



ALDENHAM
— SCHOOL —

ALDENHAM SCHOOL

Safeguarding Policy

Safeguarding@aldenham.com

**Revised September 2026
by the Designated Safeguarding Lead and
Head of Aldenham Foundation**

Chair of Governors  **Date 01/09/2026**

Safeguarding Governor  **Date 01/09/2026**

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1. Policy Statement

Aldenham School is committed to Safeguarding, Child Protection and the promotion of welfare and wellbeing – placing it at the heart of what the School seeks to achieve. It is recognised that children and young people learn best when they are healthy, safe, and secure. All children, pupils, students and staff should feel safe and protected from any form of abuse. This includes children who are in need (Section 17, children Act 1989) and children who are at risk of harm (Section 47, Children Act 1989). The School expects all staff, Governors, contractors, volunteers and organisations or individuals who lease School facilities to share this commitment.

This policy is addressed to all people working with any child, pupil and/or student on School property or on behalf of the Foundation, whether on-site or off-site. This can include members of teaching and support staff, supply staff, contractors, volunteers, Governors, and organisations or individuals who lease School facilities. The Safeguarding Policy can be accessed on the School website, families can access the policy via MySchoolPortal (MSP), staff can also access the policy via the Staff Handbook.

This policy has been authorised by the Aldenham School Governors and is reviewed annually. If the Policy is updated during the School year, the Designated Safeguarding Lead (DSL) will inform the Governing Body via the Clerk to the Governors and the Safeguarding Governor. The Governors recognise the expertise staff build by undertaking safeguarding training and managing concerns daily. Opportunities in the form of meetings and discussions are offered for all staff to contribute to the shaping of the safeguarding arrangements and policy.

The policy has regard to all guidance outlined in 'Section 5 Statutory Guidance' of this policy, particularly Keeping Children Safe in Education (KCSIE) 2026, Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014. The School regularly monitors updates to statutory and non-statutory guidance to ensure the Safeguarding Policy effectively safeguards and promotes the welfare of children, pupils and students.

2. Terminology

Foundation means the Aldenham Foundation, a collection of schools including Aldenham Prep School, and Aldenham School. This document is the policy which applies to Aldenham Prep School and Aldenham School.

School means Aldenham Prep School and Aldenham School.

Pupil means a child enrolled at Aldenham Prep School.

Student means any person enrolled at Aldenham School.

Child/Children refers to unenrolled children using School facilities and enrolled pupils/students, as per KCSIE (2026).

Family/Families can mean one or both parents, a legal guardian, or education guardian.

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

Abuse is defined as a form of maltreatment of a child. Abuse may take the form of physical, emotional or sexual abuse and includes neglect. This may involve inflicting harm, or by failing to act to prevent harm. Children may be abused by an adult or adults or another child or children.

Online abuse is defined as a form of abuse that happens via the internet. Online abuse can take the form of cyberbullying, emotional abuse, grooming, sharing of consensual and non-consensual nudes and semi-nudes, sexual abuse, and sexual exploitation. Someone can be a victim of online abuse while using social media, text messages and messaging apps, emails, online chats, online gaming and while accessing live-streaming sites – regardless of device. Children and young people are particularly vulnerable to online abuse.

Safeguarding and promoting the welfare of children is defined as per KCSIE 2026:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

3. Summary

The welfare of all children, pupils and students, including Early Years Foundation Stage (EYFS), within the School must be the primary concern for all staff. The School will do all that it can, within reason, to ensure that the children in our care are safe and happy.

Safeguarding children is the action we take to promote the welfare of children and protect them from harm. Every adult who comes into contact with our pupils and students, or children using our facilities has a role to play. Although referrals are usually managed via the DSL, anyone can refer a child to Children's Social Care. Safeguarding children is everyone's responsibility. Children includes anyone under the age of 18 and it is everyone's responsibility to safeguard children.

The Teacher Standards 2011 (updated 2021 to reflect minor changes in terminology), state that teachers, including Headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties and all staff have a responsibility to take appropriate action, working with other services as needed.

This policy seeks to demonstrate the commitment of the Head of Foundation, Head of the Prep School, all staff (including temporary staff), contractors, volunteers, the governing body and all who lease School facilities to promoting a safe environment for children and to report any allegations of abuse or suspicions of abuse to the relevant local authority agency. The School's Safeguarding Policy considers statutory guidance, local Child Protection procedures and best practice. The School is committed to remedying any difficulties or

weaknesses without delay.

Confidentiality

Adults at the School should never give absolute guarantees of confidentiality to children, pupils, students or adults wishing to tell them about something serious. They should, however, guarantee that they will only pass on information to the minimum number of people who must be told to ensure that the proper action is taken to resolve the problem. They should never tell anyone who does not have a clear 'need to know', and they should take whatever steps they can to protect the informing children, pupil, student or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made. Every effort will be made to maintain confidentiality and guard against unwanted publicity for both the victim and the accused. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/Teaching Regulation Agency (TRA) publish information about an investigation or disciplinary case (KCSIE Sept 2026).

Sharing confidential information

Staff, Governors and trustees use the DfE's data protection guidance for schools to:

- Comply with data protection law
- Develop data policies and processes
- Know what staff and pupil/student data to keep
- Follow good practices for preventing personal data breaches

Concerns regarding safeguarding issues inevitably involve the sharing of highly sensitive information. Whilst colleagues should be aware of their obligations under the General Data Protection Regulations (GDPR), concerns relating to sharing sensitive information should never be used as a reason for not passing on information to the DSL about a child at risk of harm. The School's Safeguarding Management Software, CPOMS, is fully GDPR-compliant and should be the sole means (other than a direct report to the DSL) by which concerns are raised.

Notwithstanding the paragraph above, colleagues should be aware that confidential information placed on CPOMS is not necessarily exempt from a Subject Access Request (SAR). Therefore, care should be taken to ensure that information is as objective as possible in the circumstances, and only information relevant to a particular child, pupil, and/or student is raised in a concern.

What to do when you suspect abuse

When you suspect abuse, a young person confides in you, or a complaint is made to you about any adult, it is your duty to report the concern to the Designated Safeguarding Lead (DSL). The DSL for Aldenham School and Aldenham Prep School is Mrs Lisa Lobo. While the DSL has deputies (DDSLs) acting on their behalf, the DSL retains ultimate responsibility for safeguarding and Child Protection in the School. If the DSL is not available (or a DDSL is more readily available), a report should be made immediately to a DDSL, who will then discuss the matter with the DSL.

If the suspected abuse involves a member of the staff who may have harmed or may be likely to harm a child, you should inform Alex Hems (for Aldenham School staff) and Sarah Galpin (for Aldenham Prep staff) immediately and simultaneously report your concern using StaffSafe within

CPOMS. If the member of staff in question is the Head of Prep School, you should contact the Head of Foundation and not report online. If the member of staff in question is the Head of Foundation, you should raise this with the Chair of Governors and not use the online form. For more information, see Section 18 of this policy.

What to do if a young person tells you about abuse by someone else

- Always stop and listen. If you believe the disclosure to be of a severe nature, inform the child/pupil/student you would like to seek a second person to be present for the disclosure and ask the child/pupil/student if they have a preferred trusted adult to be present. If they do not want a second person present, continue to listen.
- Ask open-ended questions such as 'What happened?' and 'Who was involved?', rather than leading questions such as 'Did X do this to you?'
- Do not guarantee confidentiality. Explain that you must report the matter to the DSL for help and guidance. If you believe the child/pupil/student, or any other person, is at risk of harm - you have a statutory duty to report to the DSL immediately.
- It is essential a written record of your conversation is made. Best practice (according to KCSIE, 2026) is to wait until the end of the conversation and immediately type up a thorough summary to CPOMS. It may be useful to make brief notes during the conversation, if making notes does not restrict giving the child your full attention. It is recommended that notes are typed directly into CPOMS to avoid GDPR breach.
- Report the matter to the DSL, either directly or via CPOMS.
- If a child is at immediate risk of harm, you must contact the DSL in person as soon as possible, even if it means arranging emergency cover for a class. This is a top priority.
- The DSL will inform you if you have any further obligations.
- Should a child be deemed at risk, the DSL will make an initial referral to Children's Social Services immediately. A full referral in any case will be made within 24 hours.
- If you are not happy with the DSL's response, you have the right to refer the matter directly to Children's Services.

The School appoints a Designated Safeguarding Lead (DSL) in charge of safeguarding for the whole School. This appointment is Mrs Lisa Lobo. In their absence, the Head of the Aldenham Foundation, Mrs Alex Hems, acts as a deputy DSL for the whole School. The DSL is supported by four Deputy Designated Safeguarding Leads (DDSL), Mrs Louise Gall, Ms Niamh Brewer, Mr Nicholas Cumming and Rev Tony Richardson based in Aldenham School, and Mrs Ann Suffield, Ms Amy Bonn and Mrs Sarah Galpin based in Aldenham Prep School. All DDSLs have been trained to an appropriate level. In the event of the DSL and DDSLs not being available in person, they will make every effort to be available for consultation.

4. Important Contact Details

School Safeguarding Team

Students, staff and families can seek safeguarding support or advice during the working day in term time (between 8:30am and 5:00pm on any school day) by emailing Safeguarding@aldenham.com. Out of hours and during the holidays, this email address can be used to seek non-urgent advice or to keep the Safeguarding Team updated regarding non-urgent safeguarding matters. Where relevant, emails will be responded to, but there can be no expectation of a response time during school holidays and out of school hours.

Staff can contact the DSL or a DDSL via MS Teams. Urgent concerns should be reported immediately via a MS Teams call or using the safeguarding telephone number below. This will be answered by a member of the Safeguarding Team.

Safeguarding telephone number: 07884 585324

Designated Safeguarding Lead (DSL):

Mrs Lisa Lobo llobo@aldenham.com

Deputy Designated Safeguarding Leads (DDSLs), Aldenham School:

Mrs Louise Gall lmg@aldenham.com

Miss Niamh Brewer nbrewer@aldenham.com

Mr Nicholas Cumming ncumming@aldenham.com

Foundation Chaplain and DDSL, Aldenham School:

Revd. Tony Richardson trichardson@aldenham.com

Deputy Designated Safeguarding Leads (DDSL), Prep School:

Mrs Ann Suffield asuffield@aldenham.com

Ms Amy Bonn aebonn@aldenham.com

Head of Aldenham Prep and DDSL, Prep School:

Mrs Sarah Galpin smgalpin@aldenham.com
07966 341156

Head of Aldenham Foundation:

Mrs Alex Hems ahems@aldenham.com
07977 392382

School Counselling counselling@aldenham.com

PA to the Deputy Heads and Student Data Administrator

Mr Joe Hughes jhughes@aldenham.com

Health Centre 07785 303555
emergencies only:

School Governor Contacts

Chair of Governors:

Mrs Sarah Altman chair@aldenham.com

Designated Governor for Safeguarding, and Filtering and Monitoring:

Dr Uchechukwu Ogunna safeguardinggovernor@aldenham.com

Useful external agencies for Children, Pupils, Students and Families

Hertfordshire Contact Centre County Council Children's Services	0300 123 4043
Hertfordshire Single Point of Access 24/7 Mental Health Helpline	0800 6444 101 or 111 and select option 2
Independent Person	Mark Klimt 0208 207 3789 or 07713 053 576
Childline, UK	0800 1111
NSPCC, UK	0808 800 5000
Samaritans National Helpline	116 123
Confidential Anti-Terrorism Line	0800 789 321
Watford Sexual Health Clinic	0300 008 5522

Useful external agencies for staff

The School has a large catchment area which covers multiple Local Authorities, each with their own Safeguarding teams and procedures. To determine which local authority a pupil or student is resident in, staff can use iSAMS to locate a permanent address and search the postcode using www.gov.uk/report-Child-abuse-to-local-council. Incidents involving full-time boarders or staff should be referred to Hertfordshire County Council. Referrals should always be made to the appropriate local authority.

In Hertfordshire, the Multi Agency Safeguarding Hub (MASH) brings together Police, Probation, Health Visiting and Children's Services staff, working together as a team, to share information and decision making about the best way to safeguard and meet the needs of vulnerable children.

MASH – Multi-Agency Safeguarding Hub	0300 123 4043 Protectedreferrals.cs@hertfordshire.gov.uk
CPSLO Hertsmere and St Albans – Child Protection School Liaison Officer	Christina (Chrissy) Lea 01992 531907 Christina.lea@hertfordshire.gov.uk
CPSL Admin Support Officer – Child Protection School Liaison Officer	Joanne Freckleton 078122 71303 Cpsloadmin@hertfordshire.gov.uk
LADO Officer – Local Authority Designated Officer	01992 555420 LADO.Referral@hertfordshire.gov.uk
Hertfordshire CAMHS	01438 843322 or 0800 644 4101
Herts Sunflower – Hertfordshire Domestic Abuse Hotline	08088 088 088 or 999 in emergency kim@mailpurple.org

0800 789 321 or 01438 735373

0300 123 4042 or 101

NSPCC Whistleblowing Service 0800 028 0285
help@nspcc.org.uk

Barnet	020 8359 4066
Bedford Borough 'Integrated Front Door'	012 3471 8700
Brent	020 8937 4300
Buckinghamshire	012 9638 3962
Camden Children & Families Contact Service	020 7974 3317
Central Bedfordshire Access & Referral Hub	030 0300 8585
Enfield	020 8379 5555
Haringey	020 8489 4470
Hillingdon	018 9555 6006
Islington Children's Services Contact Team	020 7527 7400
Luton	015 8254 7653
Westminster	020 7641 4000

All guidance is hyper-linked.

- The Education (Independent School Standards) Regulations (2014)
- Keeping Children Safe in Education (Sept 2026)
- The Education Act (2002)
- The Children Act (2004)
- The Equality Act (2010)
- The Equality Act and Schools Guidance (2014)
- The Human Rights Act (1998)
- Working Together to Safeguard Children (2023, updated 2026)
- National Minimum Standards for Boarding Schools (2026)
- What to do if you're worried a Child is being abused: guidance for practitioners (2015)
- Information Sharing – Advice for practitioners providing Safeguarding services to vulnerable Children, young people, parents and carers (2018, Updated 2024)
- Early years foundation stage (EYFS) statutory framework - GOV.UK (www.gov.uk)
- Prevent duty guidance for England and Wales (2023, Updated 2024)
- Female genital mutilation: resource pack (2023)
- Sharing Nudes and Semi-Nudes – Responding to incidents and Safeguarding Children

- and young people, (UKCIS, 2020, Updated 2024)
- Child Sexual Exploitation: definition and guide for practitioners (and annexes) (2017)
- DBS barring referral guidance (2013, updated 2026)
- Relationships and Sex Education and Health Education Guidance, (2019, updated 2025)
- Preventing Youth Violence and Gang Involvement, (March 2015)
- Home Office County Lines Guidance, (May 2022, updated 2026)
- DFE: Mental Health and Behaviour in Schools (November 2018)
- National Police Chiefs' Council: When to Call the Police (2020)
- PHE: Promoting Children and young people's mental health and wellbeing (2021)
- Meeting digital and technology standards in schools and colleges (2022, updated 2026)
- Keeping Children Safe in Out-of-School Settings (2023, updated 2026)
- Criminal Exploitation of Children and Vulnerable Adults: County Line Guidance

When paying due regard to this guidance, colleagues must take account of any particular circumstance or context of the School which may indicate a need for protocols greater than the minimum legal requirements.

6. Supporting Documents

- Acceptable Use of ICT and Mobile Phone Policy for Pupils
- Access, Security and Visitors Policy
- Administering Medicines Policy
- Anti-Bullying Strategy
- Attendance and Absence Policy
- Behaviour Policy
- Complaints Policy
- Code of Conduct
- Disability Policy
- Educational Visits Policy
- First Aid Policy
- Health and Safety Policy
- PSHE Policy
- Low-Level Concerns and Allegations Policy
- Mental Health and Emotional Wellbeing Policy
- Missing Student Policy
- Pastoral Care Policy
- Restrictive Interventions including Use of Reasonable Force
- Visitors Overnight Policy
- Racist Incidents in School Policy
- Recruitment Policy
- Safeguarding of Boarders Policy
- Smoking, Alcohol and Misuse of Drugs Policy
- Spiritual, Moral, Social and Cultural Policy
- Social Media Policy
- Whistleblowing Policy

The School has an Independent Listener who boarding students may contact directly about personal problems or concerns at school.

The School follows the procedures established by Hertfordshire Safeguarding Children Partnership and is in accordance with locally agreed multi-agency procedures.

7. Role of the School Governors

The role of School Governors in relation to safeguarding is to provide strategic challenge to test and assure that the safeguarding policies and procedures are effective, and to support the delivery of a whole-School approach to safeguarding.

The Governing Body will appoint a 'Safeguarding Governor', who will regularly visit the School to check that safeguarding processes are in place and are being followed. This will include a meeting with the Aldenham School DSL and the DDSL based in the Prep School at least once a term and may include meeting other staff as appropriate.

Governors provide strategic challenge by ensuring that:

- Members of the Governing Body have all completed appropriate safeguarding training, which is regularly updated in accordance with statutory guidance.
- The DSLs and DDSLs have completed appropriate training in Child Protection and inter-agency working.
- The Safeguarding Policy and procedures are consistent with statutory guidance and Hertfordshire Safeguarding Children Partnership (HSCP), or relevant Local Authority, requirements. School Governors have a responsibility to approve the policy.
- The Safeguarding Policy is reviewed annually and made available to families, staff, pupils and students.
- Members of Aldenham School's SLT and Aldenham Prep School's SLT are fully conversant with statutory guidance including *Keeping Children Safe in Education (KCSIE)*, September 2026.
- The School has procedures in place to deal with Allegations of abuse made against members of staff and volunteers, including Allegations made against Head of Prep or Head of Foundation.
- The School has appropriate Filtering and Monitoring systems in place which are regularly reviewed to determine effectiveness; and all staff, including the Senior Leadership Team, understand the provisions in place and manage them effectively in liaison with the Head of Technology and the DSL.
- The School operates Safer Recruitment procedures which include statutory checks on the suitability of all staff and volunteers to work with children.
- The School carries out S128 checks on all new members of the Senior Leadership Teams and Heads of Department.
- The School ensures all staff annually receive refresher training and are provided with an updated version of KCSIE Part 1.
- The DSL and DDSLs receive refresher training every 2 years and Prevent training every 3 years, (in line with HSCP or relevant Local Authority guidance).
- The School makes all volunteers and temporary staff aware of safeguarding arrangements a verbal briefing when they first report for duty.
- Members of the Governing Body are all aware of their obligations under the Human Rights Act (1998), the Equality Act (2010) and their local multi-agency safeguarding arrangements.
- A member of the governing body (normally the Chair) is nominated to be responsible

for liaising with the local authority in the event of an Allegation being made against the Head of Foundation.

8. Safer Recruitment

All School appointments are subject to Safer Recruitment guidelines. Key staff including the Head of Foundation, and the Head of Prep School are trained in Safer Recruitment. All interview panels will have at least one member of staff trained in Safer Recruitment.

As part of the shortlisting process, an online search will be carried out on candidates to help identify any incidents or issues that have happened and are publicly available which the interviewer may want to explore with the applicant at interview. Shortlisted applicants must be notified that online searches are done as part of due diligence checks.

Appointments are not made without suitable checks and evidence including criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information. All such information is stored on the Single Central Register (SCR).

An enhanced DBS certificate, which includes barred list information, will be required where staff will be engaging in regulated activity. A person is considered to engage in a regulated activity if, as a result of their work, they:

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00 am and 6.00 am; or
- satisfies the "period condition", meaning four times or more in a 30 day period; and
- provides the opportunity for contact with children.

For all other staff who have an opportunity for contact with children who are not engaging in regulated activity, e.g. on-site contractors, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.

Volunteers undertaking regulated activity with children will be subject to the same barred-list checking requirements as other individuals engaged in regulated activity. The removal of the supervision exemption means that supervision alone does not remove the requirement for an Enhanced DBS check with Children's Barred List information where the volunteer's role meets the definition of regulated activity.

For more information, refer to Aldenham Foundation Recruitment Policy and KCSIE 2026.

9. Duty of Care

The Children Act (2004) places a "Duty of Care":

- On the School in respect of a risk or perceived risk of significant harm to a child.
- On the Head of an independent school to report to a local social services department any evidence or suspicion of children being or at risk of being abused.
- On all members of staff to report to their manager the same evidence or suspicion.

In the document Working Together to Safeguard Children (2026) and KCSIE (2026) our role as a School is clearly set out and our statutory duty is made clear. All staff working directly with children will read KCSIE Part 1 annually. All staff will complete an annual online assessment to ensure they have understood the contents.

Sections 175 and 157 of the Education Act 2002 places a duty on independent schools to exercise their functions with a view to safeguarding and promoting the welfare of children who are pupils or students at the School.

KCSIE states:

“Staff working with children are advised to have an attitude of ‘it could happen here’ where safeguarding is concerned, even if no direct disclosure has been made by a pupil/student. When concerned about the welfare of a child, staff should always act in the best interests of the child”.

When staff have any concerns about a child’s welfare, they should act on them immediately. See Appendix B for a flow chart from KCSIE setting out the process for staff when they have concerns about a child.

“When staff have a concern, they should follow their own organisation’s Child Protection policy and speak to the Designated Safeguarding Lead (or deputy) For the purposes of School staff, this policy [Safeguarding Policy 2026] should be followed when raising concerns about a child’s welfare.

Options will then include:

- Managing any support for the child internally via the school or college’s own pastoral support processes;
- Family Help assessment; and,
- A referral for statutory services, for example, as the child might be in need, is in need or suffering or likely to suffer harm.

The DSL or a Deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or Deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the Senior Leadership Team and/or take advice from local Children’s Social Care. In these circumstances, any action taken should be shared with the DSL (or a Deputy) as soon as is practically possible.

If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming. The online tool [Reporting Child abuse to your local council](#) directs staff to their local Children’s Social Care contact number.

In accordance with Section 11 of the Children Act (2004), Teachers’ Standards (2011) and KCSIE (2026), the School has in place arrangements that reflect the importance of safeguarding and promoting the welfare of Children. These include:

- Appointing a designated professional lead for safeguarding (referred to as the DSL).
- A clear line of accountability for the provision of services designed to safeguard and promote the welfare of children.
- A clear commitment by senior leadership to the importance of safeguarding and promoting children's welfare including appointing a Governor to take leadership responsibility for Safeguarding arrangements.
- Promoting a culture of listening to children and taking account of their wishes and feelings.
- Engendering a culture of "professional curiosity" amongst staff with regard to possible causes of changes in the behaviour or conduct of children.
- Making arrangements which set out clearly the processes for sharing information with other professionals and the HSCP or relevant Local Authority.
- Providing appropriate supervision and support for staff including undertaking safeguarding training and so ensure that staff are competent to carry out their responsibilities for safeguarding, promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.
- Providing opportunities for reflective supervision with a trained facilitator for senior pastoral staff.
- Providing staff with mandatory induction training including familiarisation with Child Protection procedures and subsequent reviews and updates to all staff and residents, as necessary. The induction programme includes familiarisation with the School's Safeguarding Policy, Professional Conduct Guide, Whistle-blowing policy and KCSIE (Part1). All staff are required to read these and complete a short online assessment to ensure they have understood the contents and the procedures which must be adhered to. In addition, the DSL and DDSs will be introduced, or will lead the training, and staff will be made aware of how to contact them.
- Using safe recruitment practices in accordance with KCSIE (Sept 2026)
- Providing clear guidelines with reference to Hertfordshire Safeguarding Children Partnership (HSCP) and relevant Local Authorities, in accordance with locally agreed interagency procedures, for dealing with Allegations against staff. Allegations may relate to a person who works with children who has:
 - Behaved in a way that has harmed a child or may have harmed a child.
 - Possibly committed a criminal offence against or related to a child.
 - Behaved towards a child or children in a way that indicated 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.
- Involving the Local Authority Designated Officer (LADO) in the management and oversight of individual cases (the LADO should be informed within 24 hours of all Allegations that come to the School's attention or are reported directly to the Police).
- Making referrals to the Disclosure and Barring Service (DBS) if an individual (paid or volunteer) is removed from work looking after children because it is deemed that they pose a risk of harm to children.

The documents Working Together to Safeguard Children (2026) and KCSIE (2026) promote a multi-agency approach to the care of children and set forth the good practice of separate agencies co-operating and working together for the benefit of the child.

The Aldenham School Safeguarding Policy and procedures also consider the requirement of the National Minimum Boarding Standards (NMS) (2026), Standards 7, 8 & 9. Consideration must be given to any allegations or disclosures of abuse or possible abuse concerning themselves or another boarder, particularly if the subject of the allegation is another boarder or a member of staff. In such circumstances it may be necessary to arrange alternative accommodation for boarders to ensure the safety and well-being of the student and appropriate pastoral support. Boarders are also provided with one or more appropriate helpline(s), including Childline, the NSPCC, the School Counsellor, Hertfordshire Social Services and the School's Independent Person, to call in case of problems or distress. In addition, posters with the DSL's and DDSLs' contact details will be widely displayed throughout the School. As part of its commitment to the safeguarding of boarders, the School will make every attempt to adhere to the National Minimum Standards for all boarders.

For further details, please see the Safeguarding of Boarders Policy.

10. Diversity and Inclusion

The School is committed to celebrating diversity, actively challenging discrimination and promoting equality of opportunity.

Equality Act (2010) - Pupils and Students with Protected Characteristics

Recognising obligations under the Equality Act, the School will never discriminate against pupils and students because of a Protected Characteristic. These include sex, race, disability (*including neurodiversity*), sexual orientation, gender reassignment, religion or belief, and pregnancy and maternity. Where appropriate, the School may take proportionate positive action to deal with particular disadvantages affecting pupils and students with a Protected Characteristic to better meet their specific needs.

Pupils and students with a Protected Characteristic may be at greater risk of harassment or abuse. For example, KCSIE (2026) identifies that children with special educational needs and disabilities (SEND) are three times more likely to be abused by their peers. It is important for all staff to be aware that pupils and students with a Protected Characteristic may not feel ready or know how to tell someone that they are being abused, exploited or neglected as they may feel embarrassed, humiliated or are being threatened. This should not prevent staff from having a professional curiosity and speaking to the DSL/DDSL if they have concerns about a child. It is recommended that staff consider how best to build a trusted relationship with the pupil/student, to better facilitate communication. Staff can speak with the DSL/DDSL if they need support building a trusted relationship.

Human Rights Act (1998)

The School seeks to respect and protect the human rights of all pupils and students by actively challenging discrimination, harassment, violence and abuse. The School recognises that a failure to respect and protect these rights may breach the European Convention on Human Rights, specifically Article 3 (right to freedom from inhuman and degrading treatment), Article 8 (right to respect for private and family life), Article 14 (rights and freedoms must be protected and applied without discrimination, and Protocol 1, Article 2 (right to education) – all of which are protected by the Human Rights Act (1998).

Pupils and Students who are lesbian, gay, bi or gender questioning (LGBT+)

The fact that a pupil/student is LGBT+ is not, in itself, an inherent risk factor for harm. However, pupils/students who are LGBT+, are perceived to be LGBT+, or who are questioning their gender may be more vulnerable to bullying, harassment, discrimination, family conflict, social isolation, poor mental health or exploitation. These factors can increase safeguarding risks and may make it more difficult for a child to seek support.

The School is committed to providing a safe, inclusive and supportive environment in which all pupils/students feel able to share concerns and access appropriate help from trusted adults.

Children who are questioning their gender may experience additional vulnerabilities and safeguarding concerns. Decisions affecting a child who is questioning their gender will be made in a child-centred manner, taking account of the child's welfare, wishes and feelings, safeguarding needs, the potential impact on the child, the rights and interests of other pupils, and the School's legal responsibilities. The welfare of the child will remain paramount.

Decisions relating to a child's social transition will be approached with particular care and consideration. A social transition may include changes to a child's name, pronouns, mode of dress, participation in activities, or other aspects of their presentation within the school environment.

Any request or proposal relating to social transition will be considered on a case-by-case basis. Decisions will be informed by an assessment of the child's individual circumstances, needs and wishes, together with any relevant safeguarding, pastoral, educational and legal considerations.

The Designated Safeguarding Lead (DSL) will be consulted where appropriate. The School will normally work in partnership with parents and carers unless there is a compelling safeguarding reason not to do so.

Staff should refer any concerns to the DSL where a child who is questioning their gender, or any other child, may be experiencing distress, pressure, coercion, external influence, poor mental health, or other safeguarding risks connected to their circumstances. Such concerns will be managed in accordance with the School's safeguarding procedures.

Appropriate records will be maintained of discussions, decisions, risk assessments and support arrangements in order to ensure that the child's welfare remains at the centre of decision-making.

Further information regarding the School's approach to supporting gender-questioning pupils/students can be found in the Gender Questioning Students Guidance Document.

Single-Sex Spaces and Intimate Facilities

The School is committed to providing a safe, respectful and dignified environment for all pupils/students. In accordance with its safeguarding responsibilities, the School will carefully consider arrangements relating to access to toilets, changing rooms, showers, washing facilities, residential accommodation and other single-sex spaces.

The School recognises that such facilities and spaces may be necessary to protect pupils' privacy, dignity, safety and wellbeing. Access to toilets, changing rooms, showers and other intimate facilities will be managed in a manner that respects the rights, privacy and welfare of all pupils/students.

Decisions regarding access to single-sex facilities and accommodation will be made in accordance with relevant legislation, statutory guidance, safeguarding considerations and the welfare of all pupils/students. Where individual arrangements are required, these will be considered carefully on a case-by-case basis, taking account of the needs and circumstances of the pupil/student concerned, the rights and wellbeing of other pupils/students, the School's legal responsibilities, and any relevant safeguarding or pastoral considerations.

Any individual arrangements will be kept under regular review and supported by appropriate risk assessments where necessary. The School will implement suitable supervision, support and safeguarding measures to ensure that all pupils/students feel safe, respected and supported when using toilets, changing facilities, sports facilities and residential accommodation.

Concerns relating to privacy, dignity, bullying, harassment, abuse or any other safeguarding matter associated with the use of such facilities must be reported to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL) and will be managed in accordance with the School's safeguarding procedures.

Appropriate records will be maintained of any discussions, decisions, risk assessments and support arrangements to ensure that safeguarding, welfare and the best interests of all pupils/students remain central to decision-making.

11. EYFS

This Safeguarding Policy applies to all pupils, including EYFS. With specific reference to the statutory framework for EYFS 2025, staff must refer and adhere to the Prep School 'Taking, Storing and Using Images of Pupils Policy' which states that staff, visitors, volunteers and pupils/students are not permitted to use their own mobile phones or cameras to take or record any images in the Prep School or around Foundation Stage Pupils. All visitors read this policy as part of the 'signing in' procedure in the Foundation Stage.

Cameras and mobile phones are prohibited in the toilet areas. (The full policy can be found in the Foundation Stage office). The Intimate Care Policy must also be adhered to.

12. Use of School premises

When facilities are let out to external organisations or individuals (for example, community groups or sports clubs) the School will make all reasonable attempts to ensure that appropriate safeguarding arrangements are in place. Before a third party can use School facilities, their Safeguarding policy must be inspected, and the identity and contact information pertaining to the organisation's Safeguarding Officer be ascertained. Failure to provide this, and any other details required by 'Keeping Children Safe in Out-of-School Settings' (2026), will lead to termination of the agreement.

If an Allegation is made to the School relating to an incident that happened while School

facilities were let out to an external organisation or individual, then the School will follow the 'Low-Level Concern and Allegations Policy'. If appropriate, this includes informing the LADO.

The primary contact for raising a Low-Level Concern about organisations or individuals who lease School facilities is the Foundation Events Manager, Mr Andy Dawson (ald@aldenham.com), who will liaise with the DSL as necessary. Any external agency safeguarding concerns should be raised with the Aldenham School DSL. In the case of an Allegation, the Head of Foundation must be contacted directly.

When services or activities are provided by the School, regardless of whether the attendees are on the School roll, and are under direct supervision of School staff - this Safeguarding Policy will apply.

In cases when the School arranges for services to be provided by a third party (for example an entertainment provider), whether on or off-site, the third party individual or organisation must demonstrate it has Safeguarding and Child Protection policies and procedures in place by sharing the appropriate policy with the School.

13. The Designated Safeguarding Lead

The DSL is a member of the Senior Leadership Team and takes lead responsibility for safeguarding and Child Protection (including online safety). The School will ensure that the DSL is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children. Deputy DSLs of which there are four in Aldenham School and three in the Prep School, one of whom has oversight of EYFS are trained to the same level as the DSL. Whilst the activities of the DSL can be delegated to deputy DSLs, the ultimate lead responsibility for child protection remains with the DSL.

In addition, the Head of Foundation, and Head of Aldenham Prep are trained in Safeguarding and Child Protection and will receive any concerns should the DSL or DDSLs not be immediately available.

The Role of the DSL

In accordance with Annex B of Keeping Children Safe in Education, the main responsibilities of the DSL are:

Managing referrals

- To take lead responsibility for promptly referring all cases of suspected abuse and neglect of any pupil at the School to the relevant Local Authority;
- To refer cases to the Channel programme where there is a radicalisation related concern;
- To support staff who make direct referrals to the Channel programme;
- To take lead responsibility for promptly referring to the Local Authority Designated Officer all child protection concerns which involve a member of staff;
- To take lead responsibility in liaison with the Head of Foundation for promptly making

referrals to the Disclosure and Barring Service (DBS) (POBox 3961, Wootton Bassett, SN4 4HF, Tel: 03000 200 190) where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child; and

- To take lead responsibility for promptly making referrals to the police where a crime may have been committed which involves a child. The National Police Chiefs' Council advice 'When to call the police' should assist the DSL, Head and the safeguarding team understand when they should consider calling the police and what to expect when they do.
- If a student moves school to share any safeguarding records within 5 days during the year or within the first week of new academic year.
- The designated safeguarding lead should take lead responsibility for safeguarding and Child Protection including online safety and understanding the filtering and monitoring systems and processes in place.
- To take responsibility for staff training regarding Safeguarding and Child Protection matters (annual) and on joining the School through their induction programme.
- The DSL should keep written records of all concerns, discussions and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme and the outcome and ensuring that such records are stored securely on the CPOMS safeguarding platform.

Working with others

- To act as a source of support, advice and expertise for all staff;
- To act as a point of contact with safeguarding partners;
- To take lead responsibility in Family Help cases and liaise with other agencies;
- To liaise with the Head of Foundation in respect of police investigations or investigations under section 47 of the Children Act 1989 which involve the School;
- To liaise with the 'Case Manager' and Local Authority Designated Officer regarding all child protection concerns which involve a member of staff;
- To work with the Head of Foundation and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at School. This includes:
 - ensuring the School knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
 - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- To liaise with staff (especially pastoral support staff, Housemasters, the Health Centre, IT Technicians and SENDCO) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- Promote supportive engagement with parents and/or carers in safeguarding and

promoting the welfare of children, including where families maybe facing challenging circumstances.

Raising awareness

- To ensure each member of staff has access to, and understands this policy and procedures, especially new and part-time staff;
- To ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this;
- To ensure this policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made to children and Family Services and the School's role in this;
- To maintain links with the Hertfordshire Safeguarding Children Partnership to ensure staff are aware of training opportunities and the latest local policies on safeguarding;
- To help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and the Senior Leadership Team; and
- To ensure that the School's PSHE programme teaches students about safeguarding, including safer use of the internet and social media

Information sharing and managing the child protection file

The DSL will ensure that safeguarding information is shared lawfully, appropriately, proportionately and without unnecessary delay where there is a need to protect a child, pupil, student or another person from harm. Effective information sharing is essential to safeguarding and promoting the welfare of children and will be undertaken in accordance with data protection legislation, information sharing guidance and the School's safeguarding procedures. The DSL will:

- Ensure child protection files are kept up to date, kept confidential and stored securely;
- Records should include:
 - a clear and comprehensive summary of the concern;
 - details of how the concern was followed up and resolved;
 - a note of any action taken, decisions reached and the outcome.
- Ensure the file is only accessed by those who need to see it and where shared, this happens in accordance with information sharing advice as set out in parts one and two of Keeping Children Safe in Education;
- Where children leave the School, ensure that the child protection file, together with any relevant safeguarding information and context, is transferred securely to the new school or college as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should include information relating to any ongoing safeguarding concerns, risks or vulnerabilities, including where relevant concerns regarding exploitation, serious violence, harmful sexual behaviour, child-on-child abuse or other significant safeguarding matters. The file should be transferred separately from the main pupil file, ensuring secure transit and obtaining confirmation of receipt.

- Consider whether it would be appropriate to share information with the receiving school or college in advance of a child leaving, particularly where this will support continuity of safeguarding, pastoral or educational support and enable appropriate arrangements to be put in place before the child arrives.
- The School retains child protection files indefinitely where a referral has been made/social care have been involved, or a child has been the subject of a multiagency plan. Where there are low level concerns with no multi-agency involvement, the School will consider retaining the child protection file for 25 years from date of birth or indefinitely.

Training, knowledge and skills

- To undergo training, at least every two years, to acquire the knowledge and skills required to carry out the role;
- To undertake Prevent awareness training annually; and to ensure knowledge and skills are refreshed at regular intervals, as required, but at least annually to keep abreast of developments relevant to their role so they:
 - Understand the assessment process for providing Family Help and statutory intervention;
 - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and effectively contribute when required to do so;
 - Understand the importance of the role the DSL has in providing information and support to children's social care in order to safeguard and promote the welfare of children;
 - Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing; and what is needed in responding to this in promoting educational outcomes;
 - Are alert to the specific needs of children in need, those with Special Educational Needs and/or Disabilities (SEND), those with relevant health conditions and young carers;
 - Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation;
 - Understand the importance of information sharing, both within the School and with the safeguarding partners, other agencies, organisations and practitioners;
 - Are able to keep detailed, accurate, secure written records of concerns and referrals;
 - Understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
 - Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
 - Can recognise the additional risks that children with Special Educational Needs and/or Disabilities (SEND) face online, for example, from online

bullying, grooming and radicalisation and are confident they have the capability to support children with Special Educational Needs and/or Disabilities to stay safe online;

- Obtain access to resources and attend relevant refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measure the School puts in place to protect them; and
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

A full Job Description for the DSL can be in Appendices D.

Governors also undertake full safeguarding training on a 3-yearly basis and are given updates by the DSL on at least an annual basis. They sign to say they have read and have understood the contents of KCSIE Part One every year.

14. Promoting Fundamental British Values (FBV)

Aldenham teaches a broad and balanced curriculum which promotes the spiritual, moral, social and cultural development of pupils and students, preparing them for the opportunities, responsibilities and experiences of life. It places great emphasis on the promotion of community cohesion. Aldenham promotes FBV in many of its day-to-day interactions with pupils and students. Examples of this include whole school assemblies, Chapel services, PSHE lessons, talks and presentations, the School council, tutorials and House competitions.

Aldenham is a multi-cultural and multi faith school, which aims to:

- Ensure children become valuable and fully rounded members of society, who treat others with respect and tolerance regardless of background.
- Promote the FBV of democracy, the rule of law, individual liberty and mutual respect and tolerance for those of different faiths and beliefs.
- Promote mutual respect amongst pupils and students, ensuring they are fully prepared for life in modern Britain when they leave school.

As a result of this Aldenham expects pupils and students to:

- Gain an understanding of how citizens influence decision making through democratic processes.
- Recognise that freedom to hold faith and beliefs is protected in law.
- Accept that people having different faiths or beliefs to oneself (or having none) should be accepted and tolerated and should not be the cause of prejudicial or discriminatory behaviour.
- Recognise the means of identifying and combatting discrimination.

Guidance on promoting fundamental British values in schools is available at:

www.gov.uk/government/news/guidance-on-promoting-british-values-in-schools-published.

15. Filtering and Monitoring

Overview

It is essential that children, pupils and students are safeguarded from potentially harmful and inappropriate online material. The School recognises that online safety can be categorised into four areas of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as racism, misogyny, radicalisation, pornography, misinformation, disinformation, conspiracy theories, and extreme sexual or physical violence.
- **Contact** – being subjected to harmful online interaction with other users, including child-on-child pressure, coercion, grooming, exploitation, and harmful interactions involving AI-driven technologies.
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, including bullying, harassment, and the making, sending, receiving or viewing of explicit images or other inappropriate content.
- **Commerce** – risks associated with online financial activity, including gambling, phishing, scams, inappropriate advertising, financial exploitation, and other commercial pressures.

Filtering and Monitoring helps provide a safe environment for children, pupils and students to learn and work online by blocking internet access to harmful sites and inappropriate content, and raising any safeguarding concerns related to a pupil or student's activity on the School network. Filtering and Monitoring should not unreasonably impact teaching and learning or school administration or restrict pupils/students from learning how to assess and manage risk themselves.

Roles and Responsibilities

The Safeguarding Governor (Dr Uchechukwu Ogunna) is responsible for ensuring that appropriate training is in place so that staff understand the Filtering and Monitoring processes, and that the School reviews the system annually.

The Aldenham School Assistant Head (Academic), a member of the SLT, is responsible for ensuring the School meets the Department of Education's Digital and Technology Standards (2022, updated 2026), including the Filtering and Monitoring Standards (2022, updated 2026) and the DfE's Generative AI: Product Safety Expectations (2026) guidance which includes how to use generative AI safely and how filtering and monitoring requirements apply to the use of generative AI in education.

They will:

- provide training to staff on the School processes for Filtering and Monitoring and staff responsibilities. Training should include how LightSpeed can be used, where appropriate, to monitor pupil and student use of devices during lessons.
- work with the Prep School Computing Lead to ensure compliance across the School.
- work with the Head of Technology to procure Filtering and Monitoring systems.
- work with the Head of Technology to document decisions on what is blocked or allowed and why. Any changes to what is blocked or allowed should be explained to the SLT on a termly basis. The Governors should have access to the list of what is

blocked or allowed, with reasons as to these decisions.

- work with the Head of Technology and DSL to review the effectiveness of the system, which should be reported to the Governors on an annual basis.

The DSL must understand the full Filtering and Monitoring provision and take responsibility for any safeguarding and Child Protection matters picked up through monitoring. The DSL will:

- triage all monitoring reports to the appropriate DDSL and, where appropriate, Housemaster/Housemistress for further investigation.
- oversee all Filtering and Monitoring investigations, ensuring records are updated on CPOMS.
- work with the Assistant Head (Academic) to communicate staff responsibilities.
- work with the Assistant Head (Academic) and Head of Technology to review the effectiveness of the system, which should be reported to the Governors on an annual basis.

The DDSLs will follow-up any monitoring reports triaged by the DSL with the support, where appropriate, of the Housemaster/Housemistress. They may do this by having a conversation with the pupil or student to better understand the context of the search or to identify any necessary e-safety education. The DDSL will document the outcome of their investigation on CPOMS.

The Head of Technology supports the Assistant Head (Academic) in ensuring the School meets the Standards by taking responsibility for the technical aspects of the system. They will:

- work with the service provider to ensure the Filtering and Monitoring systems are maintained and updated when appropriate.
- work with the service provider to ensure the system provides accurate reports to the DSL.
- identify and report any risks to the system, carrying out checks when necessary.
- work with the Assistant Head (Academic) and DSL to review the effectiveness of the system, which should be reported to the Governors on an annual basis.
- understand the Department for Education (DfE), *Cyber security: core standard* (part of the *Meeting Digital and Technology Standards in Schools and Colleges* guidance), latest edition

All staff have a responsibility to report (using the respective system in brackets below) if they:

- witness or suspect unsuitable material has been accessed (CPOMS).
- can access or access unsuitable material (IT Support Ticket).
- teach topics that could create unusual activity on the filtering logs (IT Support Ticket).
- find a failure in the software or abuse of the system (IT Support Ticket).
- perceive unreasonable restrictions that affect teaching and learning or administrative tasks (IT Support Ticket).
- notice abbreviations or misspellings that allow access to restricted material (IT Support Ticket).

Systems

The School utilises Fortinet Fortigate Firewalls as a first line of defence against cyber threats. They continuously monitor network traffic, identifying and blocking any unauthorised access or suspicious activities. These firewalls help fortify our system against potential

vulnerabilities/intrusions and block access to inappropriate web content, ensuring that children, pupils' and students' data and online presence are protected at all times.

The School uses Securly to filter and monitor the online activity of pupils and students on their school issued devices. Securly restricts access to websites which host or are suspected to host inappropriate content. Securly also monitors pupil and student activity whether they are at home or on the school network and raises automatic reports when it detects a search phrase which may be a safeguarding concern (e.g., phrases related to self-harm, suicide, or violence). These reports are received by the DSL/DDSLs and acted upon accordingly.

The School provides a platform for teachers to physically monitor the screens of pupils and students during their lessons using Lightspeed. This platform only allows a teacher to monitor the screen of a device connected to the School network.

Review and Evaluation

The School will review the effectiveness of its Filtering and Monitoring systems at least annually, and more frequently where there is a significant change in risk, system configuration, technology provision or curriculum use. The review will consider whether Filtering and Monitoring arrangements continue to provide appropriate protection for children, pupils and students, whether alerts are being identified, reviewed and acted upon appropriately, and whether staff and pupils/students understand how concerns relating to online activity should be reported and escalated.

The review will be undertaken collaboratively by the DSL, Assistant Head (Academic) Head of Technology and other relevant stakeholders. Any recommendations arising from the review will be implemented in a timely manner to ensure that Filtering and Monitoring systems remain effective and proportionate.

The annual review will consider:

- the effectiveness of Filtering and Monitoring systems;
- the appropriateness of filtering categories and monitoring alerts;
- staff oversight and escalation arrangements;
- reporting mechanisms and staff awareness;
- emerging technologies and associated safeguarding risks, including Artificial Intelligence (AI);
- any safeguarding incidents arising from the use of School devices, systems or networks; and compliance with the School's safeguarding obligations, statutory requirements and relevant DfE guidance.

Findings from the review will be reported to Governors and senior leaders, who will maintain oversight of the effectiveness of the School's filtering and monitoring arrangements and ensure that safeguarding responsibilities are met.

In addition to the formal review process, the Safeguarding Team, Assistant Head (Academic) and Head of Technology will maintain regular communication to ensure emerging risks, safeguarding concerns and system issues are identified and addressed promptly.

16. Prevent

Aldenham has a duty of care to children, pupils, students and staff. This includes safeguarding them from the risk of being drawn into terrorism. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The government has defined extremism in the Prevent strategy as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs".

Schools should be safe spaces in which pupils and students can understand and discuss sensitive topics, including terrorism and extremist ideas that are part of the terrorist ideology and learn how to challenge these ideas. Aldenham does not intend to limit discussion of these, or other issues related to FBV e.g. democracy, law and government, however, it is mindful of its existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

The Prevent strategy, published by the Government in 2011 and updated in 2024, is part of the overall counter- terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism.

Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on schools to have "due regard to the need to prevent people from being drawn into terrorism".

The 2011 Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

If staff become aware of activity that could fall within the categories outlined in the Prevent strategy, they must pass the information on to the DSL who will share this with the Head of Foundation, Head of Prep School and Bursar, if a referral is appropriate. The School will then work with the Local Authority to make appropriate referrals to Channel, a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- Identifying individuals at risk;
- Assessing the nature and extent of that risk; and,
- Developing the most appropriate support plan for the individuals concerned.

Further guidance can be found at www.gov.uk/government/publications/channel-guidance.

There is no such thing as a 'typical extremist' and those involved in extremism come from a

range of backgrounds and experiences. A list of indicators is attached as Appendix C to provide support for staff to understand and identify factors that could suggest a child or their family may be vulnerable or involved with extremism. The list of indicators is not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable people / young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. Over-simplified assessments based upon demographics and poverty indicators have consistently demonstrated to increase victimisation, fail to identify vulnerabilities and, in some cases, increase the ability of extremists to exploit, operate and recruit.

All staff receive training on recognising the indicators of potentially vulnerable children and those who may be susceptible to radicalisation and the associated risks (such as being drawn into extremism or terrorism).

See Appendix C for indicators of vulnerability with regard to extremism.

17. Disclosures from Children, Pupils and Students

Children, pupils and students who report abuse to a teacher (or other member of staff or volunteer) must be listened to and heard, whatever form their attempts to communicate with you may take. You should engage the DSL or a DDSL in this process as soon as practicable. The following points give guidance on how to deal with a child who makes a disclosure:

- The child must be listened to but not interviewed or asked to repeat the account.
- Avoid questions, particularly leading questions.
- The child should not be interrupted when recalling significant events.
- All information should be noted immediately following the conversation, including details such as timing, setting, who was present and what was said, in the child's own words. The account obtained should be recorded verbatim or as near as possible.
- Care should be taken not to make assumptions about what the child is saying or to make interpretations or decisions about whether or not abuse has occurred.
- 'Listened to' means just that; on no account should suggestions be made to children as to alternative explanations for their understanding of a situation.
- Advice or promises must not be given to the child other than the assurance that they have done the right thing in telling you and that you will be passing on their concern to the relevant person.
- At all times the child's wishes and feelings must be respected as far as the law allows. Victims should be taken seriously, kept safe and never made to feel that they are creating a problem by reporting abuse, sexual violence or sexual harassment as their children's rights may be breached as set out in the Human Rights Act (1998).
- These notes must be uploaded to CPOMS as soon as possible after the disclosure, although priority should always be given to referring the incident to external agencies if required.
- All evidence (e.g. scribbled notes, mobile phones containing text messages, clothing and computers) must be preserved, then passed on to the DSL/DDSL intact.
- All actions subsequently taken must be recorded with dates, times and signature. It is particularly important that, if a disclosure is logged directly on CPOMS, the date and time of the disclosure is changed to the time it took place, rather than the time of being

logged.

- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim must never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report (KCSIE 2026).
- You must then immediately inform the DSL, a DDSL or, in their absence, the Head of Foundation, or the Head of Prep (see contact list toward the end of this document for details).

N.B the School does not require consent from a family to make a referral to social services but will seek to engage the family in the process unless doing so may put the child at further risk.

When it is clear that ongoing support will be required, the DSL/DDSL will ask the child, pupil or student if they would find it helpful to have a designated trusted adult to talk to about their needs. The choice of any such adult should be the victim's, as far as reasonably possible.

If you are uncertain about whether to be concerned about a child, it is always best to share that information with the DSL/DDSL.

A member of staff or volunteer may come across circumstances where they suspect or observe Child-on-Child abuse. This may take the form of:

- verbal, physical, emotional abuse
- intimidation or bullying
- sexual abuse

Whilst children and young people who abuse others need to be held responsible for their abusive behaviour, it is also important that whilst being identified, they are responded to in a way that meets their needs as well as protecting others. They may well be children in need or at risk themselves. This sort of concern is to be reported to the DSL/DDSLs in the same way as any other form of abuse or suspected abuse; the Anti-bullying Strategy should also be consulted.

Confidentiality

A member of staff or volunteer must not promise absolute confidentiality. The child can be assured that whilst you cannot keep a disclosure of abuse or suspected abuse to yourself, you will not tell anyone who does not need to know. It is best not to explain procedures in detail to the child but to say that the DSL will have to be told and will decide the next course of action.

Complaints by a Pupil or Student against Staff

An initial complaint against a teacher by a pupil or student, if there are safeguarding implications, should be referred to the DSL who will initially investigate the claims where appropriate.

As per the Low-Level Concerns and Allegations Policy, if the concern reaches the threshold for either a Low-Level Concern or Allegation, the DSL must refer the case to the Head of Foundation or Chair of Governors (if the Head of Foundation is the subject of the Allegation).

Where the complaint does not reach the threshold for a Low-Level Concern, and is directed against a member of teaching staff, the DSL will work with the Head of Department/Housemaster and/or the Deputy Head (Academic) and/or Head of Prep School to resolve the complaint.

Referral Guidelines

Allegations against Foundation staff, volunteers and organisations or individuals leasing school facilities, must be referred to the LADO by the Head of Foundation, or Chair of Governors (where an allegation is about the Head of Foundation), within 24 hours of the allegation being made.

If a crime may have been committed, it should be reported to the police in accordance with 'Working Together' procedures. The Head of Foundation (where appropriate) or Chair of Governors (where appropriate) will work with the DSL to make judgements as to whether the child is 'in need' or 'at risk'. Where boundaries are unclear, the Head of Foundation will discuss the matter with the LADO (if staff are involved) or the Local Safeguarding Children Partnership.

For example, in the following circumstances the Head of Foundation may take advice from the LADO or children's social care before a decision about making a referral is made:

- The complaint does not involve a serious criminal offence.
- A referral would be contrary to the wishes of the child, pupil or student complainant who is of sufficient maturity and understanding and properly informed, or is contrary to the wishes of the complainant's family (not involving them as perpetrators).
- The case is one that could be satisfactorily investigated and dealt with under the School's internal procedures, the family being kept fully informed, as appropriate.

Under the Head of Foundation, if the child, pupil or student is deemed to be 'in need', the DSL will discuss with children's services whether to begin early intervention and support using the Common Assessment Framework (or local version if outside Hertfordshire). If the child, pupil or student is deemed to be 'at risk', the DSL will make a referral under Section 47 of the Children's Act immediately.

External agencies

Whether or not the School decides to refer a particular complaint to the LADO or the police, the family and student will be informed of their right to make their own complaint or referral and will be provided with the appropriate contact details.

Mental Health

Mental health concerns, self-harm and suicidal thoughts or behaviours may, in some cases, be indicators that a child has suffered, or is at risk of suffering, abuse, neglect, exploitation or other harm. The School also acknowledges that poor mental health may both affect and be affected by safeguarding issues such as abuse, neglect, bullying, exploitation, child-on-child abuse or family stress.

All staff should remain alert to indicators that a child may require additional support or may be at risk of harm, including significant changes in behaviour, persistent low mood, withdrawal from peers or activities, changes in eating or sleeping patterns, expressions of hopelessness, self-harm, poor self-esteem, suicidal ideation, suicide attempts, or any other signs that may indicate emotional distress or mental health concerns.

Key pastoral staff are often well placed to identify changes in a child's presentation or wellbeing. However, staff should not attempt to make a mental health diagnosis and should exercise care when using clinical terminology in discussions with a child, pupil or student.

Concerns relating to a child's mental health, self-harm or risk of suicide should be reported in accordance with the School's safeguarding procedures and considered alongside any wider safeguarding concerns. All children thought to be experiencing poor mental health, persistent low mood and/or poor self-esteem should be referred via CPOMS to the Housemaster/Housemistress (in Aldenham School) or the Head or Deputy Head (in Aldenham Prep School). They will liaise with the School Counsellor, who may undertake an initial assessment and/or recommend referral to appropriate external agencies, including CAMHS, where appropriate.

All reports, disclosures or indicators of self-harm, suicidal thoughts or suicide attempts will be taken seriously and responded to promptly. Any suspected or disclosed incidents of self-harm must be recorded on CPOMS and managed in line with the School's safeguarding procedures.

Where mental health concerns indicate that a child may be at risk of significant harm, the School will respond through its safeguarding procedures rather than relying solely on pastoral or wellbeing support, ensuring that the child is seen, listened to and supported appropriately.

Where a child, pupil or student is believed to be at immediate risk of harm to themselves or others, the Designated Safeguarding Lead (DSL) must be informed immediately. Emergency services will be contacted without delay where required, and appropriate measures taken to safeguard the welfare of the child, pupil or student. If immediate medical attention is required, the Health Centre must be contacted urgently for assistance. A child, pupil or student requiring immediate assistance must never be left unattended.

Abuse from the use of Electronic Technology

The era of greater access to and use of mobile technology and the internet exposes young people to previously unforeseen risks of abuse. Instances of cyber bullying are increasing on social media sites/apps, such as WhatsApp, Facebook, Instagram, BeReal, TikTok and Snapchat, and through text and email messaging. People working with young people need to be aware of the risks posed by the use of such media. School policies on Anti-Bullying and Anti-Cyber Bullying should be adhered to as well as staff adopting safe working practices when considering communicating with pupils or students electronically.

Our students increasingly use mobile phones, tablets and computers on a daily basis. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The Prevent Duty also requires the School to safeguard vulnerable individuals from being

radicalised or drawn into extremism through the internet or social media.

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation; radicalisation; sexual predation - technology often provides the platform that facilitates harm. An effective approach to online safety empowers a School to protect and educate the whole School or college community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate. Online safety training forms part of annual updates to staff and is also available via the Educare platform.

The breadth of issues classified within online safety is considerable but can be categorised into four areas of risk (as specified in Filtering and Monitoring).

The School's e-safety policy is incorporated in the Pupil's Acceptable Use of ICT and Mobile Devices Policy for Pupils which can be found in the Policies section of MySchoolPortal. This explains how we try to keep pupils and students safe in School.

Cyber-bullying and sharing of consensual and non-consensual nudes or semi nudes by pupils and students, via texts and emails, will be treated as seriously as any other bullying-type behaviour and will be managed through our counter-bullying procedures.

Staff should also be wary of the possibility of children with particular skill and interest in computing being drawn into cybercrime and should refer such children to the [Cyber Choices programme](#) if appropriate.

Further guidance on keeping children safe online, particularly during online learning, is available in KCSIE (September 2026), Part Two.

See the relevant DfE advice on Searching, screening and confiscation [UK Council for Internet Safety - GOV.UK \(www.gov.uk\)](#)

The following measures and Policies are in place to promote e-safety within the School:

Induction and Education: All pupils and students are inducted in appropriate use of the School's ICT facilities and other aspects of this policy upon arrival. Subsequently, Teachers/Tutors remind pupils and students at the start of each academic year about their obligations and Code of Conduct. They should be constantly vigilant for inappropriate use of technology, e.g. unauthorised filming in lessons, and take appropriate action in line with the School's Behaviour Policy if such breaches occur.

Monitoring/Filtering: The School will exercise its right to monitor the use of computer systems, including the monitoring/filtering of internet use, interception of e-mails and the deletion of inappropriate materials at all times. The School makes use of the monitoring service Securly, which provides regular reports to the DSL about perceived and actual online safety risks.

(Factors considered when putting in place these measures, are set out in [UK Safer Internet Centre: appropriate Filtering and Monitoring](#). Follow these links for Guidance on [e-security](#) and [buying advice](#) for schools.)

In circumstances where the School believes unauthorised use of the computer system is, or may be taking place, or the system is, or may be, being used for unlawful purposes, the School reserves the right to remove the pupil or student's access to our systems with immediate effect whilst investigating the situation, inform appropriate authorities and provide documentary evidence.

Training: staff receive advice regarding ICT Code of Conduct, the use of social networking and electronic communication with pupils and students. Online safety training is integrated into the regular safeguarding training staff undergo and this forms part of the curriculum programmes for PSHE and Tutor-Time.

The School seeks to maintain a mobile phone-free environment during the school day and will apply clear restrictions on the use of mobile phones and other smart devices, students in Y7 – Y11 use Yondr pouches to support with this. Devices will not ordinarily be permitted in lessons, during movement around the School, or in other unsupervised contexts. These arrangements are intended to reduce distraction and minimise safeguarding risks, including cyberbullying, image-based abuse, unauthorised recording, sharing of harmful content and other forms of online harm. Reasonable adjustments may be made where a student requires access to a device for educational, medical, accessibility or safeguarding reasons. Any such arrangements will be considered on an individual basis, supported by appropriate risk assessment where necessary, and reviewed regularly. The School's expectations regarding mobile phone use will be communicated clearly to pupils, students, staff and parents.

Children with Special Educational Needs and Disabilities (SEND)

Children with Special Educational Needs and Disabilities (SEND) may face additional safeguarding barriers and may be more vulnerable to abuse, neglect, bullying, exploitation and other forms of harm.

Staff should remain vigilant to these additional vulnerabilities and ensure that safeguarding procedures are accessible, child-centred and responsive to the individual needs of each pupil/student.

Staff should be mindful that indicators of possible abuse, neglect or exploitation, such as behavioural changes, emotional distress, injuries, poor attendance or communication difficulties, should not be assumed to relate solely to a child's SEND without appropriate consideration and, where necessary, further enquiry.

Staff should also be aware that communication differences or difficulties may make it more challenging for some pupils/students with SEND to recognise, disclose or report abuse. Where appropriate, reasonable adjustments will be made to enable pupils/students to communicate concerns and access support.

Pupils/students with SEND may be disproportionately affected by bullying, child-on-child abuse, social isolation, coercion, online harms and exploitation. staff should remain alert to these risks and take appropriate action to safeguard pupils and promote their welfare.

The School will work closely with parents, carers, health professionals, Children's Social Care, education partners and other relevant agencies to promote children's safety and wellbeing.

Safeguarding practice will reflect current guidance relating to SEND, medical conditions, information sharing and multi-agency working.

Children with Medical Conditions

Children with medical conditions may face additional vulnerabilities and, in some circumstances, may be at greater risk of abuse, neglect, exploitation, bullying or social isolation. The School recognises that medical needs can affect a child's wellbeing, attendance, communication, emotional health and ability to seek help.

Staff should not assume that changes in a child's behaviour, presentation, attendance, emotional wellbeing or physical condition are solely attributable to a medical condition. Where concerns arise regarding a child's safety, welfare or wellbeing, these will be considered within the context of the School's safeguarding procedures and, where appropriate, alongside any wider safeguarding concerns.

The School will ensure that safeguarding arrangements are accessible to pupils with medical conditions and will make reasonable adjustments where necessary to enable children, pupils and students to communicate concerns and access support.

Effective safeguarding depends upon collaborative working. The School will work closely with parents, carers, healthcare professionals, Children's Social Care and other relevant agencies to promote the safety, welfare and wellbeing of pupils with medical conditions.

Sharing nudes and semi-nudes

All staff must be aware safeguarding issues can manifest themselves via use of technology in the form of consensual and non-consensual sharing of nude and semi-nude images and/or videos (formerly known as 'sexting' or youth produced sexual imagery), often as a form of Child-on-Child abuse. Other terminology used by young people to refer to 'sexting' is identified in the [UKCIS Sharing Nudes and Semi-Nudes Advice](#).

Creating and sharing sexual photos, livestreams and videos of under 18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management. 'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
- 'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

See the detailed [UKCIS advice on Sharing Nudes and Semi-Nudes](#). Foundation staff can access a one-page summary of this advice, also published by UKCIS.

Steps to take when dealing with consensual and non-consensual self-generated intimate images and/or videos, including those generated using AI (e.g. deepfakes), formerly

known as “sexting.”

For general concern expressed by a child, pupil or student about how sharing of the above may affect them or for information only. This should be for cases where the concern expressed is not specific or related to an alleged incident or disclosure. In this case staff should direct the child, pupil or student to the following government website: [Sex and sexual content online \(thinkuknow.co.uk\)](http://thinkuknow.co.uk)

If a disclosure is made about an alleged incident by a child, pupil or student, the following steps should be taken:

- Refer to the one-page summary of how to respond to incidents of sharing Nudes and Semi Nudes, available on CPOMS.
- Contact the DSL as soon as possible.
- Follow the steps outlined in ‘What to do’ for the recording and reporting of any disclosure as outlined in the Summary of the Safeguarding Policy.
- If appropriate, and with the child, pupil or student’s permission, take the mobile phone. Do not view any content. Place it face down. Turn it off. Place it in an envelope on which you have written: What the envelope contains, the name of the child, pupil or student, the date and time. Ask the child, pupil or student to sign the envelope over the seal to ensure that it cannot be opened and resealed without anyone knowing about it.
- Hand the mobile phone to the DSL. In the DSL’s absence, hand the device to either a DDSL or the Head of Foundation, at the same time as you report your concern.
- The DSL will then interview the child/children, pupil(s) or student(s) concerned, with another member of staff present with whom the child, pupil or student is comfortable, to ascertain the facts of the incident, such as whether images have been widely shared. The welfare of the child must be always paramount.
- Where appropriate, the family will be informed in consultation with the child, pupil or student at an early stage and involved in the process to provide the best support, unless there is a good reason to believe that involving them would put the child or young person at risk of harm.
- A referral should be made to children’s social care and/or the police immediately if there is a concern that the child, pupil or student has been harmed or is at risk of immediate harm at any point in the process.
- Once the DSL has made a judgement that it is not appropriate to engage external agencies, the child, pupil or student should be given guidance as to how such images should be deleted from the child, pupil or student’s digital footprint. This must happen without the images being viewed.

The DSL must follow the guidance contained in the UK Council for Internet Safety document [‘Sharing Nudes and Semi-Nudes’](#).

Bullying (Child-on-Child abuse)

The School recognises that children can abuse other children and that child-on-child abuse is a safeguarding matter in all cases. Such abuse can cause significant harm to victims and should never be dismissed as “banter,” “part of growing up,” “harmless fun” or normal peer conflict. All concerns, allegations and incidents of child-on-child abuse will be taken seriously, recorded on CPOMS and managed in accordance with the School’s Anti-Bullying Strategy and

safeguarding procedures. Where appropriate, Child Protection procedures will be implemented. The School will respond in a way that protects the victim, addresses the behaviour of the child causing harm, and supports both immediate safety and longer-term educational, pastoral and safeguarding interventions.

Child-on-child abuse can take several forms:

- Abuse in intimate personal relationships between peers.
- Cyber-bullying, prejudice-based bullying and discriminatory bullying.
- Physical abuse, including hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm.
- Sexual violence and sexual harassment (SVSH), including other forms of harmful sexual behaviour.
- Sharing of nude and semi-nude images and videos (whether consensual or non-consensual).
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party.
- Coercive behaviour and image-based abuse.
- Upskirting and downblousing.
- Abuse carried out in groups or online.
- Initiation/hazing-type violence and rituals.

Staff must be alert to the possibility of child-on-child abuse and recognise that it can occur between children of any age and any gender. Staff should not make assumptions regarding the nature of the behaviour, the relationship between those involved, or the gender of either the victim or the child causing harm.

Incidents involving online child-on-child abuse or the sharing of nude or semi-nude images and videos will be investigated initially by the School to establish the level of risk and any immediate safeguarding concerns. Where a matter is referred to the police or children's social care, the School will work in partnership with those agencies and will follow any advice provided regarding the conduct of its own enquiries. The School will continue to take any necessary safeguarding measures to protect and support those involved.

The School recognises that children and young people can be particularly vulnerable in residential settings and remains alert to the potential for child-on-child abuse. Any incidents occurring within the boarding setting will be responded to promptly by the Housemaster/Housemistress in conjunction with the DSL. A full investigation will establish the facts and, in all cases, the first priority will be the wellbeing and safety of the victim. Immediate measures will be implemented to protect those affected and to address the behaviour of the child causing harm, including restorative approaches where appropriate.

The School recognises that some children may be more vulnerable to child-on-child abuse, including those with special educational needs and disabilities, those with protected characteristics, children who are perceived as different by their peers, and those who may lack

strong support networks. Staff should be alert to these vulnerabilities and take appropriate action to safeguard all students.

Misogyny, Sexist Attitudes and Harmful Influences

Misogyny, sexist attitudes, discriminatory language and harmful online influences can contribute to an environment in which sexual harassment, sexual violence and other harmful behaviours become normalised or minimised.

Staff should remain alert to behaviours, language or attitudes that demean, exclude or discriminate against others on the basis of sex or gender. Such behaviour should never be dismissed as banter, harmless teasing or part of growing up.

All members of staff are expected to challenge inappropriate language and behaviour, report concerns in accordance with the School's safeguarding procedures, and support pupils/students in developing respectful relationships founded on dignity, equality and mutual respect.

Incidents involving misogynistic or discriminatory behaviour will be recorded on CPOMS and reviewed to determine whether they form part of a wider pattern of behaviour, indicate a safeguarding concern, or constitute harmful sexual behaviour, prejudice-based bullying or another form of child-on-child abuse. Appropriate safeguarding, educational and pastoral interventions will be implemented where necessary.

Artificial Intelligence (AI) and Emerging Online Risks

The School is committed to promoting the safe, responsible and effective use of technology. Whilst developments in artificial intelligence (AI) present significant educational opportunities, they also introduce emerging safeguarding risks which require ongoing vigilance.

Staff should remain alert to the ways in which AI and other digital technologies may be misused to facilitate abuse, harassment, exploitation or harm. Risks may include, but are not limited to:

- The creation, sharing or possession of AI-generated or manipulated images, audio or video content, including deepfakes.
- Image-based sexual abuse and the creation or distribution of intimate images without consent.
- Online grooming, exploitation and coercion.
- Impersonation, fraud and identity manipulation.
- Cyberbullying, harassment and discriminatory behaviour.
- Exposure to harmful, inappropriate, misleading or extremist content.
- Misinformation, disinformation and harmful online challenges or hoaxes.
- Sextortion and other forms of technology-facilitated abuse.

Children may be exposed to, create, share or become victims of harmful online content. Any concerns involving AI-generated material, image-based abuse, online exploitation or other technology-related risks will be managed in accordance with the School's safeguarding and online safety procedures and may be treated as child-on-child abuse where appropriate.

Staff must respond promptly to concerns involving digital content and report them in line with safeguarding procedures. The Designated Safeguarding Lead (DSL) will consider whether evidence should be preserved, whether parents or carers should be informed, and whether external agencies, including the police, children's social care or relevant online platforms, should be involved to reduce the risk of further dissemination or harm.

Through the curriculum, assemblies and wider pastoral programme, students will be educated about online safety and digital resilience, including the safe and responsible use of AI technologies, online relationships, image-based abuse, consent, privacy, online exploitation and the risks associated with sharing personal information and digital content.

Staff training and safeguarding procedures will be reviewed regularly to ensure that emerging technologies, online risks and developments in artificial intelligence are understood and addressed effectively. Students will be encouraged to report any online activity, AI-generated content or use of technology that causes them concern, distress or places them at risk of harm.

Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Female Genital Mutilation (FGM) and Honour-Based Abuse (HBA)

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology (Working Together to Safeguard Children 2026). CSE must always be treated as a form of child sexual abuse.

The School will maintain a vigilant response to child sexual abuse, child sexual exploitation and grooming, including exploitation that occurs online, through peer groups, social media platforms or gaming platforms. Staff should remain alert to signs that a child may be at risk, including secrecy, unexplained absences, sudden changes in behaviour, anxiety relating to particular peers or adults, unexplained gifts, sexualised language or behaviour, and indicators of coercion, control or manipulation. All concerns must be recorded and reported without delay in accordance with the School's safeguarding procedures.

Child Criminal Exploitation (CCE) may also occur because of an imbalance of power. In addition to age, the imbalance may be due to a range of other factors, including (but not limited to) gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. The experience of girls who are criminally exploited can be very different to that of boys. It is also important to note that a child of any gender being criminally exploited may be at higher risk of sexual exploitation, (KCSIE 2026)

It is important to note that both CSE and CCE may be perpetrated by:

- Groups or individuals
- People of any gender identity
- Children or adults.

Incidents of CSE and CCE must be investigated very carefully, and it must not be assumed that the alleged perpetrator fits the stereotype of a strong male.

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care (see KCSIE 2026, for further details.)

So-called 'honour-based' abuse (HBA) includes crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. All the above, by definition, constitute abuse, regardless of motivation. If staff have concerns about the possibility of a child, pupil or student being subject to HBA, these should be reported immediately to the DSL and relevant members of SLT.

If you encounter a case of FGM or have reason to believe that a girl is at risk of FGM you must inform the DSL or SLT immediately.

All employees of the School have a statutory duty to report cases of FGM involving children directly to the police, rather than via the DSL or Head of Prep/Aldenham School, who should both be informed immediately once a report has been filed. FGM concerns should be reported to Hertfordshire Domestic Violence/Abuse helpline on 08088 088 088 or in emergency dial 999. For victims living in London, the Metropolitan Police should be informed on 101.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry, including 'unofficial' non-binding marriages, before their eighteenth birthday. Any concern a child, pupil or student may have entered a 'binding' or 'non-binding' marriage before their eighteenth birthday must be reported immediately to the DSL or DDSL.

Child-on-Child Sexual Violence and Sexual Harassment

Sexual violence includes, but is not limited to, rape or assault by penetration by one or more perpetrators against a victim or victims. It can also include intentional touching of a sexual nature where consent has not been freely given (for further guidance, see KCSIE 2026 Part 5). Should staff become aware of a sexual assault having taken place, they must inform the DSL or DDSL(s) as a matter of urgency. If a child, pupil or student wishes to disclose details of such an assault, this should be done with at least two members of staff present, one of whom should be the DSL/DDSL, the child should be permitted to request the presence of a specific staff member. Every effort should be made to support the victim and to protect the identity of the alleged perpetrator to ensure that legal proceedings can run their course. The DSL and Deputy Head (Pastoral), or other member of SLT as appropriate, will liaise with the police regarding minimising the risk of a further assault taking place if the alleged perpetrator is still in School.

This will involve conducting a written risk assessment.

Sexual harassment includes, but is not limited to, sexual comments, taunting and threatening sexual behaviour. This should be dealt with by the DSL and Deputy Head (Pastoral), or appropriate member of SLT, and a record logged on CPOMS. The victim of harassment will be offered appropriate support, such as counselling.

The issues of sexual violence and sexual harassment will be addressed during PSHE lessons and in other forums such as assemblies. The School will emphasise that the law is in place to protect rather than criminalise them and will teach the importance of understanding intra-familial harms. Students have also been made aware of Shore Space, a confidential chat service for young people concerned about their own or someone else's sexual thoughts or behaviours.

KSCIE (2026) states that all staff working with children are advised to maintain an attitude of "it could happen here" when considering the possibility of Child-on-Child abuse occurring, and also states that abuse "should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children." It must be stressed that not only boys perpetrate sexual violence and/or sexual harassment. KCSIE makes it clear that sexual violence and sexual harassment can occur between two or more children "of any age and sex."

The DSL should regularly review cases of sexual violence and sexual harassment to see if any distinct patterns emerge. Consideration should then be given to take further preventative measures, e.g. additional teaching time, enhanced staff training or changes to the physical infrastructure to ensure that the risk of further occurrences of inappropriate behaviour is minimised. Even if there are no reported cases of Child-on-Child abuse (of any description), it should not be assumed that it is not happening. The School will therefore make it as straightforward as possible for children to be able to report such behaviour.

If, after investigation, it is found that a report of sexual violence or harassment is unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the disclosure is in need of any help or whether disciplinary action should be taken against the person reporting. This should be done in line with the School's Behaviour Policy.

Upskirting and Downblousing

The School recognises that "upskirting" is a criminal offence. Upskirting refers to the act of taking a photograph or recording under a person's clothing, without their consent or knowledge, to capture images of their genitals, buttocks or underwear. It is typically carried out for the purpose of sexual gratification, causing humiliation, distress or alarm, and/or sharing such images with others.

Any allegation, disclosure or incident of upskirting will be taken seriously and managed as a safeguarding concern in accordance with the School's safeguarding procedures. Concerns must be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL). The School will consider the needs of those affected and will refer matters to external agencies, including the police and children's social care, where appropriate.

The School also recognises that behaviours such as “downblousing” (taking an image of a person's chest without their knowledge or consent for the purpose of sexual gratification) may constitute harmful sexual behaviour and will be responded to as a safeguarding concern.

Through the curriculum and wider safeguarding programme, pupils/students will be educated about consent, respect, privacy, healthy relationships, online safety and the legal consequences of such behaviour. Further information is provided in Appendix 4 of the Acceptable Use of ICT and Mobile Phone Policy for Pupils.

Gang Violence

There are several areas in which young people are put at risk by gang activity, both through participation and as victims of gang violence which can be in relation to their peers or to a gang involved adult in their household. A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

For more information on safeguarding children affected by gang violence refer '[Preventing Youth Violence and Gang Involvement](#)'.

If you become aware that a child, pupil or student is involved in gang activity this should be reported immediately to the DSL who will arrange to meet with Housemaster/Housemistress, tutor and SLT to decide the best course of action which may involve the police and other outside agencies.

County Lines

Aldenham School's proximity to major transport thoroughfares, in addition to the widespread catchment area of its pupils and students, makes the School a prime target for the organisers of County Lines. Essentially, these involve coercing young people into transporting drugs and other illegal items from urban areas into provincial towns. Staff should be particularly vigilant in monitoring children, pupils and students for indicators, such as the following:

- Sudden changes in appearance or dress.
- Significant and unexplained change in their personal finances.
- Carrying a second mobile phone.
- Unusual anxiety when delayed, e.g. to attend a detention.
- Unexplained absences, particularly on Mondays and Fridays.
- Unexplained injuries.

These are just some of the indicators that a child might be involved in County Lines. Further information can be obtained from the Home Office publication [Criminal Exploitation of Children and Vulnerable Adults: County Line Guidance](#). Suspected involvement in County Lines must be reported to the DSL immediately, who will then liaise with appropriate pastoral staff to protect the pupil(s) or student(s) from harm.

Domestic violence

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition

of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Serious Violence and Weapon Carrying

The School acknowledges that children and young people can be at risk from serious violence and weapon-related harm. Concerns relating to serious violence or the possession, carrying, use of, or access to a weapon will be treated as safeguarding matters and not solely as behavioural issues.

Staff should remain alert to indicators that a child, pupil or student may be at risk of involvement in serious violence. Such indicators may include possession of a weapon, threats involving a weapon, unexplained injuries, repeated involvement in violent incidents, fear or intimidation, substance misuse, significant changes in behaviour, presentation, peer relationships or attendance, and any other information that suggests a risk of harm.

Any concern that a child, pupil or student has access to, is carrying, has used, or is threatened with a weapon must be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL).

The DSL will assess the level of risk, consider any wider safeguarding concerns, and determine the most appropriate response. This may include contact with parents or carers, Family Help intervention, referral to Children's Social Care, consultation with the police, or engagement

with other relevant agencies. Appropriate measures will be implemented to reduce risk and support the child's safety and wellbeing.

The School will work collaboratively with safeguarding partners, families and external agencies to prevent escalation, safeguard those at risk and promote positive outcomes for children and young people.

Operation Encompass

Operation Encompass operates across police forces in England and enables the police and schools to work together to provide timely emotional and practical support to children who may have been affected by domestic abuse. The purpose of the scheme is to ensure that the School receives relevant information about a child's circumstances at the earliest opportunity so that appropriate support can be put in place in response to the child's needs.

Where the School receives a police notification through Operation Encompass or another approved information-sharing arrangement, the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) will ensure that relevant staff are informed on a need-to-know basis and that appropriate support is offered to the child as soon as possible.

Information arising from domestic abuse incidents will be treated sensitively and confidentially and may inform decisions relating to pastoral support, emotional wellbeing, attendance, behaviour, welfare checks and additional safeguarding monitoring.

Operation Encompass does not replace statutory safeguarding procedures. Where concerns exist regarding a child's welfare, the police and/or the School will continue to make referrals to Children's Social Care and other relevant agencies in accordance with local safeguarding procedures.

Further information about Operation Encompass can be found on the Operation Encompass website. Operation Encompass also provides an advice and helpline service for educational staff who may be concerned about children affected by domestic abuse. The helpline is available Monday to Friday, between 8.00am and 1.00pm, on 0204 513 9990 (local rate charges apply).

Impact of abuse

The impact of abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy, and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood, and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long term medical or psychiatric difficulties. In addition, their life chances may be severely curtailed due to the impact on their academic progress during the period of abuse.

Contextual safeguarding

All staff, including the DSL and their deputies, should consider the context within which

safeguarding incidents and/or behaviours occur. This is known as 'contextual safeguarding' which expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts and should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Contextual safeguarding looks at how we can better understand these risks and engage with children and young people in order to help to keep them safe.

Good practice

- Treat all children, pupils and students with respect.
- Set a good example by conducting ourselves appropriately.
- Encourage positive, respectful, and safe behaviour amongst pupils and students.
- Be a good listener.
- Be alert to changes in children, pupils' and students' behaviour.
- Recognise that challenging behaviour may be an indicator of abuse.
- Read and understand the Safeguarding Policy and guidance documents on wider safeguarding issues, e.g., bullying, behaviour, code of conduct, restraint.
- Maintain the appropriate standard of conversation and interaction with and between children, pupils and students.
- Maintain professional standards of pastoral care within the context of appropriate professional separation and avoiding the use of sexualised, derogatory or over familiar language in the company of children, pupils and students.
- Be aware that the personal and family circumstances and lifestyles of some children, pupils and students lead to an increased risk of abuse.
- Be aware that pupils and students with a protected characteristic may have an increased risk of abuse.

Children who may be particularly vulnerable

Some children may be at increased risk. Many factors may contribute to this including prejudice, discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

A vulnerable child should not be left on their own or sent back to lessons or sent back to their boarding house; you must make arrangements to stay with the child until an initial assessment of the situation has been made by the DSL or, in his/her absence, a DDSL, the Deputy Head (Pastoral), the Head of Prep, or the Head of Foundation. If lesson cover is needed contact the member of staff in charge of cover.

Any child at the School who is looked after by the Local Authority must have special attention paid to their needs, including ensuring that their learning is managed as effectively as possible. The DSL should have details of the pupil or student's social worker and the name of the Virtual School Head in the authority that looks after the child.

Any child at the school with special educational needs or who has a disability must have special attention paid to their vulnerabilities, as they are three times more likely to be abused than their peers.

Family Help and Early Intervention

To ensure all children, pupils and students receive the right support at the right time, it is important that staff pay particular attention to the needs of those who may be vulnerable to abuse, neglect, exploitation or other safeguarding concerns, or who may benefit from additional support through Family Help services.

Family Help is intended to provide support to children and families as soon as needs are identified, helping to improve outcomes, strengthen family resilience and reduce the likelihood of difficulties escalating. All staff should be aware of the Family Help process and understand their role within it. This includes identifying emerging concerns, liaising with the DSL or DDSLs, sharing information appropriately with other professionals, and contributing to assessments, plans and interventions where necessary. In some circumstances, School staff may be required to act as a lead professional or participate in multi-agency meetings.

Any child may benefit from Family Help support, but all staff should be particularly alert to the potential need for additional support for any child, pupil or student who:

- Has Special Educational Needs and Disabilities (SEND), particularly where communication difficulties may make it harder to recognise or disclose abuse.
- Is affected by parental substance misuse, domestic abuse, parental mental ill health or other adverse family circumstances.
- Has English as an Additional Language (EAL).
- Is living away from home, in temporary accommodation, or has a transient lifestyle.
- Runs away, goes missing from home or care, or is persistently absent from education.
- Experiences attendance, behavioural, emotional wellbeing or mental health difficulties.
- Is vulnerable to bullying or engages in bullying behaviour.
- Is vulnerable to discrimination, prejudice or maltreatment on the grounds of race, ethnicity, religion, sex, sexuality, gender reassignment, disability or any other protected characteristic.
- Is at risk of Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), trafficking or other forms of exploitation.
- Is at risk of involvement in county lines activity.
- Is at risk of forced marriage, female genital mutilation (FGM), honour-based abuse or radicalisation.
- Has caring responsibilities within the family.
- Is experiencing difficulties within family relationships or facing social isolation.

Children with SEND and those with EAL may face additional safeguarding challenges. Staff should be aware that additional barriers can exist when identifying abuse, neglect or exploitation and should remain vigilant to these risks.

Such barriers may include:

- Assumptions that indicators of possible abuse, such as behavioural changes, presentation, mood or injury, relate solely to a child's SEND without further exploration.
- Children with SEND or EAL being disproportionately affected by bullying, abuse or exploitation without outwardly displaying signs of distress.
- Communication barriers that may make it more difficult for a child to disclose concerns, describe what has happened or seek help.

- Difficulties in recognising changes in behaviour, communication or emotional wellbeing that may indicate a safeguarding concern.

The School will work collaboratively with children, families, Family Help services and other partner agencies to ensure that support is provided at the earliest opportunity. Effective safeguarding relies upon timely information sharing and coordinated multi-agency working, recognising that no single professional or agency can have a complete picture of a child's needs.

Where concerns escalate or indicate that a child may be suffering, or is likely to suffer, significant harm, referrals will be made to Children's Social Care and other relevant agencies in accordance with local safeguarding procedures.

Helping Children to keep themselves safe

Children are taught to understand and manage risk through the School's PSHE lessons, assemblies and pastoral input from tutors etc. The School's approach is to help children think about the risks they may encounter and with staff and work out how these risks might be overcome. Being taught to manage risk is a valuable part of a child's education. Children are regularly reminded about safety, e-safety and tackling bullying issues. The School promotes an ethos of respect, and children, pupils and students are encouraged to speak to a member of staff if they have concerns about themselves or others.

Child abuse can be devastating for the child and very distressful for the staff who become involved. The School will support children, pupils, students, families and staff by:

- Taking all suspicions and disclosures seriously.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant agencies and individuals.
- Storing records securely.
- Offering details of help lines, counselling and other avenues of external support in all Houses and other public areas of the School, such as classrooms.
- Co-operating fully with relevant statutory agencies.

Children who run away or go missing

Occasionally, pupils and students may run away from home or from a boarding environment. If a pupil or student goes missing from school, staff should follow the Missing Student Policy. Sometimes, the School may become aware that the child ran away from home. In such a case:

- The School should work with the Police and family to give any possible assistance in finding the child – such as contacting known friends and searching School buildings and grounds, particularly boarding houses.
- Assuming the child is found, and irrespective of whether the police were involved, the School should still see such an incident as a possible indicator of abuse or a cry for help.

Using the School's pastoral team (Housemaster/Housemistress, Deputy Head (Pastoral), DSL, Deputy Head of Prep and Chaplain as deemed appropriate), the School should gently investigate the reasons for the child running away – using open questions. If further concerns

become apparent, or a disclosure is made at this point, the DSL should make the necessary referrals.

Aldenham School will inform the local authority of any pupil or student who fails to attend school regularly or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the Local Authority. (In default of such agreement, at intervals determined by the Secretary of State) See the School's Missing Student Policy.

Reporting concerns – allegations against Pupils and Students

A pupil or student against whom an allegation of abuse has been made, may be suspended from School during the investigation and the School's policy on behaviour, discipline and sanctions will apply. In the instance where there is an allegation of abuse by one or more pupils or students against another pupil or student and there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' then any such abuse will be referred to the HSCP (or the relevant Local Authority) as a Child Protection concern. The expectation is that in this instance all children involved whether perpetrator or victim will be treated as being 'at risk'.

Reporting concerns - one to one teaching

Where pupils or students are engaged in close one-to-one teaching, particularly in art, drama, dance, music or PE/games lessons, the following precautions should be observed: that another member of staff is in reasonably close proximity within the building, lessons take place within normal working hours or if out of hours that a member of SLT is aware. In addition, the activity should be visible (e.g. open doors and curtains etc.), and any physical touch should be minimal, instructive or confined to necessity in order to avoid harm or risk of injury. If it is necessary to touch a pupil or student to demonstrate a position/move/technique this should be preceded by an explanation of the manner of touching and assent should be sought e.g. 'I'll need to hold your shoulder to demonstrate this position is that OK?' Colleagues should take every possible precaution to avoid placing themselves at the risk of false Allegation.

Reporting concerns - suspected harm from outside school

A member of staff who suspects a child is suffering harm from outside school should seek information from the child with tact and sympathy, using open but not leading questions. A record should be made of the conversation and the matter referred to the DSL or a DDSL if, after the initial conversation, there remains a cause for concern. The School has a vital role to play in providing information to external agencies in such cases.

18. Raising a Low-Level Concern or Allegation

If you have concerns about a colleague

Staff who are concerned about the conduct of a colleague (including a member of supply staff, volunteer or Governor) towards a child, pupil or student are placed in a difficult situation. They may worry that they have misunderstood the situation, and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child

is paramount and they have an obligation to raise any concerns without delay. The processes for handling a concern or Allegation about a colleague is outlined in the 'Low-Level Concerns and Allegations Policy'. A copy of the full policy can be accessed in the Policies and Handbooks section of SharePoint.

Incidents of inappropriate conduct may not necessarily involve children but could have an impact on a colleague's suitability to work with children. For example, if a colleague was the perpetrator of domestic violence against an adult, it could potentially put children in school in danger due to the concept of transferable risk.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School safeguarding provision and that such concerns will be taken seriously by the Aldenham School SLT or Prep School SLT. In addition, the NSPCC provides a Whistleblowing Advice Line which offers free advice and support to professionals with concerns about how Child Protection issues are being handled in their own or another organisation. <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Local procedures plus the government guidance in Working Together to Safeguard Children (2026) and Keeping Children Safe in Education (2026) must be followed at all times.

How to distinguish a Low-Level Concern from an Allegation

The distinction between a Low-Level Concern and an Allegation is whether the harm-threshold has been met. A Low-Level Concern is one in which the staff member may have breached the staff Code of Conduct or acted in an unprofessional way, whereas an Allegation is when the staff member's actions have harmed a child, and/or committed a criminal offence, and/or behaved in a way that poses a risk to the child, and/or behaved in a way that suggests they are not suitable to work with children. Allegations must be reported to the Local Authority Designated Officer (LADO) by the Head of Foundation.

How to report a Low-Level Concern

Where there is concern that someone working on behalf of the Foundation (including staff, supply-staff, contractors, volunteers and Governors) may have breached the staff Code of Conduct or acted unprofessionally, a Low-Level Concern must be raised. This can be done using CPOMS StaffSafe. All staff receive instructions on how to access CPOMS StaffSafe. If the person does not have access to CPOMS StaffSafe they should email the Head of Foundation. If your Low-Level Concern is regarding the Head of Foundation, do not use CPOMS StaffSafe and instead contact the Chair of Governors, via email.

All Low-Level Concerns raised will be kept securely on record while the staff-member is working on behalf of the Foundation, accessible to the Head of Foundation and, where appropriate, Human Resources (HR). If multiple concerns are raised, where appropriate, the Head of Foundation or Head of Prep School may consider contacting the LADO and following the processes for an Allegation.

How to report an Allegation

Where an Allegation is made against someone working on behalf of the Foundation (including staff, supply-staff, contractors, volunteers and Governors) or against someone leasing School facilities, it must be reported immediately to the Head of Foundation. This is done by requesting an immediate meeting with the Head of Foundation in conjunction with logging on CPOMS StaffSafe. If your Allegation is regarding the Head of Foundation, do not record on CPOMS StaffSafe but contact the Chair of Governors only, via email.

All Allegations will be referred to the LADO for advice before any investigation takes place and within one working day. In case of serious harm, the police should be informed from the outset.

To minimise the risk of harm to children and accusations being made against staff because of their daily contact with children, pupils and students, Governors ensure, through the Head of Foundation that all staff are aware of safe working practice as outlined in the staff Code of Conduct and follow guidelines on their behaviour and actions and the use of control and physical restraint.

All School staff are aware that inappropriate behaviour towards children, pupils and students is unacceptable and that their conduct towards children, pupils and students must always be respectful. The School has procedures for dealing with Allegations against staff, volunteers and organisations or individuals who lease School facilities, that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from unfounded or false Allegations. These procedures follow the guidance in part 4 of KCSIE 2026.

In addition, all adults working with a child on behalf of the Foundation, whether onsite or offsite, and organisations or individuals leasing School facilities, should understand that under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where the former is in a position of trust, even if the relationship is consensual. This means any sexual activity between a member of staff and a pupil or student under 18 is a criminal offence. Furthermore, consensual sexual activity between a member of staff and a student who is 18 or above would be a serious breach of the Code of Conduct. All Allegations must be reported immediately to the Head of Foundation. If the Allegation is about the Head of Foundation, contact the Chair of Governors.

If an Allegation is made against a teacher, a quick resolution should be a clear priority for all concerned. It will be dealt with according to the statutory guidance set out in part 4 of the KCSIE 2026. At any stage of consideration or investigation, all unnecessary delays should be avoided, notwithstanding the principle of due process.

The School will not undertake its own investigation of Allegations without prior consultation with the Local Authority Designated Officer (LADO) or in the most serious cases the police, in order not to jeopardise statutory investigations. The Head of Foundation or the Chair of Governors (where the Head of Foundation is the subject), will contact the LADO within 24 hours of the Allegation. The School makes every effort to maintain confidentiality and guard against unwanted publicity. The restrictions apply up to the point where the accused person is charged with an offence, or the DfE/ Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

In response to an Allegation, suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons.

If the LADO or any of the statutory Child Protection authorities decides to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them. In the case of staff, the matter will be dealt with in accordance with the Disciplinary Procedure. Where a member of the residential staff is suspended pending an investigation of a Child Protection nature, suitable arrangements must be put in place for alternative accommodation away from children.

It is rare for children, pupils and students to make an entirely false or malicious Allegation, although misunderstandings and misinterpretations of events can and do happen. Children, pupils and students may also make an Allegation against an innocent party because they are too afraid to name the real perpetrator. Notwithstanding this, we must act on every Allegation.

Staff who are the subject of an Allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Staff will be offered support, such as counselling, during the investigation.

If the School ceases to use the services of a member of staff (or a Governor or volunteer) because they are unsuitable to work with children, a settlement agreement will not be used and there will be a prompt and detailed report to the DBS and TRA. It is a criminal offence not to report an incident when the criteria have been met. Any such incidents will be followed by a review of the safeguarding procedures within the School with a report being presented to the Governing Body without delay.

Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to and a referral to the TRA and the Charities Commission. Reasons a referral to TRA would be considered are; "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Advice about whether an Allegation against a teacher is sufficiently serious to refer to the TRA can be found in *Teacher misconduct: the prohibition of teachers* (October 2015) and DBS barring referral guidance 2018. Further guidance is published on the TRA website.

Where an Allegation is raised against a contractor provided by an agency, e.g., a supply teacher, the agency should be fully involved in the referral process.

Responsibilities of the DSL

The Head of Foundation is the ultimate decision maker for all Low-Level Concerns, and is responsible for contacting the LADO for all Allegations. Where appropriate, the Head of Foundation may delegate tasks to the DSL.

Under the instruction of the Head of Foundation, the DSL shall:

- Take necessary steps to protect children, pupils or students from risk of immediate harm, and update the pupil/student file on CPOMS (anonymising the teacher concerned).
- Raise it with the HSCP or relevant Local Authority and act on their advice. This may involve multi-agency working and the instigation of a Common Assessment Framework (CAF) or 'Team around the Family (TAF) approach.
- Although Working Together (2026) encourages joint working with the family, their consent is not required for referral to statutory authorities, and the best interests of the child must be the primary consideration.
- Preserve all evidence (for example, scribbled notes, mobile phones containing text messages, clothing and computers) and give these to the Head of Foundation where appropriate.
- Gather information about Low-Level Concerns, make recommendations to the Head of Foundation on each case.

The School keeps a record of any safeguarding incidents within CPOMS. The records are kept until the child moves to another school. At this point the records will be passed on to the new school, either via registered post or transfer on CPOMS. Aldenham will record where the records have been sent to and the date it happened. The records of the safeguarding incidents will subsequently be treated in accordance with data protection guidelines.

19. Arrangements to fulfil other Safeguarding responsibilities

Visitors

All visitors, including speakers, must follow the 'Access, Security and Visitors Policy'. This includes:

- Visitors must be escorted if they visit anywhere on site if issued with a red lanyard.
- Visitors must sign in at Reception and always wear their ID badge and correct lanyard.
- Visitors must sign out at Reception before leaving.

All visitors and overnight guests staying with staff who reside on site must follow the 'Protocol for Visitors staying in staff Accommodation'. This includes:

- Visitors must be escorted if they visit anywhere on site apart from their host's accommodation.
- Visitors should be aware of their responsibilities when engaging pupils and students in conversation, so should keep conversations to a minimum.
- Visitors must be given the name and contact details of the DSL in case of need to report a safeguarding matter.
- Overnight visitors in Boarding Houses must (a) be pre-authorised by the Head of Foundation and the Housemaster/Housemistress, (b) have a completed DBS check, (c) have their name, any previous names, and date of birth provided to HR to be checked against The Barred List.
- Overnight visitors in School House must (a) be pre-authorised by the Head of Foundation or the Bursar, (b) have their name, any previous names, and date of birth provided to HR to be checked against The Barred List.

Recruitment

The School has within its Recruitment Policy a commitment to establishing and following Safer Recruitment procedures. The policy is in line with the guidance contained within the document KCSIE (2026).

The School's procedures include the training in Safer Recruitment for key personnel involved in advertising, interviewing and recruitment. HR department staff will undertake an online search as part of their due diligence on the shortlisted candidates (KCSIE 2026) and candidates will be informed. Before taking up a post, all staff and volunteers are required to submit to an enhanced DBS check and a check on the Children's Barred List and DfE Prohibited List.

Our procedures are in line with the Protections of Freedom Act 2012 and guidance on Disclosure and Barring (June 2018). A copy of the Safeguarding Policy and Procedures are part of the recruitment pack sent to prospective applicants and new members of staff are given training in safeguarding and Child Protection awareness as part of the induction process. Policies are also held on the use of supply and agency personnel, and the School's trips policy covers the requirements for monitoring and checking non-school staff accompanying educational visits.

Clear working practice policies are also in place for staff working in sensitive areas and in the boarding houses and the induction period for new staff will make people aware of these policies and how they are to be implemented. Additionally, the School has policies covering the use of private cars for the transportation of children, pupils and students, a Missing Child Policy, an Intimate Care Policy, a Whistleblowing Policy, a Behaviour Policy an Administration of Medicine Policy, Lone Worker Policy, Search, Screen and Confiscate, an Acceptable Use of ICT and Mobile Phones for Pupils Policy and a Health and Safety Policy.

The School has a responsibility to report promptly to the DBS any person (staff, contractor, volunteer or student) who has harmed, or poses a risk of harm to a child and who has been removed from working with children, or would have been removed had he or she not left earlier.

Training and New Staff Training

The DSL and DDSs will undertake appropriate training in Child Protection and multi-agency working (updated every two years), in addition to being updated on new guidance and procedures via the weekly Andrew Hall and NSPCC Update Bulletins and/or other relevant sources of information.

All staff, including the Head of Foundation, will receive Level 1 Safeguarding training every three years, in accordance with HSCP or relevant Local Authority requirements. School staff were last trained face-to-face in October 2025.

New staff, temporary staff (including supply staff) and volunteers will be trained either before they start or on their first day (or as soon as possible thereafter) by the DSL/DDS or external agency as part of their induction. Staff are reminded annually by the DSL or DDS about the procedure for Child Protection and it forms part of the "induction of new staff" programme.

New staff will receive the following documents as part of their induction training:

- Safeguarding Policy
- Keeping Children Safe in Education – Part One
- Behaviour Policy
- Anti-Bullying Strategy
- Missing Student Policy
- Low-Level Concerns Policy
- Social Media Policy
- The relevant Code of Conduct, depending on role.

Staff annual safeguarding training will include reference to dealing with inappropriate relationships – either Child-to-Child or between children, pupils, students and staff, inappropriate use of ICT, staying safe online and how to avoid exploitation via social media. In addition, staff will be provided with guidance on the use of social media in relation to pupils and students, as contained in the Foundation Staff Code of Conduct.

Governors will undertake an annual review of the School's safeguarding policies and procedures and the efficiency with which the related duties have been discharged.

All staff have read and signed the School Staff Code of Conduct. All staff read key policies including the Safeguarding Policy and KCSIE (2026) Part 1 at the beginning of each academic year and as part of their induction. Staff should also ensure they understand the expectations, roles and responsibilities in relation to Filtering and Monitoring. Updates may take the form of face-to-face briefings, written briefings and online training modules on a platform such as TES Develop (Educare).

Monitoring and Evaluation of this Policy

The School monitors and evaluates its Child Protection policy and procedures through the following activities:

- This policy is updated at least annually.
- Governors annually review and sign off the policy (see minutes of Governors' meetings).
- Safeguarding Governor Dr Uchechukwu Ogunna meets with the School DSL and a Prep DDSL termly and reviews Safeguarding throughout the Aldenham Foundation.
- Safeguarding is an agenda item at every meeting of the Board of Governors and the Education Committee.
- Safeguarding Governor reports annually to the Governors on Safeguarding and a detailed minute is recorded.
- The Governors approve the job description for the School's DSL and DDSLs, and ensure that they have sufficient time, funding, supervision and support to perform their duties, including access to appropriate counselling if required.
- The Governors monitor the work of the School (through pastoral work, PSHE etc.) in equipping pupils and students to reduce risks and keep themselves safe.
- The Governors monitor pastoral care in the school to ensure that staff have the skills, knowledge and understanding necessary to keep children safe (including children who are looked after by a local authority).
- The DSL/DSLs update the Senior SLT/ Prep SLT on safeguarding issues at every formal

meeting.

- Senior SLT/ Prep SLT monitor and review safeguarding procedures.
- Staff read the KCSIE (Sept 2026) Part 1, Safeguarding Policy, Whistleblowing Policy, and Staff Professional Code annually and complete an online assessment to confirm their understanding.
- Attendance data is monitored and reviewed at Senior SLT/ Prep SLT.
- Risk assessments are regularly analysed in line with the Health and Safety Policy.
- Incidents of bullying/ racial behaviour incidents are regularly reviewed by the Senior SLT/ Prep SLT.

This document is to be read in conjunction with the other policies and procedures including KCSIE Part 1 (Sept 2026), the Professional Conduct Guide, Whistleblowing Policy, Anti-bullying and Anti-cyber Bullying policies.

20. Appendix A

Signs and Symptoms of Abuse - General Comments (KCSIE 2026)

Children can be harmed either by deliberate acts or by a failure to provide proper care, or both. Children may suffer neglect, emotional, physical or sexual abuse or a combination of such types of abuse.

Staff must be aware that while abuse of children is more commonly perpetrated by adults, Child-on-Child abuse can be a safeguarding issue and concerns about bullying or inappropriate behaviour must be referred to the HSM, Deputy Head (Pastoral) and DSL. For more details, see the 'Anti Bullying Strategy'.

A significant deterioration in a child's mental health could well be an indicator of abuse. Staff must raise a concern via CPOMS if they are concerned about a pupil or student's mental health. The DSL will share the concern with the Housemaster/Housemistress to ensure that the services of a mental health professional (e.g. the School Counselling Manager) are engaged. The mental health professional will in turn inform the DSL if abuse in any form is suspected.

Neglect

Neglect refers to the persistent failure to meet a child's basic physical and/or psychological needs likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs for security, love, praise and recognition. Basic needs, such as food, drink and warmth may not be provided. Slowing of growth without a medical cause may be indicative of emotional abuse and occur even when a child is not deprived of food.

Emotional Abuse

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

Physical Abuse

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

It is important that a professional who sees an injury on a child takes careful note of how the injury allegedly happened, including the informant, the date, time, place, sequence of events, nature of injury etc. The assessment of the plausibility of the explanation should be a medical judgement - other professionals should not make this decision. Although children do have a variety of accidents, the most common types of injury they sustain are usually different from the injuries caused by abuse.

The following situations, in cases of physical injury, should cause concern about the possibility of physical abuse:

- No explanation.
- Inappropriate explanation, e.g., description of a minor accident in relation to a major injury.
- Different explanations given to different enquirers.
- Parents touchy or defensive, compared with genuine accidents when parents are usually distressed and blame themselves.
- Delay in seeking treatment.
- Child states that a particular adult hurt them, or one parent accuses another of physical chastisement.

Injuries should be a cause of concern as they indicate the possibility of physical abuse because they fit recognisable patterns (e.g., human hand marks, human bite marks). A list of injury types is listed below.

Possible Indicators of Physical Abuse

- Multiple injuries of various types and ages.
- Bruising and skin marks such as.
- Black eyes – these cannot be caused by a fall on a flat surface; two black eyes are particularly suspect, especially if the lids are swollen and tender or there is no bruise to the nose or forehead.
- Bruised ears, sometimes with bleeding.
- Bruises of upper lip, torn frenulum of upper lip and injuries under the tongue.
- Bruising around mouth of child (may have finger bruises: up to three or four on one side and one on the other).
- Flat hand marks, particularly on cheeks, buttocks and lateral thighs.
- Bruises on scalp and "bald patches".
- Finger bruises on shoulders, upper arms or on the trunks or legs of babies.
- Linear marks or bruises - often seen on buttocks or backs of thighs.
- Bruises or weals curving around the body. Sometimes buckle or loop marks noted.
- Bizarre-shaped bruises with sharp borders, e.g. from hairbrush, comb, slipper.
- Bruises on abdomen - unlikely to be accidental.
- Ligature and choke marks - red mark or bruising around wrist, ankles or neck (in the

latter area may be due to sudden pulls on t-shirt).

- Bite mark – two crescent shaped marks or bruises. If more than three centimeters apart they may be caused by an adult or older child.
- Human nail marks - these shows piled up skin at the end of the marks and are unlike abrasion from falls on rough surfaces; they may just be linear bruises.

Burns

- Scalds - glove or stocking scalds to hands and/or feet caused by dunking in water.
- Scalded buttocks - children cannot scald their buttocks accidentally without also scalding their feet and leg.
- Splash marks - look at direction of splash to see if it is compatible with story or might indicate hot liquid being thrown at child.
- Cigarette burns - small circular burns most typically on the back of hands or forearms, seen in clusters and often of different ages.
- Contact burns - child held against heaters, iron, cookers. Well demarcated burns following contours of hot objects.

Bone and Joint Injuries

- These can be caused by direct blows, twists (from swinging a child round by one limb) or throwing against hard objects.

Poisoning

- Non-accidental poisoning should be suspected in bizarre episodes of ill health or unconsciousness or when poisoning involves more than one child.

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, upskirting, downblousing, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The vast majority of sexually explicit images of children are user-generated, meaning that children have been coerced into taking explicit photos or videos of themselves.

Children of all ages, boys and girls, can be victims of sexual abuse. This abuse often comes to light in a veiled way, for children are reluctant to tell. Many kinds of sexual abuse do not leave any signs of physical injury.

- Children may try to tell others that they are being sexually abused. They may do this by hinting in words, play or drawings of sexual activities to "test the waters". If the adult response is empathic they may wish to reveal more, but if the response is angry or

evasive, they may remain silent and not try again.

- If a child exhibits several signs or types of behaviour as listed below, or a pattern emerges of when or how a child exhibits such signs, the possibility of sexual abuse should be considered.
- However, it must be emphasised that the behaviour described below are descriptions of some very common conditions of childhood indicating that the child is distressed. Only rarely will they be caused by sexual abuse.

Possible Indicators of Sexual Abuse

- Sudden change in mood or behaviour.
- Change in eating patterns: loss of appetite, faddiness or excessive preoccupation with food.
- Severe sleep disturbance with fears, vivid dreams or nightmares, sometimes with overt or veiled sexual content.
- Withdrawal and depression, learning failure, self-injury, suicidal attempts.
- Temper, aggression, disobedience and attention-seeking, anxiety or restless behaviour.
- Lack of trust in familiar adults.
- Girls take over the mothering role in the family whether or not the mother is present.
- Absconding; requests to leave home.
- Sexualised conduct or inappropriate sexual knowledge in children may be due to direct sexual abuse or other forms of sexual abuse, such as from observing others or watching pornographic videos.
- Continual open masturbation, aggressive, inappropriate and explicit drawing and sex play (masturbation and some exploration are a normal part of growing up, but it is the type and persistence of these activities that cause concern).
- Precocious knowledge of adult sexual behaviour.
- A boy or girl who behaves in a sexually precocious way or exhibits harmful sexual behaviour.
- Requests for contraceptive information. These are rare, but may be a cry for help, as may be anxieties about pregnancy or sexually transmitted disease.
- Inappropriate displays of affection, e.g. parent and child behaving more like lovers.
- Marked fear of men.
- Fear of undressing.

Some physical conditions may also be indicators of sexual abuse, but not necessarily so:

- Difficulty in walking or sitting
- Pain on passing water
- Recurrent urine infections
- Soiling
- Recurrent bed wetting

Specific Safeguarding Issues

KCSIE 2026 Part 1 provides information regarding specific safeguarding issues. The following situations should be taken as potential causes of concern for the welfare of children, students and pupils:

Child abduction and community safety incidents

Child abduction is the unauthorized removal or retention of a minor from a parent or anyone with legal responsibility for a child. If colleagues become aware of this issue, they should seek support from the DSL/DDSLs immediately. Those with pastoral responsibility for children should be particularly vigilant about signs of unease amongst children travelling to, or returning from, international destinations over School holidays.

Pupils and students are not immune to the possibility of potential abduction, particularly those travelling from/to London on coaches. They will be given practical advice on how to keep themselves safe when travelling to/from coach stops.

Children and the court system

Going to court can be an immensely stressful time for children, either as a witness to a crime (or as an alleged perpetrator), or as a party to family court action. The DSL/DDSLs should be made aware of children in court for any reason and will seek to liaise closely with CAFCASS (children and Family Court Advisory and Support Services) and other relevant parties to offer support to the Child(ren). Should children be required to give evidence in criminal courts either for crimes committed against them or crimes they have witnessed, Aldenham School will refer to the guide to support children 5-11 year olds and 12-17 year olds in the court system.

Children with unexplained and/or persistent absence from education, home or care

Colleagues should be aware that children absent from education, home or care for prolonged periods and/or repeated occasions, and children missing from education may be engaged in a range of activities which could cause safeguarding concerns. These issues may include (but are not limited to) abuse, neglect and exploitation, involvement in county lines, or 'honour'-based abuse. Particular attention should be paid to patterns of absence. Colleagues should consult the Missing Student Policy and Attendance and Absence Policy for further guidance. Where a child's absence raises a safeguarding concern the Working Together to Improve School Attendance (2026) guidance will be used.

Children with family members in prison

Children with parents or other family members in custody or is affected by parental offending are more likely to suffer from Adverse Childhood Experiences (ACEs) such as poverty, stigma, isolation and poor mental health. Such children should be supported sensitively by their pastoral managers. Information about parents or other family members in prison must only be shared on a "need-to-know" basis.

Suspensions

Children who have experienced multiple suspensions, are at more risk of being permanently excluded from school.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Involvement in CCE and/or CSE (they often overlap) can have a devastating impact on a child.

It must be stressed that age is not the only factor to increase vulnerability; gender, sexual identity, cognitive ability, SEND, physical strength, status within the peer group and access to economic resources can all contribute. Particular attention should be paid to children who are at risk of CCE/CSE due to these or other relevant factors. Colleagues should inform the DSL/DDSLs immediately if they become aware of a child's involvement in such activity.

County Lines

Children at Aldenham could be drawn into County Lines and other gang-related activity due to the School's suburban location and proximity to good transport links. If colleagues suspect such involvement, the DSL/DDSL should be contacted immediately.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. The National Referral Mechanism can be used to refer potential cases of modern slavery to the authorities.

Cybercrime

Children with very high levels of IT skills can easily be drawn into nefarious activities online. The School's Monitoring and Filtering systems will protect its network against most attacks, but care should always be taken to ensure that pupils and students do not engage in such activities. Cybercrime is covered as part of online safety lessons.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be the victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

Domestic abuse (DA) can have a huge impact on children. Although DA is committed by one adult against another (or by groups of adults), it should not be assumed that witnessing such events is not deleterious to a child's wellbeing. The School will make every attempt to support such children, whilst maintaining a neutral stance towards the parents (or other perpetrators). It should be remembered that older siblings, even Students over the age of 18, can also be the victims of domestic abuse.

The School will normally be made aware of children living with DA in Hertfordshire via *Operation Encompass (OE)*. Although those living outside the county will not always be contacted in the same manner, the School will put the OE procedures in place and will liaise closely with the relevant police force to ensure the child's best interests are followed.

Given that children over 16 can also be perpetrators of DA, every attempt will be made to support children who are reported to the School as alleged perpetrators.

Homelessness

Although homelessness *per se* is unlikely within the School community, there may well be children who are vulnerably housed due to reasons such as a family break-up. Such children should be treated with discretion and a referral to Children's Services should be made if their welfare is at risk due to their residential situation.

In addition, children aged 16 and 17 could be living independently from their parents or guardians, for instance as a result of exclusion from the family home. If a child's welfare is at risk due to such a situation, a referral should be made. In the short term, it is appropriate to offer emergency boarding accommodation to children rather than seeing them housed in a dangerous environment. The Deputy Head Pastoral and DSL should always be consulted in such circumstances.

So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

If colleagues suspect a child is the victim of so-called 'honour'-based abuse (HBA), they must report it immediately to the DSL/DDSL. It is important to recognise that all forms of HBA are abuse (regardless of the motivation) and should be treated as such.

Colleagues are made aware that there is a mandatory reporting duty for all incidents of Female Genital Mutilation (FGM), and that this duty lies on the colleague who discovers the practice (either by visual evidence or disclosure by the victim). The DSL/DDSL should, of course, be informed in such circumstances.

It is a crime in England to force someone into marriage, including non-binding unofficial 'marriages' as well as legal marriages. If colleagues become aware of such a crime having taken place affecting a Student at the School, they should report it immediately to the DSL or in their absence to a DDSL. Even though a victim of Forced Marriage may well give the impression that they entered into an arrangement willingly, the prospect of coercion being used to obtain their consent must never be ruled out.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday. Any concern a student may have entered a 'binding' or 'non-binding' marriage before their eighteenth birthday must be reported immediately to the DSL or DDSL.

Preventing radicalisation, the Prevent Duty and Channel

Children are vulnerable to extremist ideology and radicalisation. Extremism, for instance, could include the vocal or active opposition to fundamental British values. Radicalisation is where a person comes to support terrorist groups and terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. Colleagues should be aware of the Prevent Programme and the DSL/DDSL should make a referral as necessary.

Channel is a voluntary programme which seeks to provide support at an early stage to those who are vulnerable to being drawn into terrorism. The School will work closely with the local

Channel panel if a pupil or student is invited to participate; if the pupil or student subsequently leaves the School, the DSL will liaise with the destination school or college to ensure that the support provided by the Channel programme can continue.

Colleagues, particularly those on the SLTs and the DSL/DDSLs should avail themselves of the additional support on the Home Office website in the form of e-learning modules.

Child-on-Child abuse

It is important to recognise that a) children can abuse other children; b) such abuse can happen both inside and outside school, and c) it can happen in a real or virtual environment. Such abuse may involve physical aggression in the form of bullying, sexual violence and sexual harassment (including coercive behaviour) and the sharing of nudes and semi-nudes.

The School should adopt a zero-tolerance approach to such abuse and should offer support to the victim/survivor(s), whilst working with the perpetrator(s) to modify their behaviour.

Sexual violence and sexual harassment between Children in School

Sexual violence and sexual harassment (SVSH) can occur between two (or more) children of any age and sex. It can also occur online. Colleagues must adopt the attitude that "it could happen here" and all members of staff should be ready to receive a report of such activity. In all cases, it is essential that **all** victims/survivors are reassured that they are being taken seriously and that they will be supported and kept safe.

Upskirting and downblousing

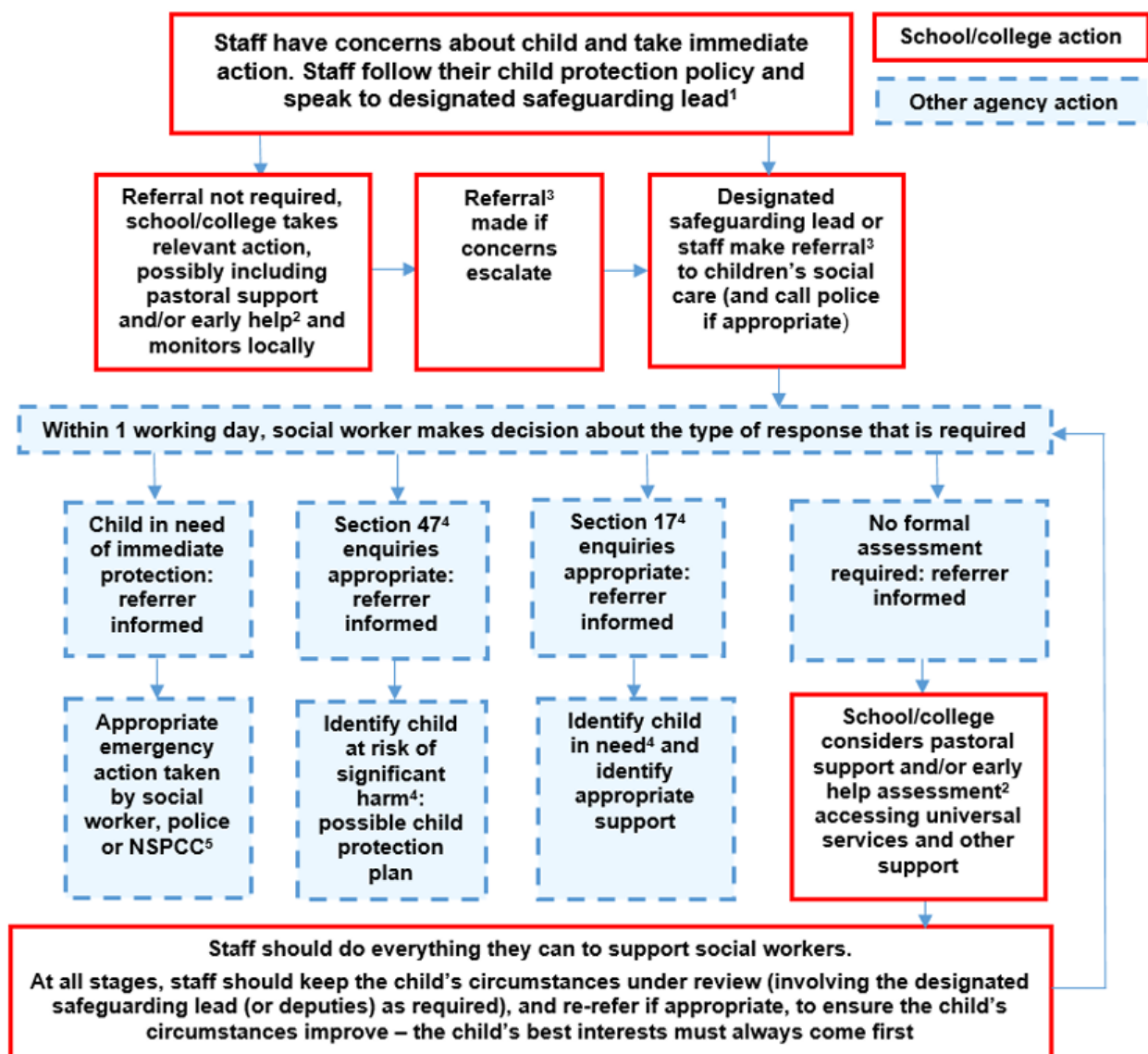
Upskirting is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim. Downblousing is where a photo is taken of a person's chest for the purposes of sexual gratification. It is important that staff remain vigilant of the possibility of upskirting and downblousing occurring, particularly in stairwells. Upskirting is a criminal offence. Downblousing and other forms of image-based abuse will also be treated seriously as safeguarding concerns and referred to external agencies where appropriate.

The response to a report of sexual violence or sexual harassment

There should be a zero-tolerance approach to any incidence of SVSH. All such incidents should be reported via CPOMS, and cases will be added to the SVSH register (kept by the DSL). A victim must be reassured that they are being taken seriously and that they will be supported and kept safe. No victim should ever be made to feel ashamed for making a report, whether this is to a member of staff or to an external agency such as the NSPCC.

21. Appendix B: Flowchart from Keeping Children Safe in Education 2026

Figure 1: Flowchart setting out the actions taken where there are concerns about a child



(Keeping Children Safe in Education, September 2026 © Department for Education)

22. Appendix C - indicators that children or young people may be vulnerable to or involved with extremism.

Vulnerability

- Identity Crisis – Distance from cultural/ religious heritage and uncomfortable with their place in the society around them.
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life.
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups.

Access to extremism / extremist influences

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc.)
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist/ military training camps/ locations?
- Is the child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the child/young person sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?

Experiences, Behaviours and Influences

- Has the child/ young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child/ young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to

- differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child/ young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child/ young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the child/ young person vocally support terrorist attacks; either verbally or in their written work?
- Has the child/ young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?

Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child/young person travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child/young person employed any methods to disguise their true identity? Has the child/ young person used documents or cover to support this?

Social Factors

- Does the child/ young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child/ young person experience a lack of meaningful employment appropriate to their skills?
- Does the child/ young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child/ young person demonstrate identity conflict and confusion normally associated with youth development?
- Does the child/ young person have any learning difficulties/ mental health support needs?
- Does the child/ young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child/ young person have a history of crime, including episodes in prison?
- Is the child/young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the child/ young person have insecure, conflicted or absent family relationships?
- Has the child/ young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child/young person's life has extremist view or sympathies?

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites, especially those with a social networking element.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.

- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Significant changes to appearance and/or behaviour.

If you have any concerns discuss them with the DSL and/or local Prevent Officer.

23. Appendix D: Designated Safeguarding Lead Job Description

Designated Safeguarding Lead (DSL)

Reports to: Head of Foundation

Summary and main purpose:

The person appointed to be the Designated Safeguarding Lead (DSL) fulfils a critical role within the life of Aldenham School. The DSL has a key responsibility for overseeing the School's Safeguarding responsibilities and in assuring the Head and the Governors that all is being done to safeguard the welfare of students within the School. DfE requirements mandate that there can only be one DSL for the entire School; therefore, the DSL's responsibilities will necessarily include oversight of the Prep School's Safeguarding team.

The DSL will manage a team of Deputy Designated Safeguarding Leads (DDSLs). Some safeguarding activities may be delegated to DDSLs, but the DSL will retain ultimate lead responsibility for safeguarding and child protection.

Duties and responsibilities:

Managing referrals

- Refer cases of suspected abuse and neglect to the local authority's children's social care
- Support staff who make referrals to the local authority's children's social care
- Refer cases to the Channel programme where there is a radicalisation concern
- Support staff who make referrals to the Channel programme
- Work closely with the Head to ensure that the appropriate referrals to the Disclosure and Barring Service and/ or the Teacher Regulation Agency are made, in instances where a person is dismissed due to risk or harm to a child or leaves before they are dismissed for this reason.
- Refer cases to the police where a crime may have been committed

Working with staff and other agencies

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the safeguarding partners
- Inform the Head of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations, and the requirement for students to have an appropriate adult
- Liaise with the case manager and the local authority designated officer (LADO) for child protection concerns in cases which concern a staff member
- Liaise with staff on matters of safety, safeguarding and welfare (including online and digital safety), and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically

- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by:
 - Knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced
 - Identifying the impact that these issues might be having on children's attendance, engagement and achievement at school

The above includes:

- Ensuring the school knows which children have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort
- Supporting teaching staff to provide additional academic support and/or reasonable adjustments to help these children reach their potential

Managing the child protection file

- Ensure child protection files within CPOMS are kept up to date
- Keep information confidential and store it securely
- Make sure records include:
 - A clear and comprehensive summary of the concern
 - Details of how the concern was followed up and resolved
 - A note of any action taken, decisions reached and the outcome
- Ensure files are only accessed by those who need to see them, and that where a file or content within it is shared, this happens in line with information sharing advice as set out in Keeping Children Safe in Education (KCSIE)
- To review and audit CPOMS entries regularly
- Where children leave the School (including in-year transfers):
 - Ensure their child protection file is securely transferred to the new school as soon as possible, separately from the main student file, with a receipt of confirmation, and within the specified time set out in KCSIE
 - Consider whether it would be appropriate to share any additional information with the new school before the child leaves, to help it put appropriate support in place

Raising awareness

- Ensure each member of staff has access to, and understands, the school's safeguarding child protection policy and procedures, especially new and part-time staff, in addition to the latest version of KCSIE
- Work with the governing board to ensure the safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly. The DSL is also responsible for updating such policies in accordance with any changes in legislation
- Ensure the safeguarding and child protection policy is available publicly and parents and carers are aware that referrals about suspected abuse or neglect may be made and the role of the School in this
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- Help promote educational outcomes by sharing information with teachers and school leadership staff about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing
- Ensure that safeguarding posters and contact information is displayed strategically in and around the school site

Training

The DSL and DDSLs will;

- Undergo training (at least every 2 years) to gain the knowledge and skills required to carry out the role and meet the expectations set out in KCSIE, including those outlined in the 'Training, knowledge and skills' section of Annex [B](#)
- Undertake Prevent awareness training
- Refresh knowledge and skills at regular intervals and at least annually
- Understand the assessment process for providing Family Help and intervention
- To deliver safeguarding training to new members of staff (including supply staff and volunteers)

Providing support to staff

- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters
- Deliver (or facilitate) appropriate safeguarding and child protection training, including online safety, and staff responsibilities in relation to filtering and monitoring
- Support staff during the referrals process
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support
- To line-manage and support the work Deputy Designated Safeguarding Leads (DDSLs) in both the Senior and Prep Schools and to provide appropriate support as necessary

- To liaise closely with tutors, Housemasters (HSMs), SLT, parents, the School medical team and School counsellor as appropriate
- To be available during the school day and whilst any residential trips are in progress during holidays, or to arrange appropriate cover by the DDSLs as necessary
- To ensure that supply staff and volunteers are provided with a summary of disciplinary and child safeguarding procedures

Understanding the views of children

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the School may put in place to protect them
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

Holding and sharing information

- Understand the importance of information sharing, both within the School, with other schools and colleges on transfer, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Keep detailed, accurate, secure written records of concerns and referrals
- To refer immediately to the Head any allegations against a member of staff
- To refer immediately to the Chair of Governors any allegation against the Head and ensure s/he consults with relevant authorities
- To be responsible for coordinating action regarding referrals by liaising with Children's Social Care Services (CSCS) and other relevant agencies

Filtering and monitoring

- Understand the filtering and monitoring systems and processes in place in the school, including how to manage them effectively and escalate concerns when identified
- Make sure that the filtering and monitoring systems and processes block harmful and inappropriate content without unreasonably impacting teaching and learning
- Liaise with the Head of Technology and review filtering and monitoring provision at least annually. The DSL may carry out filtering and monitoring responsibilities alongside IT staff, other senior leaders, and the governing body

Other areas of responsibility

- To report on a termly basis to the nominated Governor for Safeguarding and to monitor procedures and update them on specific issues
- In consultation with the Head and HR, to ensure that the DBS, TRA and Charities Commission is informed if a person leaves or is dismissed due to harm (or risk of harm) to a child

The DSL will be required to safeguard and promote the welfare of children and young people and follow school policies and the staff code of conduct.

During term time, the DSL should always be available during school hours for staff in the school to discuss any safeguarding concerns. Ideally this will be in person but can also be via phone or video call in exceptional circumstances.

Please note that this list of duties is illustrative of the general nature and level of responsibility of the role. It is not a comprehensive list of all tasks that the DSL will carry out. The postholder may be required to do other duties appropriate to the level of the role.

Person Specification:

1. Appropriate Teaching Qualification and Experience
2. To be an approachable and visible member of the whole school community who is seen by staff as responsible for this crucial area
3. To be able to demonstrate to staff the importance of safeguarding as a school community and to give them the confidence to be able to exercise their responsibilities appropriately
4. To have the appropriate seniority within the School to undertake this responsibility with staff, the leadership team, the governors and outside agencies. The DSL is a member of the Senior Leadership Team (SLT).
5. To be able to co-ordinate the work of the Safeguarding teams in both the Senior School and the Prep School
6. Experience of managing safeguarding in a school or other relevant setting including building relationships, implementing good practice and communicating effectively
7. Able to demonstrate evidence of developing and implementing strategies to assist children and their families
8. Experience of handling large amounts of sensitive information and upholding principles of confidentiality