoring, lectures and seminars, twice-termly safeguarding briefings in Houses and through all aspects of their life at the School. These include the requirements for Relationships Education, Relationships and Sex Education and Health Education. Boys are encouraged to think about risks they may encounter and to work out how such risks can be overcome. These discussions are empowering and enabling. They aim to promote sensible behaviour rather than fear or anxiety. Boys are taught how to conduct themselves in a safe and responsible manner. They are also regularly reminded about online safety and counter-bullying procedures. The School continually promotes an ethos of care and respect for others. Boys are encouraged to speak to a member of staff in confidence about any worries they may have.

The School conducts an annual Living Together Survey, which helps to inform pastoral strategy as well as shedding light upon areas of concern or specific trends in behaviour. The boys take the survey through an online form and the results are analysed by the Director of Analytics and the Director of Safeguarding. The Director of Safeguarding discusses findings with individual House Masters, who cascade back to their Houses. The Pastoral Support Committee analyses the data from a School-wide perspective.

A statement of primary findings is provided by the Head Master to boys and members of teaching staff collectively as well as to the Governing Body.

Boys self-assess their well-being/mood via the online Pulse monitoring system. They can also use this system to reach out for help to a member of staff. The data from this self-assessment is viewed by pastoral staff and overseen by a Deputy DSL.

SUPPORT FOR THOSE INVOLVED IN A CHILD PROTECTION ISSUE

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

The School will support boys, their families, and members of staff by:

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

COMPLAINTS PROCEDURE

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

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

ALLEGATIONS OR CONCERNS RELATING TO STAFF

Allegations and concerns will be dealt with in accordance with local safeguarding procedures and practice guidance and will be treated in one of two ways as follows:

- Allegations that may meet the 'harms threshold' or 'harms test': see Appendix 2 of this policy for full details of the School's procedures for managing such allegations against members of staff. These more formal allegations should generally be reported direct to the Head Master, as detailed below and in Appendix 2.
- Concerns that do not meet the harms threshold or harms test: for the purposes of this policy, such allegations are referred to as 'low-level concerns'. These low-level concerns should generally be reported direct to the Head Master or, in his absence, to the Director of Safeguarding. For further information, please see the subsequent section in this policy entitled 'Low-level concerns'.
- If a member of staff is unsure which of the above categories an allegation or concern should fall into, they should feel free to contact either the Head Master or the Director of Safeguarding.

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 do happen.

A member of staff who is concerned about the conduct of a colleague towards a boy is placed in a difficult situation. He or she may worry that they have misunderstood the situation and will wonder whether a report could jeopardise a colleague's career. However, all members of staff must

remember that **the welfare of the child is paramount**. No member of staff will suffer a detriment for raising a genuine concern. The School's Whistleblowing Policy enables members of staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. Any member of staff may also use the NSPCC whistleblowing helpline number 0800 028 0285.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, the School accepts that some professionals can pose a serious risk to the boys and will therefore act on every allegation or concern. Members of staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently, and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, a member of staff may be suspended where there is cause to suspect a child or other children at the School are at risk of harm, or the case is so serious that there might be grounds for dismissal.

- Allegations against members of staff – including the Director of Safeguarding or Deputy DSLs – should be reported directly to the Head Master. If the Head Master is absent, allegations against all members of staff should be reported to the Chair of Governors.
- When a safeguarding concern relating to a member of staff is referred to the Head Master, at that point the Head Master will consider whether a Local Authority Designated Officer (LADO) referral is appropriate.
- Allegations against the Head Master or a member of the Governing Body should be reported to the Chair of Governors without the Head Master being informed.
- Allegations against the Chair of Governors should be either reported directly to the LADO (Local Authority Designated Officer) or to the Nominated Safeguarding Governor.
- Members of staff may also report any allegations or concerns directly to the police or Harrow Children's Services, if they believe direct reporting is necessary to secure action.

The full procedures and statutory guidance for dealing with allegations against members of staff can be found in Part Four of Keeping Children Safe in Education (KCSIE) (DfE, September 2026).

LOW-LEVEL CONCERNS

Concerns may arise in several different ways and from a number of sources. For example, suspicion, complaint, or disclosure made by a child, parent or other adult within or outside the organisation, or as a result of vetting checks undertaken. Harrow School adopts a whole-School approach to safeguarding. As such, it seeks to ensure that there is an open and transparent culture in which all concerns about any adults working in any capacity (employed or voluntary) on behalf of the School are dealt with promptly and appropriately.

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

WHAT IS A LOW-LEVEL CONCERN?

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

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- **Blurred boundaries:** e.g. being overly friendly with specific children or using pet names.
- **Unprofessional conduct:** e.g. taking photographs of children on personal mobile phones or engaging one-to-one in secluded areas like closed-door offices.
- **Unconscious bias or favouritism:** e.g. consistently choosing the same children for privileges or failing to pronounce diverse names correctly.
- **Inappropriate language:** e.g. using inappropriate sexualised, intimidating or offensive language.
- **Policy violations:** e.g. repeatedly ignoring basic health and safety or safeguarding guidance.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Harrow School aims to:

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

SHARING LOW-LEVEL CONCERNS

Low-level concerns about a member of staff should be reported to the Head Master. Where a low-level concern is raised about the Head Master, it should be shared with the Chair of Governors.

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

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

The evaluation of low-level concerns will take place in consultation with the LADO, although concerns which do not meet the harms threshold will not be recorded by the LADO. The sharing of low-level concerns will be treated confidentially.

RECORDING LOW-LEVEL CONCERNS

All low-level concerns should be recorded in writing by the Director of Safeguarding on behalf of the Head Master. Only the Head Master and Director of Safeguarding have access to this record. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous, then that should be respected as far as reasonably possible.

The School must keep these records confidential, held securely in compliance with the Data Protection Act 2018,the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025.

Records should be reviewed periodically so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School

will decide on a course of action, either through its disciplinary procedures or where a pattern or behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the School that enabled the behaviour to occur and, where appropriate, policies could be revised, or extra training delivered to minimise the risk of it happening again.

The School will retain information on low-level concerns at least until the individual leaves its employment.

REFERENCES

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

RESPONDING TO LOW-LEVEL CONCERNS

Concerns about safeguarding should be reported to the Head Master. If the concern has been raised by a third party, the Head Master should collect as much information as possible by speaking:

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

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

Further information on the management of low-level concerns may be found in the document Developing and implementing a low-level concerns policy: a guide for organisations which work with children (Farrer & Co, 2023).

STAFF TRAINING

All members of staff at the School will receive appropriate training in safeguarding and child protection, which is regularly updated. In addition, all members of staff will receive safeguarding and child protection updates (for example via email, e-bulletins, staff briefings or specific INSET training) as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively.

All new members of staff are required to attend the start of year all staff safeguarding briefing or, where attendance in person is not possible, watch a recording of the briefing. During their induction period, they must read the School's Safeguarding Policy and, as a minimum, Part One (in full) of Keeping Children Safe in Education (KCSIE) (DfE, September 2026). School leaders and those staff who work directly with children must also read Annex A - Further Information. New members of staff are required to electronically confirm that they have completed the required reading and to complete the Harrow School safeguarding assessment to demonstrate their understanding of the content. All staff will be directed to the policy section on Harrow Gateway.

All new members of teaching staff and Governors will receive one to one safeguarding training during their induction with the Director of Safeguarding, which will include an introduction not only to the School's Safeguarding Policy (including the Low-Level Concerns policy) but also the School's Code of Conduct with Specific Regard to Safeguarding and the School's Behaviour Policy (and Existing Customs), which links to the DfE Advice Behaviour in Schools (February 2024). They will receive information on the roles of the Director of Safeguarding and Deputy DSLs and receive contact details for them. They will be instructed on reporting and recording arrangements. The training will also cover online safety including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, the School's Whistleblowing Policy, the Missing Boy Procedure, the Staff ICT Acceptable Use Policy and guidelines on communications between members of staff (and between members of staff and pupils) and use of social media. In addition, new teaching staff

will be provided with copies of the Masters' Handbook, Safeguarding Policy, Code of Conduct with Specific Regard to Safeguarding, and Staff/Pupil One-To-One Contact Guidance.

The Director of Safeguarding and Deputy DSLs will receive advanced-level safeguarding and child protection training updated at least every two years, including training in inter-agency procedures, in addition to annual updates. Other key members of staff (including the Lead Nurse and other nursing staff) will also be expected to receive advanced-level safeguarding and child protection training.

Matrons, House Masters and members of the Pastoral Support Committee participate together in an annual training day during early June, which focuses upon specific areas of child welfare and/or child protection. Similar training is arranged for Assistant House Masters at this stage in the academic year.

All members of Harrow's residential boarding staff as well as other members of staff (including House Visitors and Support Matrons) will be encouraged and supported to attend relevant child protection and safeguarding training offered by other agencies (e.g. Harrow Safeguarding Children Partnership, NSPCC, Boarding School's Association, Farrer & Co, SACPA, Olive Branch Consultancy).

All academic staff and residential boarding staff receive Prevent and Channel awareness training. Members of the SMT, HR and other relevant managers with responsibility for staff recruitment receive regular safer recruitment training.

Temporary staff and volunteers in regulated activity will have regular child protection and safeguarding training as required.

A member of staff will supervise visitors at all times. All staff supplied by other bodies will be made aware of the School's Safeguarding Policy and will be given the contact details of the Director of Safeguarding and Deputy DSLs.

SAFER RECRUITMENT

The School endeavours to ensure that it does its utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education (KCSIE) (DfE, September 2026) together with information provided by HSCP (see https://harrowsafeguarding.org.uk/scp/safer-recruitment-of-staff-and-volunteers-working-with-children-and-young-people/) and the various procedures pertaining to contractors, PFI partners etc.

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

Volunteers engaged in regulated activity must undergo an enhanced DBS check with children's barred list information. Where a volunteer is not engaged in regulated activity, the School will undertake a written risk assessment to determine whether an enhanced DBS check should nevertheless be obtained.

SITE SECURITY

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

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

All visitors are expected to observe the procedures laid down in the School's Safeguarding Policy, Visitor Policy and Health & Safety Management Policy to ensure that boys in the School are kept safe.

ROAD SAFETY

The Head Master regularly reminds the School in Speech Room about the importance of road safety, especially when the winter timetable begins, and boys are travelling between lessons in the dark.

The Senior Deputy Head designates appropriate crossing points on the High Street as well as the permitted access routes into Harrow town. House Masters reinforce the message to boys that they should show respect to drivers and other pedestrians. The Security Department supervises the main crossing places during key moments in the daily routine and on major occasions at other times in the academic year.

THIRD-PARTY USE AND OFF-SITE ARRANGEMENTS

PROCEDURE FOR THIRD-PARTY USERS OF THE SCHOOL FACILITIES

The School's facilities, particularly sporting facilities, may be hired by third party users (TPUs), including children's clubs; under these arrangements the School has no control over, and assumes no liability for, the conduct of individuals from TPUs. However, the School will ensure that safeguarding requirements are included in any lease or hire agreement as a condition of use and occupation of its facilities, and that failure to comply with this will lead to termination of the agreement. TPUs are also made aware of the areas of the School's grounds that are out of bounds.

TPUs will be required to provide the School with a copy of their own child protection policies before approval is given for their use of the School's facilities, and all TPUs providing activities that involve children will be required to sign a declaration to confirm that:

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

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

PROCEDURE FOR DEALING WITH CONCERNS OR ALLEGATIONS OF ABUSE BY AN INDIVIDUAL OF A THIRD-PARTY USER USING THE SCHOOL'S FACILITIES

If an allegation of abuse is made about an adult in a TPU, the organisation's Safeguarding Officer must notify the Head Master or the Director of Safeguarding on the same day as the incident occurred or the disclosure was made, or as soon as possible thereafter. As with any safeguarding allegation, the School will follow their safeguarding policies and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.

EXTERNAL ORGANISATIONS WHO HAVE RESPONSIBILITY FOR BOYS ON ANOTHER SITE

When our boys attend off-site activities, including day and residential visits and work-related activities, the School will check that effective safeguarding and child protection arrangements are in place, as outlined in the School's Expeditions Policy.

BOYS STAYING WITH HOST FAMILIES

The School may sometimes arrange for boys to stay with a host family during a foreign exchange trip or sports tour. In such circumstances, the School follows the guidance in Keeping Children Safe in Education (KCSIE) (DfE, September 2026), to ensure that hosting arrangements are as safe as possible. While the School recognises that DBS cannot access criminal records held overseas, we will work with partner schools abroad to ensure that similar assurances are undertaken before the visit. If necessary, the School will contact the relevant foreign embassy or High Commission of the country in question and find out if similar checks can be done in the country.

PHOTOGRAPHY AND IMAGES

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

To protect our boys, we will:

- seek parental consent for photography of our students through the School's Terms and Conditions;
- demonstrate respect, care and caution when including photographs of boys in newsletters, House blogs and other School publications;
- encourage boys to tell a member of staff if they are worried about any photographs that are taken of them; and
- prevent the possibility of linking the name of a boy to an image; no image will carry a caption naming a boy who can be clearly identified.

ONLINE SAFETY

The School recognises the need for a whole-school approach to online safety in order to protect pupils from potentially harmful and inappropriate online material. The use of technology is an integral part of everyday life but, as such, has also become a significant component of many safeguarding issues. In child sexual exploitation, radicalisation and sexual predation, for instance, technology often provides the platform that facilitates harm. Therefore, an effective approach to online safety empowers the School to protect and educate boys in responsible use of technology and to establish mechanisms, which can identify, intervene in and escalate an incident where appropriate. All teaching staff will be trained in the importance of online safety and how to teach children and young people about the responsible use of technology and digital resilience.

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

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories;
- **contact:** being subjected to harmful online interaction with other users, for example peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **conduct:** online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (e.g. consensual and non-consensual self-generated intimate images and/or videos including those generated using AI e.g. deepfakes and/or pornography), sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If a members of staff thinks that pupils, students or other members of staff are at risk, they should report it to the Anti-Phishing Working Group (https://apwg.org/).

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

The School will ensure online safety is a running and interrelated theme while devising and implementing policies and procedures. This will include considering how online safety is reflected in all relevant policies and considering online safety while planning the curriculum, any teacher training, the role and responsibilities of the Director of Safeguarding and any parental engagement.

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

The following measures are in place:

- The **IT Safeguarding Committee** meets to discuss all aspects of IT monitoring and filtering as well as to review the Online Safety Policy in line with any legislative changes. It meets once a term or as needed. It comprises of the Safeguarding Governor, The Director of Safeguarding, the Director of IT, the Deputy Director of IT and two Deputy DSLs.
- The **Boys' ICT Acceptable Use Policy** protects all parties by clearly stating what is acceptable and what is not. Boys are expected to sign up to this at the start of each academic year and before access can be given to the School's ICT facilities.
- **Induction and education**: all boys are inducted in appropriate use of the School's ICT facilities and other aspects of this policy upon arrival. Subsequently Tutors remind boys at the start of each academic year about their obligations and code of conduct. This is reinforced by a presentation in Houses about online safety.
- **Monitoring and filtering**: the School exercises its right to monitor and filter the use of computer systems, school devices and school networks, including the monitoring and filtering of internet use, interception of emails and the deletion of inappropriate materials at all times. In circumstances where the School believes unauthorised use of the computer system is, or may be, taking place, or the system is, or may be, being used for unlawful purposes, the School reserves the right to inform appropriate authorities and provide documentary evidence. The computer network is owned by the School and may be used by boys to advance and extend their knowledge and understanding.
- **The IT Safeguarding Committee**: meet termly to review the School's filtering and monitoring systems to ensure that they are working appropriately on all school issued internet-connected devices. Termly meetings ensure a proactive approach is taken given the increasing risks from harmful digital content, AI generated material and rapid changes in online behaviour. An annual audit will also be conducted and centrally recorded.
- All teaching members of staff, adhere to 'Teaching online safety in school'. This guidance 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.
- The School recognises that filtering and monitoring systems may not operate on personal devices when using mobile data or external networks. Members of staff should remain vigilant to safeguarding concerns arising from the use of personal devices and report concerns in accordance with this policy

Issues relating to online safety are also included in the School's Personal, Social, Health and Economic (PSHEE) Education programme.

Members of staff also receive advice regarding the use of social networking and electronic communication with boys, which follows the guidance given in the document Guidance for safer working practice for those working with children and young people in educational settings (Safer Recruitment Consortium, May 2019).

This means that members of staff should:

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

Director of Safeguarding

September 2026

Annual review – next due June 2027

APPENDIX 1: INFORMATION FOR PARENTS

Child protection: safeguarding students – information for parents.

Harrow School aims to safeguard and promote the welfare of the boys in its care and protect them from serious harm. The School's policies and procedures are fully in line with statutory requirements as published in a range of Government documents, principally Keeping Children Safe in Education (KCSIE) (DfE, September 2026). This applies to the boarding environment and all the activities the School undertakes. All members of staff and volunteers are vetted for their suitability to work with children prior to appointment. They receive training in safeguarding and child protection. They will report any concerns in accordance with official local safeguarding procedures. The School has a Safeguarding Policy, which is regularly reviewed and is available on the School's website.

It is important for parents to be aware that:

- All members of staff and volunteers in the School have a duty to report concerns about a child, whether this means the child may be in need of additional support or help of some kind or whether it is thought that a child may have been abused or be at risk of harm. There are four categories of abuse: physical, sexual, emotional, and neglect.
- In some cases, the School is obliged to refer cases to Harrow Children's Services (or to the Children's Services local to that particular family) so that a boy's needs are assessed and to consider whether an investigation into possible child abuse is required. In many cases, there will already have been discussions between the School and the parents of a boy, and the situation and concerns will not come as a surprise to the parents. However, parents may not be told that the School has referred their son to Harrow Children's Services (or the Children's Services local to that family) if it is thought that this might either put the boy at risk or it is deemed in the best interests of the boy for the parents not to be told.
- Harrow Children's Services endeavours to carry out its enquiries in a sensitive fashion. It has to gather information and generally it can be open with parents about the steps being taken.
- If you think your son may have been abused, you can contact Harrow Children's Services on 020 8901 2690 or call Children's Services in your local area. If you think the abuse may have happened in School (or during an expedition or co-curricular activity away from School), you should contact the Director of Safeguarding, who is Dr David Wendelken. If the allegation of abuse involves a member of staff, you should contact the Head Master directly, or if the Head Master himself is involved, the Chair of the Governing Body should be contacted.
- If members of staff need to express concerns about a boy or refer a boy to Children's Services, it is understood that this can cause distress for the boy's parents. It is important that all parties – parents and members of staff – try to discuss these matters as calmly and sensibly as possible, and at as early a stage as is realistically possible.
- School Monitors are given basic training in safeguarding at the start of the academic year. There is also a programme of Peer Mentoring for all members of the Lower Sixth.

Director of Safeguarding

September 2026

APPENDIX 2: CONCERNS OR ALLEGATIONS RELATING TO STAFF

Process for dealing with concerns or allegations relating to members of staff (including the Head Master), volunteers and others (including Governors) who are in contact with boys in the School.

(References to members of staff in this policy include all staff working for or on behalf of Harrow School, full time or part time, temporary or permanent, in either a paid or voluntary capacity. This includes supply staff, trainee teachers, peripatetic staff, contractors' employees working regularly on the School's premises and volunteers working with children.

Relevant guidance:

- Working Together to Safeguard Children (DfE, 2026)
- Keeping Children Safe in Education (KCSIE) (DfE, September 2026)
- What to do if you're worried a child is being abused (DfE, March 2015)

1. REPORTING CONCERNS

It is essential that any concern or allegation of abuse made against a Master, another member of staff, member of the Governing Body or a volunteer at Harrow School be dealt with quickly, and in a fair and consistent way that provides effective protection for the child(ren) and at the same time supports the individual who is the subject of the allegation.

All staff and volunteers should know how to recognise and report concerns or allegations and should understand what to do if they have such concerns personally or hear an expression of such concerns or allegations against colleagues.

On hearing an allegation or concern about abuse directly from a boy, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided, and inappropriate guarantees of confidentiality should not be given. Rather, the boy should be told the matter will be referred in confidence to the appropriate people in positions of responsibility. An accurate written record should be made for this purpose.

All allegations about members of staff (including the Director of Safeguarding, Deputy DSLs, supply staff and volunteers) must be reported without delay to the Head Master.

All allegations against the Head Master must be reported immediately to the Chair of Governors (without informing the Head Master).

Following this, the Head Master or the Chair of Governors (as appropriate) will notify the Director of Safeguarding (or if the Director of Safeguarding is the subject of the allegation, the Deputy DSLs) and will, if appropriate, report immediately to the LADO (see 2 below). Concerns about any member of the Governing Body, including the Chair, should be reported direct to the LADO. Where there is a potential conflict of interests in reporting the matter to the Head Master, the LADO should be contacted directly.

It is vital that expressions of concern that do not necessarily amount to 'allegations' be reported, particularly if there are repeated reports of such concerns and/or questionable conduct. Low-level concerns and more serious allegations should initially be reported to the Head Master. 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.

Allegations against a former member of staff no longer working at Harrow School should be referred to the police.

This procedure, known as the 'harms threshold' or 'harms test' will be used in all cases in which there is an allegation or suspicion that a person working with or who is in contact with boys has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;

- behaved towards a child or children in a way that indicates she or he may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

These criteria should be considered in the context of the four categories of abuse (i.e., physical abuse, sexual abuse, emotional abuse and neglect – as described in the Child Protection Procedures section of the Safeguarding Policy above). These include concerns relating to inappropriate relationships between members of staff and boys, for example:

- having a sexual relationship with a child if in a position of trust in respect of that child, even if consensual (ss. 16-21 Sexual Offences Act 2003);
- 'grooming' (i.e. meeting a child aged under 16 with intent to commit a relevant offence (s.15 Sexual Offences Act 2003);
- other grooming behaviour rising to concerns of a broader safeguarding nature (e.g. inappropriate text/email messages or images, gifts, socialising); or
- possession of indecent photographs/pseudo-photographs/videos of children.

Members of staff, parents and members of the Governing Body are reminded that they should NOT:

- investigate the matter themselves;
- make assumptions or offer alternative explanations for behaviours; or
- promise confidentiality to the alleged victim(s).

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. Harrow School will always comply with the provisions of the Act.

2. CHECKLIST OF IMMEDIATE REPORTING ACTIONS

PROCEDURE FOR INDIVIDUAL MEMBERS OF STAFF/VOLUNTEERS/OTHER ADULTS

- Write a dated and timed note of what has been disclosed or noticed, said or done.
- Report the information immediately to the Head Master or, in his absence, the Director of Safeguarding (or in both of their absences to the Senior Deputy Head).
- Pass on the written record.
- If the suspicion or allegation of abuse is against the Director of Safeguarding, the information must be taken to the Head Master or his absence to the Senior Deputy Head.
- The Chair of Governors deals with allegations of abuse made against the Head Master, in liaison with the LADO (Local Authority Designated Officer).

PROCEDURE FOR THE HEAD MASTER

- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- The Head Master may ask to clarify details or circumstances of the allegation, but this must not amount to an investigation.
- Notify the Chair of Governors and LADO on the same day.
- Copies of the documents concerning the allegation must be sent to the LADO on the same day.
- Report to Harrow SCP in relevant cases, on advice of the LADO.

- On-going involvement in cases: liaison with the LADO and co-operation with the investigating agencies as appropriate; consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.

PROCEDURE FOR THE CHAIR OF GOVERNORS (ONLY RELEVANT IN CASE OF AN ALLEGATION AGAINST THE HEAD MASTER)

- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- The Chair of Governors may ask to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
- Notify the LADO on the same day.
- Copies of the documents concerning the allegation must be sent to the LADO on the same day.
- Report to Harrow SCP in relevant cases, on the LADO's advice; in cases concerning the Head Master, a report to Harrow SCP may sometimes be undertaken by the LADO on behalf of the Chair of Governors, following discussion.
- On-going involvement: liaison with the LADO and co-operation with the enquiries of investigating agencies as appropriate; consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.

3. HOW ALLEGATIONS WILL BE MANAGED

INITIAL ACTION

Decisions about course of action would be taken on a case-by-case basis, bearing in mind the paramount importance of the safety of any child(ren) involved; investigating as expeditiously as possible and making every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. Any course of action would be subject to a risk assessment. Decisions would also follow the guidance of the LADO and/or police.

Upon receiving an allegation or concern about a member of staff , the case manager (whether the Head Master or the Chair of Governors) 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 boys;
- if necessary, consider whether suspension is appropriate;
- decide what information and/or advice is to be given to the Head Master (or Nominated Governor if the allegation is about the Head Master), 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 DBS and/or Teaching Regulation Agency).

STRATEGY MEETING

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 Head Master, the Director of Safeguarding or Chair of Governors as appropriate).

From the above discussions, there are two 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
- The matter may be remitted to the School to be dealt with, which may include an internal disciplinary investigation.

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 or cause harm to the person subject of the allegation;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation; the term, therefore, does not imply guilt or innocence;
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

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.

CASE SUBJECT TO POLICE INVESTIGATION

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.

DISCIPLINARY INVESTIGATION

Where a disciplinary investigation is required, the investigation should be conducted in accordance with the School's disciplinary procedure.

Whenever possible the person will be given a full opportunity to answer the allegation and make representations about it. The process of investigating the allegation, and reaching a judgment about whether it is substantiated, will continue even if the person does not co-operate.

Suspension is never a default option and the School will consider all other options before suspending a member of staff. The School would only suspend someone if there were no reasonable alternative.

If the suspension concerned a member of staff living away from the immediate possibility of contact with boys, he or she could remain within their School accommodation but under carefully managed conditions and guidelines.

If the suspension concerned a member of staff normally resident in a boarding House, accommodation would be found for them elsewhere, if he/she did not have his/her own accommodation away from the Hill.

'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. In any event, such an agreement would not prevent a thorough police investigation where that is appropriate.

4. SUPPORTING THOSE INVOLVED

The School's procedures will be managed with common sense and sound judgement throughout. Cases may not meet the criteria in 1 above, and indeed may not require either a police investigation or further enquiries by HSCP. In such situations, the School will resolve the matter as quickly as possible. Where more appropriate, the School may use the Complaints Procedure instead.

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

Rarely, some allegations may be so serious that the School may need to ask for immediate intervention by Harrow SCP and/or police. If this is the case, and the School believes the above criteria are likely to be met, the Director of Safeguarding or Head Master will inform the LADO of such allegations immediately and keep the Chair of Governors fully informed.

Parent(s)/guardian(s) of a boy 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 HSCP 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.

5. 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 has:

- engaged in relevant conduct in relation to children and/or adults. 'Relevant conduct' for this purpose is conduct that endangers a child or is likely to endanger a child; conduct of a sexual nature involving a child; involves sexual material relating to a child; or involves sexually explicit images depicting violence against human beings, and/or
- satisfied the harm test in relation to children and/or vulnerable adults, and/or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

'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 situations where, on conclusion of the case, it is decided 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 boy or boys 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 boy 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 Head Master will consider whether any disciplinary action is appropriate against the boy who made it. This may include permanent exclusion from Harrow School.

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) for serious misconduct. The reasons such a prohibition 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'.

The School will make a serious incident report to the Charity Commission at the appropriate time, whenever the Commission's guidelines deem it appropriate to do so.

6. RECORDS

A central record of all allegations and concerns (and connected documents) against members of staff will be kept securely by the Head Master (or the Nominated Safeguarding Governor if it involves the Head Master), separate from normal staff and boy records, and with access limited to officers who may be key workers for cases. The Director of Safeguarding and Deputy DSLs will always be kept informed of safeguarding and child protection matters and will have access to all records. 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 reinvestigation if, as occasionally happens, an allegation resurfaces 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 ten 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 members of staff.

Every effort will be made to maintain confidentiality and to guard against publicity while an allegation is being investigated or considered. Apart from keeping the boy(s), parent(s)/guardian(s) and the person about whom the allegation has been made (in cases when this would not place the boy 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.

TRANSFER OF RECORDS

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

The Director of Safeguarding, Nominated Safeguarding Governor or Head Master will pass allegations or concerns affecting a boy on to his next school, if applicable.

MONITORING AND EVALUATION

This policy will be reviewed annually by the Director of Safeguarding and revised in accordance with changing national requirements for independent schools. It will be shared with members of staff and made available on the School's website. The Governing Body will conduct a review of safeguarding and child protection policies and the effectiveness of their implementation at least annually.

Director of Safeguarding

September 2026

APPENDIX 3: LADO REFERRAL THRESHOLD MATRIX

INDICATORS MATRIX LADO = TIERS 1-5		
TIER 1: INCIDENT THAT DOES NOT NEED LADO ACTION BUT MAY BE A CONDUCT ISSUE, OR REQUIRE MORE GENERAL ADVICE.		
Detail	Action by the LADO	Examples
Complaint made by parent or carer or comment made by child that does not seem to have any corroborating evidence. There is no injury seen, or witness accounts do not corroborate the allegation, the manager confident this does not meet the threshold for a referral but is intending to investigate further. The employer may be concerned regarding the MOS's behaviour or responses to a situation which raises concerns regarding suitability. In such cases the relevant manager may wish to have a consultation discussion with the LADO, and both can make a record of the discussion and agree it will be dealt with internally, in case further information comes to light to question why no formal LADO referral was made. However no names will be used as this does not meet the threshold for a record about a named person to be kept.	The LADO will provide advice and guidance on concerns. Consultation will be recorded in consultation spreadsheet but without name of member of staff or identifying details. The employer's details will be logged. Any emails received or supporting documentation will be recorded within Sharepoint with the spreadsheet reference number in its title	Child objecting to a sanction imposed in school, describing an event to parent who then comes in to complain about how their child says they have been treated; but does not have all the information. Young person in children's home involved in a confrontation and making accusations where there were several witnesses and there is an incident report that appears to refute the child's account that they were harmed. An allegation that is made second or third hand and facts are not clear, or the professional alleged to have done this was not there at the time; or there is confusion about the account. A school girl telling a friend, who tells the teacher, that another teacher 'makes her feel funny when he looks at her' but no other concerns or complaints expressed. A child with a history of challenging behaviour, alleging s/he feels bullied by a well-respected member of staff. Concerns that family members of the professional or volunteer may be involved in criminal activity.
TIER 2: INCIDENT OR CONCERN WHICH MIGHT REQUIRE LOGGING WITH LADO BUT WILL BE 'NO FURTHER ACTION'		
Detail	Action by the LADO	Examples
Member of staff alleged to have behaved, acted or reacted in a way considered inappropriate but not harmful; parental or child complaint about such an incident, to	The LADO will provide advice and guidance on concerns. Record will be held on the consultation spreadsheet with	Child accusing teacher of pushing them, when it appears they were being guided away from a situation (covered by Restrictive interventions, including use of reasonable

outside agency e.g. Ofsted, who have referred to LADO for further enquiries; allegation made but manager believes at this point they can deal with this internally and are checking with LADO for information only. This category also includes volunteers and professionals where there are domestic issues which require them to inform their line manager (for example a section 47 investigation at home) but the employer/manager is clear there are no risks presented by this person in their place of work. These are incidents where an escalation to a police referral would be considered a disproportionate response. These cases are likely to meet the threshold for a confidential record to be kept by the LADO, with the knowledge of the person concerned and their manager.	the name of the member of staff identified. The LADO will advise the employer to tell the MOS that the LADO has been consulted and the outcome. The LADO will confirm the outcome of the discussion in email to the employer Any emails received or supporting documentation will be recorded within Sharepoint with the spreadsheet reference number in its title.	force in schools, DfE April 2026. Nursery worker seen by parent to be pulling a child away from a situation, parent considers this is done roughly but professional claims it was to remove child from a confrontation where they may have been harmed/ may have harmed another child. Professional or volunteer accused of domestic violence assault on own children but there have never been any concerns at work about him/her. A professional or volunteer makes an inappropriate remark that appears on the surface to be naive rather than potentially grooming, or acts in a way that could be deemed unprofessional. Teacher under stress who is heard to shout inappropriately at the children one day towards the end of term. Childminder witnessed to ignore children crying and speak rudely to them, but further context not known.
TIER 3: INCIDENT OR CONCERNS WHICH INDICATE SIGNIFICANT CONCERNS RE STANDARDS OF CARE PROVIDED TO AN INDIVIDUAL CHILD OR GROUP OF CHILDREN		
Detail	Action by the LADO	Examples
Issues, identified as indicating concerns regarding serious standards of care issues, where the concerns are considered serious and warrant investigation by the employer, with oversight and the support of the LADO. This affords the employer with the support of external scrutiny to demonstrate transparency and provides the employee with the protection afforded by the LADO. In some circumstances an Initial Evaluation meeting may be appropriate to consider if the concerns meet the	Dependant upon the nature of the concerns, a strategy Discussion with the employer, may be sufficient to plan a way forward. In some cases where the information needs to be clarified and there may be other agencies involved in the concerns, an initial Evaluation meeting may be required to consider the concerns The concerns and details will be recorded on CRS as an adult contact and within the allegations workspace[1] against the member of staff's name and the employer will be required to advise the MOS that the LADO is overseeing	A complaint that a foster carer provides significantly poor care or there are numerous concerns regarding that care which lead to concerns regarding the appropriateness of the placement. Where a member of staff repeatedly treats a child in their care in a negative manner by making derogatory comments Early recourse to the use of restraint, where judgement might indicate alternative methods of diffusing a situation Failing to meet expectations of levels of care consistently

threshold for Tier ¾. This is not an allegation meeting.	the investigation and will therefore keep a record of the investigation An outcome will be recorded in the allegations workspace of CRS as a standards of care outcome Initial Evaluation Meetings will be recorded and minuted in CRS within the allegations workspace	
TIER 4: INCIDENT WHICH REQUIRES CONSIDERATION OF REFERRAL TO OTHER AGENCY SUCH AS POLICE OR OFSTED		
Detail	Action by the LADO	Examples
Allegation made which meets the threshold for referral to LADO under the LCPP and appears in the first instance to meet the threshold for referral to police. Such cases may not always involve serious injury to a child but present as a breach of the position of trust the professional or volunteer was in. A proportion of these types of referral may result in a 'no crime' outcome from police, but the allegations process must be followed as the referring information met the threshold. Sometimes these referrals do not immediately appear to have a criminal element but the reported actions mean that a regulatory body such as Ofsted, or the National Council for Teaching and Leadership, or HCPC, will need to be informed. It is essential in these cases that there is a clear outcome and this is communicated to the professional/volunteer. These referrals can result in a note on future DBS checks and could have an impact on the professional/ volunteer's future career.	In such circumstances a strategy discussion with the police ort employer may be indicated to agree immediate action. Dependent upon the allegations, the LADO will convene either an initial Evaluation meeting or an Allegations against Professional or volunteers (APV) meeting. The concerns and details will be recorded on CRS as an adult contact and within the allegations area against the member of staff's name and the employer will be required to advise the MOS that the LADO is overseeing the investigation and will therefore keep a record of the investigation An outcome will be recorded in the allegations area of CRS as a standards of care outcome Initial Evaluation Meetings and strategy meetings will be recorded in CRS within the Allegations Workspace	A credible disclosure by a child or young person that uses the word 'hit' or 'hurt'; yet there is no injury seen and no corroborating evidence of child's account. Restraint that has caused an injury to the person being restrained. An incident witnessed, where there is a physical exchange between a member of staff and child or young person. It is unclear whether self defence or retaliation was involved. The matter needs full investigation. A very young child still requiring personal care/ nappy changing, indicates that a nursery worker touched him/her in the genital area A professional or volunteer has been sending inappropriate but not necessarily sexual, texts to young people he/she works with. A foster carer where there have been several complaints about poor practice and standards of care; children in their care who are not always clean or appropriately dressed, or seen to be treated in a way that causes concern to observing professionals.
TIER 5: INCIDENT WHICH REQUIRES IMMEDIATE SUSPENSION/ POLICE REFERRAL/ ARREST/ IMMEDIATE ACTION TO PROTECT CHILD.		
Detail	Action by the LADO	Examples

Allegation made with credible corroborating evidence, where a child has been injured or harmed. Behaviour by the professional or volunteer which is deemed to be extremely concerning towards the children they are caring for and requires immediate suspension. Allegation by a member of the professional/ volunteer's family which is so serious it requires immediate consideration by employer.	In such circumstances a strategy discussion with the police or employer may be indicated to agree immediate action Recording will be as Tier 4. Where an allegation is substantiated this will be recorded within the Risks element of CRS which is accessible to all members of staff with access to CRS	Child has clearly been injured or could have been injured as a direct result of the actions of a professional or volunteer. Incident within the professional/ volunteers home life that is of high risk and high level of concern. Professional or volunteer arranging to meet young person outside the work environment and asking them not to tell anyone; or making inappropriate contact through social media with sexual overtones. Making racist or derogatory remarks to a child or young person in the presence of witnesses.

Table available at https://national-lado-network.co.uk/lado-threshold-document/