



HARROW SCHOOL
ENTERPRISES LTD
EDUCATION | EVENTS | SPORTS | LOCATIONS

HSEL SAFEGUARDING POLICY & CODE OF CONDUCT

Updated: Dec 2019
Owner: Heather Rhodes (Academic Principal)

Harrow School Enterprises Ltd.

5 High Street, Harrow on the Hill, Middlesex, HA1 3HP
Tel: 020 8426 4638 E-mail: enterprises@harrowschool.org.uk

HSEL Safeguarding Policies

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HSEL SAFEGUARDING POLICIES OVERVIEW

Harrow School Enterprises Limited (HSEL) is the commercial trading arm of Harrow School. We offer a variety of services to Harrow School and the wider community that covers five key areas: Education, Events, Sports, Locations and the Harrow Shop. As a wholly owned subsidiary of Harrow School, we are guided by Harrow School policies for the high expectations of conduct of those who are contracted and engaged by us.

This document is relevant to all those contracted in the following areas of HSEL operations:

- Harrow School Short Courses
- Easter Revision Courses
- Lumina Oxbridge Preparation Courses
- HSEL Events & Filming

All employees, agents and professionals whose services have been contracted by HSEL and/or who may come into contact with under 18s in one of the above contexts must be fully aware of both the guidelines set out within this document and additionally those relevant to their specific role. The latter can be found within the handbook given to you before the commencement of your contract. For ease of reference throughout these policies, all employees, agents, group leaders, people on work experience and self-employed contractors are referred to as professionals.

This document sets out the main policies and expectations of conduct that are in place to ensure a happy and safe environment both for professionals who work with us and for the children in our care. It must be read in full before your contract or placement with us starts, and your contract is conditional to your declaration that you have read and fully understood each part of the document and your agreement to observe the conditions outlined within.

The policy overview is comprised of the following parts:

- Safeguarding and Child Protection Policy
- Code of Conduct
- ICT Acceptable Use Policy

HSEL policy is derived from Harrow School policy and we have the same expectations of behaviour from professionals who work on temporary contracts with HSEL as for year-round employees of Harrow School. These particular policy documents have been adapted from Harrow School policy to take into account the different organisational activities and structures at HSEL. There are references within these documents to other Harrow School policies which are directly applicable to professionals who work with us at HSEL. These are downloadable from the Harrow School intranet for those professionals provided with HSEL IT logons, and available in hard copy on request from the HSEL HR Coordinator.

Review of Policies

This document will be reviewed in the event of any new developments in employment or child protection legislation and on taking into consideration feedback from professionals and students at HSEL and Harrow School. As a minimum it will be reviewed on an annual basis. It is not a contractual document and can be amended at any time. You will be notified of any amendments. You must comply with both the provisions of this document and HSEL's other policies and procedures. If you do not understand any aspect of this document or HSEL's requirements with regards to the conduct of employees or contractors, then you should seek advice and guidance from your line manager or the person responsible for your induction.

SAFEGUARDING & CHILD PROTECTION POLICY

Key Contacts

Harrow School Enterprises

Designated Safeguarding Lead (DSL)	Kirsty Matthews, Academic Principal matthewsk@harrowschool.org.uk 020 8872 8077
Deputy Designated Safeguarding Lead (DDSL)	Josh Billinge, Senior Operations Manager billingej@harrowschool.org.uk 020 8872 8075
Nominated Safeguarding Board Member	Alastair Chirnside, Harrow School Deputy Head Master ac@harrowschool.org.uk 020 8872 8039 07920 568493
HSEL Director	Harry Ogden ogdenhp@harrowschool.org.uk 020 8872 8072
Chairman of Board	Adam Hart Via Andrew Millett, Clerk to Governors 020 7591 3333 (Office) andrew.millett@crippspg.co.uk

Child and Family Services of the London Borough of Harrow

Children's Access Team	The Golden Number 020 8901 2690
Emergency Duty Team	(24 hours) 020 8424 0999
Harrow Strategic Safeguarding Partnership Harrow Safeguarding Children Board	Second Floor, Civic Centre, Station Road, Harrow, Middlesex HA1 2UL 020 8424 1147 lscb@harrow.gov.uk
Allegations Manager/LADO	Paulette Lewis and Janice Miller 020 8736 6435 Paulette.Lewis@harrow.gov.uk Janice.Miller@harrow.gov.uk
Education Lead, MASH Team	Gavin Baker 020 8416 8664 Gavin.Baker@harrow.gov.uk

National contacts

Crimestoppers	0800 555 111 crimestoppers-uk.org
NSPCC	Weston House, 42 Curtain Road, EC2A 3NH 0808 800 5000
NSPCC Whistleblowing Helpline (for staff)	0800 028 0285 help@nspcc.org.uk
Childline	0800 1111
Kidscape Bullying Helpline	020 7730 3300
Samaritans	0845 790 9090
Children's Commissioner	Anne Longfield 0800 528 0731 advice.team@childrenscommissioner.gsi.gov.uk

Policy Statement and Principles

1 Key points

- This policy applies to all children studying on courses run by or in conjunction with HSEL and/or under the care or supervision of HSEL. Any student on such a course, whether under or over the age of 18, will be regarded as a child for the purpose of this policy.
- All professionals working for or with HSEL have a responsibility for the implementation of this policy.
- Any concerns regarding Safeguarding and/or Child Protection must be reported immediately to the Designated Safeguarding Lead (DSL), Heather Rhodes, or in her absence to the Deputy Designated Safeguarding Lead (DDSL), Josh Billinge.
- All professionals working for or with HSEL should be alert to identifying children who may benefit from early help.
- If, at any point, a child is in immediate danger or is at risk of harm, a referral should be made to Children's Social Care and/or the police immediately.
- If a crime has been committed, it should be reported to the police.
- All professionals working for or with HSEL must know who the trained DSL and DDSL are.
- All concerns of a safeguarding of child protection nature must be treated in the utmost confidence.
- The DSL or DDSL must report all concerns in line with local authority thresholds to Children's Social Care.
- Allegations of abuse in relation to adults must be dealt with in line with the associated policy.

2 HSEL's core safeguarding principles

- HSEL's responsibility to safeguard and promote children's welfare is paramount.
- It is everyone's responsibility to safeguard children. Everyone who comes into contact with children and their families has a role to play in keeping children safe.
- Safer children make more successful learners.
- The HSEL safeguarding policies are derived from the Harrow School safeguarding policies, with development and review in line with the requirements of the courses and activities operated by HSEL.

3 Terminology

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

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

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

4 Contextual safeguarding

In order to help prevent and tackle peer-on-peer abuse, HSEL understands the value of Contextual Safeguarding. Contextual Safeguarding is an approach to understanding, and responding to, children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers sometimes have little

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influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, safeguarding practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that children are vulnerable to abuse in a range of social contexts.

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

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

5 Safeguarding statement

HSEL fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. Professionals working for and with HSEL should be alert to the signs of abuse and neglect and follow procedures to ensure that our students receive effective support, protection and justice.

The procedures contained in this policy apply to all those working for and with HSEL and are consistent with those of the the Harrow Strategic Safeguarding Partnership (HSSP) and the Harrow Safeguarding Childrens Board (HSCB) (<http://www.harrowscb.co.uk/guidance-for-practitioners/>).

6 Safeguarding at HSEL

This includes

- ensuring students' health and safety;
- referring concerns or allegations about a child to the Local Authority promptly;
- preventing bullying;
- preventing all forms of abuse;
- preventing harassment and discrimination;
- use of physical intervention;
- meeting the needs of students with medical conditions;
- provision of first aid and medical support;
- preventing alcohol, drug and substance misuse;
- intimate care;
- e-safety;
- issues specific to the local area (for example, road safety or gang activity); and
- School security.

7 Guiding principles

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

8 Policy aims

- To provide all professionals with the necessary information to enable them to meet their child protection responsibilities;
- To ensure consistent good practice;

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- To demonstrate HSEL's commitment with regard to child protection to students, parents and other partners;
- To contribute to HSEL's portfolio of safeguarding policies

9 HSEL's commitment

HSEL adopts an open and accepting attitude towards children as part of its responsibility for pastoral care. We hope that children, parents and agents will feel free to talk about any concerns and see HSEL as a safe place when there are difficulties. Children's worries and fears will be taken seriously. Children are encouraged to seek help from professionals.

HSEL will therefore:

- establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to;
- ensure that children know that there are adults at HSEL whom they can approach if they are worried or are in difficulty;
- ensure every effort is made to establish effective working relationships with parents, agents and colleagues from other agencies;
- operate safe recruitment procedures and make sure that all appropriate checks are carried out on new staff, contractors and volunteers who will work with children through HSEL;
- ensure that all professionals are aware of how and when to act on concerns that they have and work in a safe and appropriate manner at all times;

10 Confidentiality

HSEL recognises that all matters relating to child protection are sensitive and confidential. The DSL will share that information on a 'need to know, what and when' basis. Concerns about individuals should never be discussed elsewhere, inside or outside the School, unless in confidential meetings for that purpose. Professionals are expected to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and Children's Services. Professionals should never promise a student that they will not tell anyone about an allegation, as this may not ultimately be in the best interests of the child.

Safeguarding Legislation and Guidance

The courses run by HSEL do not fall under the UK government definition of a school as issued in statutory guidance. However, as we look to Harrow School to inform our safeguarding and safer recruitment practices, the policies in this guide have been drawn up taking into account the following guidance, including government guidance issued in response to Section 94 of the [Education and Skills Act 2008](#), which requires the Secretary of State to prescribe standards for independent educational institutions to safeguard the welfare, health and safety of children. The relevant standards are set out in the [Education \(Independent School Standards\) Regulations 2014 \(the ISS Regulations 2014\)](#).

[Keeping Children Safe in Education \(DfE, September 2019\)](#) is statutory guidance issued under Section 175 of the [Education Act 2002](#) and the [Education \(Independent School Standards\) Regulations 2014](#). The document contains information on what schools and colleges should do and sets out the legal duties with which schools and colleges must comply in order to keep children safe. It should be read alongside [Working Together to Safeguard Children \(DfE, July 2018\)](#) and department advice [What to do if you are worried a child is being abused – Advice for practitioners \(DfE, March 2015\)](#). Part One of this guidance contains a summary of key requirements.

The statutory guidance [Working Together to Safeguard Children \(DfE, August 2018\)](#) covers the legislative requirements and expectations on individual services to safeguard and promote the welfare of children. It

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applies to all children up to the age of 18 years whether living with their families, in state care, or living independently.

[What to do if you are worried a child is being abused - Advice for practitioners \(DfE, March 2015\)](#) provides more information on understanding and identifying abuse and neglect. Examples of potential signs of abuse and neglect are highlighted throughout the advice. The NSPCC website also provides useful additional information on types of abuse and what to look for.

[The Prevent Duty](#): from 1 July 2015 all schools became subject to a duty under Section 26 of the [Counter-Terrorism and Security Act 2015](#), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. HSEL recognises that “safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm”.

[Guidance for safer working practice for those working with children and young people in education settings \(Safer Recruitment Consortium, October 2015\)](#), whilst not safeguarding guidance provides advice for all staff working with children of illegal, unsafe, unprofessional or unwise behaviour and advises staff to monitor their own standards and practice.

[Sexual violence and sexual harassment between children in schools and colleges](#) (DfE, May 2018) covers what sexual violence and harassment is, schools’ and colleges’ legal responsibilities, a whole school approach to safeguarding and child protection, and how to respond to reports of sexual violence and sexual harassment.

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

[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). This advice is for practitioners and senior managers. It helps them decide when and how to share personal information legally and professionally. It might also be helpful for practitioners working with adults who are responsible for children who may be in need.

Child Protection Procedures

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

Professionals are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned.

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

HSEL will act on identified concerns and provide early help to prevent concerns from escalating.

If a child is in immediate danger or is at risk of harm, a referral should be made to children’s social care and/or the police immediately.

11 Recognising abuse

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

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

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Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). An adult, or adults, or another child or children may have abused them.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect. The definitions are taken from [Keeping Children Safe in Education \(DfE, September 2019\)](#).

11.1 Physical abuse

Physical abuse is any form of threatened or actual violence, which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

11.2 Emotional abuse

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

11.3 Sexual abuse

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

11.4 Neglect

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

11.5 Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and even has featured in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying, should be reported and will be managed through our disciplinary procedures. If the bullying-type behaviour is particularly serious, or the

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counter-bullying procedures are deemed ineffective, the DSL will consider implementing child protection procedures.

12 Indicators of abuse

It is the responsibility of all members of staff to report any and all niggling worries or concerns over safeguarding and welfare. It is not their responsibility to investigate or decide whether a child has been abused. A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for sports or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- show signs of not wanting to go home;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol; or
- display sexual knowledge or behaviour beyond that normally expected for their age; or
- is showing signs of being drawn into anti-social or criminal behaviour including gang involvement and association with organised criminal groups.

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

All professionals should have awareness of safeguarding issues in the broad. In particular, they should know that behaviours linked to drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

13 Peer-on-peer abuse

All professionals should be alert to the risk of peer-on-peer abuse and understand their role in preventing, identifying and responding to it. Professionals will be particularly sensitive to the nature of relationships within a residential setting and respond accordingly.

It is important that all such abuse is recognized as unacceptable and will be taken seriously. It should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'.

Peer-on-peer abuse may take different forms, such as:

- sexual violence and sexual harassment;
- upskirting;
- physical abuse (such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm);
- sexting (also known as youth produced sexual imagery); or
- initiation type violence and rituals.

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Members of staff will refer such abuse to an external agency where there is a risk of significant harm. Allegations of peer-on-peer abuse will be referred directly to Children's Services.

14 Sexual violence and sexual harassment between children

HSEL adheres to DfE [Advice on Sexual Violence and Sexual Harassment Between Children and Colleges](#) (SVSH), which was updated in May 2018, and recognises the following:

- That we must protect any adult students (i.e. aged 18 and above) and engage with adult social care, support services and the police as required;
- That professionals need to choose terminology carefully (for example, the use of 'victim' and 'perpetrator'), on a case by case basis;
- That a child abusing another child may have been abused themselves and may therefore need support too;
- That sexual violence and sexual harassment can be driven by wider societal factors such as everyday sexist stereotypes and everyday sexist language;
- That all professionals, and particularly the DSL, need to adopt a contextual safeguarding approach to incidents, which involves considering the context within which incidents or behaviours occur;
- That assessments of children need to consider wider environmental factors present in a child's life that are a threat to their safety or welfare;
- The importance of information sharing and effective multi-agency working; and
- That, where police will not take further action in a case, HSEL will continue to engage with specialist support for the victim as required.

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

- **Managing internally:** in some cases of sexual harassment (such as one-off incidents) a school may manage the incident internally;
- **Early help:** this is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
- **Referrals to Children's Services:** in cases where there has been harm, or there is an immediate risk, a referral should be made to Children's Services;
- **Reporting to Police:** in cases where rape, assault by penetration or sexual assault is reported, HSEL will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other children in the school. The DSL will work closely with the Police to ensure that HSEL's actions do not jeopardise the police investigation. If a child is convicted or cautioned, HSEL will update the risk assessment and consider suitable action through its disciplinary policy.

The management of children and young people with sexually harmful behaviour is complex and HSEL will follow DfE guidance when issued. HSEL will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Professionals who become concerned about a boy's sexual behaviour should speak to the DSL as soon as possible. It is important to ensure that the victim and perpetrator(s) remain protected, especially from bullying and harassment. Where no further action is taken, or a child found guilty, HSEL will continue to support the victim and perpetrator.

15 If concerned about a student's welfare

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

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Professionals should report their concerns via an incident report. If the student starts to reveal that he or she is being (or has been) harmed, professionals should follow the advice below. Following an initial conversation with the student, if the member of staff remains concerned, he/she should discuss their concerns with the DSL.

16 If a student makes a disclosure

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

During such conversations with students, professionals should:

- allow the student to speak freely;
- remain calm and avoid overreaction;
- offer reassurance and general words of comfort (rather than physical touch);
- not be afraid of pauses or silences;
- not ask investigative or leading questions;
- explain at an appropriate time that, in order to help, the information must be passed on to relevant people in positions of responsibility;
- not reprimand the student for failing to disclose earlier;
- establish next steps (the student may agree to see the DSL or the Welfare Officer, otherwise let them know that someone will come to see them before the end of the day);
- report verbally to the DSL, even if the student has agreed to do this by themselves;
- write up the conversation as soon as possible on an incident form and hand it to the DSL; and
- seek support, if distressed.

17 Confidentiality and sharing information

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

Professionals should only discuss concerns with the DSL, Deputy DSL or the Director of HSEL, (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following a number of highly publicised cases where senior leaders in schools failed to act upon concerns raised by staff, [Keeping Children Safe in Education \(DfE, September 2019\)](#) emphasises that any professional can make a referral to Harrow Children's Services, if they are concerned about a child. If anyone other than the DSL makes the referral, he/she should inform the DSL, as soon as possible.

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

Child Protection Records and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. The School's ICT Acceptable Use Policy will be adhered to and every effort will be made to prevent unauthorised access. If it is necessary to store child protection on portable media, such as a CD or flash drive, these items will also be kept in locked storage. Child Protection information will be stored separately.

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Child protection records are normally exempt from the disclosure provisions of the Data Protection Act. This means that students and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL. The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

18 Reporting directly to child protection agencies

Professionals should follow the reporting procedures outlined in this policy. However, they may also share information directly with Harrow Children's Services or the NSPCC using the contact details on p.5 if:

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

19 Notifying Parents

The DSL will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively. HSEL will make contact with parents in the event of a concern, suspicion or disclosure. However, if we believe that notifying parents could increase the risk to the student or exacerbate the problem, advice will first be sought from Harrow Children's Services or the police.

20 Referral to police and Harrow Children's Services

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

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

The DSL will make a referral to Children's Services, if it is believed that a student is 'suffering or is at risk of suffering significant harm'. The student (subject to his or her age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the student or issues of confidentiality pertain. First response will be by telephone to Harrow Children's Services and then followed with written confirmation on the appropriate Inter-Agency Referral Form within 24 hours. There may be need for a subsequent referral to the Children's Services local to the student's home, if his or her family lives in the UK and outside the Harrow area.

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

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

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

Child exploitation, sexting and children at particular risk

21 Sexual Exploitation of Children

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

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

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

Child Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. Any concerns should be reported immediately to the DSL as soon as possible.

22 Serious Violence

Staff should be aware of the indicators, which may signal that children are at risk from, or are involved with serious violent crime. [KCSIE 2019](#) sets out what is required in relation to this in Child Protection and Safeguarding policy in paragraphs 29 and 30. Indicators may include: relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. Any concerns should be reported immediately to the DSL as soon as possible.

23 Youth produced sexual imagery (sexting)

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

24 Looked after children

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

25 Early help for children who may be particularly vulnerable

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

To ensure that all children receive equal protection, special consideration will be given to a child who is:

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

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

26 Children and families requiring early help and additional support

All professionals should be able to identify children in need of early help and to distinguish these from children in immediate danger or at risk of significant harm. As distinct from cases where a child has suffered or is likely to suffer significant harm, where children and families need support from agencies beyond our School, we will respond according to our LSCB procedures to ensure there is an inter-agency assessment, including use of the 'Common Assessment Framework' (CAF) or the 'Team around the Child' (TAC) approaches as appropriate. The CAF will help us to identify what the child needs to prevent the need for statutory assessment under the Children Act 1989. We will liaise closely with the LSCB, including acting as lead professional to co-ordinate support, with the agreement of the child and their parent/carer(s), and in accordance with local procedures. It is to be hoped that in each case early help or additional services will improve the welfare of the child. However, each case will be kept under review and consideration given to Children's Services if the child's situation does not appear to be improving.

Prevent duty, honour based violence and forced marriage

27 The prevent duty

The [Prevent Duty](#) is the duty in the [Counter-Terrorism and Security Act 2015](#) on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. The Prevent Duty applies to schools and non-publicly-funded institutions at which 250 students are undertaking courses in preparation for examinations related to qualifications regulated by the Office of Qualifications and Examinations Regulation and therefore courses run by HSEL do not fall under this specification. However, best practice dictates that professionals working with children should be aware of indicators of radicalisation and extremism and respond to any concerns as with other safeguarding risks.

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The Department of Education advice for schools and childcare providers, June 2015, states that, 'School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately'. Radicalisation refers to the process by which a person comes to support terrorism or forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, professionals should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. HSEL will work more generally to ensure the fundamental British values of democracy, rule of law and tolerance are celebrated and not undermined.

Professionals who have concerns about a student will make these concerns known to the DSL at the earliest opportunity. The DSL will then make a judgement as to whether or not it is appropriate to make a referral, through Harrow's Multi Agency Safeguarding Hub (MASH) to the Channel programme.

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

27.1 Signs of vulnerability

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are number of signs that together increase the risk. Signs of vulnerability include:

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

27.2 Recognising extremism

Early indicators of radicalisation or extremism may include:

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

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

28 'Honour based' violence and female genital mutilation (FGM)

So called 'honour based' violence encompasses crimes which have been committed to protect and defend the honour of a family and/or a community. It is a form of physical violence against women and girls, and should be dealt with as part of existing child safeguarding/protection structures, policies and procedures.

HSEL Safeguarding Policies

FGM is a procedure where the female genitals are deliberately cut, injured or changed, but where there is no medical reason for this to be done. In England, Wales and Northern Ireland, the practice is illegal under the [Female Genital Mutilation Act 2003](#). HSEL recognise the possibility that a child may disclose information relating to themselves or a sibling or close friend who has suffered abuse in the form of FGM. Professionals must be alert to the mandatory reporting requirement for suspected cases of FGM, which became a statutory duty from October 2015. This means that if a disclosure is made to a professional relating to FGM, as well as them informing the DSL as per our internal child protection procedures, that person must report what was disclosed to them directly to the police.

29 Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of free and full consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-Agency Guidelines: Handling cases of forced marriage. Professionals can also contact the Forced Marriage Unit, if they need advice or information: contact 020 7008 0151 or email fmua@fco.gov.uk

Support for those involved in a child protection issue

Child abuse is devastating for the child. It can also result in distress and anxiety for professionals who become involved. HSEL will support children, their families, and professionals by:

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

Staff-related Safeguarding Matters

30 Abuse of trust

All professionals are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach. In addition, professionals should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have any kind of sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a student under 18 would be a criminal offence, even if that student were over the age of consent.

31 Concerns or Allegations Relating to Professionals

When an allegation is made against a professional or a concern expressed about their conduct relating to children, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

Professionals who are concerned about the conduct of a colleague towards a child are placed in a difficult situation. He or she may worry that they have misunderstood the situation and will wonder whether a report could jeopardise a colleague's career. However, all professionals must remember that the welfare of the child is paramount. No professional will suffer a detriment for raising a genuine concern. HSEL's Whistleblowing policy enables professionals to raise concerns or allegations in confidence and for a sensitive enquiry to take place. Professionals may also use the NSPCC whistle-blowing helpline number: 0800 028 0285.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we accept that some professionals can pose a serious risk to children and will therefore act on every allegation or concern. Professionals who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, professionals may be suspended where this is deemed the best way to ensure that children are protected.

- Allegations or concerns against professionals – including the DSL or DDSL – should be reported directly to the HSEL Director. If the HSEL Director is absent, allegations against or concerns about all members of staff should be reported to the Chairman of the HSEL Board.
- Allegations against or concerns about the HSEL Director or a member of the HSEL Board should be reported to the Chairman of the HSEL Board without the HSEL Director being informed.
- You may also report any allegations or concerns directly to the police or Harrow Children's Services, if you believe direct reporting is necessary to secure action.

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

32 Staff Training

All professionals at HSEL will receive appropriate training in safeguarding and child protection. All new professionals working with HSEL receive an induction, which will include an introduction to our Child Protection and Safeguarding policy and the Code of Conduct along with contact details for the DSL and DDSL. They will be instructed on reporting and recording arrangements. The programme will also cover our Whistleblowing policy, the ICT Acceptable Use policy as well as guidelines on communications between professionals and use of social media.

The DSL and DDSL will receive Advanced Level Safeguarding and Child Protection training updated at least every two years, including training in inter-agency procedures, in addition to annual updates. The Clinical Manager and nursing staff at the Harrow School Medical Centre will also receive Advanced Level Safeguarding and Child Protection training.

The DSL will undertake Prevent awareness training. Members of the academic staff will also receive Prevent and Channel awareness training. A member of staff will supervise visitors at all times. All staff supplied by other bodies will be made aware of the School's Child Protection and Safeguarding policy and will be given the contact details of the DSL and DDSL.

33 Safer Recruitment

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HSEL endeavours to ensure that it does its utmost to employ 'safe' staff by following the guidance in [Keeping Children Safe in Education \(DfE, September 2019\)](#) together with information provided by Harrow LSCB (see <http://www.harrowlscb.co.uk/safer-recruitment-of-staff-and-volunteers-working-with-children-and-young-people/>) and the various procedures pertaining to contractors, PFI partners etc.

Harrow School's Safer Recruitment policy and the Recruitment, Selection and Disclosure policy is adhered to in all HSEL recruitment activities. Full details of HSEL's recruitment procedures are to be found in the HSEL Application and Recruitment Process document.

Site Security

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

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

All visitors are expected to observe the procedures laid down in the School's Child Protection and Safeguarding policy and Health & Safety policy to ensure that students in the School are kept safe.

34 Road safety

Students on HSEL courses are reminded about road safety in their induction. The Deputy Head Master designates appropriate crossing points on High Street as well as permitted access routes into Harrow Town.

35 Third Party Use

The School's facilities, particularly sporting facilities, may be hired by Third Party Users (TPUs), including children's clubs, and under these arrangements the School has no control over, and assumes no liability for the conduct of individuals from TPUs. However, the School will ensure, as far as it is able, that TPUs have appropriate child protection and safer recruitment procedures in place. TPUs are also made aware of the areas of the School's grounds, which are out of bounds.

TPUs will be required to provide the School with a copy of the organisation's Child Protection policy prior to approval being given for their use of the School's facilities and all TPUs providing activities, which involve children, will be required to sign a declaration to confirm that:

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

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

If an allegation of abuse is made about an adult in a TPU, the organisation's Safeguarding Officer must notify the Head Master or the Harrow School DSL on the same day as the incident occurred or the disclosure was made, or as soon as possible thereafter. The School expects the TPU to follow its own Child Protection and Safeguarding policy and the Head Master will require confirmation that appropriate action has been taken before further use of the School's facilities will be allowed.

Photography and Images

HSEL Safeguarding Policies

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

To protect our students, we will:

- seek parental consent for photography of our students through our Terms and Conditions;
- demonstrate respect, care and caution when including photographs of students in any marketing material; and
- encourage students to tell a professional, if they are worried about any photographs that are taken of them.
- prevent the possibility of linking the name of a student to an image. No image will carry a caption naming a boy who can be clearly identified.

E-Safety

The use of technology is an integral part of everyday life but, as such, has also become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation – technology often provides the platform that facilitates harm. Therefore, an effective approach to online safety empowers HSEL to protect and educate students in responsible use of technology and to establish mechanisms which can identify, intervene and escalate an incident where appropriate.

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

- content: being exposed to illegal, inappropriate or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm

Our e-safety policy is incorporated in the Pupil ICT Acceptable Use policy, which can be found on the School's Intranet. Cyber-bullying and sexting by students, via texts and emails, will be treated as seriously as any other bullying-type behaviour and will be managed through our counter-bullying procedures.

CODE OF CONDUCT

Safe Working Practices for the Protection of Students and Professionals at HSEL

1 Overview

The purpose of this code is to provide a clear framework within which employees of HSEL and those whose services have been contracted by HSEL are expected to conduct themselves with particular regard to safeguarding. It is a supporting document to the Safeguarding and Child Protection Policy above.

HSEL recognises that it has a duty of care to maintain a working environment for its employees and other associated professionals, and a learning environment for its students, in which honesty, integrity and respect are reflected in personal behaviour and standards of conduct, where the welfare of students is paramount and where the working environment is safe. In turn, professionals must recognise that they are each accountable for their own actions. They have a duty not only to keep young people safe but also to protect them from physical and emotional harm.

2 Introduction

This Code of Conduct applies to all professionals employed by the HSEL, as well as those who undertake work for and on behalf of HSEL. A relationship between an adult and a child or young person is not a relationship between equals. Because of their knowledge, position and/or the authority invested in their role, all adults working in educational settings are in positions of trust in relation to the young people either in their care or in the environment in which they work.

As some of the courses run by HSEL are fully residential, contact time with students can be greatly increased. Whilst this represents one of the most significant benefits of residential education, professionals must take into account the vulnerability of students living away from home and of working within this setting. HSEL bases its expectations upon legality, proportionality and common sense.

It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship. There is potential for exploitation and harm of vulnerable young people. Adults therefore have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Professionals must ensure their relationships with students are not of a kind that compromise (or could be perceived to compromise) their professional responsibilities.

To meet and maintain our responsibilities towards students and those who work for and with HSEL, we need to agree standards of good practice, which form a code of conduct for professionals, regardless of their position, employment status or specific department.

Good practice must include:

- Recognising that the welfare of the students is paramount;
- Treating all students and colleagues with dignity and respect and ensuring that behaviour, either intentional or unintentional, does not constitute discrimination, bullying or harassment;
- Setting the highest standards of professionalism and personal conduct, recognising that we are each responsible for our own actions;
- Working in an open and transparent way;
- Giving clear and fair management instructions and, as employees, following reasonable rules and instructions given by managers;
- Discussing or taking advice promptly from their line manager or other senior members of staff over any incident, which may give rise to concern;

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- Involving students in decisions that affect them;
- Encouraging positive, respectful and safe behaviour among students at all times;
- Being prepared to listen;
- Being alert to changes in students' behaviour, which may indicate that they are having problems;
- Reading and understanding the School's Child Protection & Safeguarding Policy and other policies relating to students' welfare;
- Asking a student's permission before initiating physical contact, such as assisting with dressing, physical support during sports, music or administering first aid;
- Maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language;
- Adhering to Harrow School's Reasonable Force Policy, where physical intervention in a given circumstance is required; and
- Referring all concerns about a student's safety and welfare via incident forms or, as necessary, to the Designated Safeguarding Lead (DSL).

Failure to follow the code of conduct may result in disciplinary action being taken, as set out in our disciplinary policies and procedures.

3 Maintaining professional boundaries

All adults should clearly understand the need to maintain appropriate boundaries in their contact with students to minimise the possibility of behaviour which might be misinterpreted by others. Any incidents or exchanges that others could misinterpret should be immediately reported and recorded. Staff contact with other staff should be adult, professional and respectful at all times. The School's Equal Opportunities and Dignity at Work policy provides further detail for staff to staff contact. Inevitably, professionals will need on occasions to have one to one contact with students. In these circumstances ensure that the setting is appropriate and complies with requirements of the School's Guidance on One to One Contact.

4 The legal position on sexual contact with students

All professionals are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards every student must be beyond reproach. Breaches of this Code may well result in serious disciplinary action and fall into the category of gross misconduct resulting in disciplinary action up to and including dismissal.

In addition, professionals should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a professional and a student under 18 may be a criminal offence, even if that student is over the age of consent. Professionals need to properly understand the law.

This offence has nothing to do with the legal age of consent; it deals specifically with the abuse of a position of trust, whatever the age of the student. This means that the young person's consent is not the issue, which determines whether an offence has been committed. Even if the young person were to have consented to the relationship, this would not detract from the seriousness of the offence.

The legal definition of a child is a person under the age of 18. Professionals must be aware of this. If convicted of such an offence, a person is likely to serve a custodial sentence and have their name added to the sex offender register, which would bar them from working with children again.

The sexual activity referred to is not exclusively physical contact including penetrative and non-penetrative acts. It may also involve other activities, such as causing children or young people to engage in or watch sexual activity through the sending of explicit sexual images, emails and texts.

5 Communication with students (including the use of electronic technology)

Communication between students and professionals, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, web-cams, websites, social networking sites, online gaming and blogs.

Professionals should not share any personal information with a student. They should not request, or respond to, any personal information from the student, other than that which might be appropriate as part of their professional role. Professionals should ensure that all communications are transparent and open to scrutiny.

Professionals should also be careful in their communications with students so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. They should not give their personal contact details to students including e-mail, home or mobile telephone numbers, unless the need to do so is agreed with senior management and parents. E-mail or text communications between a professional and a student outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet-based websites, such as social networking, instant messaging or gaming.

Communication with former students, who are over 18 years old, is left to staff discretion. However, be conscious of the fact that former students may be in contact with or related to current students.

6 Photos and videos

Many HSEL activities involve recording images. Such activities may be undertaken as part of a course of studies, as out of school activities, for publicity or to celebrate achievement.

HSEL requests permission from students and their parents to use images of students for the purpose of publicity. Images should not be displayed on other websites, in publications or in a public place without the permission of a member HSEL staff.

Professionals should not have images of students stored on personal cameras, devices or home computers. Any images stored on school equipment must be justified.

Under no circumstances should adults in the school access inappropriate images on the internet. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating such material is illegal.

Professionals must read and sign the School's ICT Acceptable Use Policy.

7 Social networking sites and online gaming

HSEL professionals may use social networking for personal use. However, HSEL requires that profile and photos of professionals remain 'locked down' as private so that students or parents do not have access to personal data or images.

Professionals should be aware that they leave themselves open to a charge of professional misconduct if images of staff in a compromising situation are made available on a public profile by anyone. If a student does gain access to the profile of a professional by fraudulent means (impersonation or hacking), senior management should be informed immediately.

Outside of the context of academic study or formal extra-curricular school activities, professionals should not seek out students and/or share their own gamer tags/ID with students, or use HSEL equipment to play online games. Similarly, as soon as a professional becomes aware that they are in an online game with a student who

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is known to them from a HSEL operated activity, he/she should cease to play against that student and should not enter any games containing that player as part of the group.

Professionals must deny current or past students under the age of 18 any access to their personal online profiles.

Where relationships exist between professionals and those who are parents of students on HSEL courses, or personal friends who are parents of students on HSEL courses, social networking is acceptable but caution must be exercised so that professional standards are maintained and professionals do not compromise themselves or HSEL. This same caution should apply to online communications with past students of HSEL.

Professionals are advised to report any inadvertent online contact with current or recent students to the DSL to ensure full transparency is maintained.

8 Social contact

Professionals should not establish (or seek to establish) social contact with students for securing a friendship or to pursue or strengthen a relationship. If a student or parent seeks to establish social contact, or if this occurs coincidentally, the professional should exercise his/her professional judgement in making a response and ensure that a member of the HSEL managerial staff is aware.

There will be occasions when there are social contacts between students and professionals, where for example the parent and professional are part of the same social circle. These contacts, however, will be easily recognised and openly acknowledged.

9 The use of personal living space

No student should be invited into the home of an adult who works with them, unless the reason for this has been firmly established and agreed with a member of the HSEL managerial team.

10 Grooming

All professionals should be aware that persons intent on sexual abuse of children groom both children and adults around them. This is to ensure that they can carry out their abusive behaviour without raising anybody's suspicion or making other people scared to blow the whistle on them.

It is important that professionals do not behave in a way that could be misinterpreted, leaving themselves open to suspicion. Managing relationships within (and especially outside) of HSEL in line with this policy should minimise the risks of any such misunderstandings occurring.

11 Physical contact

There are occasions when it is entirely appropriate and proper for professionals to have physical contact with students. This may be to comfort a distressed student, to demonstrate a sporting or music technique or, in appropriate circumstances, to provide restraint.

It is crucial that this contact is carried out in ways appropriate to the professional's role. When professionals make physical contact with students, this should be in response to their needs at the time, be of limited duration, be appropriate and take place in an open environment. Professionals should use their professional judgement at all times about the appropriateness of any physical contact.

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Where a professional has a particular concern about the need to provide this type of care he/she should seek further advice from a senior colleague. He/she should also record any situations with their line manager or with the DSL, which may give rise to concern.

Physical contact which occurs regularly with an individual student is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to students with physical disabilities). Any such contact should be the subject of an agreed and open policy but also subject to review.

On occasion, it may be necessary for a professional to restrain a student. Professionals should refer to Harrow School's Reasonable Force Policy as summarised here:

No professional may strike, manhandle or intimidate a pupil. Corporal punishment is prohibited. The law forbids a teacher or any member of staff from using any degree of physical contact that is deliberately intended to punish a pupil or that is primarily intended to cause pain or injury or humiliation. A student should only be subject to reasonable force to prevent:

- *the committing of an offence;*
- *injury to himself or others;*
- *the damage of property; and/or*
- *the causing of significant disorder.*

In such rare events, the use of reasonable force must be by judicious and non-injurious means and for the minimum time necessary. 'Reasonable' means using no more force than is needed. The decision on whether or not physically to intervene is down to the professional judgement of the professional concerned and should always depend on the individual circumstances.

All HSEL professionals have a legal power to use reasonable force. Reasonable adjustments must be made for disabled children and children with special educational needs or disabilities (SEND). All instances must be recorded in writing and reported to the DSL, who must maintain a log of such incidents and review them regularly.

Physical contact should never be secretive or for the gratification of the professional, or represent a misuse of authority. If a professional believes that an action could be misinterpreted, the incident and circumstances should be declared immediately to a senior staff member or to the DSL.

12 Transporting students

In certain situations, for example on airport transfers for summer courses, professionals may agree to transport students. Wherever possible and practicable, professionals should use transport provided by the School with one designated driver and at least one escort.

Where it is necessary to transport a student in a privately owned vehicle on a one to one basis, the vehicle must be roadworthy, taxed, insured.

The driver must be a member of staff and have been registered on the School's list of approved drivers. The member of staff may only transport students alone if the journey is within 20 miles of Harrow and does not include an overnight stay.

Further information can be found in your Employment Handbook.

13 Extra-curricular activities

Professionals should take particular care when supervising students in the less formal atmosphere of a residential setting or extracurricular activity or as part of an excursion which takes place away from the Hill.

14 Favouritism

HSEL Safeguarding Policies

Professionals should exercise care when selecting students for teams, roles in activities, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when students are excluded from an activity. Methods of selection and exclusion should always be subject to clear and agreed criteria and not be used as a tool for humiliation which could be perceived as abusive.

15 Infatuation

Occasionally, a student may develop an infatuation with an adult professional. Professionals should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. However, they should remain aware that such infatuations carry a high risk of words or actions being misinterpreted. Therefore professionals should make every effort to ensure that their own behaviour is above reproach. They should discuss this situation at the earliest opportunity with a senior colleague so that appropriate action can be taken.

16 Changing clothes and showering

Students are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard students, satisfy health and safety considerations and ensure that bullying or teasing does not occur.

Any supervision should be appropriate and the needs and age of the students concerned should be taken into account with sensitivity to the potential for embarrassment. This might include avoiding any visually intrusive behaviour where students are changing or offering sensitive students an opportunity to change privately.

17 Confidentiality and data protection

From time to time during the course of their work with HSEL, professionals may be privy to information of a confidential or sensitive nature. Under no circumstances should professionals disclose this information to a third party or provide them with documentary evidence of a confidential nature. Should this rule be broken, it may be considered gross misconduct and result in termination of employment in line with our Disciplinary Policy and Procedure.

HSEL is committed to the principles underlying the Data Protection Act 1998 and, the General Data Protection Regulations (2018) and protecting the rights and freedoms of individuals with respect to the processing of their personal data.

Professionals should familiarise themselves with the School's General Data Protection Regulations and fully understand their duties to report any safeguarding concerns by ensuring they regularly refresh their knowledge of the School's Child Protection and Safeguarding Policy.

18 Conflicts of interest

Professionals should identify conflicts of interest to avoid involvement in decisions, where others might read bias into their actions. A conflict of interest represents a conflict between the private interests and official responsibilities of a person in a position of trust.

Professionals must also consider potential conflicts when they find themselves responsible for dealing with friends or family members in the normal course of their employment. There is a risk that others may view such involvement as an opportunity for favouritism or corruption. Examples would include a decision regarding the award of a contract for goods and services or the employment of friends and family members. HSEL therefore actively discourages direct line management of close friends or family members.

19 Gifts and rewards

HSEL Safeguarding Policies

Harrow School has a clear Gifts and Hospitality Policy regarding arrangements for the declarations of gifts received and given, which must be followed very carefully. Professionals need to take care that they do not accept any gift, personal payment or other incentive (such as secondary employment) that might be construed as a bribe by others, or lead the giver to expect any form of preferential treatment. There are occasions when students or parents wish to pass small tokens of appreciation to professionals, for example as a thank-you, and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

Any professional concerned about whether they or their colleagues may be at risk of giving or receiving a bribe (financial or otherwise) should contact the Bursar. Any member of staff receiving gifts or entertainment valued at more than £100 must disclose this to the Bursar.

Professionals may not give personal gifts to students. It is acceptable for professionals to offer prizes of small value in certain tasks or competitions.

19.1 Bribery Act 2010

A bribe is a financial payment or other form of reward or advantage, offered, promised or given to induce a person to perform a relevant function of activity improperly, or to reward them for doing so.

Under the Bribery Act 2010, individuals can be prosecuted for accepting bribes or offering bribes. In addition, the School can be prosecuted for failing to prevent bribery committed to obtain or retain business or a business advantage for the School by an employee.

Professionals are expected to comply with applicable bribery and corruption laws and to report to their line manager or another senior manager any conduct that could amount to a bribe being offered, promised, given, requested or accepted.

More general guidelines

20 Dress and appearance

Professionals should ensure their appearance and clothing

- promotes a positive and professional image and is appropriate to their role;
- is not likely to be viewed by others as offensive, revealing or sexually provocative;
- does not distract, cause embarrassment or give rise to misunderstanding;
- is absent of any political or otherwise contentious slogans;

Professionals should

- Keep the wearing of rings, pierced earrings and any other jewellery (including body piercings) to a minimum (to be removed when advised or prohibited by health and safety regulations);
- Cover up tattoos, where possible;
- Ensure that any uniform, when worn, is clean and presentable; and
- Adhere, where appropriate, to the Personal Protective Equipment Policy.

21 Alcohol, recreational drugs, smoking and other substance misuse

HSEL wishes to promote the health and wellbeing of professionals and minimise problems at work arising from the effects of alcohol, drugs (whether prescribed or recreational), solvents, etc. These elements are covered in the Harrow School's Alcohol, Drugs and Smoking policies. The taking of recreational drugs during working hours is unacceptable and will not be tolerated. All professionals are expected to attend work without being under the influence of alcohol or recreational drugs and without their performance being adversely impacted by the consumption of alcohol or recreational drugs.

Our smoking policy dictates that HSEL professionals are not allowed to smoke on any school premises at any time, except in the designated smoking areas as follows and when not in view of students:

HSEL Safeguarding Policies

- At the back of Speech Room near the projector room
- The Works Department yard
- The area outside the kitchens (towards the bottom of Moretons garden)
- Outside the grounds staff tea rooms

Staff are not allowed to smoke in the presence of students, whether on or off school premises.

Professionals taking prescribed medication are required to advise their manager if these are likely to impact on their duties, their ability to drive and/or use equipment required by their role. Professionals whose performance or behaviour falls below the acceptable standard, or who cause danger or disruption because of alcohol, drug or other substance misuse, may be the subject of disciplinary action.

Where there are reasonable grounds to suspect that a professional is under the influence of alcohol or drugs on reporting for work or during the course of work, the School reserves the right under its Alcohol and Drug Policy to exercise alcohol and drug testing of the employee. The School will take steps to ensure that it does not use the policy in a discriminatory manner against any employee and that it targets no individual unfairly. The School will put in place all measures to protect confidentiality of test results. The School will respect the employee's dignity at all times. Employees refusing to submit to an alcohol and drug test where a reasonable suspicion has been raised may still be subject to disciplinary action and may be suspended pending a full investigation.

Professionals may not smoke on School premises at any time (except in the designated smoking areas set out in the Smoking Policy). Professionals are not allowed to smoke in the presence of students, whether on or off the Hill.

22 Gambling

Professionals should not conduct gambling activities on the School's premises. Professionals should employ discretion in relation to small raffles for charitable purposes, National Lottery syndicates, occasional sweepstakes etc.

23 Conduct outside of work

HSEL does not concern itself with the private lives of its professionals, unless they affect its effective operation or its reputation. Any employees, who demonstrate unlawful or anti-social behaviour or who conduct themselves in a way that may jeopardise HSEL or Harrow School's reputation or position, may be dealt with under the disciplinary procedure. In particular, a professional accused of a criminal offence is expected to inform HSEL at the earliest opportunity. Failure to do so may be a disciplinary offence.

Throughout the course of their work with HSEL, professionals must disclose any criminal offences with which they are charged or cautions they receive.

Professionals will not act in a way that would bring HSEL, Harrow School or the teaching profession into disrepute. This covers relevant criminal offences, such as violence or sexual misconduct, as well as negative or inappropriate comments about HSEL or Harrow School on social media or in any public capacity.

24 Breaches of this code of conduct

This Code of Conduct is not exhaustive. If situations arise, which this code does not cover, HSEL expects professionals not only to use their professional judgement but also to act in the best interests of HSEL and its students.

Any breaches of this code will be dealt with in accordance with the relevant policies and procedures, which might include the Disciplinary Policy.

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Any professional, who has a concern or is unsure about an event that has arisen, should discuss the matter with a senior colleague as soon as possible.

25 Whistleblowing (public interest disclosure)

Professionals have a right and a duty to raise concerns (in other words, 'to blow the whistle') about any suspected breaches of the law or wrongdoing by HSEL or its employees, which they encounter. This could include suspected cases of fraud, breaches of Health & Safety, safeguarding concerns and/or any other criminal or moral activities.

Please refer to Harrow School's Whistleblowing Policy for further information.

Whistleblowing legislation does not cover personal grievances.

Professionals, who feel obliged to make a disclosure, will be treated as having done so in good faith and will not be victimised for raising their concerns, even if they later turn out not to be true.

ICT ACCEPTABLE USE POLICY

HSEL PROFESSIONALS

This document sets out the security, administration and internal rules which you should observe when communicating electronically or using the IT facilities provided by Harrow School and HSEL (the 'School'). You should familiarise yourself with the terms of this Policy in order to minimise potential difficulties to you, your colleagues, pupils, and the School and HSEL, which may arise as a result of misuse of email or Internet facilities.

This Policy applies to all employees and contractors of HSEL, as well as resident family members of resident employees who use School ICT facilities.

1 School Property

1.1 The School acknowledges and welcomes the creativity of staff in the production and storage of material to support teaching, learning and administration. It is important to note that, according to the letter of the law, computer files and email messages created and stored on the school network by employees, contractors and residents in the performance of their normal duties technically remain the property of the School. In any question regarding copyright and intellectual property, staff are encouraged to seek advice from the Head Master.

1.2 Subject to the further provisions outlined in this Policy, computer files and email messages created and stored on the school network by employees, contractors and residents for their private and personal use remain the property of the creator.

2 Monitoring

2.1 The School's computer network is a business and educational tool to be used primarily for business or educational purposes. You therefore have a responsibility to use these resources in an appropriate, professional and lawful manner.

2.2 All messages and files on the School's system will be treated as education or business related, which may be monitored. Accordingly, you should not expect any information or document transmitted or stored on the School's computer network to be entirely private.

2.3 You should also be aware that the School maintains systems that automatically monitor and filter use of the Internet, both during school or working hours and outside of those hours. This includes the sites and content that you visit and the length of time you spend using the Internet.

2.4 You should structure your email in recognition of the fact that the School may, if concerned about possible misuse, have the need to examine its contents.

2.5 Emails will be archived by the School as it considers appropriate and to comply with statutory requirements.

3 Personal Use

3.1 You are permitted to use the Internet and email facilities to send and receive personal messages, provided that such use is kept to a minimum and does not interfere with the performance of your work duties.

3.2 However, you should note that any use of the School network, internet or email for personal purposes is still subject to the same terms & conditions as otherwise described in this Policy.

3.3 In the case of shared IT facilities, you are expected to respect the needs of your colleagues and use the computer resources in a timely and efficient manner.

3.4 Excessive or inappropriate use of email or Internet facilities for personal reasons during working hours may lead to disciplinary action. For instance, you should not therefore download MP3 (or other compressed music or video) files for personal use, nor large quantities of images, nor should you download or install computer programs without the consent of the Director of ICT.

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3.5 At all times, Harrow School and HSEL staff and contractors should conduct network communications with the utmost propriety, and avoid any internet behaviour that may bring themselves or the school into disrepute.

3.6 You should not use social networking sites for communication with current pupils.

4 Content

4.1 Email correspondence should be treated in the same way as any other correspondence, such as a letter or a fax. That is, as a permanent written record which may be read by persons other than the addressee and which could result in personal or the School's liability.

4.2 You and/or the School may be liable for what you say in an email message. Email is neither private nor secret. It may be easily copied, forwarded, saved, intercepted, archived and may be presented in litigation. The audience of an inappropriate comment in an email may be unexpected and extremely widespread.

4.3 You should never use the School network, internet or email for the following purposes:

- to abuse, vilify, defame, harass or discriminate (particularly, but not exclusively by virtue of sex, sexual orientation, marital status, race, colour, nationality, ethnic or national origin, religion, age, disability or Trade Union membership);
- to send or receive obscene or pornographic material;
- to injure the reputation of the School or any of its employees or to cause embarrassment to your employer;
- to spam or mass mail or to send or receive chain mail;
- to infringe the copyright or other intellectual property rights of another person;
- to perform any other unlawful or inappropriate act;
- to upload or publish externally images of School pupils or staff without permission; or
- to infringe the privacy of another person

4.4 Email content that may seem harmless to you may in fact be highly offensive to someone else. You should be aware, therefore, that in determining whether an email falls within any of the categories listed above, or is generally inappropriate, the School will consider the reaction and sensitivities of the recipient of an email.

4.5 If you receive inappropriate material by email, you should delete it immediately and not forward it to anyone else. It would be appropriate for you to discourage the sender from sending further materials of that nature.

4.6 Comments that are not appropriate in the workplace or school environment will also be inappropriate when sent by email. Email messages can easily be misconstrued. Accordingly, words and attached documents should be carefully chosen and expressed in a clear, professional manner.

4.7 You should be aware that use of the School's computer network in a manner inconsistent with this policy or in any other inappropriate manner, including but not limited to use for the purposes referred to in paragraph 4.3 of this policy, may give rise to disciplinary action, including termination of an employee's employment or contractor's engagement.

5 Data Protection and Privacy

5.1 In the course of carrying out your duties on behalf of the School or HSEL, you may have access to, or handle personal information relating to others, including pupils, colleagues, contractors, residents, parents and suppliers. Email should not be used to disclose personal information of or about another except in accordance with the School's Data Protection Policy and Privacy Policy or with proper authorisation.

5.2 The Data Protection Act 2018 and General Data Protection Regulation (GDPR) requires both you and the School to take reasonable steps to protect any personal information, that you hold as a consequence of your employment, from misuse and unauthorised access. Please note that Data Protection breaches may be treated as gross misconduct by the School, which could result in summary dismissal for employees and significant fines for employers. We stress therefore:

- You must take responsibility for the security of your school computer and any personal computers and removable storage devices (including mobile phones) that you may use as a consequence of your employment;
- Unless absolutely necessary, you must not use your own home computer, laptop or any portable electronic device to store school confidential data (such as pupil/parent addresses, email addresses, telephone numbers, medical histories, staff information or the like);
- If you transmit confidential data outside of the school (either by email or internet, or by using removable storage media such as memory sticks, CDs, DVDs, removable hard drives and the

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like), it must be ENCRYPTED, and you must take all reasonable precautions to securely delete / destroy the data once you no longer require it;

- If you need any assistance or advice regarding appropriate security measures, please contact the School's IT department.

5.3 You will be assigned a log-in code and you will also be allocated a password to use the School's electronic communications facilities. You should ensure that these details are not disclosed to anyone else. We suggest that you take steps to keep these details secure. For example, you should change your password regularly and ensure that your log-in code and password are not kept in writing close to your working area.

5.4 You are encouraged either to lock your screen or log-out when you leave your desk, and to log out and shutdown your computer overnight. This will avoid others gaining unauthorised access to your personal information, the personal information of others and confidential information within the School.

5.5 In order to comply with the School's obligations under the Data Protection Act, you are encouraged to use the blind copy option when sending emails to multiple recipients where disclosure of those persons' email addresses will impinge upon their privacy.

5.6 In addition to the above, you should familiarise yourself with the DPA and GDPR, and ensure that your use of email does not breach these. If you require more information on compliance, contact the School's Privacy Officer.

6 Distribution and Copyright

6.1 When distributing information over the School's computer network or to third parties outside the School, you must ensure that you and the School have the right to do so, and that you are not violating the intellectual property rights of any third party.

6.2 If you are unsure of whether you have sufficient authorisation to distribute the information, please contact the Director of ICT (ext 8593).

6.3 In particular, copyright law may apply to the information you intend to distribute and must always be observed. The copyright material of third parties (for example, software, database files, documentation, cartoons, articles, graphic files and downloaded information) must not be distributed through email without specific authorisation to do so. A similar caveat applies to the posting of pupil photographs on the School's network.

7 Social Media Rules

The School recognises that many staff make use of social media in a personal capacity outside the workplace and outside normal working hours. While they are not acting on behalf of the School in these circumstances, staff must be aware that they can still cause damage to the School or HSEL if they are recognised online as being one of its staff or contractors. Therefore, it is important that the School has strict social media rules in place to protect its position.

When logging on to and using social media websites and blogs at any time, including personal use on non-School computers outside the workplace and outside normal working hours, HSEL professionals must not:

- conduct themselves in a way that is potentially detrimental to the School or brings the School or HSEL or its pupils, contractors, residents, parents and suppliers into disrepute, for example by posting images or video clips that are inappropriate or links to inappropriate website content
- allow their interaction on these websites or blogs to damage working relationships with or between staff and pupils, colleagues, contractors, residents, parents and suppliers of the School, for example by criticising or arguing with such persons
- include personal information or data about the School or HSEL's staff, pupils, colleagues, contractors, residents, parents or suppliers without their express consent (an employee may still be liable even if staff, pupils, colleagues, contractors, residents, parents or suppliers are not expressly named in the websites or blogs as long as the School reasonably believes they are identifiable) - this could constitute a breach of the Data Protection Act 1998 which is a criminal offence
- make any derogatory, offensive, discriminatory, untrue, negative, critical or defamatory comments about the School or HSEL, its staff, pupils, contractors, residents, parents or suppliers (an employee may still be liable even if the School, HSEL, its staff, pupils, contractors, residents, parents or suppliers are not expressly named in the websites or blogs as long as the School reasonably believes they are identifiable)

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- make any comments about the School or HSEL's staff that could constitute unlawful discrimination, harassment or cyber-bullying contrary to the Equality Act 2010 or post any images or video clips that are discriminatory or which may constitute unlawful harassment or cyber-bullying – professionals can be personally liable for their actions under the legislation
- disclose any trade secrets or confidential, proprietary or sensitive information belonging to the School or HSEL, its staff, pupils, colleagues, contractors, residents, parents or suppliers or any information which could be used by one or more of the School or HSEL's competitors, for example information about the School or HSEL's work, its products and services, technical developments, deals that it is doing or future business plans and staff morale
- breach copyright or any other proprietary interest belonging to the School or HSEL, for example, using someone else's images or written content without permission or failing to give acknowledgement where permission has been given to reproduce particular work - if professionals wish to post images, photographs or videos of their work colleagues or pupils, contractors, residents, parents or suppliers on their online profile, they should first obtain the other party's express permission to do so.

Professionals must remove any offending content immediately if they are asked to do so by the School.

Staff should remember that social media websites are public fora, even if they have set their account privacy settings at a restricted access or "friends only" level, and therefore they should not assume that their postings on any website will remain private.

Staff must also be security conscious when using social media websites and should take appropriate steps to protect themselves from identity theft, for example by placing their privacy settings at a high level and restricting the amount of personal information they give out, e.g. date and place of birth. This type of information may form the basis of security questions and/or passwords on other websites, such as online banking.

Should staff notice any inaccurate information about the School or HSEL online, they should report this to their line manager in the first instance.

8 Confidentiality

8.1 As mentioned above, the Internet and email are insecure means of transmitting information. Therefore, items of a highly confidential or sensitive nature should not be sent via email. You should note that there is always a trail and a copy saved somewhere, not necessarily only on the School's network server.

8.2 You must ensure that all emails that are sent from your email address contain the School's standard disclaimer message. This message will be set to appear automatically on each outgoing email. Please contact IT if this feature is not working. The standard disclaimer is

Harrow School, Harrow School Enterprises Limited, Harrow Development Trust, the Harrow Association and Harrow International Schools Limited do not accept responsibility for email contents. This email and any attachments are intended only for the addressee(s) named above and may not therefore be disclosed to any other person. If you are not the named addressee, please delete or destroy all copies whether in electronic or hard copy form and telephone Harrow School immediately or email us on postmaster@harrowschool.org.uk including the message headers if possible.

8.3 There is a risk of false attribution of email. Software is widely available by which email messages may be edited or 'doctored' to reflect an erroneous message or sender name. The recipient may therefore be unaware that he or she is communicating with an impostor. Always maintain a reasonable degree of caution regarding the identity of the sender of incoming email. Please verify the identity of the sender by other means if you have concerns.

8.4 Please delete old or unnecessary email messages. Retention of messages takes large amounts of storage space on the network and can slow down performance. You should maintain as few messages as possible in your in-boxes and out-boxes. If you are advised that you have exceeded your email storage limit, please contact IT Services for assistance.

9 Viruses

9.1 All external files and attachments will be automatically virus-checked using scanning software. The Internet is a potential host for computer viruses. The downloading of infected information from the Internet

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is potentially fatal to the School computer network. A document attached to an incoming email may have an embedded virus.

9.2 If you are concerned about an email attachment or believe that it has not been automatically scanned for viruses, do not open the attachment or reply to the email but contact the IT Department.

10 General

10.1 This policy may be updated or revised from time to time. The School will notify you annually of any revisions to this Policy. If you are unsure whether you are reading the most current version, you should contact the Head of HR.

10.2 The terms and recommended conduct described in this Policy are not intended to be exhaustive, nor do they anticipate every possible use of the School's email and Internet facilities. You are encouraged to act with caution and take into account the underlying principles intended by this Policy. If you feel unsure of the appropriate action relating to use of email or the Internet, you should contact the Director of ICT.

For the attention of staff who are issued a mobile device

11 Device User Agreement

- Professionals must sign and return this agreement before a device can be issued.
- The device and peripheral items must be returned when the teacher ceases employment with Harrow School or HSEL, or when requested by the School. The use of the device provided by the School is not transferable to anyone and terminates when a professional is no longer employed by Harrow School or HSEL.
- All users of issued devices must follow the expectations outlined in the School's ICT Acceptable Use Policy.
- Nothing done on the issued device is private. Harrow IT Services may, at any point, confiscate and search the contents of any issued device.
- In the event of failure to return a device or accessories upon departure from the School, teachers will be responsible for the full replacement cost of the items not returned.
- All data must be stored on the School network / School cloud.
- If any data are stored on the local device, it must be backed-up. Professionals should carry out a back-up of all data regularly. In the event of a system failure or hardware problem, it may be necessary to return the device to its original state.
- Professionals should use only software licensed by Harrow School (software centre), authorised and installed by the School's IT staff.
- "Fair usage" personal Internet access is permitted but the School will not accept responsibility for offering technical support relating to personal Internet connectivity.
- The School's insurance policy does not cover not accidental damage, loss or theft to these devices issues by HSEL. After a consideration of the circumstances, any repairs or replacements that are otherwise required to a device issued by HSEL (broken screens, water damage, theft etc.) could be recharged to the professional by HSEL.
- If devices are modified or adjusted in any way, the manufacturer's warranty will no longer be valid and the professional will be liable for the full cost of the device.
- Devices issued by HSEL are intended for HSEL use. Whilst HSEL will not prevent professionals from using devices for personal functions, the IT department will not support faults or requests relating to these.
- To meet the School's Data Protection obligations, and to secure School data in the event of loss or theft, IT Services have installed BitLocker encryption software on certain School devices. Professionals should not under any circumstances attempt to disable or remove this encryption. The device will otherwise become unusable.