



HOLLAND HOUSE SCHOOL

SAFEGUARDING AND CHILD PROTECTION POLICY

Whole School, including the Early Years Foundation Stage

Publication Edition - FINAL for Governor Ratification

Effective from 1 September 2026

FINAL FOR GOVERNOR RATIFICATION

This is the final policy text submitted to the Board of Governors for ratification. The substantive statutory, local-contact, school-specific and ISI-readiness audit is complete. The ratification date and signatures will be completed after the governing meeting. Once ratified, the version label may be changed to "Approved Publication Edition" without altering the substantive policy.

Document Control

Policy title	Safeguarding and Child Protection Policy
School	Holland House School
Policy owner	Designated Safeguarding Lead (DSL)
To be ratified by	Board of Governors
Policy status	Statutory
Applies to	All pupils, including EYFS; all staff; governors; volunteers; agency and supply staff; trainee teachers; students on placement; peripatetic staff; contractors; visitors; and any adult working in or on behalf of the School
Ratification date	To be completed following ratification
Effective date	1 September 2026
Review date	31 August 2027, or earlier if legislation, statutory guidance, local procedures or School arrangements change
Version	2.0 - Publication Edition FINAL for Governor Ratification
Supersedes	Holland House School Safeguarding Policy, September 2025
Related policies	See Appendix F - Related School Policies and Procedures

Policy Status and Source Hierarchy

This policy has been prepared for implementation from 1 September 2026. It has regard to the current statutory and regulatory framework applicable to an independent school in England, including the Early Years Foundation Stage (EYFS).

Only current official Government publications are being used as the legal and statutory basis for the Publication Edition. The School's existing September 2025 policy is being used only to preserve accurate Holland House procedures, names, responsibilities and local arrangements.

Governance and statutory “proprietor” terminology

Holland House School is a charitable company limited by guarantee (company number 01164455) governed by its Board of Governors. The Governors are the company's directors and charity trustees. For the Independent School Standards and Keeping Children Safe in Education, Holland House School is the

registered proprietor and the Board exercises those statutory functions. Accordingly, this policy uses “Board of Governors”. Where legislation or statutory guidance uses “proprietor”, it means Holland House School acting through its Board.

The words 'must' and 'should' are used deliberately. 'Must' identifies a legal requirement. 'Should' identifies statutory guidance that is expected to be followed unless there is a good reason not to do so.

Internal Safeguarding Contacts

Role	Name	Contact
Designated Safeguarding Lead (DSL)	Raksha Davé	rakshadave@hollandhouse.org.uk
Deputy DSL / Headteacher	Emily Brown	emilybrown@hollandhouse.org.uk
Deputy DSL / Deputy Head	Paul Longman	paullongman@hollandhouse.org.uk
EYFS safeguarding oversight	Emily Brown	emilybrown@hollandhouse.org.uk
Chair of Governors	Parag Mehta	paragmehta@hollandhouse.org.uk
Immediate danger		
If a child is in immediate danger or at risk of immediate serious harm, call 999. A safeguarding referral must not be delayed because the DSL or a Deputy DSL is unavailable.		

Version History

Version	Date	Author / owner	Summary
2.0 FINAL for Governor Ratification	July 2026	Designated Safeguarding Lead	Final statutory, Barnet-contact, school-specific, accessibility and ISI-readiness audit completed. Submitted to the Board of Governors for ratification.

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PART A

POLICY FOUNDATIONS

Safeguarding at Holland House School

The welfare of the child is paramount. Safeguarding is everyone's responsibility. All concerns will be taken seriously, recorded accurately and acted upon without delay.

1. Purpose, Scope and Safeguarding Principles

1.1 Purpose

This policy sets out how Holland House School safeguards and promotes the welfare of every pupil, including children in the Early Years Foundation Stage. It establishes the School's child protection procedures, defines the responsibilities of all adults working in or on behalf of the School and explains how safeguarding practice is led, monitored and reviewed.

The policy is intended to ensure that:

- children receive help and support as soon as problems emerge;
- concerns about a child's welfare are recognised, recorded and acted upon promptly;
- staff understand their individual safeguarding responsibilities and the School's reporting procedures;
- the School works effectively with parents, safeguarding partners and other agencies;
- safeguarding is embedded in governance, leadership, recruitment, curriculum, pastoral care, online safety and day-to-day practice; and
- the School's arrangements are capable of withstanding detailed regulatory and inspection scrutiny.

1.2 Scope

This policy applies to all pupils and to all adults working in or on behalf of Holland House School, whether paid or unpaid. It applies during the school day and to before-school and after-school provision, clubs, educational visits, residential visits, off-site activities, remote education, online communication and any circumstance in which an adult is acting in a professional capacity for the School.

The policy also applies when the School becomes aware of safeguarding concerns arising outside school, including in the home, the community or online.

1.3 Child-centred and coordinated approach

Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a child-centred approach and will consider at all times what is in the child's best interests.

No single practitioner can have a complete picture of a child's needs and circumstances. All adults must therefore identify concerns, share relevant information and take prompt action so that children and families receive the right help at the right time.

The wishes and feelings of the child will be heard and taken into account, having regard to the child's age, understanding, communication needs and safety. A child's wishes will not prevent the School from taking protective action where this is necessary.

1.4 Safeguarding culture

At Holland House School, safeguarding is not confined to the management of individual child protection cases. It is a whole-school culture founded on vigilance, professional curiosity, respectful relationships and the understanding that 'it could happen here'.

The School will maintain a culture in which:

- children feel safe, valued and able to speak to a trusted adult;
- staff listen to children and take their concerns seriously;
- inappropriate, abusive, prejudicial or discriminatory behaviour is challenged;
- concerns about children or adults are shared promptly and never minimised;
- staff are supported to exercise professional curiosity and respectful challenge;

- leaders and governors test whether policy is reflected in practice; and
- the School learns from incidents, audits, reviews and changes in statutory guidance.

1.5 Availability and review

The policy will be available to all staff and published for parents and carers. Parents will be informed that the School may make referrals about suspected abuse, neglect or exploitation and may share information where this is necessary to safeguard a child.

The Board of Governors will review this policy at least annually. Procedures and implementation will be reviewed regularly and the policy will be revised sooner where legislation, statutory guidance, local arrangements, identified risks or School practice make this necessary.

2. Statutory and Regulatory Framework

This policy is based on the legal and statutory framework applying to independent schools in England and to the School's EYFS provision. The principal sources are listed below, and Appendix G contains the verified official source schedule used for the final compliance audit.

2.1 Core statutory guidance and regulatory framework

- Keeping Children Safe in Education 2026, which comes into force on 1 September 2026;
- Working Together to Safeguard Children 2026;
- the Early Years Foundation Stage statutory framework for group and school-based providers, effective from 1 September 2026;
- the Education (Independent School Standards) Regulations 2014, as amended, together with current Department for Education guidance on the Independent School Standards;
- Relationships Education, Relationships and Sex Education and Health Education statutory guidance, for introduction on 1 September 2026;
- Restrictive Interventions, including the Use of Reasonable Force, in Schools, effective from 1 April 2026;
- the Prevent Duty guidance in force at the date of ratification;
- Working Together to Improve School Attendance and Children Missing Education statutory guidance in force at the date of ratification; and
- current Government guidance on information sharing, filtering and monitoring, safer recruitment, regulated activity and supporting pupils with medical conditions.

2.2 Principal legislation

- Children Act 1989 and Children Act 2004;
- Education Act 2002;
- Education (Independent School Standards) Regulations 2014;
- Childcare Act 2006 and relevant disqualification regulations;
- Safeguarding Vulnerable Groups Act 2006, as amended;
- Protection of Freedoms Act 2012;
- Counter-Terrorism and Security Act 2015;
- Female Genital Mutilation Act 2003 and Serious Crime Act 2015;
- Equality Act 2010;
- Human Rights Act 1998;

- Data Protection Act 2018, UK General Data Protection Regulation and Data (Use and Access) Act 2025;
- Crime and Policing Act 2026, including the change to the definition of regulated activity from 1 September 2026;
- Children's Wellbeing and Schools Act 2026, including relevant allergy-safety provisions; and
- other legislation and regulations identified in the final verified source schedule.

2.3 Relationship between law, statutory guidance and School procedure

The School will comply with legal duties and will have regard to statutory guidance. Where this policy goes beyond a minimum legal requirement, it does so to establish a clear, consistent and child-centred procedure for Holland House School.

Nothing in this policy prevents any person from making a direct referral to local authority children's social care or the police where they believe this is necessary to protect a child.

3. Definitions and Terminology

3.1 Child

A child is any person under the age of 18.

3.2 Safeguarding and promoting the welfare of children

Safeguarding and promoting the welfare of children means:

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

3.3 Child protection

Child protection is part of safeguarding and refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

3.4 Abuse, neglect and exploitation

Abuse is a form of maltreatment. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm may include ill-treatment that is not physical and the impact of seeing, hearing or experiencing the effects of another person's ill-treatment.

Abuse, neglect and exploitation may occur within or outside the home, within an institutional or community setting, online or through a combination of online and offline activity. Children may be harmed by adults or by other children.

The four categories of abuse are physical abuse, emotional abuse, sexual abuse and neglect. Further indicators and specific safeguarding issues are summarised in Appendix A.

3.5 Family Help

Family Help is support provided as soon as a problem emerges at any point in a child's life. For the purposes of this policy, the term includes:

- universal services and community-based early help;
- targeted early help delivered through Family Help; and
- statutory support for children in need under section 17 of the Children Act 1989.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral must be made for consideration under section 47 of the Children Act 1989.

3.6 Data protection laws

In this policy, 'data protection laws' means the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025.

3.7 Victim and alleged perpetrator

The terms 'victim' and 'alleged perpetrator' may be used where they aid clear drafting. The School recognises that not every child who has experienced abuse identifies with the term 'victim'. Staff will use language that is sensitive to the child's wishes and circumstances and will avoid language that prejudices an allegation or criminal process.

3.8 Safeguarding partners

The local safeguarding partners are the local authority, the integrated care board and the chief officer of police. The School will work in accordance with published local safeguarding arrangements and threshold documents.

4. Equality, Inclusion and Children at Greater Risk of Harm

Holland House School is committed to anti-discriminatory and inclusive safeguarding practice. All children are entitled to protection, but some children may face additional barriers to recognition, disclosure or access to help.

Staff must not assume that changes in behaviour, mood, attendance, communication or presentation are explained by a child's disability, special educational need, health condition, culture, language or family circumstances. Safeguarding concerns must be considered on their own facts and in the context of the child's lived experience.

4.1 Children requiring particular professional curiosity

All staff should be particularly alert to the potential need for additional support for a child who:

- has special educational needs or disabilities, whether or not they have an Education, Health and Care plan;
- has a medical condition or mental health need;
- has, or has previously had, a social worker;
- is looked after, previously looked after, privately fostered or living in kinship care;
- is a young carer;
- has a parent or carer in custody or is affected by parental offending;
- is frequently absent from education, missing from home or care, on a part-time timetable, repeatedly removed from class or at risk of exclusion;

- is at risk of criminal or sexual exploitation, trafficking, modern slavery, serious violence or radicalisation;
- is affected by domestic abuse, substance misuse, adult mental ill-health, temporary accommodation or other family adversity;
- is at risk of female genital mutilation, forced marriage or other honour- or faith-based abuse;
- has displayed abusive, violent, sexualised or otherwise harmful behaviour;
- may experience racism, prejudice, discrimination or identity-based bullying; or
- faces any other circumstance that may increase vulnerability or make it harder to seek help.

4.2 SEND and communication barriers

Children with SEND can face additional safeguarding challenges. These may include communication barriers, social isolation, being disproportionately affected by bullying or exploitation, and the risk that injuries, behaviour or distress are attributed to a disability or condition without further exploration.

The School will make reasonable adjustments to enable a child to communicate, be heard and participate in safeguarding decisions.

4.3 LGB and gender-questioning children

Children who are lesbian, gay or bisexual, who are perceived to be so, or who are questioning their gender may be targeted by other children or experience distress, bullying or isolation. Staff will provide a safe and trusted space for concerns to be shared and will respond in a child-centred, lawful and safeguarding-focused manner.

Safeguarding decisions will be based on the child's individual circumstances, welfare and best interests. Parents will normally be involved unless doing so would place the child at increased risk of harm or otherwise conflict with safeguarding advice.

4.4 Equality and human rights

The Board of Governors and School leaders will have regard to the Equality Act 2010 and the Human Rights Act 1998. The Public Sector Equality Duty will be applied where it is legally applicable. The School may take proportionate positive action to address identified disadvantage or risk.

5. Roles and Responsibilities

Safeguarding is everyone's responsibility. Specific duties are allocated below, but no allocation of responsibility removes the duty of any adult to act where they are concerned about a child.

5.1 Board of Governors

The Board of Governors has strategic responsibility for ensuring that the School's safeguarding arrangements comply with the law, statutory guidance and the Independent School Standards.

The Board of Governors will:

- facilitate a whole-school approach in which safeguarding underpins policy development and decision-making;
- approve and review this policy at least annually and monitor its effective implementation;
- ensure that all staff, including staff who do not work directly with children, read Part One of KCSIE 2026 and are helped to understand and discharge their responsibilities;

- ensure that the DSL is a senior member of staff with appropriate status, authority, time, funding, training, resources and support;
- ensure that appropriately trained Deputy DSLs and robust, known cover arrangements are in place whenever the DSL is unavailable;
- ensure that staff and governors receive appropriate safeguarding, child protection and online safety training;
- ensure that safer recruitment procedures, the Single Central Record and the changes to regulated activity from 1 September 2026 are implemented correctly;
- ensure appropriate filtering and monitoring systems are in place and that their effectiveness is reviewed at least once each academic year;
- ensure that child-on-child abuse, harmful sexual behaviour, allegations, low-level concerns and whistleblowing are addressed through clear procedures;
- ensure that use of School premises by outside bodies is subject to appropriate safeguarding conditions and assurance;
- ensure that the School fulfils its duties regarding reasonable force, restraint, seclusion, recording and parental reporting;
- appoint a safeguarding governor who is not the DSL to provide additional oversight and report to the full Board of Governors;
- receive proportionate safeguarding assurance and challenge leaders while respecting confidentiality; and
- ensure that deficiencies in safeguarding practice are remedied without delay.

5.2 Headteacher

The Headteacher is responsible for the day-to-day implementation of this policy and for ensuring that safeguarding is embedded across the School.

The Headteacher will:

- ensure that all staff and volunteers receive appropriate induction and understand the School's safeguarding systems;
- support the DSL and ensure adequate safeguarding cover at all times;
- ensure that staffing, supervision, premises, technology and operational arrangements protect pupils;
- act as case manager for allegations against adults where required, except where the allegation concerns the Headteacher;
- manage low-level concerns in accordance with KCSIE and School procedures;
- ensure that lessons are learned from incidents and that required improvements are implemented;
- ensure that parents can access this policy and understand the School's role in making referrals; and
- ensure that EYFS safeguarding and welfare requirements are met.

5.3 Designated Safeguarding Lead

The DSL is Raksha Davé. The DSL is a member of the senior leadership team and has lead responsibility for safeguarding and child protection, including online safety and understanding the School's filtering and monitoring arrangements. Lead responsibility remains with the DSL and will not be delegated.

The DSL will:

- act as the principal source of support, advice and expertise for staff;
- manage and support referrals to children's social care, the police, Channel, the Disclosure and Barring Service and other agencies as required;

- liaise with the Headteacher, LADO, safeguarding partners and other professionals;
- maintain a complete safeguarding picture and ensure that children's wishes, safety, welfare and educational outcomes are considered;
- promote supportive engagement with parents and carers where it is safe and appropriate to do so;
- work with staff responsible for attendance, SEND, mental health, IT, pastoral support and curriculum;
- ensure that child protection files are current, clear, factual, secure and transferred within the required timescales;
- ensure all staff can access and understand the policy and that parents understand the School's safeguarding role;
- monitor safeguarding themes, identify emerging risks and report strategic assurance to the Board of Governors;
- maintain knowledge and skills through formal training at least every two years, Prevent training and updates at least annually; and
- encourage a culture of listening to children and building trusted relationships.

5.4 Deputy Designated Safeguarding Leads and cover

The Deputy DSLs are Emily Brown and Paul Longman. They are trained to the same standard as the DSL and may undertake delegated safeguarding activities. The DSL retains ultimate lead responsibility.

During term time, the DSL or a Deputy DSL will be available during school hours to discuss concerns. Holland House School will maintain a clear, reliable and known cover arrangement whenever the DSL is unavailable, including a secure method through which urgent concerns can be raised and reviewed.

Out-of-hours arrangements for school activities and trips will be identified in advance and communicated to relevant staff.

5.5 All staff

All staff must:

- read Part One of KCSIE 2026 in full and confirm annually that they have done so;
- understand the School's safeguarding systems, the identity of the DSL and Deputy DSLs, and how to report concerns;
- maintain an attitude that 'it could happen here';
- recognise indicators of abuse, neglect, exploitation, modern slavery and overlapping harms;
- act immediately on any concern and never assume that another person will act;
- record information accurately, using the child's own words where relevant, and distinguish fact from opinion;
- know how to respond if a child makes a disclosure and never promise secrecy;
- reassure children that they are being taken seriously and will be supported;
- understand that children may not feel ready or know how to tell someone and may not recognise their experience as harmful;
- exercise professional curiosity and build trusted relationships;
- support children's social care and other agencies after a referral when required;
- report concerns about adults, including low-level concerns, in accordance with School procedures; and
- follow the Staff Code of Conduct and maintain appropriate professional boundaries.

5.6 Volunteers, contractors, agency staff, trainee teachers and visitors

All adults working in or on behalf of the School must receive safeguarding information appropriate to their role and must report concerns immediately. The School will determine required checks, supervision and access arrangements by reference to the nature, frequency and circumstances of the work and the legal definition of regulated activity.

The removal of the supervision exemption from regulated activity from 1 September 2026 will be reflected in the School's vetting of volunteers and other unpaid roles.

5.7 Pupils, parents and carers

Pupils will be taught how to keep themselves and others safe, including online, and how to seek help from a trusted adult. Parents and carers are expected to share information relevant to their child's welfare and to work with the School's safeguarding procedures.

The School will work openly with parents wherever this is safe and appropriate. Information may be shared or action taken without prior parental agreement where consultation would increase risk, compromise an investigation or conflict with the child's best interests.

PART B

RECOGNISING AND ACTING ON CONCERNS

Core staff instruction

If you are concerned about a child: act immediately, record what you know, and speak to the DSL or a Deputy DSL. If they are unavailable, do not delay appropriate action.

6. Safeguarding Systems, Induction and Training

6.1 Systems explained at induction

The following will be explained to all staff as part of induction:

- this Safeguarding and Child Protection Policy;
- the Behaviour Policy and measures to prevent bullying, including cyberbullying and prejudice-based or discriminatory bullying;
- the Staff Code of Conduct, including allegations, low-level concerns and whistleblowing;
- the safeguarding response to children absent from education, particularly repeated or prolonged absence;
- the role and identity of the DSL and Deputy DSLs;
- online safety, including staff responsibilities for filtering and monitoring;
- the School's recording and reporting system; and
- emergency and escalation arrangements.

6.2 Training

All staff will receive appropriate safeguarding and child protection training, including online safety, at induction. Training will be updated regularly. All staff will receive safeguarding and child protection updates as required and at least annually.

Training will be appropriate to the age range and context of Holland House School and will include relevant local risks, child-on-child abuse, harmful sexual behaviour, exploitation, domestic abuse, mental health, SEND, attendance, Prevent, online safety, generative AI, information sharing and concerns about adults.

Governors will receive training appropriate to their strategic and legal responsibilities. Staff involved in recruitment will receive appropriate safer recruitment training.

6.3 Reading KCSIE 2026

All staff must read Part One of KCSIE 2026 in full and confirm annually that they have done so. The former condensed Annex A has been withdrawn. School leaders and staff who work directly with children should also read KCSIE Annex A (Further Information) appropriate to their role.

The School will use declarations, discussion, training and checks for understanding to assist staff to understand and discharge their responsibilities.

6.4 Children taught about safeguarding

The School will teach children how to keep themselves and others safe through an age-appropriate, inclusive and regularly reinforced curriculum. This includes Relationships Education, Health Education, PSHE, online safety and other relevant curriculum and pastoral opportunities.

Preventative education will promote respectful relationships, boundaries, kindness, equality, critical thinking, digital literacy, recognition of unsafe behaviour and confidence to report concerns.

7. Recognising Abuse, Neglect, Exploitation and Modern Slavery

All staff must be alert to indicators of abuse, neglect, exploitation and modern slavery. Safeguarding issues are rarely standalone and multiple forms of harm may overlap.

Children may be at risk inside or outside school, inside or outside the home, in the community and online. Technology may facilitate abuse or cause online and offline harms to occur concurrently.

7.1 Categories of abuse

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. It also includes fabricated or induced illness and may include child-to-parent or caregiver abuse.

Emotional abuse

Emotional abuse is persistent emotional maltreatment causing severe and adverse effects on emotional development. It may include persistent criticism, belittling, name-calling, rejection, silencing, serious bullying, intimidation, age-inappropriate expectations, overprotection, restriction of normal exploration or social interaction, exploitation or corruption.

Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activity, whether or not the child understands what is happening. It may involve contact or non-contact activity and may occur online or be facilitated by technology. Sexual abuse can be perpetrated by adults or by other children.

Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of health or development. It may include failure to provide food, clothing, shelter, supervision, medical care, protection from harm or emotional responsiveness.

7.2 Professional curiosity and cumulative concerns

Staff must consider patterns, chronology and cumulative low-level observations. A single indicator may have an innocent explanation, but a combination of changes in behaviour, appearance, attendance, relationships, emotional state, online activity or achievement may indicate that a child needs help or protection.

Staff must not investigate, seek proof or wait for certainty before reporting a concern.

7.3 Extra-familial harm

Staff must consider whether a child is at risk of harm outside the family, including child-on-child abuse, sexual harassment and violence, exploitation, financial exploitation, serious violence, county lines, radicalisation, stalking or abuse in a child's own relationship.

Detailed provisions on specific safeguarding risks are set out in Part C of this policy.

8. Responding to Concerns and Disclosures

8.1 Immediate action

Any member of staff who has a concern about a child's welfare must act immediately. They must follow this policy and speak to the DSL or a Deputy DSL.

If the child is in immediate danger, requires urgent medical attention or a crime is in progress, staff must call 999 and take reasonable steps to protect the child. The DSL must be informed as soon as practicable.

8.2 If the DSL or a Deputy DSL is unavailable

Unavailability of the DSL or a Deputy DSL must not delay action. Staff should speak to a member of the senior leadership team and/or seek advice directly from local authority children's social care. Any action taken must be shared with the DSL or a Deputy DSL as soon as practicable.

8.3 Receiving a disclosure

When a child tells an adult about abuse, neglect, exploitation or another safeguarding concern, the adult must:

- listen carefully and remain calm;
- give the child time and take the child seriously;
- reassure the child that they have done the right thing by speaking;
- not promise confidentiality or secrecy;
- explain that information will be shared only with people who need to help keep the child safe;
- avoid leading, suggestive, repeated or investigative questions;
- use open prompts only where clarification is essential, such as 'Tell me what happened';
- not ask the child to repeat the account unnecessarily;
- record the child's words accurately as soon as possible; and
- report immediately to the DSL or a Deputy DSL.

8.4 Reassurance and language

A child must never be given the impression that they are creating a problem by reporting abuse, neglect or exploitation. They must not be made to feel ashamed. Staff will explain what is likely to happen next in a way the child can understand.

8.5 Staff must not investigate

Staff must not investigate allegations, confront an alleged perpetrator, contact family members where this may increase risk, search a child's device or attempt to gather evidence unless specifically directed under an authorised safeguarding process.

The role of staff is to recognise, respond, record and report.

8.6 Recording

The member of staff must make a clear, factual and contemporaneous record that includes:

- the date, time and place of the concern or disclosure;
- what was observed or reported;
- the child's exact words where possible;
- the names of relevant people and witnesses;
- any immediate action taken; and
- the date, time and method by which the concern was passed to the DSL or a Deputy DSL.

The record must distinguish observation, direct speech, professional opinion and historical information.

8.7 Escalation

If a member of staff believes that a child remains at risk or that appropriate action has not been taken, they must escalate the concern to the DSL, Headteacher, Chair of Governors, children's social care, the

LADO or the police as appropriate. No person will be disadvantaged for raising a genuine safeguarding concern in good faith.

9. Family Help and Referrals to Statutory Services

9.1 Support before statutory intervention

Any child may benefit from support before statutory intervention. The DSL will consider whether needs can be met through the School's pastoral arrangements, universal services, community-based early help or the targeted early help level of Family Help.

The School will not allow the provision of early support to delay a referral where the threshold for statutory assessment or child protection action may be met.

9.2 Family Help assessment

Where appropriate, the DSL or a Deputy DSL will liaise with other agencies and support an assessment. A practitioner outside social care may lead an assessment where this is consistent with local arrangements, the family's needs and the competence of the practitioner.

The School will follow Barnet's published thresholds, assessment protocols and escalation procedures. Cases will be kept under review and escalated if the child's circumstances do not improve or the level of concern increases.

9.3 Referral to children's social care

A referral to local authority children's social care will be made without delay where:

- a child may be in need under section 17 of the Children Act 1989;
- there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm under section 47 of the Children Act 1989;
- the concern involves suspected abuse, neglect, exploitation, trafficking or modern slavery requiring statutory assessment; or
- advice from children's social care indicates that a referral is required.

9.4 Direct referrals by staff

Any member of staff may make a direct referral to children's social care or the police. Staff should ordinarily discuss the concern with the DSL first, but must not delay where urgent action is required. The DSL must be informed of any direct referral as soon as practicable.

9.5 Parents and carers

Parents and carers will normally be informed and involved in support and referrals. They will not be informed in advance where doing so may increase risk to the child or another person, lead to the loss or destruction of evidence, compromise a police or social care investigation, or conflict with advice from a safeguarding agency.

The rationale for decisions about parental involvement will be recorded.

9.6 Following a referral

The School will cooperate with assessments, strategy discussions, child protection conferences and other multi-agency processes. Staff may be required to provide information, attend meetings and support an agreed plan.

If the School does not receive an appropriate response, or believes that risk remains, the DSL will follow local escalation procedures and continue to pursue the concern.

10. Information Sharing, Confidentiality and Record Keeping

10.1 Information sharing principles

Timely and appropriate information sharing is essential to safeguard children. Data protection laws do not prevent the sharing of information for safeguarding purposes and must not be used as a reason for inaction.

Information will be shared on a lawful, necessary, proportionate, relevant, accurate, timely and secure basis. The School will consider the purpose of sharing, the potential benefits and risks, who needs the information and how it can be shared safely.

10.2 Consent and transparency

Consent is not always required to share safeguarding information. Staff should be as open as possible with the child and family about what will be shared and why, provided that it is safe and appropriate to do so.

Where information is shared without consent, or contrary to a person's wishes, the legal basis and safeguarding rationale will be recorded.

10.3 Confidentiality

Safeguarding information is confidential but is not secret. It will be shared only with those who need it to safeguard or support a child. Staff must not discuss safeguarding matters with colleagues who have no professional need to know.

No member of staff may promise a child that information will not be shared.

10.4 Child protection records

The DSL is responsible for ensuring that child protection files are current, secure and accessible only to authorised persons. It is good practice for each child to have a separate child protection file.

Records will include:

- a clear and comprehensive summary of the concern;
- details of follow-up and resolution;
- actions taken, decisions reached, outcomes and the rationale for decisions;
- whether referrals were made or not made and why; and
- relevant current risk, context and support needs.

10.5 Transfer of files

When a child leaves the School, the DSL will ensure that the child protection file is transferred securely and separately from the main pupil file as soon as possible:

- within five days for an in-year transfer; or
- within the first five days of the start of a new term.

Confirmation of receipt will be obtained. The file will include a clear, structured summary distinguishing current concerns and support needs from historic information.

Where necessary, the DSL will speak directly with the receiving DSL and share relevant information in advance so that risks and support can be planned before the child arrives.

10.6 Receiving safeguarding records

Safeguarding information received by Holland House School will be reviewed promptly by an appropriately trained person. The School will seek clarification where information is incomplete or unclear and will use the information to support, not disadvantage, the child.

Relevant information will be shared with the SENCO, teachers, pastoral staff or other professionals on a need-to-know basis.

10.7 Retention and security

Safeguarding records will be retained and disposed of in accordance with current legal requirements and the School's records management arrangements. Electronic systems will be protected by appropriate access controls, audit trails and information security measures.

PART C

SPECIFIC SAFEGUARDING RISKS AND CONTEXTUAL HARMS

Whole-school principle

Specific safeguarding issues frequently overlap. Staff must not attempt to fit a child's experience into a single label. They must consider the whole safeguarding picture, act promptly and follow Sections 8 to 10.

11. Child-on-Child Abuse and Harmful Sexual Behaviour

Holland House School recognises that children can abuse other children and that this can occur inside or outside school, online or offline, as a single incident or as part of a pattern. Child-on-child abuse is a safeguarding issue for the child who has experienced harm, the child alleged to have caused harm and any other children affected.

The School adopts a zero-tolerance approach to abuse. Behaviour will never be dismissed as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. The absence of reports will never be taken to mean that abuse is not occurring.

11.1 Forms of child-on-child abuse

Child-on-child abuse may include, but is not limited to:

- bullying, including cyberbullying and prejudice-based or discriminatory bullying;
- physical abuse, serious assault, the threat of physical harm or threats involving a weapon;
- harmful sexual behaviour, sexual harassment and sexual violence, including conduct involving misogyny or misandry;
- abuse within intimate personal relationships between children;
- causing another person to engage in sexual activity without consent;
- consensual or non-consensual making or sharing of nude or semi-nude images or videos, including images generated or altered using artificial intelligence;
- upskirting;
- coercion, intimidation, exploitation, stalking or controlling behaviour; and
- initiation or hazing-type violence, abuse or humiliation, including online elements.

11.2 Prevention and culture

The School will minimise the risk of child-on-child abuse through clear standards of behaviour, effective supervision, pastoral care, staff vigilance, an age-appropriate curriculum and prompt challenge of inappropriate conduct.

Preventative education will help pupils to understand:

- kindness, respect, equality, personal boundaries and healthy relationships;
- that abuse, harassment and violence are never acceptable and are never the fault of the child experiencing them;
- how to recognise unsafe, coercive, sexualised or controlling behaviour;
- how online behaviour can cause serious harm;
- how to seek help for themselves or another child; and
- that reporting concerns is responsible and will be taken seriously.

11.3 Pupil reporting systems

Pupils may report a concern to any trusted adult. Holland House School promotes reporting routes through assemblies, PSHE and Relationships Education, classroom discussion and pastoral conversations.

Each classroom has an 'Ask It Basket' in which pupils may leave a note for their teacher. Form teachers also hold individual check-in meetings with pupils at least once each term, and more frequently where required. These arrangements do not replace the responsibility of every member of staff to notice concerns and respond to a child's communication.

11.4 Responding to a report

A report of child-on-child abuse must be acted upon immediately under Section 8. Staff must safeguard the children involved, make an accurate record and inform the DSL or a Deputy DSL. Staff must not investigate, mediate, ask children to confront one another or attempt to determine guilt.

The DSL will undertake an initial safeguarding and risk assessment that considers:

- the nature, seriousness and frequency of the behaviour;
- the ages, developmental stages, understanding and needs of the children involved;
- any difference in power, size, status, ability, social influence or access to technology;
- whether the behaviour was consensual, coercive, exploitative or part of a wider pattern;
- the immediate and continuing safety of all children;
- the wishes and feelings of the child who has experienced harm;
- whether any child involved may be experiencing abuse, trauma or exploitation elsewhere;
- the need for referral to children's social care, the police or specialist services; and
- the effect on witnesses, siblings, friendship groups, classes and the wider school environment.

11.5 Sexual harassment, sexual violence and harmful sexual behaviour

Reports of harmful sexual behaviour, sexual harassment or sexual violence will be managed in accordance with KCSIE Part Five and the procedures in this policy. The School will not wait for the outcome of a police investigation before taking proportionate steps to safeguard pupils.

The DSL will record the decision-making process and, where appropriate, complete a written risk and needs assessment. Measures may include changes to supervision, timetabling, access to particular areas, online contact, arrival or departure arrangements and pastoral support. The School will avoid measures that unnecessarily isolate or disadvantage the child who has reported harm.

11.6 Nude and semi-nude images, including AI-generated images

Any incident involving nude or semi-nude images or videos, including AI-generated, altered or deepfake material, must be reported immediately to the DSL. Staff must not view, copy, print, forward, save or ask a child to share the image, except where a limited and carefully justified action is authorised under the School's incident procedure.

The DSL will assess safeguarding risk, the need to preserve evidence, whether a crime may have been committed and whether children's social care or the police should be involved. A child will not be treated as responsible for abuse merely because an image of them exists or has been shared.

11.7 Support and ongoing review

The School will provide proportionate support to the child who has experienced harm, the child alleged to have caused harm, witnesses and other affected children. Safeguarding support and disciplinary action are not mutually exclusive.

The DSL will monitor individual incidents and wider patterns, including locations, times, groups, online platforms and repeated behaviours. Relevant findings will inform supervision, curriculum, staff training, policy and governor assurance.

12. Online Safety, Mobile Phones, Generative AI, Filtering and Monitoring

Online safety is an integral and interrelated part of safeguarding at Holland House School. The School will protect and educate pupils and staff in their use of technology and maintain clear mechanisms to identify, intervene in and escalate concerns.

12.1 The four areas of online risk

The School considers the four broad areas of online risk:

- content: exposure to illegal, inappropriate or harmful material, including pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme violence, misinformation, disinformation and conspiracy theories;
- contact: harmful interaction with other users or generative AI applications that simulate interaction, including grooming, peer pressure, exploitation, advertising and adults posing as children;
- conduct: online behaviour that causes or increases the likelihood of harm, including bullying and the creation, sending or receipt of explicit or abusive images, including AI-generated material; and
- commerce: online gambling, inappropriate advertising, phishing, financial scams and other commercial exploitation.

12.2 Whole-school online safety

Online safety will be considered in:

- this policy and all related safeguarding, behaviour, curriculum, data protection and technology policies;
- staff induction, training and professional conduct;
- Relationships Education, Health Education, PSHE and computing;
- the DSL's role and safeguarding oversight;
- procurement and deployment of technology and AI-enabled products;
- parental engagement and remote education; and
- the annual safeguarding and technology risk assessment.

12.3 Pupil mobile phones and connected devices

Holland House School is a mobile phone-free environment for pupils during the school day. Pupils must not have access to a personal mobile phone or other personal connected device during lessons, transitions, breaktime or lunchtime, except where a specific, documented exception has been authorised by the Headteacher for medical, accessibility or safeguarding reasons.

Detailed arrangements for collection, storage, retrieval, breaches and exceptional use are set out in the School's Mobile Phone and Acceptable Use procedures.

12.4 Staff personal devices, photographs and recordings

Staff may bring personal mobile phones to school but must restrict personal use to authorised non-contact times and locations. Personal devices must not be used to photograph, film or record pupils or to store pupil information.

Personal mobile phones, cameras and other devices with imaging or sharing capability must not be used in EYFS areas. Any authorised image or recording of a pupil must be made on School equipment and handled in accordance with consent, data protection and safeguarding procedures.

12.5 Generative artificial intelligence

Only generative AI tools approved by the School may be used for School purposes. Approval will take account of safeguarding, age suitability, product safety, filtering, monitoring, information security, data protection, accuracy, bias, intellectual property and the ability to provide effective adult oversight.

Staff must not:

- enter personal, confidential, safeguarding or special-category data into an unapproved AI system;
- use AI to create, alter or simulate sexual, violent, discriminatory, humiliating or otherwise harmful material involving a pupil or another identifiable person;
- present AI output as verified fact without appropriate checking; or
- permit pupil-facing AI use unless it is authorised, risk assessed, supervised and compatible with the School's filtering and monitoring arrangements.

12.6 Filtering and monitoring

The Board of Governors will ensure that appropriate filtering and monitoring systems operate on School devices and networks. The systems will block harmful and inappropriate content without unreasonably restricting teaching, learning or safeguarding education.

The School will:

- identify and assign clear roles for filtering and monitoring;
- maintain effective monitoring strategies proportionate to the age and needs of pupils and the School's risk profile;
- review filtering and monitoring provision and effectiveness at least once every academic year;
- ensure the annual review is led by the responsible senior leader with support from the DSL and IT support;
- test filtering on internet-connected devices in all relevant locations and retain a record of checks;
- ensure staff understand the systems, their own responsibilities and how to escalate concerns;
- review alerts promptly and take safeguarding action where required; and
- report strategic themes and assurance to the Board of Governors without disclosing unnecessary personal information.

12.7 Information security and access management

Information security and cyber security form part of the School's safeguarding responsibilities. Access to systems and data will be limited according to role, protected by appropriate authentication and reviewed when roles change or employment ends.

Suspected phishing, malware, unauthorised access, data loss or other cyber incidents must be reported immediately through the School's IT and safeguarding procedures.

12.8 Remote education and parental engagement

Where remote education is provided, the School will use approved platforms, professional accounts, appropriate supervision and clear conduct expectations. Parents will be informed about the sites, platforms and forms of online interaction pupils are expected to use.

The School will communicate with parents about online safety, filtering and monitoring, emerging risks and routes for reporting concerns.

12.9 Review

The School will review its approach to online safety at least annually. The review will be supported by a risk assessment that reflects the age of pupils, pupils at greater risk of harm, technologies in use, local and national concerns, incidents and emerging harms.

13. Attendance, Children Absent from Education, Children Missing Education and Elective Home Education

Attendance is everybody's business and is an important safeguarding indicator. Repeated or prolonged absence can be a warning sign of neglect, exploitation, domestic abuse, mental health difficulty, harmful peer relationships, radicalisation or other risk.

13.1 Daily safeguarding response to absence

The School will maintain accurate admission and attendance registers, identify unexplained absence promptly and make timely enquiries to establish the reason for absence and the child's welfare.

Attendance staff and the DSL will share relevant information. The level and urgency of the response will take account of known safeguarding risks, the child's age and vulnerability, previous absence, family circumstances and whether the child has a social worker.

13.2 Persistent and repeated absence

Patterns of lateness, illness, absence on particular days, unexplained absence, repeated leave or sudden deterioration in attendance will be reviewed alongside safeguarding, pastoral, behaviour and attainment information.

Where absence indicates a safeguarding concern, the School will work with the local authority and children's services, offer appropriate support and make a safeguarding referral where necessary. Attendance action must not replace child protection action.

13.3 Children missing education

A child missing education is a child of compulsory school age who is not registered at a school and is not receiving suitable education otherwise. Children missing education are at increased risk of abuse, neglect, exploitation and poor outcomes.

The School will:

- make reasonable enquiries to establish a child's whereabouts and safety;
- work with the local authority on joint reasonable enquiries;
- provide required information when a child joins or leaves the School, including at non-standard transition points;
- not remove a pupil from the admission register unless the legal conditions for deletion are met; and
- refer immediately where absence or loss of contact creates a safeguarding concern.

13.4 Elective home education

The School recognises parents' right to educate their child at home, but also recognises that home education can make some children less visible to services and may not always result in suitable education.

Where a parent expresses an intention to remove a child for elective home education, the School will seek to coordinate a meeting with the parent, the local authority and other relevant professionals before the final decision where possible. This is particularly important where the child has SEND, an Education, Health and Care plan, a social worker or another vulnerability.

The School will consider the child's wishes and welfare, share relevant safeguarding information lawfully and make the required return to the local authority when the pupil's name is deleted from the admission register.

13.5 Alternative or off-site provision

Where the School commissions alternative or off-site provision, Holland House School remains responsible for safeguarding the pupil. The School will complete due diligence, obtain written safeguarding assurance, know where the pupil is during school hours and review attendance, safety and suitability at least half-termly. Any safeguarding concern will trigger an immediate review.

14. Mental Health and Emotional Wellbeing

Holland House School has an important role in promoting positive mental wellbeing, identifying concerns early, providing or arranging targeted support and liaising with specialist services.

Mental health problems can develop into safeguarding concerns and may include self-harm, signs of an eating disorder, suicidal ideation or risk of suicide. They may also indicate that a child has experienced or is at risk of abuse, neglect or exploitation.

14.1 Staff role

Staff must not diagnose mental illness. They are, however, well placed to notice changes in behaviour, relationships, attendance, appearance, eating, concentration, sleep, communication, self-care or educational progress.

Staff will:

- promote wellbeing and resilience through relationships, curriculum and pastoral care;
- observe and identify children who may be struggling or at risk;
- report safeguarding concerns and seek advice from the DSL;
- support early targeted intervention; and
- help children and families access appropriate specialist services where needed.

14.2 Anxiety and emotional distress

Staff will be alert to anxiety that interferes with a child's daily functioning, relationships, learning or attendance. Support will be calm, age appropriate and based on the child's individual needs. Persistent or escalating concerns will be reviewed with parents and appropriate professionals, unless parental involvement would create additional risk.

14.3 Urgent and emergency concerns

Where a child may be at immediate risk of serious self-harm or suicide, staff must treat the matter as an emergency, remain with the child, obtain urgent assistance and call 999 or arrange immediate emergency medical care as appropriate.

Where urgent mental health help is needed but the situation is not an emergency, the DSL or a senior leader will seek timely advice through appropriate NHS or local services.

14.4 Parents, safeguarding and confidentiality

Parents and carers will normally be involved in supporting a child's mental health and wellbeing. The DSL will consider whether and when to inform them, taking account of the child's safety, wishes, age and understanding. Parents will not be contacted first where this could place the child at additional risk.

14.5 Monitoring and whole-school improvement

The DSL, Headteacher and relevant wellbeing lead will monitor patterns and ensure that safeguarding, attendance, SEND, behaviour and pastoral information are considered together. Staff training will include recognition of anxiety, emotional distress and when a mental health concern requires safeguarding action.

15. Exploitation, Modern Slavery, Trafficking, County Lines and Serious Violence

Exploitation is child abuse. It may be criminal, sexual, financial or labour exploitation and may involve trafficking, modern slavery, coercion, manipulation, threats, violence, debt, gifts, status, affection or the promise of protection.

A child cannot consent to being exploited, abused or trafficked. A child who appears to have committed an offence while under coercion or exploitation will be recognised first as a child requiring protection.

15.1 Child criminal exploitation and child sexual exploitation

Child criminal exploitation and child sexual exploitation arise where a person or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal or sexual activity. Exploitation may be one-off or repeated, online or offline, and may be organised by adults or other children.

Indicators may include:

- unexplained money, gifts, possessions or mobile phones;
- association with older people, unfamiliar adults, groups or children known to be exploited;
- going missing, returning late, unexplained travel or repeated absence from education;
- changes in friendships, emotional wellbeing, behaviour or educational performance;
- drug or alcohol misuse, injuries, fear, secrecy, threats or debt;
- sexualised behaviour beyond expected development, concerning online relationships or sexual health concerns; and
- criminal behaviour, carrying weapons or appearing to act under the direction of others.

Indicators may present differently according to the child's sex, age, disability, neurodivergence, communication, social circumstances or the form of exploitation. Staff must avoid stereotypes.

15.2 County lines

County lines is a form of criminal exploitation involving gangs or organised criminal networks using dedicated phone lines or other communication to move and supply drugs, money or other items. Children may be transported, accommodated, threatened, assaulted, placed in debt or compelled to carry weapons.

Where county lines exploitation is suspected, the DSL will consider both child protection and modern slavery referrals and will work with the police and children's social care.

15.3 Modern slavery, trafficking and the National Referral Mechanism

Modern slavery includes human trafficking, slavery, servitude, forced or compulsory labour, forced criminality, sexual and financial exploitation and organ removal.

Where a potential victim is identified, the School will follow child protection procedures and seek a referral through the National Referral Mechanism by an authorised First Responder. The DSL will consider whether the child is entitled to support from an Independent Child Trafficking Guardian.

15.4 Serious violence and weapons

Concerns about a child carrying, threatening with or using a weapon, or being involved in serious violence, must be reported immediately to the DSL. Indicators may include increased absence, new or older associates, reduced attainment, self-harm, injuries, unexplained gifts or possessions and links with criminal networks.

Risk may be heightened before or after school and while pupils travel. The School will listen to pupils and staff, consider locations and times where children feel unsafe and work with parents, police, the local authority and other partners to reduce risk.

15.5 Responding to exploitation

The DSL will assess immediate safety, family and extra-familial risk, online contact, missing episodes, transport, peer relationships and the possibility of overlapping criminal and sexual exploitation. A safeguarding referral will not be delayed because the child denies exploitation or appears loyal to the person or group causing harm.

The School will support the child's continued engagement in education and will avoid language or responses that blame or criminalise the child.

16. Domestic Abuse, Homelessness and Family Adversity

16.1 Domestic abuse

Children who see, hear or experience the effects of domestic abuse are victims in their own right. Domestic abuse may be physical, emotional, sexual or economic and may include coercive or controlling behaviour, abuse by family members, intimate partner violence and child-to-parent or caregiver abuse.

Domestic abuse may affect a child's safety, health, emotional wellbeing, behaviour, attendance, relationships and ability to learn. The School will consider the needs of every child connected to the affected household, including children who were not physically present at an incident.

16.2 Operation Encompass notifications

Where the School receives a police notification that a child may be affected by domestic abuse, the DSL will review the information promptly, consider immediate support and record any action taken. A notification does not replace ordinary safeguarding procedures or the need for a referral where there are welfare concerns.

16.3 Responding safely

Staff must not confront an alleged abuser, attempt family mediation or contact a parent where this may increase risk. The DSL will seek advice from children's social care or the police where necessary before information is shared.

16.4 Homelessness and temporary accommodation

Homelessness, threatened homelessness and unsuitable temporary accommodation can increase safeguarding risk. Indicators may include debt, rent arrears, domestic abuse, overcrowding, frequent moves, loss of possessions, fatigue, poor attendance or sudden changes in transport and contact details.

The School will seek early support, maintain accurate contact information and make a safeguarding referral where accommodation or family circumstances place the child at risk of harm.

16.5 Children with family members in prison and parental offending

Children affected by parental imprisonment or offending may experience stigma, poverty, isolation, anxiety, disrupted care and poor mental health. The School will respond sensitively, protect confidentiality and consider whether pastoral, attendance, Family Help or safeguarding support is required.

16.6 Family adversity

Adult mental ill-health, substance misuse, high-conflict separation, bereavement, financial hardship and caring responsibilities may affect a child's welfare. These circumstances do not automatically indicate abuse, but staff must consider their cumulative impact and report concerns where a child's needs are not being met or risk is increasing.

17. Prevent Duty, Radicalisation and Extremism

The Prevent duty is part of the School's wider safeguarding responsibilities. Holland House School will have due regard to the need to prevent people from becoming terrorists or supporting terrorism.

17.1 Approach to Prevent

The School's approach will address:

- leadership and partnership;
- staff capability, training and referral knowledge; and
- the reduction of environments in which extremist ideas can operate unchallenged.

The School will use a proportionate risk assessment informed by the age of pupils, online risk, local context and national guidance.

17.2 Recognising concerns

There is no single profile of a child susceptible to radicalisation. Staff will be alert to concerning changes in language, relationships, online activity, behaviour, attitudes or interests and to attempts by others to isolate, groom, manipulate or exploit a child.

Strong beliefs, religious observance or political interest do not in themselves indicate radicalisation. Staff must use professional judgement, avoid stereotyping and report concerns to the DSL.

17.3 Curriculum and resilience

Through the curriculum, assemblies and pastoral work, pupils will be helped to develop critical thinking, digital literacy, respect for law, individual liberty, democracy and mutual respect and tolerance of different faiths and beliefs. Teaching will enable pupils to question misinformation and manipulative narratives safely and age appropriately.

17.4 Referral and Channel

The DSL is the School's Prevent lead and will understand local referral arrangements. Where a child may be susceptible to radicalisation, the DSL will assess the concern and may seek advice or make a Prevent referral. A referral is a safeguarding intervention and is not an accusation of criminality.

Where appropriate, the School will cooperate with a Channel panel and contribute relevant information and support. Immediate threats or suspected terrorist activity will be reported to the police.

17.5 Filtering, monitoring and training

The Prevent risk assessment will inform the School's filtering and monitoring arrangements. Staff will receive Prevent training appropriate to their role, and the DSL and deputies will maintain more detailed knowledge of ideology, referral thresholds and Channel procedures.

18. Honour- and Faith-Based Abuse, FGM and Forced Marriage

Honour- or faith-based abuse includes incidents or crimes committed to protect or defend the perceived honour of a family or community. It can include female genital mutilation, forced marriage, breast ironing, coercion, intimidation, physical or emotional abuse and restrictions on a child's freedom.

These forms of abuse may involve a wider family or community network and multiple people. All such conduct is abuse regardless of the claimed motivation.

18.1 Responding to concerns

Any concern about honour- or faith-based abuse must be reported immediately to the DSL or a Deputy DSL. Staff must not contact or confront family or community members, attempt mediation, disclose a child's location or arrange a family meeting without safeguarding advice.

The DSL will follow local procedures and liaise with children's social care, the police or relevant specialist services. A child's travel plans, passport access, extended absence or proposed overseas visit may require urgent consideration.

18.2 Female genital mutilation

Female genital mutilation comprises procedures involving partial or total removal of external female genitalia or other injury to female genital organs for non-medical reasons. It is illegal and is child abuse.

Indicators of risk or that FGM may have occurred must be reported to the DSL. Staff must not examine a child or seek visual evidence.

18.3 Mandatory reporting duty for teachers

A teacher who, in the course of professional work, discovers through a disclosure by the child or visual evidence that FGM appears to have been carried out on a girl under 18 must personally report the matter to the police. Unless there is a good reason not to do so, the teacher should also inform the DSL and children's social care as appropriate.

The personal police-reporting duty does not apply to suspected or at-risk cases where FGM has not been discovered. Those concerns must be managed through the School's ordinary safeguarding procedures.

18.4 Forced marriage and child marriage

A forced marriage is entered into without the full and free consent of one or both parties and involves violence, threats or another form of coercion. A person may be unable to consent because of a learning disability or other reason.

It is also a criminal offence to carry out conduct intended to cause a child to marry before their eighteenth birthday, even where violence, threats or coercion are not used. This includes non-binding and unofficial marriages.

Staff must report any concern immediately and must not contact family members or attempt reconciliation. The DSL may seek advice from the Forced Marriage Unit, children's social care or the police.

PART D

CHILDREN REQUIRING TAILORED SAFEGUARDING AND SUPPORT

Individualised protection

The same safeguarding principles apply to every pupil, but some children require additional professional curiosity, reasonable adjustments, coordinated planning or specialised support.

19. Children with Social Workers, Looked-After and Previously Looked-After Children, Kinship Care, Private Fostering and Young Carers

Holland House School recognises that children known to social care, children living away from their parents and children undertaking caring responsibilities may have additional vulnerabilities. Information about these circumstances will be used sensitively to support safety, attendance, wellbeing and educational outcomes.

19.1 Children with a social worker

The DSL will hold and use information about whether a child has a social worker, the social worker's contact details and the reasons for involvement where this is relevant to safeguarding or educational support.

This information may inform decisions about:

- the urgency and nature of the School's response to absence, behaviour, emotional distress or a change in circumstances;
- the support required to promote attendance, engagement and academic progress;
- how and when parents or carers should be contacted;
- whether information should be shared with staff on a need-to-know basis; and
- how the School contributes to Child in Need, child protection, Family Help or other multi-agency plans.

19.2 Looked-after and previously looked-after children

The School will maintain the information necessary to safeguard and promote the welfare of looked-after and previously looked-after children, including the child's legal status, care arrangements, social worker and relevant virtual school head contact details.

The Headteacher will appoint an appropriately trained member of staff to take lead responsibility for promoting the educational achievement of looked-after and previously looked-after children. This role will work closely with the DSL and will not replace the DSL's safeguarding responsibilities.

19.3 Kinship care

The School will recognise and support children living in kinship care. Staff will not assume that a kinship arrangement removes safeguarding risk or that it necessarily requires statutory intervention. The child's legal status, care arrangements, wishes, stability and support needs will be considered individually.

19.4 Private fostering

A private fostering arrangement may arise where a child under 16, or under 18 if disabled, is cared for and accommodated by a person who is not a parent, person with parental responsibility or close relative for 28 days or more, outside the circumstances excluded by law.

Where staff become aware of an actual or proposed private fostering arrangement, they must inform the DSL. The DSL will notify the local authority so that required checks and support can be considered.

19.5 Young carers

Young carers may experience stress, fatigue, anxiety, isolation, disrupted attendance or reduced opportunities to learn and socialise. Staff will identify possible caring responsibilities sensitively and consider whether the child and family would benefit from Family Help, pastoral support or a safeguarding referral.

19.6 Information sharing and dignity

Information about a child's care status, social worker or family circumstances will be shared only with those who need it to safeguard or support the child. Staff will avoid language or assumptions that stigmatise the child or lower expectations.

20. Restrictive Interventions, Reasonable Force, Restraint and Seclusion

Holland House School seeks to prevent and minimise restrictive intervention through a calm environment, positive relationships, reasonable adjustments, early support, effective behaviour practice and de-escalation.

Reasonable force is not a punishment and must never be used to cause pain, humiliate, intimidate or secure compliance where there is no lawful purpose. Any intervention must be necessary, proportionate, reasonable in the circumstances and used for the shortest time and with the minimum force required.

20.1 Lawful circumstances

A member of staff with lawful authority may use reasonable force to prevent a pupil from:

- committing a criminal offence;
- injuring themselves or another person;
- damaging property; or
- prejudicing the maintenance of good order and discipline at the School or among pupils receiving education, whether during a teaching session or otherwise.

Whether force is reasonable depends on the individual circumstances, including the seriousness and immediacy of the risk, the pupil's age, understanding, needs and vulnerabilities, and the availability of a safer alternative.

20.2 Prevention and de-escalation

Staff should use prevention and de-escalation wherever it is safe and practicable. Strategies may include:

- calm and respectful communication;
- reducing demands, noise, audience or stimulation;
- offering time, space, reassurance, choice or a trusted adult;
- redirecting other pupils and seeking assistance;
- using known communication or sensory strategies;
- following an individual plan or risk assessment; and
- contacting parents, specialist staff or emergency services where appropriate.

20.3 Planning for foreseeable risk

Where a pupil is known to be at increased risk of behaviour that may lead to restrictive intervention, the School will consider an individual support plan and risk assessment with the pupil, parents, relevant staff and external professionals where appropriate.

Plans will identify triggers, communication needs, reasonable adjustments, preventative strategies, preferred de-escalation, emergency responses and post-incident support. A plan does not authorise unnecessary or disproportionate force.

20.4 Restraint

Restraint is a non-disciplinary restrictive intervention that immobilises a pupil or limits movement. It may or may not involve direct physical contact; examples include holding a pupil's arms or removing a mobility aid. It may be used only where lawful, necessary and proportionate. Staff must continually review the pupil's presentation and end the restraint as soon as the risk has reduced sufficiently.

Any technique that deliberately restricts breathing, applies pressure to the neck, throat, chest or abdomen, or creates a foreseeable risk of positional asphyxia is prohibited.

20.5 Seclusion and withdrawal

Seclusion means the supervised confinement and isolation of a pupil in a space they are prevented from leaving freely. Seclusion may be used only as a safety measure, never as punishment or for convenience.

A secluded pupil must be supervised continuously, treated with dignity, supported to regulate and released as soon as the immediate safety risk has reduced. A pupil must not be locked alone in a room or left without the ability to obtain help.

A calm or withdrawal space that a pupil enters voluntarily and can leave freely is not seclusion, but its use must still be appropriate, supervised and reviewed.

20.6 Medical and safeguarding response

Following an intervention, staff will check the physical and emotional welfare of the pupil and others involved, arrange first aid or medical treatment where necessary and consider whether the incident raises a safeguarding concern.

Where there is concern about injury, breathing, consciousness or serious distress, emergency medical assistance must be sought without delay.

20.7 Recording

Every incident of restraint and every incident of seclusion must be recorded. Any other significant use of force must also be recorded as soon as practicable and ideally on the same day.

The record will include, as a minimum:

- the date, time, duration and location;
- the pupil and adults involved and any witnesses;
- the circumstances, known triggers and immediate risk;
- the preventative and de-escalation strategies attempted;
- the type, duration and reason for the intervention;
- how the intervention ended;
- injuries, first aid or medical attention;
- the pupil's account and views, when they are able to give them;
- post-incident support, debrief and review;
- parental notification; and
- any safeguarding, risk assessment, training or policy action arising.

20.8 Informing parents

Parents or carers must be given written information about every incident of restraint or seclusion and every significant use of force as soon as practicable, ideally on the same day.

Information will not be sent to a parent where doing so would be likely to cause serious harm to the pupil. In that exceptional situation, the School will provide the information to another safe parent or carer or to the local authority and will record the reason for the decision.

20.9 Post-incident review and support

The School will offer an age-appropriate opportunity for the pupil and staff to reflect when calm. The review will consider the pupil's views, whether the intervention was lawful and proportionate, what could reduce recurrence and whether additional support, reasonable adjustments, training or external advice are required.

The Headteacher and DSL will review incidents for safeguarding concerns and patterns. Anonymised information will be reported to governors as part of safeguarding and behaviour oversight.

20.10 Complaints and allegations

Any complaint or concern that force was unnecessary, excessive, unsafe or punitive will be considered promptly. Where the concern may meet the harm threshold or may constitute a low-level concern, the procedures in Sections 23 and 24 will apply.

21. Medical Conditions, Allergy Safety, Medicines and Exceptional Intimate Care

Holland House School will support pupils with medical conditions and allergies so that they are safe, included and able to participate fully in school life. Medical and allergy arrangements will be child-centred, proportionate and developed with parents and relevant health professionals.

21.1 Supporting pupils with medical conditions

The School will maintain arrangements consistent with current Department for Education guidance, the Equality Act 2010, the EYFS framework and its duty of care.

Where appropriate, an individual healthcare plan will set out:

- the condition, signs, symptoms and triggers;
- medication, treatment and emergency action;
- the pupil's own understanding and ability to manage the condition;
- staff roles, training and cover;
- reasonable adjustments and educational support;
- arrangements for meals, physical activity, trips and residential visits; and
- review and communication arrangements.

21.2 Allergy safety policy and leadership

The School will maintain and publish a separate Allergy Safety Policy. The Headteacher will appoint a named senior leader to coordinate allergy safety and ensure that responsibilities are understood across teaching, pastoral, catering, premises, trips and governance.

At the date of ratification, the July 2026 Allergy Safety statutory guidance applies directly to maintained schools, academies and pupil referral units. Equivalent requirements for independent schools are expected through the Independent School Standards. Pending commencement of those requirements, Holland House School adopts the relevant standards in that guidance as School policy and will implement any equivalent statutory requirements when they commence.

21.3 Identification and planning

Before admission and whenever information changes, the School will obtain accurate information about allergies, dietary requirements, medication and emergency action. A pupil at risk of anaphylaxis will have an individual healthcare plan or recognised allergy action plan shared with relevant staff.

The School will keep an accessible allergy register, protect confidentiality and ensure that those preparing, serving or supervising food have the information they require.

21.4 Staff training

All staff will receive allergy awareness and emergency-response training at induction and at least annually. Training will cover recognition of allergic reactions, anaphylaxis, the pupil's action plan, use of an adrenaline auto-injector, calling emergency services and post-incident action.

Staff with specific responsibilities will receive additional practical training. The School will maintain training records and ensure adequate trained cover.

21.5 Emergency medication and spare adrenaline auto-injectors

Prescribed emergency medication must be readily accessible, within date and available wherever the pupil is participating in School activity. It must not be locked away in a manner that delays access.

The School will stock suitable spare adrenaline auto-injectors in accordance with current legal and clinical guidance and will maintain arrangements for checking, storage, access and replacement.

In a suspected anaphylactic emergency, staff will follow the child's action plan and emergency guidance, administer adrenaline without delay where indicated, call 999 and monitor the child until emergency help arrives.

21.6 Reducing risk

The School will take reasonable steps to reduce foreseeable allergy risk, including:

- safe procurement, preparation, storage and service of food;
- clear communication with catering staff, staff, pupils and parents;
- consideration of crafts, science, cooking, celebrations, rewards and shared equipment;
- appropriate supervision while pupils eat;
- trip and off-site risk assessment;
- avoiding blanket exclusions that unnecessarily restrict a pupil; and
- promoting a respectful culture in which allergy bullying, deliberate exposure or misuse of medication is treated seriously.

21.7 Incidents and near misses

All allergic reactions, anaphylaxis incidents and significant near misses will be recorded. Parents will be informed promptly. The School will review what occurred, identify learning, update plans and risk controls and provide wellbeing support where appropriate.

Serious or repeated incidents will be reported to the Board of Governors in an anonymised form and notified externally where required.

21.8 Administration of medicines

Medicines will be received, stored, administered and recorded under the School's Administration of Medicines procedures. Staff will not administer medication for which they are not trained or authorised, except where emergency action is lawful and necessary.

A pupil who is competent to carry and use their own emergency medication may do so where this is agreed and recorded, with a back-up arrangement where appropriate.

21.9 Educational visits and activities

Planning for trips, residential visits, sport and off-site activities will include medical and allergy needs, trained staff, medication, emergency access, food arrangements and communication with providers. A pupil will not be excluded solely because of a medical condition or allergy where reasonable adjustments can make participation safe.

21.10 Exceptional intimate care

The School does not routinely provide planned intimate care, but will make reasonable adjustments and suitable arrangements where required by a child's age, disability, medical need or circumstances. A child may also require assistance following illness, injury or an accident.

Where intimate care is necessary, staff will:

- preserve the child's dignity, privacy and safety;
- explain what is happening and seek the child's cooperation;
- use the minimum assistance required;
- follow any individual care plan or parental agreement;
- ensure, where practicable, that another adult is aware and available without unnecessarily compromising privacy;
- record significant or unusual care; and
- report any safeguarding concern immediately.

PART E

SAFER PEOPLE AND CONCERNS ABOUT ADULTS

Culture of vigilance

Safeguarding begins before appointment and continues throughout employment or service. Every concern about an adult must be shared through the correct route and considered in context.

22. Safer Recruitment, Regulated Activity and Ongoing Suitability

Holland House School is committed to deterring, identifying and rejecting applicants who are unsuitable to work with children and to maintaining vigilance throughout employment or service.

This section should be read with the School's Safer Recruitment Policy and Single Central Record procedures.

22.1 Recruitment planning and trained decision-making

At least one person involved in the recruitment process will have completed appropriate safer recruitment training. Safeguarding responsibilities and the School's commitment to child protection will be reflected in advertisements, job descriptions, person specifications and candidate information.

22.2 Application and employment history

The School will use a structured application form and will not accept a curriculum vitae in place of a completed application. Applicants will provide a full chronological history of employment, voluntary activity and education and explain any gaps or inconsistencies.

Shortlisted candidates will complete an appropriate self-declaration regarding criminal history, suitability, conduct, disqualification and other matters relevant to work with children.

22.3 Shortlisting and online searches

Shortlisting will be undertaken consistently against the person specification. The School will consider an online search as part of due diligence on shortlisted candidates and will inform candidates that this may take place.

Any search will be proportionate, relevant to suitability to work with children and considered fairly. Information that may reveal a protected characteristic will not be used unlawfully.

22.4 References

References will normally be obtained before interview where practicable, sought directly from the referee and verified. Open references or testimonials supplied by the applicant will not be accepted as sufficient.

References will seek objective information about:

- dates and role;
- performance and conduct;
- reason for leaving;
- disciplinary or safeguarding concerns relevant to suitability;
- whether the referee is satisfied that the applicant is suitable to work with children; and
- any inconsistencies with the application.

22.5 Interview and selection

The selection process will explore motivation, values, safeguarding understanding, professional boundaries, employment gaps and any concerns arising from the application, references or online search. Decisions and the resolution of material discrepancies will be recorded.

22.6 Pre-appointment checks

The School will complete all checks required for the particular role, which may include:

- identity and right to work in the United Kingdom;
- enhanced Disclosure and Barring Service checks and barred-list information where legally permitted and required;
- prohibition from teaching and other professional sanctions or restrictions;
- section 128 or prohibition from management checks where applicable;
- qualifications required for the role;
- overseas criminal-record or professional checks and additional risk assessment;
- medical fitness to perform the role after a conditional offer, handled lawfully;
- disqualification from childcare requirements where applicable; and
- any further check required by law, KCSIE, the Independent School Standards or the EYFS framework.

No person will begin regulated activity until required checks are complete, except where the law permits a carefully risk-assessed and supervised start and the Headteacher has authorised it in writing.

22.7 Regulated activity from 1 September 2026

From 1 September 2026, the supervision exemption is removed from the definition of regulated activity with children. The School will apply the amended definition when determining barred-list checks, particularly for volunteers and unpaid roles.

This does not make every occasional volunteer regulated activity. Teaching, training, instructing, caring for or supervising children must still be carried out frequently, on more than 3 days in a 30-day period, or overnight for the amended rule to apply, unless the activity is always regulated regardless of frequency.

A person who is barred must never be permitted to engage in regulated activity. The School will not knowingly request barred-list information unless legally entitled to do so.

22.8 Single Central Record

The School will maintain an accurate Single Central Record containing the checks required for staff, supply staff, governors and other categories specified by law and the Independent School Standards.

The Record will be maintained contemporaneously and audited regularly by an appropriately knowledgeable person. Supporting evidence and decision records will be retained securely in accordance with data protection and records management requirements.

22.9 Volunteers

The School will determine whether a volunteer is in regulated activity and will obtain the checks required by law. A volunteer in regulated activity will require an enhanced DBS check with barred-list information.

For a volunteer who is not in regulated activity, the School will complete and record a proportionate risk assessment considering the role, frequency, supervision, existing knowledge, references and contact with children. An unchecked volunteer must not be left unsupervised or permitted to undertake regulated activity.

22.10 Supply staff, agency staff, trainee teachers and contractors

The School will obtain written confirmation from an employment business, agency, training provider or contractor that required checks have been completed and will verify the identity of the individual on arrival.

Where the School has concerns about the conduct or suitability of a supply teacher, agency worker, trainee or contractor, it will follow Section 23, involve the employing body and make referrals where required. The School will not simply end the placement without addressing safeguarding risk.

22.11 Visitors and speakers

Visitors will be identified, signed in, given safeguarding information and supervised according to risk. The School will assess external speakers and activities to ensure they do not expose pupils to extremist, discriminatory, unsafe or otherwise inappropriate content.

22.12 Ongoing suitability and duty to refer

All adults must disclose promptly any change that may affect their suitability. The School will consider concerns arising inside or outside work, including criminal allegations, online conduct, relationships, disqualification or other transferable risk.

Where the legal conditions are met, the School will make a referral to the Disclosure and Barring Service as soon as possible after removing a person from regulated activity, whether through dismissal, redeployment, suspension, resignation or cessation of volunteering. A referral to the Teaching Regulation Agency or another regulator will be made where required.

22.13 Use of School premises and external providers

Where the School hires or makes premises available to another organisation, the agreement will require appropriate safeguarding and child protection arrangements. The School will seek written assurance and may inspect procedures. A material safeguarding failure may result in suspension or termination of the arrangement.

23. Concerns or Allegations That May Meet the Harm Threshold

This section applies to concerns or allegations about staff, supply staff, trainee teachers, volunteers, governors, contractors and any other adult working in or on behalf of the School.

23.1 Harm threshold

The procedure applies where a person has:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour outside the School that may present transferable risk.

23.2 Reporting route

A concern or allegation must be reported immediately as follows:

- about a member of staff, supply staff, volunteer, trainee, contractor or other adult: to the Headteacher;
- about the Headteacher: to the Chair of Governors;
- about the Chair of Governors or where there is a conflict: to another non-conflicted Governor authorised by the Board and the LADO; and
- where the concern is raised by the Headteacher about themselves: directly to the Chair of Governors and the LADO.

If there is uncertainty about whether the threshold is met, the case manager will seek advice from the LADO. Staff must not investigate the matter, alert the person concerned or discuss it unnecessarily.

23.3 Immediate safeguarding action

The case manager will first consider the immediate safety of children, whether urgent medical care or police action is required, whether the adult should be removed from contact with children and what information must be preserved.

The case manager may establish only the basic facts necessary to clarify the nature of the concern and to inform consultation. They must not undertake an investigation that could compromise police, social care, LADO or disciplinary processes.

23.4 LADO and multi-agency management

The case manager will contact the Barnet LADO through MASH without delay and within Barnet's published one-working-day timescale where the harm threshold may be met. The School will follow LADO advice regarding police, children's social care, regulatory, employment and communication arrangements.

23.5 Suspension and alternatives

Suspension is a neutral act and will not be automatic. The case manager will consider whether the risk can be managed safely through an alternative such as redeployment, additional supervision, restricted duties or temporary removal from particular activities.

A decision to suspend will be based on safeguarding risk, the integrity of any investigation and fair employment practice, taking account of LADO or police advice.

23.6 Supply staff and adults employed by another organisation

Where the individual is employed by an agency, contractor or another organisation, the School will take the lead in managing the safeguarding concern on site and will work with the employer and LADO. The School will participate fully in meetings and will not cease using the person as a substitute for proper investigation and referral.

23.7 Support, confidentiality and communication

The School will consider appropriate support for the child, parents, the person who is the subject of the allegation and staff managing the case. Information will be shared only with those who need to know.

The School will follow statutory restrictions on publication and will take reasonable steps to protect confidentiality, while recognising that information may need to be shared to safeguard children and ensure a fair process.

23.8 Outcomes and records

The outcome will be recorded using the terminology in KCSIE, including substantiated, malicious, false, unsubstantiated or unfounded as appropriate. The record will include the allegation, action, decisions, outcome and reasons.

Records will be retained and disclosed in references only in accordance with KCSIE, data protection law and employment law.

23.9 Referrals and learning lessons

At the conclusion of the process, the case manager will consider referrals to the DBS, Teaching Regulation Agency or another regulator and whether policies, supervision, training, premises or practice require improvement.

Where the individual returns to work, the School will consider a planned and supported return, proportionate communication and any necessary risk controls.

24. Low-Level Concerns, Professional Conduct and Whistleblowing

Holland House School promotes an open culture in which all concerns about adults are shared, however small they may appear. A low-level concern does not mean that the concern is insignificant.

24.1 Definition

A low-level concern is any concern, no matter how small and even if it amounts only to a sense of unease, that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but does not meet the harm threshold in Section 23.

Examples may include an adult who:

- is over-friendly with children or shows favouritism;
- uses humiliating, intimidating, sexualised, prejudicial or inappropriate language;
- engages in one-to-one contact in a secluded area or behind a closed door without good reason;
- uses personal devices, accounts or social media contrary to School rules;
- takes photographs or recordings inappropriately;
- fails to maintain appropriate touch, transport, gift or communication boundaries;
- uses force or restraint in a manner inconsistent with School policy; or
- otherwise behaves in a way that causes concern about professional judgement or boundaries.

24.2 Reporting and self-referral

Low-level concerns about any adult must be reported promptly to the Headteacher. A concern about the Headteacher must be reported to the Chair of Governors.

Staff are encouraged to self-refer where they believe they may have acted in a way that could be misunderstood, fallen below expected standards or placed themselves in a situation that may compromise professional boundaries.

24.3 Initial response and threshold decision

The Headteacher will gather sufficient information to understand the concern, speak to the person who raised it and, where appropriate, the person concerned and witnesses. The Headteacher retains ultimate responsibility for deciding how the matter is managed.

If at any stage the harm threshold may be met, the low-level process will stop and Section 23 will apply. LADO advice will be sought where there is doubt.

24.4 Records and patterns

Low-level concerns will be recorded in writing, kept securely and reviewed to identify patterns, repeated boundary issues, cultural concerns or links with other information.

Records will be retained at least until the individual leaves the School and longer where required by the School's retention schedule, legal advice or the nature of the concern.

24.5 References

Low-level concerns will not be included in a reference unless they relate to matters that would normally be included, for example because they have met the harm threshold, resulted in substantiated disciplinary action or otherwise form part of relevant factual employment information.

24.6 Professional boundaries

All adults must comply with the Staff Code of Conduct and maintain clear boundaries in person and online. They must use authorised communication channels, avoid private or secret contact, protect pupil information and report any accidental or unavoidable boundary concern.

24.7 Whistleblowing

Staff, volunteers and students on placement must raise concerns about unsafe practice, failures to follow safeguarding procedures, concealment, retaliation or wrongdoing through the School's Whistleblowing Policy.

A person who feels unable to raise a concern internally or believes that a genuine concern has not been addressed may contact the NSPCC Whistleblowing Advice Line or an appropriate statutory body. No person will suffer detriment for raising a genuine concern in good faith.

PART F

EYFS, GOVERNANCE AND POLICY ASSURANCE

Safeguarding in practice

The policy is effective only when it is implemented, understood, evidenced, reviewed and improved. EYFS requirements are fully integrated into the whole-school framework and receive additional scrutiny where the statutory framework requires it.

25. Early Years Foundation Stage Safeguarding and Welfare Requirements

This policy applies in full to the School's EYFS provision. The School will meet the safeguarding and welfare requirements in the EYFS statutory framework for group and school-based providers effective from 1 September 2026.

25.1 Safeguarding policy requirements

The School's EYFS arrangements include clear procedures for:

- action where there are safeguarding concerns about a child;
- action where an allegation or concern concerns a member of staff, student or volunteer;
- use of mobile phones, cameras and other electronic imaging or recording devices;
- safer recruitment and suitability;
- staff safeguarding training and supervision;
- whistleblowing;
- children absent from or missing education;
- medicines, food, allergy safety, accidents and emergencies; and
- complaints, records and required notifications.

25.2 Suitable people and staffing

The School will ensure that persons looking after children are suitable, have the required checks and qualifications and receive induction, support, supervision and training appropriate to their role.

EYFS staffing and supervision will meet statutory ratios and qualification requirements. Children will be adequately supervised and usually within sight and hearing of staff, taking account of the activity and risk.

25.3 Paediatric first aid

The School will ensure that the required number of staff hold current paediatric first-aid qualifications and that a paediatric first aider is available on the premises and accompanies children on outings where the EYFS framework requires it.

25.4 Key person

Each child will be assigned a key person. The key person will help the child become familiar with the setting, build a settled relationship with the child and parents and support learning, development and wellbeing. The key-person role does not replace the safeguarding responsibility of every adult.

25.5 Absence and contact

Parents must notify the School where a child will be absent. Unexplained or concerning absence will be followed up promptly. Staff will consider patterns of absence, changes in contact, family circumstances and other safeguarding information.

25.6 Mobile phones, cameras and electronic devices

Personal mobile phones, cameras and other personal imaging or recording devices are not permitted in EYFS areas. Staff must not carry a personal mobile phone on their person while working in the EYFS provision. Before entering the EYFS area, staff must place their personal mobile phone in the designated mobile-phone storage box in the School Office, where it must remain while they are working in EYFS. A personal phone may only be accessed outside the EYFS area during an authorised break or, in an

emergency, with the knowledge of the Headteacher or DSL. Visitors, volunteers, students and contractors must also comply with the EYFS no-personal-device requirement. Staff will use only authorised School devices for images or records and will follow consent, storage and data protection procedures.

Any use of screens or internet-connected devices with children will be purposeful, supervised, age appropriate and consistent with the School's online-safety arrangements.

25.7 Medicines, allergy safety, food and safe eating

Before admission, the School will obtain information about medical conditions, allergies and dietary requirements and will share necessary information with staff responsible for food preparation and supervision.

Children will be supervised while eating in a manner appropriate to age and risk. Staff will be alert to choking and allergic reaction, understand emergency procedures and ensure medication is accessible.

25.8 Behaviour, physical intervention and dignity

EYFS behaviour practice will be age appropriate, positive and consistent. Corporal punishment, threats of corporal punishment and any punishment that adversely affects a child's wellbeing are prohibited.

Any physical intervention will be governed by Section 20 and the EYFS statutory framework. The child's dignity, safety and developmental needs will remain central.

25.9 Records, complaints and notifications

EYFS records will be accurate, secure and available for inspection where required. The School will investigate written complaints relating to the fulfilment of EYFS requirements and provide the outcome within the statutory timescale.

The School will make notifications required of its provider category to the appropriate regulator, inspectorate, local authority, DBS or other body within the applicable statutory timescale.

26. Governance, External Providers, Monitoring and Quality Assurance

The Board of Governors recognises safeguarding as its highest priority. It will provide strategic leadership, challenge and assurance while respecting the operational roles of the Headteacher and DSL.

26.1 Safeguarding governor

The Board of Governors will appoint a safeguarding governor who is not the DSL. The safeguarding governor will undertake appropriate training, meet the DSL regularly, review evidence and report to the full Board of Governors. The role supports but does not replace collective governor responsibility.

26.2 Governor assurance

The Board of Governors will receive proportionate assurance regarding:

- safeguarding referrals, themes and outcomes in anonymised form;
- Family Help and multi-agency work;
- attendance and children absent from education;
- online safety, filtering and monitoring;
- child-on-child abuse and behaviour themes;
- allegations and low-level concerns;
- reasonable force, restraint and seclusion;

- medical and allergy safety;
- safer recruitment and the Single Central Record;
- staff and governor training;
- EYFS safeguarding and welfare; and
- audit findings, actions and emerging statutory change.

26.3 Quality assurance activity

Quality assurance may include:

- review of safeguarding files and chronologies;
- Single Central Record audits;
- checks of staff induction, KCSIE declarations and training;
- filtering and monitoring review and device testing;
- review of attendance, behaviour, bullying and wellbeing trends;
- pupil voice and staff understanding;
- governor safeguarding visits;
- review of external-provider assurance and premises use;
- medical, allergy and trip audits;
- review of reasonable-force records and individual plans; and
- follow-up of actions from complaints, incidents, reviews and inspections.

26.4 Listening to pupils and staff

The School will use age-appropriate pupil voice to understand whether pupils feel safe, know how to report concerns and experience any locations, times, relationships or online spaces as unsafe.

Staff will be encouraged to identify barriers, emerging risks and areas where procedures are unclear. Feedback will be considered alongside safeguarding data and professional judgement.

26.5 External providers and non-School activities

Where another body provides services or activities for children on School premises, the School will seek assurance that appropriate safeguarding and child protection policies and procedures are in place and will establish arrangements for information sharing and liaison.

Safeguarding requirements will form part of any premises-use agreement. A failure to comply may lead to immediate protective action and termination of the arrangement.

26.6 Deficiencies and continuous improvement

Any identified safeguarding deficiency will be remedied without delay. The School will learn from incidents, near misses, complaints, audits, local and national safeguarding reviews, changes in law and guidance and inspection findings.

27. Implementation, Complaints, Review and Publication

27.1 Implementation

The Headteacher and DSL will ensure that this policy is translated into practice through induction, training, operational procedures, role descriptions, supervision, record keeping, curriculum, risk assessment and governor oversight.

27.2 Accessibility and publication

The policy will be available to staff and governors and published for parents and carers. A hard copy will be available on request. The School will provide accessible information or reasonable adjustments where required.

27.3 Complaints

Safeguarding concerns will be managed through safeguarding procedures and will not be delayed by the complaints process. A complaint about the way a safeguarding matter has been handled may also be considered under the School's Complaints Policy, provided this does not compromise statutory or employment processes.

27.4 Annual and interim review

The Board of Governors will review this policy at least annually. An interim review will take place where legislation, statutory guidance, local procedures, School arrangements, identified risks or lessons from a case require amendment.

Minor content, role-title or procedural updates may be made under delegated authority where they do not alter the policy's principles or legal effect. Material amendments will be presented to the Board of Governors for approval.

27.5 Pre-ratification assurance

This edition has been checked against the official sources listed in Appendix G and the Barnet contacts in Appendix E. Before ratification, the Board of Governors must satisfy itself that:

- the named safeguarding roles and contact details remain current;
- the titles and ownership of the related School policies in Appendix F are accurate;
- the policy reflects the School's actual operational practice and can be evidenced;
- a safeguarding governor has been appointed and trained, with their details held in the School's governance records;
- volunteer roles affected by the 1 September 2026 regulated-activity change have been audited; and
- the ratification date and review arrangements are entered in Document Control.

27.6 Ratification and commencement

This policy will take effect when ratified by the Board of Governors and on the implementation date stated in Document Control. The approved version will supersede the September 2025 Safeguarding Policy.

APPENDICES

PRACTICAL REFERENCE MATERIAL

Use with professional judgement

The appendices support prompt action and consistent practice. They do not replace training, consultation with the DSL or referral to statutory services.

Appendix A - Indicators and Specific Safeguarding Issues

Indicators do not prove that abuse has occurred. Staff must consider the child's age, development, communication, culture, disability, history and circumstances, and must report concerns rather than investigate.

Physical abuse

- unexplained, repeated or patterned injuries;
- injuries inconsistent with the explanation or developmental ability;
- fear of going home, flinching or covering injuries;
- fabricated or induced illness; and
- a child reporting being hit, shaken, burned, poisoned, suffocated or otherwise harmed.

Emotional abuse

- persistent low self-worth, anxiety, withdrawal or hypervigilance;
- extreme compliance, aggression, developmental regression or attachment difficulty;
- persistent criticism, rejection, humiliation, threats, isolation or unrealistic expectations;
- serious bullying or exposure to domestic abuse; and
- a child describing fear, coercion, degradation or being silenced.

Sexual abuse

- sexual knowledge, language or behaviour beyond expected development;
- fear of a particular person, place or activity;
- pain, injury, infection or other sexual-health concern;
- pregnancy, unexplained gifts or secretive relationships;
- online grooming, sexual requests, image sharing or blackmail; and
- a direct or indirect disclosure.

Neglect

- persistent hunger, poor hygiene, unsuitable clothing or untreated medical need;
- inadequate supervision, unsafe care or frequent absence;
- fatigue, poor growth, developmental delay or emotional unresponsiveness;
- repeated failure to provide medication, food, shelter or protection; and
- exclusion from home or abandonment.

Child-on-child abuse

- injuries, fear, avoidance, friendship changes or reluctance to attend;
- sexualised, coercive, controlling, threatening or humiliating behaviour;
- bullying, online harassment, discriminatory abuse or image sharing;
- power imbalance based on age, status, ability, group influence or access to information; and
- reports that behaviour is being minimised as banter or normal.

Exploitation and serious violence

- missing episodes, unexplained travel, repeated absence or late return;

- older associates, new groups, multiple phones or unexplained money and possessions;
- injuries, threats, fear, debt, carrying weapons or criminal activity;
- sexualised behaviour, concerning relationships or online contact; and
- a child appearing controlled, directed or rewarded by others.

Domestic abuse and family adversity

- fear, anxiety, aggression, withdrawal, poor concentration or tiredness;
- witnessing or experiencing coercion, violence, economic abuse or intimidation;
- frequent moves, temporary accommodation, debt or loss of belongings;
- adult substance misuse or mental ill-health affecting care; and
- a child used to monitor, control or communicate between adults.

Radicalisation

- exposure to extremist material or relationships encouraging violence or hatred;
- increasing secrecy, isolation, intolerance or dehumanising language;
- online grooming, manipulation or fixation on violent ideology; and
- statements indicating support for terrorism or intent to cause harm.

Mental health and self-harm

- significant changes in behaviour, sleep, eating, appearance or relationships;
- withdrawal, hopelessness, self-harm, suicidal thoughts or plans;
- persistent anxiety, distress, unexplained physical complaints or reduced functioning; and
- a sudden decline in attendance, engagement or self-care.

Other safeguarding issues requiring immediate consultation with the DSL

- female genital mutilation, forced marriage, honour- or faith-based abuse;
- modern slavery, trafficking, private fostering or a child missing from education;
- pregnancy in a child, fabricated illness or neglect of medical needs;
- cybercrime, hacking, malware, financial exploitation or sextortion;
- a child carrying or threatening to use a weapon;
- a child expressing suicidal intent or presenting an immediate mental-health emergency;
- a concerning adult relationship, unexplained gifts, secrecy or grooming; and
- any concern that does not fit a category but creates unease about a child's welfare.

Appendix B - Staff Reporting Route: Concern About a Child

Step	Required action
1. Recognise	Notice a concern, receive information or a disclosure, or observe an incident.
2. Protect	If there is immediate danger or urgent medical need, call 999 and take reasonable steps to keep the child safe.

Step	Required action
3. Listen	Remain calm, take the child seriously, do not promise secrecy and do not investigate.
4. Record	Write a factual, contemporaneous account using the child's own words where possible.
5. Report	Speak immediately to the DSL or a Deputy DSL and submit the record through the School's secure system.
6. Do not delay	If no DSL is available, contact senior leadership and/or children's social care or police directly.
7. Follow through	Provide further information and support as requested. Escalate if you believe the child remains at risk.

Remember

Staff do not need proof. Staff must not assume that somebody else will act. The welfare of the child is paramount.

Appendix C - Reporting Route: Concern About an Adult

Type of concern	Reporting route
Concern may meet the harm threshold	Report immediately to the Headteacher. If the concern is about the Headteacher, report to the Chair of Governors. The case manager consults the LADO.
Low-level concern	Report promptly to the Headteacher. If the concern is about the Headteacher, report to the Chair of Governors. The Headteacher decides the response and reviews patterns.
Unsafe practice or concealment	Use the Whistleblowing Policy. External advice may be sought from the NSPCC Whistleblowing Advice Line or the appropriate statutory body.
Immediate danger or suspected crime	Call 999 or 101 as appropriate and inform the case manager as soon as practicable.

No member of staff should investigate, alert the person concerned or discuss the matter with colleagues who do not need to know.

Appendix D - Restrictive Intervention Recording and Reporting Checklist

- ☐ Immediate safety and medical needs have been checked.
- ☐ The pupil and other affected children have been supported.

- ☐ The DSL and Headteacher have been informed.
- ☐ The record identifies the risk, de-escalation, type and duration of intervention, outcome and any injury.
- ☐ The pupil's views have been obtained when they are able to give them.
- ☐ Written information has been provided to the parent or carer as soon as practicable, ideally the same day.
- ☐ Any reason for withholding information from a parent has been recorded and safeguarding advice obtained.
- ☐ A post-incident debrief and review have taken place.
- ☐ The individual plan or risk assessment has been reviewed where applicable.
- ☐ The need for safeguarding, LADO, police, medical, training or disciplinary action has been considered.
- ☐ The incident has been included in pattern and governor oversight as appropriate.

Appendix E - Key Safeguarding Contacts

Internal contacts

Role	Name	Contact
Designated Safeguarding Lead	Raksha Davé	rakshadave@hollandhouse.org.uk
Deputy DSL / Headteacher	Emily Brown	emilybrown@hollandhouse.org.uk
Deputy DSL / Deputy Head	Paul Longman	paullongman@hollandhouse.org.uk
EYFS safeguarding oversight	Emily Brown	emilybrown@hollandhouse.org.uk
Chair of Governors	Parag Mehta	paragmehta@hollandhouse.org.uk

Barnet and emergency contacts

Service	Purpose	Contact
Immediate danger	Police / ambulance	999
Non-emergency police	Metropolitan Police	101
Barnet MASH	Safeguarding concerns and advice	020 8359 4066 mash@barnet.gov.uk Mon-Thu 9.00am-5.15pm; Fri 9.00am-5.00pm online referral required
Barnet Emergency Duty Team	Out-of-hours urgent welfare concerns	020 8359 2000 outside MASH hours for urgent welfare concerns

Service	Purpose	Contact
Barnet LADO	Allegations and transferable-risk concerns about adults	Contact through Barnet MASH; submit the current LADO referral form within Barnet's one-working-day timescale
NSPCC	Advice about a child	0800 800 5000
NSPCC Whistleblowing Advice Line	Concerns about safeguarding practice	0800 028 0285
Childline	Support for children	0800 1111

Barnet MASH hours and referral routes were verified against the official Barnet Council website in July 2026 and must be checked again at each annual review and whenever local arrangements change.

Appendix F - Related School Policies and Procedures

This policy should be read with the following policies and procedures, where maintained separately:

- Staff Code of Conduct;
- Behaviour Policy and Anti-Bullying Policy;
- Low-Level Concerns Procedure;
- Whistleblowing Policy;
- Safer Recruitment Policy and Single Central Record Procedure;
- Online Safety, Acceptable Use, Mobile Phone and Data Protection policies;
- Attendance Policy, Children Missing Education Procedure and Missing Child Procedure;
- Relationships Education, Health Education and RSHE Policy;
- SEND and Equality policies;
- Supporting Pupils with Medical Conditions, Allergy Safety, First Aid and Administration of Medicines policies;
- Restrictive Interventions and Reasonable Force Procedure;
- EYFS policies and procedures;
- Educational Visits Policy;
- Health and Safety and Risk Assessment policies;
- Complaints and Disciplinary procedures;
- Privacy Notices and Records Retention Schedule; and
- Premises Hire and External Providers safeguarding arrangements.

Governor confirmation

At the ratification meeting, Governors should confirm that the exact titles, owners and current versions of the related policies listed above remain accurate and that a trained safeguarding governor is formally appointed.

Appendix G - Official Government Source Schedule

Publication	Issuer	Version / commencement	Status / use
Keeping Children Safe in Education 2026	DfE	Published 7 July 2026; effective 1 September 2026	Statutory guidance for schools and colleges
Working Together to Safeguard Children	DfE	Updated 18 March 2026	Statutory multi-agency guidance
EYFS statutory framework for group and school-based providers	DfE	Effective 1 September 2026	Mandatory framework for school-based providers, including independent schools
Education (Independent School Standards) Regulations 2014 and DfE guidance	DfE	DfE guidance, April 2026	Statutory and departmental framework for independent schools
Restrictive Interventions, including the Use of Reasonable Force, in Schools	DfE	Effective 1 April 2026	Page 14 is statutory guidance on recording and reporting; remainder is non-statutory guidance
Allergy Safety in Schools	DfE	Published July 2026	Not yet directly statutory for independent schools; adopted as School policy pending equivalent Independent School Standards requirements
Supporting Pupils at School with Medical Conditions	DfE	Current version at ratification date	Statutory guidance for schools within its legal scope; used as good practice where appropriate
Relationships Education, Relationships and Sex Education and Health Education	DfE	Version for introduction 1 September 2026	Statutory guidance
Prevent Duty Guidance and Channel Duty Guidance	Home Office	Current versions at ratification date	Statutory guidance
Working Together to Improve School Attendance	DfE	Updated July 2026	Statutory guidance applying to independent schools

Publication	Issuer	Version / commencement	Status / use
Children Missing Education	DfE	Updated September 2025	Statutory guidance for proprietors and schools
Information Sharing: Advice for Practitioners	HM Government / DfE	Current version at ratification date	Safeguarding information-sharing guidance
Filtering and Monitoring Standards for Schools and Colleges	DfE	Core standard updated June 2026	Technology and safeguarding standard, including generative-AI risk
Regulated activity and DBS guidance, including removal of supervision exemption	DfE / DBS	Change effective 1 September 2026	Supervision exemption removed; frequency, period and overnight conditions still apply
Children's Wellbeing and Schools Act 2026	UK Parliament	Current legislation	Including allergy-safety and other relevant provisions
Crime and Policing Act 2026	UK Parliament	Current legislation	Including relevant safeguarding and regulated-activity provisions

The final compliance audit used current official Government, legislation and Barnet Council sources. The source schedule below must be checked again at each annual review and whenever relevant law, statutory guidance or local arrangements change.

FINAL COMMITMENT

SAFEGUARDING AT HOLLAND HOUSE SCHOOL

Our commitment

Every child has the right to be safe, heard, respected and protected. Holland House School will act promptly, work collaboratively, learn continuously and keep the child's welfare at the centre of every safeguarding decision. This policy becomes the Approved Publication Edition when ratified by the Board of Governors and dated below.

Ratified by the Board of Governors: _____

Date: _____

Chair of Governors: _____

Headteacher: _____

Designated Safeguarding Lead: _____