



HAYDON SCHOOL
Child Protection and Safeguarding
Policy
2026-2027

Mission Statement

Haydon School is committed to the achievement of individual excellence, encouraging students to be creative and considerate, confident of their role in society and capable of rising to the challenges of a diverse and rapidly developing global economy.

Haydon School Safeguarding Vision

To deliver best practice safeguarding that ensures all children and adults stay safe, in person and online, through preventative practice, rigorous systems and regular training.

Table of Contents

1.0 Key Professional Terminology and Acronyms
2.0 Statement of Intent
3.0 Safeguarding Definition and Culture
4.0 Policies and Processes
5.0 Prevent Duty
6.0 Training
7.0 Reporting
8.0 Attendance
9.0 Curriculum
10.0 Definitions
11.0 Legal Framework
12.0 Linked School Policies
13.0 Roles and Responsibilities
13.1 All Staff
13.2 Teachers (Including the Headteacher)
13.3 The Governing Body
13.4 The Headteacher
13.5 The Designated Safeguarding Lead (DSL)
14.0 Multi-Agency Working & Family Help
15.0 Abuse, Neglect and Exploitation: Core Definitions
16.0 Key Statutory Indicators
17.0 Regulations and safeguarding requirements relating to school premises
18.0 Specific Safeguarding Issues
18.1 Domestic Abuse
18.2 Child-on-Child Abuse
18.3 Homelessness and Housing Insecurity
18.4 Private Fostering Arrangements

- 18.5 Children Missing Education (CME) Framework
- 18.6 Management of the Admissions Register
- 18.7 Statutory Grounds for Deletion from the Register
- 18.8 Child Abduction and Community Safety Incidents
- 18.9 Child Criminal Exploitation (CCE), County Lines & Cuckoing
- 18.10 Cyber-Crime
- 18.11 Child Sexual Exploitation (CSE)
- 18.12 AI-Generated Child Sexual Abuse Material (AI-CSAM), Deepfakes & Financial Sextortion
- 18.13 Modern Slavery and the National Referral Mechanism (NRM)
- 18.14 Female Genital Mutilation (FGM)
- 18.15 Forced Marriage
- 18.16 Preventing Radicalisation and Extremism (The Prevent Duty)
- 19.0 Online Safety, Cyber Security and Personal Electronic Devices
- 20.0 Risk Reduction, Student Resilience and Targeted Pastoral Interventions
- 21.0 Serious Youth Violence and Criminal Exploitation
- 22.0 Contextual Safeguarding and Vulnerable Student Cohorts
- 23.0 School Lettings, External Premises Use, and Out-of-School Settings
- 24.0 Alternative Provision, Work Experience and Homestay Arrangements
- 25.0 Reporting Concerns and Managing External Referrals
- 26.0 Institutional Safeguarding, Safer Recruitment, and Governance
- 27.0 General Visitor Arrival and Departure Procedures

1.0 Key Professional Terminology and Acronyms

Within this policy, several industry-specific acronyms common across the education sector are utilised. These terms and their respective definitions are found under Appendix A

2.0 Statement of Intent

Haydon School prioritises the safety and welfare of every student. We maintain a preventative, inclusive, and anti-discriminatory safeguarding culture, requiring all staff and volunteers to share this commitment. This policy provides a framework for consistent delivery in accordance with legislation.

Strategic objectives include:

- Ensuring that members of the Governing body, the Headteacher, and all staff (without exception) fully understand and enact their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and possess the professional competence to identify, record, and escalate concerns to the DSL.
- Teaching students how to keep safe, recognise behaviour that is unacceptable, and safely navigate emerging digital environments and generative technologies.
- Identifying and making holistic, multi-agency provision for any student that has been subject to, or is at risk of, abuse, neglect, or exploitation, actively collaborating with local partners within the statutory Family Help framework.
- Delivering comprehensive, continuous staff CPD (Continuing Professional Development) on Safeguarding issues throughout the academic year for all stakeholders of the Haydon community, ensuring all staff review and understand Part One of the statutory guidance in full.
- Using Safeguarding meetings and professional safeguarding supervision to regularly review and reflect on practice in order to inform best practice moving forward.
- Creating a culture of safer recruitment by adopting procedures and standardized frameworks that help deter, reject, or identify people who might pose a risk to children.
- Ensuring that the Headteacher and any new staff and volunteers are only appointed when all appropriate statutory checks—including robust verification on the Single Central Record—have been satisfactorily completed.

Referrals are handled professionally to support student needs while challenging engagement barriers.

3.0 Safeguarding Definition and Culture

We operate on the principle that 'it could happen here'. Every community member has a responsibility to maintain this culture. We work collaboratively with parents and local partners within statutory multi-agency and Family Help frameworks.

4.0 Policies and Processes

We have written policies and procedures in place to deal effectively with child protection and safeguarding issues, which include tackling radicalisation and extremism, online harms, generative AI risk, and child-on-child abuse, together with robust recording and monitoring processes via CPOMS. There are a number of related policies and procedures linked to safeguarding some of which are a statutory requirement and some considered to be best practice in order to support us with our collective responsibility of Keeping Children Safe in Education (2026/27). These include, but are not limited to, our Staff Behaviour Policy (Code of Conduct), Behaviour Policy, ICT Policy, and Procedures for Children Missing Education.

This policy meets the statutory requirement for schools to have in place a Child Protection Policy and clearly explains the process and procedures that Haydon School has in place to ensure all students are kept safe and protected from harm. Following the removal of statutory short-form summaries (Annex A), this policy ensures that all adults in our school, without exception, read and implement Part One of Keeping Children Safe in Education in full, ensuring total clarity regarding their role and professional responsibilities in identifying, documenting, and escalating overlapping risks.

Digital safeguarding systems are audited annually by the DSL and IT Manager to respond to emerging cyber threats and deepfakes.

5.0 Prevent Duty

Our Safeguarding Policy complies with our statutory duty under the Counter-Terrorism and Security Act 2015, which states that all schools and educational establishments must have due regard to the need to prevent people from being drawn into terrorism—this is called the Prevent Duty. In alignment with the updated Prevent Duty Guidance and KCSIE 2026/27, the school focuses proactively on "reducing permissive environments" where extremist narratives, online hate speech, and divisive ideologies (including extreme misogynistic subcultures) can flourish. Further information regarding this, and advice around building student resilience and providing counter-narratives through our curriculum, can be found in our Prevent Strategy and our statutory Relationships, Sex and Health Education (RSHE) framework.

Staff receive regular training on Prevent awareness and Channel referral to identify vulnerabilities like online grooming.

When interviewing for all new members of staff, the Headteacher, Deputy Heads or the Director of Finance and Operations is always on the interview panel. These members of

staff have all completed Level Three Safer Recruitment Training. To promote a safe environment for students, Haydon School employs a selection and recruitment policy and a standardised Single Central Record framework which includes all statutory pre-employment vetting checks on staff, trainee teachers, and regular volunteers, including Enhanced DBS (Disclosure and Barring Service) checks and online/social media footprint screening to deter and reject individuals who might pose a risk to children.

6.0 Training

All staff are required to read KCSIE (2026/27) Part One in full. Annual updates and continuous professional development (CPD) cover emerging threats such as generative AI harms and radicalisation.

Specialised teams (Safeguarding, Pastoral, SLT) maintain Level 3 Advanced certification. The DSL and deputies receive formal safeguarding supervision to support decision-making in complex cases.

The Safeguarding Team, pastoral teams, and the Senior Leadership Team (SLT) are trained to Advanced Safeguarding Level 3. To maintain professional efficacy and support decision-making in complex cases, the DSL and Deputy DSLs actively participate in regular, formal safeguarding supervision.

Safeguarding training and strategic briefing sessions are delivered to governors by the DSL to ensure the Governing Body can robustly challenge and audit school safeguarding structures, including the annual review of IT filtering and monitoring systems. All training records, inductions, and compliance logs are audited by our HR department and tracked via the Single Central Record framework.

7.0 Reporting

Operational protocols for reporting: Staff must log all concerns (including weapon intent) on CPOMS for daily triage by the DSL and wider safeguarding team. All stakeholders can use the online 'Whisper' system for anonymous disclosures. FGM disclosures or imminent danger require an immediate 999 call.

Parents of Haydon students are informed that should they have any serious concerns about their child(ren), another student, or a member of staff at Haydon School, they are to contact the Designated Safeguarding Lead (DSL). The DSL team will provide advice, intervention, and support in accordance with statutory information-sharing principles, prioritising the safety of the child over absolute confidentiality where a risk of harm exists.

Haydon stakeholders (including the local community) are also able to register any safeguarding concerns or low-level anonymous disclosures via our online reporting system, Whisper which is linked on the school website. All notifications received via

Whisper are subject to the same daily triage and assessment by the DSL team as internal staff logs.

Alternatively, if a child is in imminent danger, or if a student has disclosed to a member of staff that they have been a victim of Femal GENital Mutilaton (FGM) staff are instructed to call 999 for the Police, with the support of the DSL.

Should parents or students have any concerns about online sexual abuse, the non-consensual sharing of AI-generated intimate images (deepfakes), or the way someone has been communicating online, a report can be made directly to the Child Exploitation & Online Protection Centre via the CEOP website:

8.0 Attendance

Student attendance is monitored closely by Form Tutors, Year Teams and our School Attendance Officer. Concerns are shared as appropriate with parents/carers, the School's Participation Officer, the School's Officer, Social Care and the School Safeguarding Team.

Persistent absence (<90%) or severe absence (<50%) are treated as potential indicators of neglect or exploitation. The DSL team conducts immediate risk assessments for students with declining attendance and refers concerns to early family help where appropriate.

9.0 Curriculum

Haydon School delivers a preventative safeguarding curriculum designed to equip students with the skills to keep themselves and their peers safe. This is delivered through our structured P/RSHE programme, assemblies, form-time sessions and broader curriculum subjects. The R/PSHE programme addresses key safety and relationship concepts at age-appropriate stages, explicitly teaching:

- **Healthy Relationships:** The building blocks of positive, respectful relationships, including kindness, personal boundaries, consent, body confidence, and self-esteem.
- **Prejudice and Equality:** Challenging stereotypes, addressing discrimination, and promoting equality across all school cohorts.
- **Abuse and Harassment:** How to recognise and report concerns regarding abusive, coercive, or controlling relationships. Lessons explicitly define the concepts of, and laws relating to, sexual harassment and sexual violence, emphasising that these behaviours are never acceptable and are never the fault of the victim.
- **Online Harms:** Navigating digital risks, including the mechanics of image sharing, the prevalence and impact of deepfakes, exposure to pornography, and the influence of harmful or misogynistic online figures.

- Reporting Pathways: Clear guidance on when, where, and how to access internal school support and external specialist services.

In accordance with KCSIE, the curriculum is updated annually to address emerging societal and technological risks. The curriculum also focuses on fostering respectful relationships by actively challenging mental health stigma, harmful sexual behaviours, online harassment, extreme misogynistic ideologies and peer-on-peer abuse.

10.0 Definitions

This section establishes the precise statutory and legal definitions underpinning this policy to ensure consistent application by all staff. These definitions reflect the mandates of KCSIE 2026/27, the Sexual Offences Act 2003 and the Voyeurism (Offences) Act 2019.

- Child / Children: Anyone under the age of 18.
- Safeguarding and Protecting the Welfare of Children: Protecting students from maltreatment (online, inside, or outside the home). Including: Preventing impairment of students' mental and physical health or development. Ensuring students grow up in circumstances consistent with the provision of safe, effective care. Taking action to enable all students to achieve the best outcomes. Providing targeted help and support via local multi-agency Family Help frameworks as soon as problems emerge.
- Consent: The freedom and capacity to choose to engage in sexual activity. Consent can be withdrawn at any time, must be given for each individual act, and applies to specific activities only. Children under 13 can never legally consent to any sexual activity. The statutory age of consent in the UK is 16.
- Sexual Violence (Sexual Offences Act 2003). Including: Rape: Intentional penetration of the vagina, anus, or mouth of another person with a penis, without reasonable belief of consent. Assault by Penetration: Intentional sexual penetration of the vagina or anus of another person with a part of the body or an object, without reasonable belief of consent. Sexual Assault: Intentional sexual touching of another person without reasonable belief of consent. Causing Engagement in Sexual Activity Without Consent: Intentionally forcing a person to engage in a sexual activity (e.g., forced stripping, self-touching, or sexual acts with a third party) without their consent.
- Sexual Harassment: Unwanted conduct of a sexual nature (online or offline) that violates a student's dignity or creates an intimidating, hostile, or humiliated environment. If unchallenged, it normalises abusive cultures and intersects directly with online misogyny. It includes: Sexual comments, lewd remarks, stories, or sexualised name-calling and taunting. Deliberately brushing against someone, interfering with clothes, or displaying sexual images. Sharing unwanted explicit content including online, upskirting, sexualised bullying, and coercive messaging.
- Upskirting (Voyeurism Offences Act 2019): The criminal offence of taking a picture or video under another person's clothing without their consent, to obtain sexual

gratification or cause humiliation and distress. This applies to victims and perpetrators of any sex.

- Self-Generated Intimate Images and/or Videos: (*Updated title for 2026/27, replacing "sexting"*). The sharing between students of sexually explicit content or indecent imagery. Under KCSIE 2026/27, this explicitly includes images or videos generated, altered, or manipulated using AI (e.g., deepfakes). Indecent imagery is legally defined by one or more of the following: Nude or semi-nude sexual posing (including AI deepfakes). A child touching themselves in a sexual way. Any sexual activity involving a child or a child with animals. Someone hurting a child sexually.

11.0 Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

11.1 Legislation

- Children Act 1989
- Children Act 2004
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Counter-Terrorism and Security Act 2015
- Data Protection Act 2018 & UK General Data Protection Regulation (UK GDPR)
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021

11.2 Statutory Guidance

- DfE (2026) 'Keeping Children Safe in Education' (KCSIE 2026/27)
- DfE (2026) 'Working Together to Safeguard Children'
- DfE (2024) 'Working Together to Improve School Attendance'
- DfE (2023) 'The Prevent Duty: Guidance for England and Wales'
- HM Government (2026) 'Channel Duty Guidance'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- HM Government (2020) 'Multi-agency Statutory Guidance on Female Genital Mutilation'
- Home Office / FCDO (2023) 'Multi-agency Statutory Guidance for Dealing with Forced Marriage'

11.3 Non-statutory Guidance & Standards

- DfE (2025) 'Children's Social Care National Framework'

- DfE (2024) 'Information Sharing: Advice for Practitioners'
- DfE (2024) 'Mobile Phones in Schools: Guidance for Schools on Creating a Mobile Phone-Free Environment'
- DfE (2024) 'Generative Artificial Intelligence in Education'
- DfE (2024) 'Sharing Nudes and Semi-nudes: Advice for Education Settings'
- DfE (2024) 'Sexual Violence and Sexual Harassment Between Children in Schools and Colleges'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit Teachers from Overseas'
- DfE (2015) 'What to Do if You're Worried a Child Is Being Abused'

12.0 Linked School Policies

This policy operates in conjunction with the following school policies:

- Online Safety Policy (*Updated to include statutory Filtering and Monitoring procedures*)
- Behaviour for Learning Policy (*Including serious violence and suspension frameworks*)
- Relationships, Sex and Health Education (RSHE) Policy (*Updated statutory naming*)
- Social, Emotional and Mental Health (SEMH) Policy
- Attendance Policy
- Prevent and Anti-Radicalisation Policy
- Data Protection Policy
- Whistleblowing Policy
- HR Handbook
- Staff Code of Conduct
- Student Equality and Diversity Policy
- Substance Misuse Policy
- Protocol for Passing Information to the Police
- SMSC, Citizenship and PSHE Policy

13.0 Roles and Responsibilities

13.1 All Staff

Every member of staff must maintain an attitude of 'it could happen here' and 'it does happen here'. In all actions, staff must prioritise what is in the best interests of the student.

All staff have a responsibility to:

- Maintain a Safe Environment: Provide a secure space where students can learn, and identify those who require early intervention via the local Family Help framework.

- Understand Systems and Identity: Know the role and identity of the DSL and Deputy DSLs, and remain fully aware of the school's safeguarding systems, policies and induction tracking.
- Complete Mandatory Training: Read and implement Part One of KCSIE in full. Participate in continuous, annual safeguarding CPD, including dedicated training on digital safety, filtering and monitoring, and identifying vulnerabilities (e.g. mental health crises, substance misuse, online radicalisation and self-generated intimate images).
- Identify and Escalating Risks: Be alert to the fact that victims may not recognise their experiences as harmful or feel ready to disclose abuse. Reassure victims that they are taken seriously and will be supported, while maintaining professional confidentiality.
- Escalate Concerns Swiftly: Report all safeguarding, contextual or child-on-child concerns via CPOMS immediately.
- Bypass Internal Channels in Emergencies: Contact the police or relevant local authority children's services directly if there is an imminent threat of serious harm, FGM or if they suspect failure or obstruction by school leadership.

13.2 Teachers (Including the Headteacher)

In accordance with the Teachers' Standards, all teaching staff must safeguard students' wellbeing and maintain public trust in the profession. They must provide a safe learning environment and report actual or suspected abuse to the DSL team swiftly.

13.3 The Governing Body

The Governing Body holds strategic leadership responsibility for Haydon School's safeguarding arrangements.

The Governing Body must:

- Ensure Compliance: Guarantee school compliance with all child protection and safeguarding legislation, local inter-agency procedures and the statutory mandates of *Working Together to Safeguard Children*.
- Verify Vetting and Training: Formally ensure all staff read Part One of KCSIE and that compliance is tracked via the Single Central Record (SCR). Ensure all governors undergo an Enhanced DBS check and receive regular safeguarding training.
- Structure Leadership: Formally appoint an SLT member as DSL, ensuring the role—and those of the trained Deputy DSLs—are explicitly outlined in job descriptions. Nominate a safeguarding governor to liaise with the Local Authority regarding allegations against the Headteacher or other governors.
- Listen to the Student Voice: Ensure accessible reporting systems are in place so students can confidently report abuse, express their views and know that their wishes and feelings are factored into decision-making (except where safety requires overriding a student's wishes).

- **Oversee Strategic Policies:** Maintain robust, compliant policies covering safer recruitment (ensuring at least one panel member holds Level 3 certification), data protection, mobile phone boundaries, mental health referral routes, child-on-child abuse and student equality.
- **Support Vulnerable Cohorts:** Appoint a Designated Teacher to promote the educational achievement of Looked-After (LAC) and Previously Looked-After Children (PLAC), ensuring collaboration with the Virtual School Head (VSH). Establish robust safeguarding responses for students missing education.

13.4 The Headteacher

The Headteacher must:

- **Enforce Operational Compliance:** Ensure the safeguarding and referral policies adopted by the Governing Body are explicitly followed by all staff.
- **Provide Induction Material:** Provide all new staff, supply staff and volunteers with the necessary safeguarding policies, procedures and training upon arrival.
- **Support the Safeguarding Team:** Ensure the DSL and Deputy DSLs are provided with adequate time, funding, resources and professional safeguarding supervision to discharge their duties.

13.5 The Designated Safeguarding Lead (DSL)

The Governing body should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should have the appropriate status and authority within the school to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. The DSL holds lead operational responsibility for safeguarding, child protection and digital safety across Haydon School.

To ensure continuity of safeguarding responsibilities, Haydon implements robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances, including a shared email. During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns.

The DSL must:

- **Act as Specialist Lead:** Serve as the central source of expertise, support and advice for all staff on child welfare, information-sharing laws (UK GDPR) and data protection.
- **Manage Referrals and External Liaison:** Refer cases of suspected abuse or exploitation to the Integrated Front Door, radicalisation concerns to Prevent, potential crimes to the Police (in line with NPCC guidance) and safer recruitment breaches to the LADO, DBS or TRA.

- **Coordinate Case Management:** Lead strategy discussions, inter-agency assessments and multi-agency family support plans. Ensure term-time availability and arrange adequate cover for out-of-hours activities.
- **Maintain Secure Records:** Manage secure, up-to-date child protection files via CPOMS. Ensure files are transferred securely to a student's new school within 5 days of their departure.
- **Drive Educational Outcomes for Vulnerable Groups:** Coordinate with teachers and the SLT to track and promote the attendance, attainment and wellbeing of students who have or have had a Social Worker, or are in kinship care.
- **Foster Inclusive Support:** Promote supportive, unbiased family engagement. Lead the Mental Health Support Teams and school counsellors to address overlapping mental health and safeguarding needs. Work with the SENCO and Attendance teams to identify and raise awareness of vulnerable intersections safeguarding needs of students.
- **Deliver Continuous CPD:** Lead the school's annual safeguarding policy reviews and coordinate the year-round staff CPD programme. Undergo advanced DSL refresher training at least every two years.
- **Oversee LAC/PLAC Progress:** Act as the Designated Teacher responsible for strategically promoting the educational outcomes of care-experienced children, collaborating directly with the VSH to maximise enhanced Pupil Premium funding.
- **Multi-Agency Working & Family Help**
- **Ensure Statutory Curriculum Compliance:** Oversee the RSHE curriculum to ensure it meets all current statutory requirements.
- **Manage Lettings and Facilities Safeguarding:** Ensure that all school lettings are managed in line with KCSIE requirements, including the execution of robust safeguarding audits of all external providers.
- **Oversee Estate Safety:** Ensure the school estate is safe and compliant with all relevant legislative guidance.
- **Maintain Safer Recruitment Standards:** Ensure all safer recruitment standards are met across the school.
- **Ensure Continuous Safeguarding Coverage:** Act as the primary point of contact and ensure continuous safeguarding response and coverage throughout both term time and school holidays.

14.0 Multi-Agency Working & Family Help

Haydon School operates in accordance with local multi-agency safeguarding arrangements as part of its statutory duty under *Working Together to Safeguard Children*. As a named relevant agency, the school co-operates fully with local safeguarding partners, the Integrated Front Door, the police, and health services to protect students, share information, and contribute to multi-agency plans.

Where a safeguarding or welfare need is identified, the school provides seamless access for local authority children's services to conduct Section 17 or Section 47 assessments under the Children Act 1989. The school recognises that robust inter-agency

context-mapping is vital to identifying, disrupting, and preventing complex extramural harms, including Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE).

14.1 Partnership and Statutory Cooperation

Haydon School operates under a statutory duty to co-operate with local safeguarding partners, the Integrated Front Door, the police, and health services. Where a safeguarding or welfare need is identified, the school provides immediate access for local authority children's services to conduct Section 17 or Section 47 assessments under the Children Act 1989. The school utilises multi-agency context-mapping to identify, disrupt, and prevent extramural harms, including Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE).

14.2 The Family Help Framework and Risk Indicators

Family Help provides coordinated support as soon as a problem emerges. The DSL team coordinates school-led pastoral interventions and external multi-agency support, managing assessments and requiring staff to support cases. If a student's situation fails to improve or worsens, an immediate referral is made to the Integrated Front Door.

Staff must maintain heightened vigilance and an assumption of risk for students who:

- Have SEND or a disability (regardless of a statutory EHCP).
- Have mental health needs or display severe emotional distress (including self-harm, eating disorders, or suicidal ideation).
- Are young carers or are privately fostered.
- Misuse drugs or alcohol, or live in a household affected by adult substance misuse, mental health problems, or domestic abuse.
- Are supported under Operation Encompass, requiring the school to explicitly document and respond to the 'voice of the child'.
- Have a parent or carer in custody, or are affected by parental offending.
- Display signs of being drawn into anti-social or criminal behaviour, gangs, organised crime groups, or county lines.
- Have been repeatedly removed from the classroom or are placed on a part-time timetable.
- Are frequently missing, or at risk of going missing, from home, care, or education.
- Are at risk of modern slavery, human trafficking, or sexual/criminal exploitation.
- Are vulnerable to radicalisation, online hate speech, or extreme misogynistic subcultures.
- Are at risk of 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage.
- Have returned home to their family from local authority care.
- Are persistently absent (under 90%) or severely absent (under 50%), including unexplained absences for parts of the school day.
- Have experienced multiple suspensions or are at risk of permanent exclusion.

14.3 Statutory Information Sharing

Proactive information sharing is essential to safeguard children. While the UK GDPR and the Data Protection Act 2018 require personal information to be processed fairly and lawfully, data protection frameworks do not act as a barrier to sharing information where a child is at risk of harm. Staff must never allow the fear of sharing information to obstruct their professional responsibilities. Where a risk to a child's safety exists, the duty to safeguard overrides the principle of absolute confidentiality. Staff in doubt must consult the DSL team immediately.

15.0 Abuse, Neglect and Exploitation: Core Definitions

All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery (see below), understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, especially around chat groups, and the sharing of abusive material and images.

15.1 - Abuse:

A form of maltreatment involving inflicting harm or failing to prevent it. Harm includes non-physical ill-treatment and the severe psychological impact of witnessing domestic abuse. Abuse can occur within family, institutional, or community settings, be perpetrated by adults or other children, and take place wholly online or via technology-facilitated offline abuse.

15.2 - Physical Abuse:

Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm. This includes Fabricated or Induced Illness (FII), where a parent/carer fabricates or deliberately induces illness in a child.

15.3 - Emotional Abuse:

Persistent emotional maltreatment causing severe, adverse effects on developmental and emotional health. This includes verbal abuse such as conveying worthlessness, conditional value, deliberate silencing, imposing developmentally inappropriate expectations, overprotection that limits exploration, or exposure to the ill-treatment of others. It also features severe cyberbullying, online harassment, and exploitation. Emotional abuse is inherently involved in all other forms of maltreatment.

15.4 - Sexual Abuse:

Forcing or enticing a child into sexual activities, regardless of physical violence or the child's awareness. This includes physical contact (rape, assault by penetration, or non-penetrative acts) and non-contact activities (coercing children into viewing or producing sexual images, encouraging sexually inappropriate behaviours, or online/offline grooming).F

15.5 - Neglect:

The persistent failure to meet a child's basic physical and psychological needs, resulting in serious impairment of health or development. This includes failure to provide adequate food, clothing, or shelter (including abandonment); lack of adequate supervision (using inappropriate caregivers); failure to protect from danger; or withholding appropriate medical care and responsiveness to emotional needs.

16.0 Key Statutory Indicators

While the indicators below represent common markers of harm, they are not exhaustive; students may present with other signs, symptoms, or behavioural changes not explicitly listed here. While these indicators can occur in isolation, multiple issues frequently overlap. Safeguarding incidents are rarely standalone events, and indicators may stem from extra-familial harms outside the home or school environment. All staff must remain vigilant to any unusual or unexplained changes in a student's presentation.

16.1 - Physical Injuries and Medical Markers

- Any injuries that are completely inconsistent with the explanation given for them.
- Bruises, burns, bites, fractures, cuts, or scratches which do not have a plausible, accidental explanation.
- Injuries which occur to the body in places which are not normally exposed or vulnerable via ordinary falls, games, or sports.
- Visible injuries or medical conditions which have clearly not received appropriate medical attention.

- Repeated urinary infections or unexplained, chronic abdominal ("tummy") pains.

16.2 – Physical Neglect and Personal Care

- Under-nourishment, failure to grow, constant hunger, or high-risk food habits (such as stealing or gorging food).
- Inadequate general care, untreated illnesses, and poor physical hygiene.
- Direct or persistent reluctance to change clothes for PE, school games, or swimming.

16.3- Emotional, Mood and Behavioural Changes

- Regressive, sudden, or extreme changes in mood or behaviour (e.g., where a child suddenly withdraws, becomes abnormally "clingy", or exhibits depression/aggression and extreme anxiety).
- Pervasive nervousness, sudden obsessions, phobias, or a state of "frozen watchfulness".
- Sudden, unexplained academic under-achievement or a severe, ongoing lack of concentration.
- Running away from home, habitual stealing, or compulsive lying.
- Persistent, unexplained tiredness or severe attention-seeking behaviour.

16.4 – Sexual Preoccupation and Behaviours

- Any direct allegations or disclosures made by a child concerning sexual abuse.
- An excessive preoccupation with sexual matters and a detailed knowledge of adult sexual behaviour far exceeding their developmental age.
- Regular engagement in age-inappropriate sexual play, or expressing sexual activity explicitly through words, play, or drawing.
- A child who displays sexually provocative or seductive behaviours with adults.
- Disclosures or evidence of inappropriate or unsafe bed-sharing arrangements at home.
- Severe sleep disturbances accompanied by intense fears, phobias, vivid dreams, or nightmares (sometimes featuring overt or veiled sexual connotations).
- Developing severe eating disorders, including anorexia or bulimia.

16.5 – Exploitation and Community Risk (CSE & CCE)

- Appearing with unexplained gifts, large amounts of cash, or new luxury possessions.
- Associating with other young people known to be involved in exploitation, or having older boyfriends or girlfriends.
- Regularly going missing for periods of time, frequently coming home late, or missing school, training, and education.
- Suffering from changes in general emotional wellbeing or turning to drug-taking and alcohol misuse.
- The presence of sexually transmitted infections (STIs) or teenage pregnancy.

- Evidence of creating, altering, or sharing indecent imagery (including self-generated intimate images and AI-generated deepfakes), which can serve as a strong indicator of coercive manipulation.
- Inappropriate or unsafe relationships with peers and/or adults outside of normal school circles (extra-familial harms).

17.0 Regulations and safeguarding requirements relating to school premises

As a mixed secondary school with pupils aged 11 to 18, the configuration of our site is designed to uphold the legal requirements for safety, comfort, privacy, and dignity in accordance with the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014,

The school explicitly recognises its statutory safeguarding duties regarding single-sex spaces. Consequently, the school enforces clear boundaries based on biological sex to protect the privacy and welfare of all students.

17.1 – Toilet Facilities

- Separate toilets are provided for boys and girls.
- Pupils must not enter toilets designated for the opposite biological sex. This applies strictly, including when responding to requests to support any degree of social transition.
- Pupils who object to using toilets designated for their biological sex will be offered alternative accommodations. At Haydon School, this is met using self-contained, individual accessible toilets which are non-gendered, intended for single occupancy, and lock from the inside.
- Alternative arrangements must not compromise the safety, comfort, privacy, dignity, or single-sex provision available to other pupils.

17.2 – Changing Rooms and Showers

- Suitable, sex-segregated changing and shower facilities are provided for pupils.
- Pupils are not permitted to undress in front of pupils of the opposite biological sex. Social transition support must never include granting access to changing rooms designated for the opposite sex.
- If a pupil objects to using facilities designated for their biological sex, the school will provide a fully enclosed private room (used by one child at a time and secured from the inside) or permit access at an alternative time. These measures do not compromise standard single-sex communal provision.

18.0 Specific Safeguarding Issues

18.1 - Domestic Abuse

In accordance with the Domestic Abuse Act 2021, domestic abuse is defined as abusive behaviour between individuals aged 16 or over who are personally connected. This encompasses physical or sexual abuse, violent or threatening behaviour, controlling or coercive control, economic or financial abuse, and psychological or emotional manipulation.

Under the KCSIE, this definition explicitly includes children who see, hear, or experience its effects, recognising them as victims of domestic abuse in their own right.

Operational Response and Operation Encompass Data Standards

Haydon School works in active partnership with Operation Encompass to receive rapid police notifications when domestic abuse has occurred in a student's home. In compliance with the KCSIE, the school's response following a notification must:

- Securely document and respond to the "voice of the child", specifically capturing what they say, their presenting behaviour, and any protected characteristics to ensure culturally sensitive support.
- Implement targeted safety plans and adjustments to manage sudden disruptions, such as forced relocations out of the family home.
- Override standard data protection restrictions to store and share information where a failure to do so would leave a child at risk of harm.

Behavioural Indicators of Domestic Abuse Exposure

Staff must consider the possibility of household domestic abuse if a student presents with a pattern of the following overlapping indicators:

- Physical & Developmental: Unexplained physical injuries, sudden weight loss, eating difficulties, or noticeable developmental delays.
- Emotional & Psychological: Severe withdrawal, persistent sadness or depression, self-harm, low self-esteem, or intense feelings of guilt and self-blame.
- Behavioural & Relational: Insecurity, pervasive fear, chronic difficulties trusting others, poor social skills, unprovoked aggression, truanting or running away, or being intensely secretive or hyper-protective of a parent or siblings.

18.2 Child-on-Child Abuse (*including harassment and violence*)

In accordance with the KCSIE (which retitled and rewrote this section to explicitly include harassment and violence), Haydon School operates a zero-tolerance approach to all forms of peer exploitation. Staff must never dismiss abusive peer behaviours as "banter" or a normal part of growing up.

Safeguarding responses must consider both the child who has been harmed and the child who has caused harm. Staff must recognise a progressive continuum of sexual behaviours, noting how misogyny can lead to the normalisation of harassment and violence. Child-on-child abuse occurs inside or outside of school, as well as online, and includes:

- Sexual Violence and Harassment: Harmful sexual behaviour (HSB), rape, sexual assault, and assault by penetration (explicitly clarified to include penetration with an object).
- Serious Violence and the Intent Threshold: Physical assaults and threats involving weapons. Staff must report any instance where a student carries, uses, or expresses an explicit intent to use or carry a weapon, lowering the threshold to allow for immediate DSL intervention and preventative de-escalation.
- Image-Based Abuse: Consensual and non-consensual sharing of self-generated intimate images and/or videos, including those generated or manipulated using AI (such as deepfakes), which serves as a critical indicator of abuse and coercive manipulation.

Haydon School operates a zero-tolerance approach to child-on-child abuse. Staff must never dismiss abusive peer-to-peer behaviours, harassment, or physical intimidation as "banter", "play-fighting", or a normal part of growing up.

Abuse can occur between pupils of any age, gender, or orientation, both inside and outside the school estate, as well as online. Staff must recognise that an absence of reported incidents does not mean child-on-child abuse is not occurring within the school community.

Manifestations of Peer Abuse:

Child-on-child abuse presents across a progressive continuum of behaviours, which staff are trained to identify and disrupt:

- Bullying & Intimidation: Systematic physical, verbal, or emotional bullying, including cyberbullying and prejudice-based or discriminatory harassment.
- Intimate Relationship Abuse: Coercive control, physical violence, or psychological abuse within teenage romantic relationships.
- Serious Violence: Physical assaults or threats involving weapons or knives.
- Sexual Violence & Harassment: Rape, sexual assault, and assault by penetration (including penetration with an object), alongside standalone or patterned sexual harassment (online and offline).
- Image-Based Abuse: The consensual or non-consensual sharing of nude and semi-nude images or videos, explicitly including synthetic, deepfaked, or AI-manipulated intimate pseudo-imagery.
- Upskirting: The non-consensual taking of images beneath a person's clothing.
- Initiation Rituals: Hazing-type violence, peer pressure, or humiliation designed to initiate a student into a specific social group or peer network.

Targeted Vulnerabilities & Protective Pathways:

The school recognises that certain student cohorts face a disproportionately high risk of targeted abuse:

- Students with SEND: Statistics demonstrate that pupils with Special Educational Needs and Disabilities face heightened vulnerability. Staff must never assume that a potential indicator of abuse (e.g. withdrawal, behavioural outbursts, or regression) is simply a manifestation of the student's SEND, and must always investigate further.
- LGBTQ+ Students: Pupils who are LGBTQ+, or who are *perceived* to be LGBTQ+, face elevated risks of peer targeting. The school's response to sexual harassment, discrimination, or violence between students of the same sex is identical in rigour and scale to incidents involving opposite-sex students.

Student Reporting & Safeguarding Actions:

Students are taught through the RSHE curriculum how to safely report peer concerns regarding themselves or their friends. All student disclosures will be handled with absolute gravity, with an explicit reassurance that they will be taken seriously, protected, and fully supported.

All verified or suspected incidents must be logged instantly on CPOMS. The DSL team will deploy a victim-centred response, managing allegations through the *Child-on-Child Abuse Policy*, executing separate safety plans for victims, and initiating statutory multi-agency Family Help / Integrated Front Door interventions for both the victim and the alleged perpetrator where thresholds are met.

18.3 Homelessness and Housing Insecurity

The DSL and Deputy DSLs maintain operational referral pathways into the Local Housing Authority to address severe housing instability or homelessness early. Under statutory updates, homelessness must be tracked as both a critical poverty indicator and a prominent safeguarding vulnerability linked directly to neglect and extra-familial exploitation.

Key Risk Indicators:

- Accumulating household debt, severe rent arrears, or sudden changes in family socioeconomic circumstances.
- Eviction notices or temporary accommodation orders triggered by domestic abuse or anti-social behaviour frameworks.
- Explicit disclosures from a student or parent regarding forced, sudden relocations ("having to move").
- Unexplained or sudden declines in personal hygiene, extreme fatigue, or sudden changes in a student's ability to maintain standard school uniform or equipment.

Statutory Safeguarding Threshold: Local Housing Authority referrals do not replace a mandatory child protection referral to the Integrated Front Door if a child is experiencing significant harm or systemic neglect due to their housing situation. For vulnerable 16- and 17-year-olds facing solo homelessness or rooflessness, an immediate safeguarding referral must be made to local authority children's services to trigger statutory assessments under Section 17 or Section 20 of the Children Act 1989.

18.4 Private Fostering Arrangements

A private fostering arrangement occurs when a child under the age of 16 (or under 18 if they have a registered disability) is cared for, and provided with accommodation for 28 continuous days or more, by someone who is not a parent, close relative, or legal guardian with parental responsibility.

- *Note: Under the Children Act 1989, statutory "close relatives" are limited to step-parents, grandparents, siblings, aunts, and uncles. Distant relatives, family friends, or neighbours do not hold this status.*

Strategic Tracking and Reporting Duties:

- **The Notification Mandate:** The school holds a statutory duty to identify and report private fostering arrangements to the local authority immediately. When staff discover a student is living in an unnotified arrangement, the school must inform children's services, even if the carers or parents withhold consent.
- **Contextual Risk Identification:** While many arrangements are benign, staff must maintain an attitude of 'it could happen here' and be alert to high-risk profiles. This includes unaccompanied asylum-seeking minors, students left behind due to parental overseas deployment, or international students on independent study programs who are living with host families or strangers.
- **Modern Slavery & Exploitation Overlap:** In line with national guidance, staff must remain open to the possibility that an hidden or unnotified private fostering arrangement may serve as a vehicle for modern slavery, human trafficking, or criminal/sexual exploitation.
- **Operational Action:** Staff must verify who has legal parental responsibility during induction or when a change of address occurs. Any ambiguous, unverified, or informal living arrangements lasting or intended to last more than 28 days must be logged on CPOMS and escalated immediately to the DSL team for local authority referral.

18.5 Children Missing Education (CME) Framework

A child going missing from school, or showing a pattern of irregular or severely disrupted attendance, is a primary indicator of potential abuse, neglect, radicalisation, or extra-familial exploitation. In compliance with the KCSIE and the statutory *Working Together to Improve School Attendance* frameworks, Haydon School treats attendance vulnerabilities as an active child protection threshold.

Operational Safeguarding Mandates:

- **Continuous Monitoring:** All staff have a duty to systematically monitor pupils who fail to attend regularly or go missing from education, particularly on repeat occasions. Every incident must be reported immediately to the DSL team via CPOMS.
- **The 10-Day Unauthorised Boundary:** The school will formally notify the Local Authority (LA) of any student who has been absent without permission for a continuous period of 10 school days or more.
- **The 15-Day Medical Threshold:** The school will formally notify the LA when a student misses or is expected to miss 15 consecutive or cumulative school days due to illness, ensuring the LA can deploy alternative educational support.
- **Integrated Escalation:** Where a student's absence indicates underlying safeguarding risks, the DSL team will instantly initiate joint casework with local authority children's services and the Senior Attendance Champion to deploy multi-agency Family Help interventions.

18.6 Management of the Admissions Register

In accordance with The School Attendance (Pupil Registration) (England) Regulations 2024, the admissions register must be held electronically, kept completely accurate, and every entry preserved for a mandatory minimum of six years.

Enrollment and Arrival Standards:

- **Day-One Registration:** Pupils are formally placed on the admissions register at the beginning of the first day they are expected to attend (as agreed between the school and the parent/carer). The school will not delay registration until a pupil physically arrives.
- **LA Notification:** The school will notify the LA within 5 school days of any student's name being added to the admissions register.
- **Day-One Absence & Missing Checks:** Staff will actively monitor students who fail to attend on their agreed start date. The school will hold at least two emergency contacts for every student where possible. If a child fails to arrive, the school will exhaust contact options and notify the LA at the earliest opportunity.

Relocation Tracking and Mandatory Context Logs:

If a parent notifies the school that a student is changing address or transferring institutions, the school must record the following verified information on the register:

- **Change of Address:** The full name of the parent with whom the student will live, the new address, and the specific date from when the student will live there.
- **Change of School:** The name of the new school, and the date on which the student first attended (or is due to attend). Data transfers to the new institution will be handled instantly through a secure internet system (Common Transfer File/CTF).

18.7 Statutory Grounds for Deletion from the Register

To ensure robust context-mapping and prevent children from being "lost" within the system, Haydon School will inform the LA of any student who is due to be deleted from the admissions register before the deletion takes effect. In adherence to Regulation 9 of the Pupil Registration Regulations, a student of compulsory school age will only be removed under the following defined grounds:

- Elective Home Education (EHE): The student has been taken out of school by their parents to be educated efficiently otherwise than at school, requiring an explicit return to the LA.
- Cessation of Residence: The student has ceased to attend the school and no longer lives within a reasonable distance of the premises.
- Extended Custody: The student is detained in custody for a period of more than four months under a final court order, and the school has no reasonable grounds to believe they will return at the end of that period.
- Permanent Exclusion: The student has been permanently excluded, and the disciplinary review/appeals frameworks have been fully exhausted.
- Joint Enquiries (Whereabouts Unknown): The student has been continuously absent from school for at least 20 school days, and both the school and the LA have *jointly* made reasonable efforts to locate the child's position and circumstances but have failed to succeed.

Statutory Modification Note: Under current statutory registration regulations, a school can no longer delete a student from the register solely because they have been certified by a GP or medical officer as unfit to attend. These students must remain on roll, and their absence must be handled as a collaborative safeguarding and support case with the LA.

Information Required for LA Deletion Returns:

When reporting a removal to the LA, the school must supply:

- The full name and date of birth of the student.
- The full names and addresses of any parents with whom the student lives, along with at least one active telephone contact number.
- The full name and address of the parent with whom the student is going to live, and the expected transfer date (if applicable).
- The name of the student's destination school and the expected start date (if applicable).
- The precise statutory ground for removal under Regulation 9.

Haydon School will work in direct partnership with the LA to establish secure methods for managing student returns. The school will explicitly flag instances where parents withhold necessary tracking information (such as destination addresses), ensuring that all missing data is passed to the LA alongside essential contextual safeguarding concerns.

18.8 Child Abduction and Community Safety Incidents

Child abduction is defined as the unauthorised removal or retention of a child from a parent or anyone holding legal parental responsibility. Child abduction can be perpetrated by parents and other relatives (familial abduction), people known to the victim, or strangers.

Operational Vigilance & Community Safety Protocols:

- **Vicinity Monitoring:** All staff must remain highly alert to community safety incidents and suspicious activity occurring in the immediate vicinity of the school estate. This includes identifying individuals loitering near school gates, unknown adults attempting to converse with pupils, or suspicious vehicles operating during drop-off and pick-up windows.
- **Immediate Escalation Pathways:** Any community safety concern, suspicious approach, or attempted abduction must be reported immediately to the DSL team and the Site Safety team. The school will instantly execute an emergency alert to local policing teams via the non-emergency (101) or emergency (999) networks, in line with the Protocol for Passing Information to the Police.
- **Contextual Communication:** Where a verified threat or suspicious incident occurs within the local area, the DSL team will work alongside the Local Authority and neighbouring schools to securely distribute context-specific safety alerts to parents, carers, and staff.

Student Preventative Education:

Through a structured, age-appropriate PSHE and Citizenship curriculum, Haydon School provides students with practical personal safety strategies to mitigate risks when travelling to and from school or when outdoors. This includes digital safety awareness regarding location-sharing applications, situational awareness, and clear guidelines on how to confidently report safety concerns or suspicious approaches to trusted adults.

18.9 - Child Criminal Exploitation (CCE), County Lines & Cuckoing

Child Criminal Exploitation (CCE) is a form of abuse where an individual or group exploits an imbalance of power to coerce, manipulate, or deceive a child into committing criminal activity. This exploitation occurs in exchange for promised rewards, for the financial or operational advantage of the perpetrator, or under the duress of violence and intimidation.

Haydon School recognises that students caught in CCE are victims of abuse, irrespective of whether they have committed illegal acts, and even if the criminal activity appears consensual. CCE affects students of any sex, background, or capability.

Specific Contexts and Forms of CCE:

- County Lines: Organised criminal networks and gangs exploiting children to move, store, or sell drugs and illicit cash into one or more areas, either locally or across the UK.
- Cuckoing: A highly predatory practice where criminal groups compromise and take over a person's home (either an older teenager's property or a student's family home) to use it as a "trap house" or regional base to store drugs, conceal weapons, or manage cash.
- Cultivation and Theft: Forcing or manipulating children into working in illegal cannabis factories, shoplifting, pickpocketing, or committing vehicle crime.
- Coerced Violence: Forcing children into committing, or threatening to commit, serious violence against others (including knife crime and gang-related assaults).

Overlapping Risk Indicators

Staff must maintain professional curiosity and look out for overlapping signs across community, home, and school environments. Report the following indicators to the DSL team via CPOMS immediately:

- Possession & Association: Appearing with unexplained gifts, large amounts of cash, or new premium possessions (e.g. mobile phones, designer clothing); or associating with older individuals or youth groups known to be involved in exploitation.
- Absence & Geographics: Frequently going missing from home or school, regularly returning home late, displaying persistent or severe school absence, or being found in areas far away from their home or local community.
- Home Environment & Cuckoing Red Flags: A student actively avoiding going home after school hours, expressing intense anxiety about returning home, or reporting sudden, unknown adult "visitors" or a total lack of privacy at home.
- Wellbeing & Substance Use: Sudden, unexplained declines in general emotional wellbeing, extreme fatigue, declines in personal hygiene, or turning to drug taking and alcohol misuse.
- Trauma & Serious Violence: Presenting as either the victim or the alleged perpetrator of serious community violence, knife crime, or weapon-related offences.

Immediate Safeguarding Escalation

CCE, County Lines, and Cuckoing represent acute, high-risk intersections of extra-familial harm, community violence, and systemic neglect. When a member of staff suspects a student is being subjected to any form of criminal exploitation, they must instantly log the concern on CPOMS.

The school treats these indicators as an immediate child protection threshold. The DSL team will execute rapid referrals to the Integrated Front Door and work in direct tandem with local police networks to secure the safety of the child, support the family, and disrupt the criminal network.

18.10 Cyber-Crime

Cyber-crime covers criminal activity committed using smartphones, computers, or the internet. The school differentiates between two categories:

- Cyber-Dependent Crimes: Offences that can only be committed using a computer, such as unauthorised network access ("hacking"), Denial of Service attacks ("booting"), or creating/using malicious software ("malware", ransomware, spyware, or Remote Access Trojans).
- Cyber-Enabled Crimes: Offline crimes—such as fraud, stalking, or exploitation—facilitated at scale and speed via online platforms.

Safeguarding Indicators:

Staff must maintain professional curiosity regarding students who show an unhealthy fixation on digital infrastructure, particularly alongside these markers:

- Technical: Possessing multiple encrypted devices, using advanced anonymising tools (e.g. specialised VPNs), or demonstrating coding capabilities far exceeding the school curriculum.
- Behavioural: Spending excessive, unmonitored hours online, chronic fatigue, being highly defensive or secretive about screen activity, or boasting about network takedowns and online financial gains.
- Social: Isolation from physical school peers alongside total immersion in anonymous online forums or dark web marketplaces.

Intervention and Referral:

Where a student demonstrates advanced digital skills but risks crossing into illegal cyber activity, the school treats this as a safeguarding intervention rather than a purely disciplinary issue.

The DSL team will formally refer the student to the National Crime Agency's (NCA) Cyber Choices programme. This statutory framework aims to divert vulnerable individuals into safe, legal, and valuable technical careers. All concerns must be logged immediately on CPOMS.

18.11 – Child Sexual Exploitation (CSE)

Child Sexual Exploitation (CSE) is a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into sexual activity. This exploitation can occur:

- In exchange for something the victim needs or wants.
- For the financial advantage, increased status, or other operational advantage of the perpetrator or facilitator.
- Through violence or the threat of violence.
- By an organised network

Haydon School recognises that CSE can occur over time or as a one-off occurrence. It frequently takes place without the student's immediate awareness, such as when perpetrators or peers share or manipulate intimate videos and images across social media networks. Most sexual abuse will be committed by individuals known to the victim.

CSE affects students of any sex, background, or vulnerability. Abuse is never mitigated by apparent consent; this includes students aged 16 and above who are of the legal age of consent, as well as those who mistakenly believe they are in a genuine, egalitarian romantic relationship.

Staff must maintain professional curiosity and look out for overlapping signs across community, home, and school environments. Report the following indicators to the DSL team via CPOMS immediately:

- **Possession & Relationships:** Appearing with unexplained gifts, money, or premium possessions; associating with individuals or youth groups known to be involved in exploitation; or having significantly older boyfriends or girlfriends.
- **Attendance & Behaviour:** Regularly going missing from home or education, returning home late, displaying persistent or severe school absence, or turning to drug or alcohol misuse.
- **Physical & Emotional Health:** Sudden, unexplained changes in emotional wellbeing; displaying sexualised behaviours or language beyond expected developmental stages; the presence of Sexually Transmitted Infections (STIs); or teenage pregnancy.
- **Digital Coercion & Financial Sextortion:** The presence, non-consensual sharing, or threat of distribution of self-generated intimate images—including illegal pseudo-images generated or manipulated using AI (such as deepfakes)—which serves as a primary vehicle for blackmail, sextortion, and coercive control.

All concerns or disclosures related to CSE must be managed in line with statutory child protection pathways:

- Where CSE or the risk of it is suspected, staff must immediately discuss the case with the DSL and log the entry on CPOMS. If a concern remains, local multi-agency safeguarding procedures will be triggered immediately via a formal referral to the Local Authority Family Help / Integrated Front Door pathways.
- Staff must never delete, download, distribute, or look at any suspected illicit digital images or videos. Devices and digital profiles must be preserved exactly as they are, untouched, pending legal police instructions.
- The DSL team will act as the primary liaison with the police (calling 101, or 999 if the child is in immediate danger), CEOP, and the Internet Watch Foundation (IWF).
- The school will actively assist affected pupils to access secure, victim-led erasure resources, such as Childline's *Report Remove* tool, to remove intercepted or leaked imagery from public networks. The school will cooperate fully with the LA and all assigned authorities throughout the lifecycle of the case.

18.12 - AI-Generated Child Sexual Abuse Material (AI-CSAM), Deepfakes & Financial Sextortion

In compliance with KCSIE statutory guidance, Haydon School treats AI-generated child sexual abuse material (AI-CSAM) with the exact same level of severity, urgency, and legal intervention as traditional CSAM.

The proliferation of technology has escalated the risks of digital abuse, specifically regarding the creation of synthetic imagery, deepfakes, and their weaponisation by adult offenders to commit financially motivated sexual extortion ("sextortion").

Statutory Legal Definitions & Legal Status:

- The "Pseudo-Image" Standard: Under UK legislation, computer-generated content including AI deepfakes, face-swaps, or "nudified" images and videos that appear to depict a photograph or video of a child under 18 is explicitly classified as illegal pseudo-images.
- The Absolute Liability Framework: Statutory guidance clarifies that intent is legally irrelevant. The production, possession, or distribution of a deepfake or synthetically manipulated intimate image of a minor constitutes a criminal offence under the law, regardless of the user's intent or perceived "banter".

All staff must maintain a zero-tolerance approach to digital harms and execute the following instructions immediately upon a disclosure or suspicion:

- Staff must never delete, download, copy, print, or look at suspected illicit digital content, including deepfakes. No member of staff should investigate the device or ask a pupil to display the imagery. The physical device or digital profile must be preserved exactly as it is, untouched, to maintain forensic integrity for law enforcement.
- Immediate DSL Notification: Any suspicion involving synthetic deepfakes or real intimate imagery of a child must be reported to the DSL team instantly via an encrypted CPOMS pathway.
- Law Enforcement Escalation: The DSL/DDSL team will directly notify the police via the primary operational pathway (calling 101, or 999 if the child is in immediate or active danger). Secondary statutory reports will be routed to the National Crime Agency's Child Exploitation and Online Protection (CEOP) command or the Internet Watch Foundation (IWF).
- Active Pupil-Led Takedowns: To mitigate trauma and contain data spread, the school will actively support affected students in deploying the Internet Watch Foundation and Childline "Report Remove" tool (www.childline.org.uk/remove), allowing minors to securely flag, track, and delete explicit imagery or deepfakes of themselves from public server hosts.
- Preventative Curricular Education: Through a structured RSE, PSHE, and computing curriculum, students are explicitly educated on the legal boundaries,

consent mechanisms, and severe criminal liabilities involved in creating, possessing, or sharing AI-generated content or deepfakes.

18.13 - Modern Slavery and the National Referral Mechanism (NRM)

Modern slavery encompasses human trafficking, slavery, servitude, and forced or compulsory labour. Haydon School recognises that modern slavery does not exist in isolation; it frequently intersects with extra-familial harms, serving as the systemic mechanism driving Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), and unnotified private fostering arrangements.

Under the KCSIE statutory framework, any minor under 18 who is recruited, transported, or harboured for exploitation is legally classified as a victim of trafficking, irrespective of whether force, coercion, or deception can be proven.

Strategic Safeguarding Indicators:

Staff must maintain an attitude of "it could happen here" and log immediate concerns on CPOMS if a student displays the following markers:

- **Physical & Environmental:** Displaying clear signs of physical neglect, malnourishment, chronic fatigue, or untreated injuries; living in overcrowded, sub-standard accommodation; or a history of frequent, unexplained moves.
- **Control & Coercion:** Being regularly dropped off and collected from school by changing, unknown adults; possessing no control over their identity documents (passports, birth certificates); or showing intense fear of authority or law enforcement.
- **Behavioural & Economic:** Presenting with unexplained large sums of cash, multiple mobile phones, or high-value items, alongside severe or erratic school absence.

Statutory Escalation & The National Referral Mechanism (NRM):

Where modern slavery or trafficking is suspected, the school treats this as a high-risk child protection threshold:

- **Immediate Pathway:** Staff must immediately alert the DSL team via CPOMS. The DSL team will launch a formal child protection referral to the multi-agency Family Help / Integrated Front Door pathways.
- **The National Referral Mechanism (NRM):** The NRM is the UK's statutory framework for identifying and supporting victims of modern slavery. Because the school is not a direct First Responder, the DSL team will work in direct tandem with designated First Responders (such as the Local Authority or Police) to fast-track an NRM referral.
- **The Consent Standard:** In compliance with Home Office and statutory updates, explicit consent is not required to refer a child under the age of 18 into the NRM, and safeguarding actions must be prioritised ahead of any immigration or

criminal concerns, Female Genital Mutilation (FGM) and Honour-Based Abuse (HBA)

18.14 - Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. FGM is a severe form of child abuse, a violation of human rights, and is illegal in the UK.

FGM is classified as a form of Honour-Based Abuse (HBA)—crimes or threats committed to defend the perceived "honour" of a family or community. All forms of HBA are treated by the school as acute safeguarding emergencies.

Under Section 5B of the Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015), regulated teachers are subject to a statutory personal mandate. Teachers must personally report to the police (via 101) if a student under the age of 18 discloses that they have undergone FGM, or if physical signs are observed. This is a personal legal duty; reporting it to the DSL does not absolve the teacher of their individual responsibility to notify the police. However, the teacher must also immediately inform the DSL and log the case on CPOMS so that multi-agency pathways can be activated simultaneously. Staff must never visually examine or check a student under any circumstances. The mandatory reporting duty applies *only* to confirmed, discovered cases. If a teacher *suspects* a student is merely at risk of FGM, they must not contact the police directly under the mandate; instead, they must immediately escalate the concern to the DSL via CPOMS to trigger local multi-agency child protection pathways.

Staff must maintain professional curiosity regarding the overlapping indicators of FGM and HBA:

Risk Context	Specific Safeguarding Indicators
Pre-Existing & Cultural Risk	• The student originates from, or has heritage linked to, a community where FGM is traditionally practised. • A mother, older sister, or extended family member has already been subjected to FGM or HBA. • The family displays limited integration into UK society or parent/carers unexpectedly withdraw the student from RSE/PSHE lessons.

Imminent Danger Signs	• A female family elder is visiting from an FGM-practising country. • The student confides that she is going on a "long holiday" or trip to her country of origin, or mentions a "special ceremony" to "become a woman". • The student directly requests help because she suspects she is at immediate risk.
Indicators that FGM has Occurred	• The student exhibits sudden physical difficulties walking, sitting, or standing comfortably. • Spending unusually long periods in the bathroom, or frequently leaving the classroom due to sudden bladder, urinary, or menstrual complications. • Prolonged or repeated absences from school, followed by severe emotional withdrawal, anxiety, or depression. • A marked reluctance to undergo routine medical examinations or school nurse checks.

Where a student is deemed to be at risk of FGM or any form of Honour-Based Abuse, the DSL team will instantly initiate a high-level child protection referral to the multi-agency Family Help / Integrated Front Door pathways and coordinate directly with local police protection units.

Because the risk of HBA and FGM escalates dramatically if the family becomes aware of school intervention, staff must never attempt to challenge, mediate, or discuss these suspicions with the student's parents or carers before consulting the DSL team. Doing so could place the student in immediate physical danger.

18.15 - Forced Marriage

A forced marriage is a marriage entered into without the full and free consent of one or both parties, where physical, emotional, or psychological coercion is used. A lack of consent includes instances where a person cannot consent due to a lack of cognitive capacity, such as students with severe Special Educational Needs and Disabilities (SEND). It is a criminal offence in the UK and a form of Honour-Based Abuse (HBA).

Safeguarding Indicators:

Staff must maintain professional curiosity and log concerns on CPOMS if a student displays a pattern of the following markers:

- Irregular or severe school absence, requesting extended leave for overseas visits, failing to return from trips, or expressing fear or anxiety about upcoming school holidays.

- Being subjected to surveillance by siblings or cousins at school, being barred from extracurricular activities, or parents withdrawing the student from school or day centres.
- A family pattern of older siblings marrying early or leaving education, sudden engagement announcements, or parents preventing a student from progressing to further or higher education.
- A sharp drop in performance, motivation, or punctuality, accompanied by severe mental health concerns (e.g. depression, self-harm, or eating disorders).

The "One Chance" Rule & Immediate Action:

Forced marriage represents an acute, life-threatening safeguarding threshold. In line with the national "One Chance" rule, staff may only have one opportunity to secure and save a victim.

- Staff must never approach the student's family, contact their parents, or engage with community figures about these concerns. Doing so alerts the family and places the student in immediate physical danger.
- Staff must log the concern instantly on CPOMS and verbally report it to the DSL team.

Operational Response and Specialist Liaison:

The DSL and Headteacher will speak to the student privately and safely. The DSL team will seek immediate advice from the Forced Marriage Unit (FMU), the police, and multi-agency Family Help / Integrated Front Door pathways to execute the following protection standards:

- Developing a discreet personal safety plan, including establishing "cover stories" for why the student is seeking help, and identifying whether the student holds dual nationality or a second passport.
- Documenting physical injuries, arranging medical examinations, and guiding the victim toward specialised legal representation, including Forced Marriage Protection Orders (FMPOs).
- Coordinating immediate psychological and mental health support through the Senior Mental Health Lead to address trauma and self-harm risks.

Haydon School implements a whole-school approach through regular staff training and a robust RSHE curriculum. Forced marriage is discussed openly to signpost students to national support networks, legal rights, and confidential advice.

18. 16 - Preventing Radicalisation and Extremism (The Prevent Duty)

In accordance with the Counter-Terrorism and Security Act 2015 and the KCSIE framework, Haydon School operates a zero-tolerance approach to radicalisation, violent

extremism, and terrorism. Protecting students from these risks is integrated directly into the school's wider statutory safeguarding duties.

Core Statutory Definitions:

- Radicalisation: The process by which an individual comes to support terrorism and extremist ideologies associated with terrorist groups.
- Extremism: The vocal or active opposition to fundamental British values—including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. This explicitly includes calls for the death of members of the UK Armed Forces.
- Terrorism: Any action designed to influence the government or intimidate the public for political, religious, or ideological purposes that endangers life, causes serious violence or property damage, or severely disrupts an electronic system.

Risk Indicators of Vulnerability:

Staff must use their professional judgement and curiosity to identify pupils who may be susceptible to extremist narratives or radicalisation. Vulnerability markers are categorised across four contextual domains:

- Identity & Personal Crisis: Distancing themselves from their cultural or religious heritage; expressing severe discomfort with their place in society; experiencing acute family tensions, low self-esteem, or sudden disassociation from established friendship groups; or searching obsessively for answers regarding faith and belonging.
- Unmet Aspirations & Perceptions of Injustice: Pervasive feelings of failure; verbalising systematic perceptions of societal injustice; or a total rejection of civic life.
- Criminality & Exploitation: Prior experiences of dealing with law enforcement or active involvement with criminal groups.
- Trauma & Marginalisation: Experiencing poverty, discrimination, or social exclusion; lacking an affinity or understanding for others; or having a history of acute trauma, particularly trauma authorised or associated with war, sectarian conflict, or insecure immigration/refugee status.

Haydon School actively protects pupils against the messages of all violent and non-violent extremism. This includes, but is not limited to, Islamist ideologies, Far-Right, Neo-Nazi, and White Supremacist groups, extreme misogynistic or Incel cultures, Left-Wing/Anarchist movements, and extremist animal rights networks.

In line with updated statutory mandates, staff must remain highly alert to modern digital vectors of radicalisation. This includes social media recommendation algorithms, extremist gaming forums, live-streamed propaganda, and AI-generated extremist text and imagery designed to exploit vulnerable young people.

Critical Escalation Indicators:

The presence of any of the following critical markers represents an immediate child protection threshold:

- Active contact with extremist recruiters or joining extremist organisations.
- Articulating explicit support for extremist causes, leaders, or global terrorist ideologies.
- Possessing, downloading, or distributing extremist literature.
- Using a grievance-based global ideology to explain personal disadvantage.

Operational Response and the Channel Programme:

Any member of staff who identifies these concerns must log the report immediately on CPOMS and notify the DSL team.

- Emergency Response: If a student displays an immediate threat of violence to themselves or others, or if a criminal act is imminent, staff must execute an emergency response by calling 999.
- Statutory Prevent Referral: For non-emergency trajectories, the DSL or DDSL will complete a formal Prevent referral form alongside a multi-agency Family Help / Integrated Front Door notification.
- The Channel Framework: Channel is a voluntary, multi-agency statutory programme chaired by the Local Authority under the Counter-Terrorism and Security Act 2015. It is designed to safeguard vulnerable children and adults of any faith, ethnicity, or background from being exploited by terrorists.
- Multi-Agency Support Plans: If the Prevent coordinator determines the case meets the statutory threshold, a panel will develop a bespoke, multi-agency support plan. The school will actively cooperate with the panel, ensuring Channel interventions sit alongside and complement the student's existing educational or pastoral support plans. Engagement with Channel remains voluntary for the individual and their family at all stages.

18.17 - Child-on-Child Abuse

Haydon School operates a zero-tolerance approach to child-on-child abuse. Staff must never dismiss abusive peer-to-peer behaviours, harassment, or physical intimidation as "banter", "play-fighting", or a normal part of growing up.

Abuse can occur between pupils of any age, gender, or orientation, both inside and outside the school estate, as well as online. Staff must recognise that an absence of reported incidents does not mean child-on-child abuse is not occurring within the school community.

Manifestations of Peer Abuse:

Child-on-child abuse presents across a progressive continuum of behaviours, which staff are trained to identify and disrupt:

- Bullying & Intimidation: Systematic physical, verbal, or emotional bullying, including cyberbullying and prejudice-based or discriminatory harassment.
- Intimate Relationship Abuse: Coercive control, physical violence, or psychological abuse within teenage romantic relationships.
- Serious Violence: Physical assaults or threats involving weapons or knives.
- Sexual Violence & Harassment: Rape, sexual assault, and assault by penetration (including penetration with an object), alongside standalone or patterned sexual harassment (online and offline).
- Image-Based Abuse: The consensual or non-consensual sharing of nude and semi-nude images or videos, explicitly including synthetic, deepfaked, or AI-manipulated intimate pseudo-imagery.
- Upskirting: The non-consensual taking of images beneath a person's clothing.
- Initiation Rituals: Hazing-type violence, peer pressure, or humiliation designed to initiate a student into a specific social group or peer network.

Targeted Vulnerabilities & Protective Pathways:

The school recognises that certain student cohorts face a disproportionately high risk of targeted abuse:

- Students with SEND: Statistics demonstrate that pupils with Special Educational Needs and Disabilities face heightened vulnerability. Staff must never assume that a potential indicator of abuse (e.g. withdrawal, behavioural outbursts, or regression) is simply a manifestation of the student's SEND, and must always investigate further.
- LGBTQ+ Students: Pupils who are LGBTQ+, or who are *perceived* to be LGBTQ+, face elevated risks of peer targeting. The school's response to sexual harassment, discrimination, or violence between students of the same sex is identical in rigour and scale to incidents involving opposite-sex students.

Student Reporting & Safeguarding Actions:

Students are taught through the RSHE curriculum how to safely report peer concerns regarding themselves or their friends. All student disclosures will be handled with absolute gravity, with an explicit reassurance that they will be taken seriously, protected, and fully supported.

All verified or suspected incidents must be logged instantly on CPOMS. The DSL team will deploy a victim-centred response, managing allegations through the *Child-on-Child Abuse Policy*, executing separate safety plans for victims, and initiating statutory

multi-agency Family Help / Integrated Front Door interventions for both the victim and the alleged perpetrator where thresholds are met.

19.0 - Online Safety, Cyber Security and Personal Electronic Devices

Haydon School integrates online safety and cyber resilience directly into its statutory safeguarding framework, adhering to the KCSIE statutory guidance and national cyber security standards.

The school recognises that the digital landscape is an ever-evolving vector for extra-familial harm, requiring robust technical barriers alongside proactive curricular education.

19.1 - The Four Areas of Digital Risk:

Staff must maintain professional curiosity regarding student digital profiles, using their training to spot behaviours indicating a student is exposed to harms across the statutory four-tiered risk framework:

- **Content:** Exposure to illegal, inappropriate, or harmful material. This includes pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, conspiracy theories, and AI-generated misinformation or deepfake disinformation.
- **Contact:** Harmful online interaction with other users. This encompasses peer-to-peer pressure, predatory adult grooming, and financially motivated sexual extortion ("sextortion") targeting young people.
- **Conduct:** Online behaviour by the student that causes harm. This includes online bullying, targeted harassment, and the consensual or non-consensual sharing of intimate images, explicitly including synthetic or AI-manipulated intimate pseudo-images.
- **Commerce:** Exposure to commercial financial risks. This includes online gambling, predatory advertising, phishing networks, and digital scams. Staff must report active institutional threats to the Anti-Phishing Working Group (<https://apwg.org/>).

19.1 - Technical Infrastructure: Filtering, Monitoring and Generative AI

In compliance with DfE filtering and monitoring standards, the school operates a multi-layered technical defensive network:

- **The Monitoring Matrix:** Every school computer and Chromebook is equipped with SENSO monitoring software, which actively tracks and logs internet domains and user keystrokes. Any flagged keywords or anomalous activities trigger instant, encrypted automated alerts to the DSL team for immediate safeguarding evaluation.

- The Filtering Framework: Web access is through the LGfL School Protected filtering system. The school utilises the DfE's 'Plan technology for your school' service to self-assess its configuration annually, ensuring technical barriers effectively prevent access to illicit material without causing "over-blocking" that restricts legitimate, age-appropriate educational delivery.
- Generative AI Protocols: In accordance with the *Generative AI: Product Safety Expectations* framework, filtering and monitoring parameters are systematically applied to all institutional access to generative artificial intelligence tools, preventing the generation or exploitation of harmful synthetic media within the school infrastructure.

19. 2 - Cyber Security and Institutional Resilience

Haydon School maintains direct operational responsibility for securing its network architecture against external breaches. The governing body and IT leadership review the school's cyber security practice and policy periodically, and at least annually, against the DfE *Cyber Security Standards* and the *National Cyber Security Centre (NCSC)* guidance.

The IT department conducts regular physical health and safety audits of all suites, escalating infrastructural vulnerabilities to the Site Team or external technical networks to prevent exploitation or physical hazards.

19. 3 - Management of Personal Electronic Devices and Imagery

To protect the digital footprint and physical safety of the school community, the use of mobile phones, cameras, and personal recording equipment, including digital glasses and watches, is regulated under the *Staff Code of Conduct Policy*:

- Staff are prohibited from using personal electronic devices or mobile phones to take photographs, capture videos, or record audio of students. The school provides designated, audited institutional devices for all approved media capture.
- All photography and video tracking must be planned in advance, with explicit consent verified under the *Data Protection Policy* and overseen by the Data Protection Officer (DPO).
- For Looked After Children (LAC), adopted students, or pupils subject to specific security frameworks, the Headteacher and DSL will directly liaise with social workers, carers, or adoptive parents to execute context-specific risk assessments before any imagery is captured or distributed.
- The school maintains regular communication with parents regarding digital safety, clarifying what applications students are required to use for educational delivery and providing resources to help families mirror safe filtering configurations at home.

Any observed or suspected misuse of personal electronic devices by students or staff must be logged on CPOMS and reported verbally to the DSL team immediately.

In line with statutory guidance Haydon ensures that pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime, though he uses a compulsory lockable pouch system.

19.4 - Upskirting and Image-Based Peer Abuse (Nude and Semi-Nude Imagery)

In accordance with the KCSIE framework and the Voyeurism (Offences) Act 2019, Haydon School treats upskirting and the unauthorised creation, possession, or distribution of intimate imagery as severe forms of child-on-child abuse and safeguarding emergencies. Staff must recognise that these actions represent serious criminal offences under UK law, irrespective of whether the imagery is generated or distributed by the young people depicted.

Statutory Definitions and Thresholds:

- Upskirting: The illegal operation of equipment—including activating, enabling, or securing motion-sensitive or hidden cameras—to capture images beneath a person's clothing without their consent for sexual gratification, or to cause humiliation and distress.
- Intimate Peer Imagery: The sharing of nude or semi-nude images and videos (historically referred to as "sexting" or youth-produced sexual imagery). Under statutory updates, this explicitly encompasses both real photographs and illegal pseudo-images generated or manipulated via AI (such as deepfakes or face-swaps).

Mandatory Immediate Staff Protocols:

When a member of staff becomes aware of or receives a disclosure regarding the circulation of intimate peer imagery or upskirting, they must instantly execute the following instructions:

- Staff must never view, copy, print, share, download, or save the imagery under any circumstances. If an image is accidentally viewed, the staff member must immediately notify the DSL and seek support.
- Reassure the student without judgment, blame, or shaming. Explain clearly that the incident must be reported immediately to the DSL to ensure their safety and protection.
- Log the report immediately on CPOMS and notify the DSL team verbally.

Contextual Incident Categorisation:

To protect young people from unnecessary criminalisation while disrupting harmful behaviours, the DSL alongside a Level 3 safeguarding-trained member of the

Safeguarding or Year Team will investigate the context of the incident without viewing the material. The incident will be classified into one of two statutory categories:

- **Experimental:** Incidents involving the creation or distribution of intimate images among peers where there is no adult involvement, systemic coercion, or apparent intent to cause harm, embarrassment, or blackmail. The response focuses on intensive educational intervention, support, and guidance to help pupils understand the legal implications and move forward.
- **Aggravated:** Incidents involving additional abusive or exploitative elements. This includes any adult involvement, malicious intent to harm or humiliate the student depicted, reckless public distribution, bullying, or financially motivated sexual extortion ("sextortion"). Aggravated incidents are managed through the *Behaviour for Learning Policy* and escalated immediately to the police and external multi-agency pathways.

Regulatory Conditions for Viewing Imagery

Staff must operate under the legal presumption that viewing child sexual abuse material is illegal. For there to be an exceptional, defensible reason for the DSL to view the imagery, it must be deemed unavoidable (e.g., presented directly on a school device or network) or the only possible way to establish the facts to determine whether to involve external agencies. If viewing is verified as necessary, the DSL must adhere to the following protocol:

- The decision must be discussed and approved in advance by the Headteacher or a member of the Senior Leadership Team (SLT) in the Headteacher's absence. Viewing must be conducted by the DSL (or other delegated safeguarding lead) with another member of staff present in the room (ideally the Headteacher or an SLT member), though this second witness does not need to view the imagery.
- Wherever possible, the viewing must take place on school premises within an SLT office and be performed by a staff member of the same sex as the student depicted in the imagery.
- Under no circumstances may the image be copied, saved, printed, or shared. A comprehensive, permanent entry must be recorded in the student's safeguarding file on CPOMS detailing exactly how and why the decision to view was made, who was present, and what subsequent actions were taken.

Multi-Agency Escalation and Takedown Interventions:

Where there is any reason to believe the distributed imagery or upskirting incident places a student at risk of significant harm, the DSL will immediately escalate the matter to the multi-agency Family Help / Integrated Front Door pathways and the police (101, or 999 if an immediate threat exists).

If intimate images or deepfakes have been shared publicly or across social networks, the DSL team will work in direct partnership with the student and their parents to deploy specialised takedown frameworks—specifically utilising the Internet Watch Foundation and Childline "Report Remove" tool (www.childline.org.uk/remove)—to safely intercept and purge the imagery from public servers.

20.0 - Risk Reduction, Student Resilience and Targeted Pastoral Interventions

In accordance with the KCSIE statutory framework, the Counter-Terrorism and Security Act 2015, and the DfE *Serious Violence Duty*, Haydon School implements a robust risk-reduction framework. This strategy combines preventative curriculum design with targeted pastoral and multi-agency interventions to safeguard vulnerable students.

20.1 - Building Student Resilience and Prevent Resources

The Governing Body, Headteacher, and DSL continuously assess institutional risks—including the school's profile, Special Educational Needs and Disabilities (SEND) provision, and the external use of premises—to foster a safe, inclusive culture. Resilience against radicalisation, grooming, and exploitation is systematically integrated into the PSHE, RSHE, and Citizenship curricula by:

- Providing a safe, guided environment for debating sensitive, political, and controversial issues while teaching students to weigh evidence and evaluate arguments critically.
- Explicitly teaching the mechanics of British democracy, government, and law enforcement, whilst promoting fundamental British values, mutual respect, and tolerance for the UK's diverse identities.
- Equipping students with the self-protection skills needed to identify online and offline risks, manage coercive peer pressure, and make safe personal choices.

To support the Prevent duty, the school actively utilises and signposts to statutory and verified national safety resources, including:

- Local multi-agency safeguarding arrangements and specialised local police units (via 101).
- The Department for Education (DfE) dedicated counter-extremism helpline (020 7340 7264).
- The statutory Channel Awareness Programme, *Educate Against Hate* <https://educateagainsthate.com>, <https://educateagainsthate.com>, and the Act Early initiative <https://actearly.uk/>.

20.2 - Targeted Safeguarding Interventions for Vulnerable Cohorts:

The school recognises that specific life events and familial disruptions present distinct safeguarding vulnerabilities requiring tailored pastoral oversight:

- Students with Family Members in Custody: Students experiencing the imprisonment of a parent or carer face elevated emotional and social risks. The school provides discreet pastoral monitoring, collaborates with specialist charities such as *Action for Prisoners' Families*, and ensures these pupils have a secure environment to voice concerns.
- Students Giving Evidence in Court: Pupils required to serve as witnesses or provide evidence in criminal proceedings (whether as victims or witnesses) are supported through a coordinated pastoral plan. The school provides age-appropriate statutory guidance—such as the HM Courts & Tribunals Service (HMCTS) '*Going to Court and being a witness*' framework—and monitors their psychological well-being throughout the legal process.

20.3 Mental Health and Safeguarding Intersections

In compliance with statutory guidance, all staff are 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 child has suffered or is at risk of suffering abuse, neglect or exploitation. Haydon School treats acute or sudden mental health deterioration as a potential primary indicator of abuse, neglect, or extra-familial exploitation.

- The Mental Health Lead: Due to the clear correlation between emotional vulnerability and safeguarding risks, the Deputy Designated Safeguarding Lead (DDSL) is appointed as the school's Senior Mental Health Lead.
- Identification vs. Diagnosis: Staff are prohibited from attempting to diagnose mental health conditions. Instead, staff are trained to maintain professional curiosity, identify behavioural anomalies that suggest an underlying mental health issue, and log these concerns immediately on CPOMS.
- Clinical Pathways: The safeguarding team, in alignment with the school's *Social, Emotional and Mental Health (SEMH) Policy*, coordinates internal counselling interventions and assists parents and carers in navigating external clinical escalations to the local Child and Adolescent Mental Health Services (CAMHS).

21.0 -Serious Youth Violence and Criminal Exploitation

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL (or a deputy), who will assess the risk and take appropriate action. Where relevant

this will include any action needed to de-escalate peer conflict. To meet local and national risk profiles, staff are trained to recognise the compounding risk factors and warning signs associated with serious violent crime, knife crime, and county lines exploitation.

Statistically, risk escalates for students who are male, have a history of persistent school absence or permanent exclusion, have experienced child maltreatment, or have a background of minor offending (such as theft or robbery).

Staff must immediately alert the DSL via CPOMS if a student displays a combination of the following indicators:

- Increased or erratic school absence and a sudden decline in academic engagement.
- An abrupt change in friendship groups or entering into relationships with significantly older individuals or external peer groups.
- Unexplained physical injuries, bruising, or clear signs of physical assault.
- Appearing with unexplained gifts, money, or new possessions.
- Marked changes in emotional well-being, severe anxiety, or signs of self-harm.

Where serious youth violence or criminal exploitation is suspected, the DSL team will instantly trigger local multi-agency child protection pathways via the Family Help / Integrated Front Door and engage dedicated youth justice or police safeguarding teams to establish immediate protective safety plans.

22.0 Contextual Safeguarding and Vulnerable Student Cohorts

Safeguarding incidents are frequently linked to extra-familial threats, environments, and peers outside the school gates. In line with the KCSIE framework, Haydon School takes a contextual approach to safeguarding. Staff systematically evaluate whether a student's behaviour or distress stems from wider environmental risks (such as community grooming, gang exploitation, or online harms). The school ensures comprehensive contextual information is included in all statutory referrals to multi-agency pathways.

22.1 Children Requiring Social Work Intervention

Students with an allocated social worker face heightened vulnerabilities and systemic educational disadvantages.

- **Information Sharing:** The DSL maintains a secure, updated record of all pupils currently under Child in Need (CiN) plans, Child Protection (CP) plans, or wider local authority care.
- **Operational Action:** This status informs all day-to-day safeguarding decisions. Unauthorised absences for these students are treated as high-priority alerts,

triggering immediate communication with the assigned social worker and prompt internal pastoral or academic support.

22. 2 Elective Home Education (EHE)

While parents have a legal right to choose elective home education, the school recognises that EHE can reduce a child's visibility to supportive safeguarding services.

- **Statutory Notification:** In compliance with the Education (Pupil Registration) (England) Regulations, the school formally notifies the Local Authority immediately when a pupil is removed from the admissions register.
- **Multi-Agency Reviews:** If a parent indicates an intent to withdraw a student for EHE, the school coordinates a multi-agency review meeting with the parents, the Local Authority, and key professionals before the final decision is enacted. This is prioritised if the student has Special Educational Needs and Disabilities (SEND), is flagged as vulnerable, or has an active social worker.

22. 3 Looked After Children (LAC) and Previously Looked After Children (PLAC)

Most care-experienced pupils have entered the care system due to historical abuse or neglect, leaving them disproportionately vulnerable to ongoing safeguarding challenges.

- **Governance and Oversight:** The Governing Body ensures staff possess the training required to understand care-experienced vulnerabilities.
- **The DSL and Designated Teacher (DT) Interface:** At Haydon School, where the DSL and the Designated Teacher (DT) for LAC are not the same individual, they maintain a mandatory communication pathway. The DT is responsible for the operational oversight of Personal Education Plans (PEPs), whilst the DSL retains ultimate statutory responsibility for child protection. The DT will provide the DSL with direct contact details for assigned social workers, Personal Advisers (PAs), and the Virtual School Head (VSH). The DSL and DT hold regular, formal case reviews to ensure that academic, pastoral, and care-plan data are synthesised seamlessly.
- **Information Requirements:** Key staff maintain explicit awareness of each child's legal status (e.g. voluntary Section 20 accommodation, or interim/full care orders), parental contact arrangements, and the exact levels of authority delegated to foster carers or residential teams.

22.4 Special Educational Needs and Disabilities (SEND)

Students with SEND face a statistically higher risk of abuse and exploitation, combined with distinct barriers to reporting it.

- **Challenging Assumptions:** Staff must never assume that indicators of distress or harm (such as sudden behavioural changes, regressions, emotional outbursts, or

physical injuries) are simply a manifestation of a student's SEND. Every indicator must be investigated thoroughly.

- **Communication and Peer Vulnerability:** Staff receive targeted training to overcome cognitive or communication barriers. The safeguarding team recognises that SEND students can be heavily impacted by peer abuse or bullying without showing outward signs.
- **Professional Collaboration:** The DSL works directly alongside the Special Educational Needs Co-ordinator (SENCO) and parents to deploy tailored communication tools and ensure the child's specific requirements are met effectively throughout any safeguarding intervention.

22. 5 - LGBTQ+ Students

Identifying as LGBTQ+ is not an inherent risk factor for harm; however, societal prejudices mean these students are frequently targeted for discrimination, peer harassment, and isolation.

- **Perceived Identity:** Staff must be aware that pupils who are *perceived* to be LGBTQ+ by peers are equally vulnerable to targeted abuse, regardless of how they actually identify.
- **Removing Barriers:** Risks increase significantly when a student lacks a trusted adult at home or school. Haydon School fosters an inclusive environment, ensuring identical support frameworks and robust interventions for peer abuse, regardless of the sex, gender identity, or sexual orientation of those involved.

22. 6 - Mental Health Safeguarding Intersections

Severe, sudden, or persistent mental health difficulties are treated by the school as a potential primary indicator of underlying abuse, neglect, or exploitation. While staff do not diagnose clinical conditions, any student exhibiting acute emotional distress or suspected mental health decay must be logged immediately on CPOMS for evaluation by the DSL who is the Senior Mental Health Lead.

22.7 - Supporting Gender-Questioning Pupils and Social Transition

Requests relating to a pupil questioning their gender are managed within a safeguarding framework rather than as a purely administrative or inclusion matter. All decisions must be child-centred but are not automatically child-led, meaning the school will formally consider the best interests of the requesting pupil alongside the safety, comfort, and privacy of the wider school body. Furthermore, school personnel must never initiate action or suggest paths toward social transition; these procedures apply exclusively in response to a request formally raised by a pupil or their parent or carer.

22.7.1 - Parental Engagement and Clinical Protocols

Engaging parents or carers is a matter of priority, and the school will not implement or agree to any informal accommodations or formal changes without full parental consultation. In rare circumstances where involving parents poses a direct, verifiable risk of significant harm to the pupil, the Designated Safeguarding Lead (DSL) will manage the case via multi-agency safeguarding pathways before contacting the family. Staff must never advise families on the risks or benefits of social transition, as this requires clinical training, and the school will always advise early clinical involvement and external specialist advice where a child is navigating acute distress regarding their gender.

22.7.2 - Management of Social Transition Requests

Ad hoc adjustments by individual staff members, such as informally agreeing to a preferred pronoun or name, are prohibited. Any request to change a pupil's name or pronouns must undergo a formal school assessment involving the, the DSL, and the parents. If changes are agreed, options such as utilising preferred names instead of pronouns may be considered to minimise institutional friction. The school remains legally required to record a pupil's biological sex accurately within its statutory management information systems, and the DSL ensures that relevant staff remain aware of a pupil's biological sex to satisfy overall duty-of-care obligations.

22.7.3 - Prohibitions and Facility Constraints

As mandated by school premises regulations, a request for social transition cannot include access to toilets, changing facilities, or boarding and overnight trip accommodation designated for the opposite biological sex, and there are no exceptions to this rule. Suitable alternative single-occupancy facilities will be offered to ensure privacy and dignity without compromising single-sex provision. Similarly, where sports or physical education activities are segregated by sex for reasons of physical safety or competitive fairness, no exception to these groupings will be made under a social transition plan.

22.7.4 - Case Oversight and Monitoring

A detailed, contemporaneous record of all requests, panel decisions, rationale, and external consultations must be maintained securely on CPOMS. Pastoral teams will remain alert to the heightened vulnerabilities of gender-questioning pupils, including complex psychosocial needs or peer conflict, and any instance of discriminatory bullying or harassment will be met with immediate intervention and formal sanctions under the Behaviour Policy. Finally, any agreed temporary accommodations must be reviewed at least termly by the DSL, the pupil, and their parents to ensure the safety and ongoing well-being of all parties.

23.0 School Lettings, External Premises Use, and Out-of-School Settings

In compliance with the KCSIE framework and the DfE's statutory updates for *Out-of-School Settings* (OOSS), Haydon School maintains rigorous safeguarding command over its estate when hired or rented by third parties. This protocol ensures that whether an activity is managed directly by the school or operated independently by external providers, students are protected from harm.

23.1 - Safeguarding Requirements for Independent Lettings

Where facilities are let or leased to external bodies, such as charities, companies, or individuals running community or extracurricular activities, the school's Lettings Manager and Governing Body enforce compliance barriers. Prior to confirming any booking, the school will inspect and formally audit the provider's Child Protection and Safeguarding Policy to ensure it aligns with local safeguarding partnership arrangements. Providers must submit documented evidence that all staff and volunteers present on site have undergone appropriate Enhanced DBS checks, with barred list checks where regulated activity occurs.

To ensure continuous compliance, the DSL will periodically audit these external providers to verify they are operating in accordance with their stated safeguarding policies, officially logging the outcomes of these audits with the Lettings Manager. The provider must also demonstrate they possess a structured complaints procedure allowing children, parents, and families to safely raise concerns, alongside an annualised risk assessment, fire evacuation plan, and paediatric first aid protocols. All hire or lease agreements include a non-negotiable safeguarding clause under a formal Transfer of Control Agreement, specifying that any failure by the hirer to enforce these child protection standards or cooperate with school audits will result in the immediate termination of the agreement.

23.2 - Reporting and Sports Body Standards

Independent providers are required under their hiring terms to establish an explicit communication link with the school's DSL team so that any safeguarding concern or disclosure arising during an external activity is reported directly to the school. In alignment with national mandates, any sports provider or club utilising Haydon School premises that receives funding from Sport England or UK Sport must explicitly verify they meet the statutory Standards for Safeguarding and Protecting Children in Sport.

Where activities are delivered under the direct supervision or management of school staff, Haydon School's primary Child Protection Policy applies in full, meaning staff running internal extracurricular clubs remain bound by standard logging procedures on CPOMS and must report concerns immediately to the DSL.

24. Alternative Provision, Work Experience and Homestay Arrangements

In accordance with the KCSIE framework, the Children Act 1989, and statutory tracking mandates, Haydon School maintains ultimate safeguarding responsibility for students placed in external, non-traditional, or off-site educational environments.

24.1 - Alternative Provision (AP) Oversight

Students directed to Alternative Provision frequently present complex needs, placing them at an elevated statistical risk of harm and exploitation. Haydon School retains primary accountability for the safeguarding and welfare of any pupil placed with an AP provider.

The school must obtain written confirmation from the AP provider that all appropriate safer recruitment checks, matching the standard the school performs on its own staff, have been completed for every individual working at their establishment. This agreement obligates the provider to notify the school immediately of any personnel or structural changes that could alter the risk profile, allowing the school to verify the credentials of new staff before they interact with pupils.

The school must always know the precise physical location of the student during school hours. The DSL, safeguarding and attendance teams maintain verified records of the AP's primary address, alongside any subcontracted provision or satellite sites the student attends. Placements are formally reviewed at least half-termly to monitor attendance, safety, and instructional suitability. If a safeguarding concern arises, the placement is reviewed immediately and suspended or terminated if the provider cannot satisfactorily resolve the threat.

24.2 - Work Experience Safeguarding

When organising external work experience placements, the school evaluates the placement provider's child protection protocols before a student is deployed. If the school acts as the host employer by offering work experience placements on its own site to individuals aged over 16, it will obtain an Enhanced DBS check for those individuals where the placement constitutes regulated activity.

24.3 - School-Arranged Homestays in the UK

Where the school organises an exchange or homestay visit within the UK that places a visiting child in the care and accommodation of a host family to whom they are not related, the responsible adults in that household are legally engaged in regulated activity.

As the regulated activity provider, Haydon School will secure an Enhanced DBS certificate with barred list information for all responsible adults in the host household

to assess their suitability. The school will also use its professional judgement to determine whether to obtain Enhanced DBS certificates for any other individuals aged over 16 residing in the property. Any disclosed criminal record data will be rigorously evaluated before a host is approved.

24.4 - School-Arranged Homestays Abroad

For international exchange visits, the school liaises directly with partner institutions to evaluate and agree on host vetting procedures. The school assesses placements on a case-by-case basis and, where necessary, contacts the relevant foreign embassy or High Commission to establish what criminal and background checks are viable within that jurisdiction.

The school relies on its professional judgement to determine if the host country's arrangements are robust enough to safeguard our pupils. All participating students are equipped with dedicated emergency contact details and clear reporting strategies to use if they feel unsafe or uncomfortable at any point during the trip.

24.5 - Privately Arranged Homestays and Private Fostering

Homestays arranged independently by parents or students are classified as private arrangements, meaning the school is not the regulated activity provider and cannot perform statutory background checks.

However, under the Children Act 1989, if a school-aware UK homestay placement lasts for 28 days or more for a child aged under 16 (or under 18 for a student with SEND), it constitutes a Private Fostering arrangement. The moment the school becomes aware of a private fostering arrangement, the DSL will immediately notify the Local Authority to ensure statutory welfare checks are executed.

25.0 Reporting Concerns and Managing External Referrals

In accordance with the KCSIE framework and local multi-agency safeguarding arrangements, all staff must act immediately on any concern regarding a student's welfare, or any disclosure of harm relating to themselves or a peer.

25.1 Statutory Reporting Protocols and Professional Curiosity

Staff must recognise that students may not feel ready, know how, or possess the vocabulary to articulate that they are experiencing abuse, neglect, or exploitation. Pupils may also fail to recognise their experiences as harmful. This must never prevent staff from maintaining active professional curiosity.

Any identified concern must be logged immediately on CPOMS and reported directly to the Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL). If the DSL is unavailable,

the DDSL must be contacted. If a referral to the multi-agency safeguarding hub is made by any individual other than the DSL, the DSL must be notified without delay.

When receiving a disclosure, staff must act calmly and supportively, ensuring the student feels listened to, protected, and believed. The school ensures that the student's wishes are factored into safeguarding processes, and clear systems remain available for pupils to express their views and feedback.

25.2 - Immediate Danger and Criminal Acts

If a child is in immediate danger or at risk of significant harm, a referral must be made to local authority children's social care and the police instantly. Where a student has been the victim of or has committed a crime, such as peer-on-peer sexual violence, law enforcement must be notified without delay.

The school will never wait for the initiation or completion of a police or social care investigation before taking internal action to protect the victim and the wider student body.

25.3 - Managing Referrals and Multi-Agency Escalation

The Local Authority is under a statutory obligation to make a decision regarding what action is required within one working day of receiving a multi-agency referral, and must notify the referrer of their determination.

- **Tracking and Follow-Up:** The referrer and the DSL team are required to monitor the referral actively. If feedback is not received within the twenty-four-hour window, staff must proactively contact the assigned social worker or duty team for updates.
- **Challenging Decisions (Escalation):** If a case is closed or a statutory investigation is deemed inappropriate by local authority children's social care, but the school believes the student remains at risk, the DSL will formally request a case reconsideration. The school will utilise local resolution and escalation procedures to ensure its concerns are fully addressed.
- **Alternative Provisions:** Where the school agrees that statutory social care thresholds are not met, it will immediately deploy internal support mechanisms, including the statutory Family Help framework (encompassing early help and targeted pastoral support), keeping the student's case under constant review. If the situation fails to improve, a subsequent referral will be submitted.

25.4 - Information Sharing, Care Partnerships and Parents

The DSL maintains continuous liaison with external agencies and the police to secure student well-being while ensuring school processes do not jeopardise any active criminal proceedings. Information is shared in line with statutory confidentiality and

information-sharing guidelines, releasing data only when it is necessary and proportionate to protect the child.

Discussions regarding safeguarding concerns will be held openly with parents and carers to ensure the family understands the in-school or external interventions available. However, a consultation with parents will not take place if the DSL evaluates that doing so would place the student, staff, or others at an increased risk of harm.

At all stages of this process, the student will be kept informed of the decisions made, the actions taken, and the reasons behind them in an age-appropriate manner. All concerns, discussions, decisions, and rationales must be documented comprehensively on CPOMS.

26.0- Institutional Safeguarding, Safer Recruitment, and Governance

Haydon School operates a rigorous internal safeguarding architecture in compliance with the KCSIE framework, the Data Protection Act 2018, and UK safer recruitment legislation. This infrastructure ensures absolute professional accountability, safe employment practices, and high-quality staff training.

26.1 School Safeguarding Practices, Whistleblowing, and Managing Allegations

Any concern regarding the conduct of a staff member, trainee teachers, supply worker, or volunteer must be raised immediately with the Headteacher. If the concern involves the Headteacher, it must be escalated directly to the Chair of Governors. Safeguarding practice deficiencies must be raised with the Senior Leadership Team (SLT) in accordance with the *Whistleblowing Policy*.

Staff who feel unable to raise concerns internally can access the NSPCC whistleblowing helpline (0800 028 0285) or contact the Hillingdon Local Authority Designated Officer (LADO) directly (lado@hillingdon.gov.uk / 01895 250975).

All allegations against adults working within the school are managed under the HR Policy. The school distinguishes between allegations meeting the statutory harm threshold and low-level concerns. All allegations meeting the statutory harm threshold will be raised with the LADO by the DSL or Headteacher. The harm threshold is met when an individual has:

- Behaved in a way that has harmed, or may have harmed, a child.
- Committed, or possibly committed, a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Where an individual is removed from regulated activity because they have harmed a child or pose a risk of harm, the school holds a statutory duty to refer the matter to the Disclosure and Barring Service (DBS) immediately. This obligation applies equally if the individual is suspended or redeployed.

26.2 - Communication, Confidentiality, and Information Sharing

All safeguarding disclosures are managed under "need-to-know" protocols. Staff must never promise absolute confidentiality to a student; they must explain supportively what information will be shared, with whom, and why. In cases of sexual abuse or harassment, victims are entitled to lifelong anonymity by law, and the school will actively protect this profile throughout any criminal justice proceedings.

Information can be lawfully shared without consent if it is in the public interest, such as preventing serious crime or protecting others from significant harm. The DSL will weigh the student's wishes against the duty of care before executing a referral against a victim's wishes, ensuring specialist support is provided.

Safeguarding discussions with parents are conducted openly to manage safety plans and support. However, these consultations will be bypassed if they place the student or others at risk. When a student transfers to a new setting, the DSL ensures the secure transfer of their child protection file alongside any contextual information necessary to guarantee continuous pastoral care.

26.3 - Safer Recruitment and Staff Suitability

The Human Resources Manager executes comprehensive pre-employment verifications for all prospective staff, governors, volunteers, and contractors. This includes tracking candidates who have lived or worked outside the UK and using the DfE '*Check a teacher's record*' service to confirm prohibition, direction, and children's barred list statuses. All staff in regulated activity must undergo an Enhanced DBS check with barred list information.

In compliance with statutory safeguarding frameworks and safer recruitment standards, Haydon School enforces a rigorous selection and assessment process for all prospective personnel.

- Every interview panel must include at least one member who has completed accredited Safer Recruitment Training.
- To maintain institutional oversight, eliminate individual bias, and safeguard the integrity of the process, the shortlisting and selection panel must consist of a minimum of two people.
- All candidates undertake a face-to-face interview (online or in person) which must explicitly incorporate dedicated safeguarding questions designed to test the candidate's suitability to work with children, explore their understanding of

professional boundaries, and evaluate their capacity to uphold a proactive safeguarding culture.

This assessment is underpinned by an institutional culture of "it could happen here," ensuring that panels remain actively vigilant, exercise professional curiosity, and never assume that abuse or inappropriate behaviour cannot occur within the school environment.

All personnel must sign a declaration confirming they are not disqualified from working in a school environment. Following appointment, the school maintains an active culture of ongoing suitability, operating under the explicit awareness that "it could happen here" to deter abuse and challenge inappropriate behaviour.

26.4 - The Single Central Record (SCR)

The school maintains a comprehensive SCR tracking all employees, agency supply workers, and salaried teacher trainees. The SCR is maintained by the MR Manager and audited half-termly by the DSL and the HR Manager, with periodic independent checks by the Safeguarding Link Governor, as appropriate. Profiles are deleted from the SCR immediately once their employment terminates. The SCR details:

- Identity verification and right to work in the UK.
- Enhanced DBS and children's barred list checks.
- Prohibition from teaching restrictions.
- Professional qualification verifications.
- Global background checks for time spent overseas.
- Section 128 management checks for all governors, SLT members, and post-holders to ensure they are not barred from school management.

For agency and supply staff, the school records the exact date written confirmation was received from the employment business verifying that all statutory checks have been completed. Written risk assessments and DBS checks for volunteers are similarly logged.

26.5 - Mandatory Safeguarding and Child Protection Training

Staff complete safeguarding and child protection training at induction, with mandatory continuation sessions delivered at least half-termly and whenever legislation changes. Induction training covers this policy, the *Staff HR Handbook*, *KCSIE Part One*, and reporting pathways via CPOMS. All staff receive updates at least annually, encompassing Level 1 safeguarding certification, online safety, and annual iterations of KCSIE.

The DSL, Deputy DSLs, all members of the SLT, and all pastoral leaders complete Level 3 safeguarding and child protection training every two years. The DSL and DDSL engage in continuous professional development to maintain expert knowledge across:

- Early help and statutory intervention pathways, including local MASH criteria.
- Local authority child protection case conferences and review procedures.
- The long-term impacts of adversity, trauma, and adverse childhood experiences (ACEs).
- The distinct vulnerabilities of children in need, young carers, and students with SEND.
- The Prevent duty, online filtering and monitoring standards, and digital risks.

Visitor Protocols, Volunteers, and Site Security

In accordance with the KCSIE framework and the school's commitment to robust site security, Haydon School enforces precise procedures for all external individuals entering the premises. These measures ensure that students are safeguarded from unvetted adults while maintaining a welcoming and professional environment.

27.0 - General Visitor Arrival and Departure Procedures

All visitors, including parents and contractors, must report directly to the school reception immediately upon arrival, unless alternative arrangements have been made to welcome on to the site. They are required to provide their name, purpose of visit, and the name of the staff member or pupil the visit pertains to, before signing in using the digital reception system. Every visitor is issued a *Safeguarding at Haydon* information pamphlet and a colour-coded lanyard with an ID badge, which must be clearly displayed at all times while on school property.

The school operates a two-tier lanyard system to manage supervision requirements:

- Red Lanyards: Issued to visitors without a verified Enhanced DBS check. These individuals must be accompanied by a member of staff at all times and are never permitted unsupervised access to children.
- Yellow Lanyards: Issued to visitors with a verified Enhanced DBS check who are permitted to move around the site unaccompanied.

Before departing, all visitors must sign out using the digital reception system and return their ID badges and lanyards to the school office.

27.1 - Professional Visitors, Relatives, and Site Security

For professionals visiting the school in an official capacity—such as external teachers, educational psychologists, or social workers—reception staff will check their professional identification and ensure they register via the digital system. Rather than requesting to see individual DBS certificates, reception staff must seek formal, written assurance from the visitor's employing organisation that all appropriate pre-employment and identity checks have been conducted. The school maintains a

pre-approved list of registered lettings and contractors; any queries must be directed to the Site Development Manager before entry is granted.

For parents, relatives, or members of the public attending specific school events, standard DBS or barred list checks are not required. However, these individuals must still sign in via reception, receive the safeguarding pamphlet, and wear the appropriate colour-coded lanyard, for activities during the schools regulated hours, unless alternative arrangements have been made.

It is the collective responsibility of all staff members to maintain a secure environment by politely questioning any individual on school premises who is unaccompanied or not displaying a valid lanyard. Any such individual must be escorted immediately to reception. If a visitor cannot be identified, a member of the Senior Leadership Team (SLT) must be informed without delay. If an unauthorised individual refuses to report to reception, or becomes aggressive or abusive, they will be ordered to leave the premises immediately, and the police will be called to assist.

27.2 - Statutory Volunteering Framework

Volunteers are a valued part of the school community, but their deployment is heavily regulated to prevent the opportunity for harm. In line with updated statutory guidance, the school never utilises a volunteer to undertake regulated activity unless an Enhanced DBS check with barred list information has been successfully obtained.

A volunteer is considered to be in regulated activity if they are unsupervised and teach, train, instruct, care for, or supervise children regularly, or provide personal care. If a volunteer is fully supervised by a member of staff who is in regulated activity, they are not deemed to be in regulated activity themselves. In these instances, the school will conduct a formal, documented risk assessment to determine whether an Enhanced DBS check (without barred list information) is required. Under no circumstances will a volunteer who has not undergone a DBS check be left unsupervised with students. All approved volunteers must complete the school's safeguarding induction training before commencing their placement.

Appendix A: Key Professional Terminology and Acronyms

Acronym	Long Form	Description / 2026 Compliance Notes
CCE	Child Criminal Exploitation	Common in use. Explicitly linked in KCSIE to classroom removal patterns and extramural risk.
CP Lead	Child Protection Lead	Refers specifically to Hillingdon's local tier structure.

CSE	Child Sexual Exploitation	Remains a core statutory harm definition.
DBS	Disclosure and Barring Service	Essential for safer recruitment sections.
DfE	Department for Education	The national government body setting statutory safeguarding parameters.
DPO	Data Protection Officer	Crucial for school systems managing secure CPOMS data transfer.
DSL & DDSL	Designated Safeguarding Lead & Deputy Designated Safeguarding Lead	Responsibilities heavily expanded in 2026/27 regarding filtering governance and gender-questioning risk assessments.
EEA	European Economic Area	Standard terminology for tracking international pre-employment vetting checks.
FHA / FHP (Replaces EHA)	Family Help Assessment / Family Help Plan	CHANGED FOR 2026. Under <i>Working Together 2026</i> , "Early Help" terms are replaced by the statutory Family Help framework. Update this description to reference multi-disciplinary Family Help teams.
EHCP	Education, Health and Care Plan	Covers students with significant needs who are flagged as highly vulnerable cohorts.
ESFA	Education and Skills Funding Agency	National funding body.
FGM	Female Genital Mutilation	Subject to mandatory statutory reporting duties for teachers.

UK GDPR	UK General Data Protection Regulation	Governs the confidentiality overrides applied by the DSL team.
HBA	'Honour-based' Abuse	Standard terminology.
HMCTS	HM Courts and Tribunals Service	Applied to guidelines for students giving evidence.
ITT	Initial Teacher Training	Bound by safer recruitment induction laws.
KCSIE	Keeping Children Safe in Education	Updated to the 2026/27 legal baseline.
KISS	Keep it Safe 'n' Sorted	Local Hillingdon-specific sexual health drop-in pathway.
LA	Local Authority	Universal term.
LAC	Looked-After Children	Direct links added connecting care planning with child protection tracking.
LADO	Local Authority Designated Officer	Explicitly handles allegations against staff, contractors, and volunteers.
LGBTQ+	Lesbian, Gay, Bisexual, Transgender and Queer plus	Note that under KCSIE 2026/27, the DSL must handle requests regarding "gender questioning" children using a highly cautious, parent-default framework.
Front Door / Multi-Agency Team (Replaces MASH)	Integrated Front Door / Local Safeguarding Partners	CHANGED FOR 2026. <i>Working Together 2026</i> shifts away from the generic "MASH" acronym toward integrated front doors or localised multi-agency referral teams.

NPCC	National Police Chiefs' Council	Oversees national policing standards for school officers.
PLAC	Previously Looked-After Children	Amended Definition: Children who were in care but left via adoption, special guardianship or a child arrangements order. (Note: Care leavers are older youths exiting care; they are a distinct statutory category).
PSHE / RSHE	Personal, Social, Health and Economic Education / Relationships, Sex and Health Education	Core statutory delivery vector for teaching online safety, deepfakes, consent, and counter-extremism.
UKHSA / OHID (Replaces PHE)	UK Health Security Agency / Office for Health Improvement and Disparities	CHANGED. Public Health England (PHE) was disbanded. Safeguarding health guidance now comes from the UKHSA or OHID.
QTS	Qualified Teacher Status	Standard professional requirement tracking.
SCR	Single Central Record	KCSIE includes a direct standardized template to ensure national compliance consistency.
SENCO	Special Educational Needs Coordinator	Core partner with the DSL team for tracking contextual vulnerability.
SEND	Special Educational Needs and Disabilities	Cohort highlighted for elevated baseline vulnerability.
SG	Safeguarding	Standard internal shorthand.

SLT	Senior Leadership Team	The DSL must be a member of the SLT.
TRA	Teaching Regulation Agency	Direct referral agency used when a teacher is dismissed for safeguarding failures.
VSH	Virtual School Head	Description is correct and accurately covers their expanded remit over children in kinship care arrangements and children with a social worker.

Document History

Date	Iss	Status	Comments
November 2020	1	Newly written policy	To the Student Committee 10.11.20.
October 2021	2	Updated	To FGB 21.10.21
June 2022	3	Updated	To Student Committee on 28.06.22, Approved FGB 20.07.22
June 2023	4	Updated	
June 2024	5	Updated	Approved FGB 22/07/24
June 2025	6	Updated	Approved FGB July 2025
July 2026	7	Full redrafted in line with significant change to KCSIE	