Safeguarding Children Policy

Reviewed and approved:	Deputy Head Pastoral (DSL)
	September 2024
Next review due:	September 2025
Approved by Governors:	Nathan Millard & Harriet Gurprashad

1. **DEFINITIONS AND APPLICABILITY**

In this Policy:

- **"Abuse"** means any form of maltreatment of a child. Detailed information about the signs of different types of abuse can be found at Appendix 1.
- **"Child / Children"** means all young people who have not yet reached their 18th birthday. It includes all current registered Dragon School pupils, but may also extend to children visiting the School and siblings of children at the School.
- **"Child-on-child abuse"** means abuse caused by children to other children. Further details about child-on-child abuse can be found on page 10.
- **"CWCF"** means a Child We Care For, which is the term used in Oxfordshire for children who are under the care of the local authority.
- **"DDSL"** means the Deputy Designated Safeguarding Lead. Deputy Designated Safeguarding Leads exist in each section of the School.
- **"DSL"** means the Designated Safeguarding Lead.
- **"EYFS"** means Early Years Foundation Stage
- **"IICSA Report"** means the Report of the Independent Inquiry into Child Sexual Abuse, which was published in October 2022 and made a series of recommendations for reform in several institutional settings (including schools) in order to improve Child safety.
- **"KCSIE"** means the Department for Education Guidance "Keeping Children Safe in Education 2023".
- **"LADO"** means Local Authority Designated Officer.
- **"LCSS"** means the Locality Community Support Service.
- **"Low Level Concern"** means any concern that a Staff member may have acted in a way that (a) is inconsistent with the School Code of Conduct but (b) does not meet the threshold for harm or is otherwise not considered serious enough to require a referral to the LADO. (The threshold for harm is the point at which it is known that harm has been caused or may be caused, a crime has been committed, or it is clear that the person responsible may not be suitable to work with children).
- **"MASH"** means the Multi Agency Safeguarding Hub.

- **"OSCB"** means the Oxfordshire Safeguarding Children Board.
- **"Parent"** means those holding parental responsibility or other officially-appointed carers for current registered Dragon School pupils.
- **"Prevent Duty"** means the duty specified in Section 26 of the *Counter-Terrorism and Security Act 2015* to have 'due regard to the need to prevent people from being drawn into terrorism', which applies to those working in schools. Further details about the Prevent Duty can be found on page 10.
- **"Safeguarding"** means the action that is taken to promote the welfare of children and protect them from harm.
- **"SEN/D"** means special education needs and/or disabilities.
- **"School"** means the Dragon School, Oxford, comprising the Prep, Pre-Prep and EYFS settings.
- **"Staff"** means all those working permanently or temporarily for or on behalf of the School (including governors and other volunteers) and may also include Parents.
- **"Transferable Risk"** refers to the behaviour of a childcare professional in their private life which indicates that they are unsuitable to work with Children.

This Policy applies to the Prep School, the Pre-Prep School and the EYFS and should be read in conjunction with the following School policies and national guidance documents, which have been made available to Staff:

- Dragon School Behaviour Policy (Prep)
- Dragon School Behaviour Policy (Pre-Prep and EYFS)
- Dragon School Character and Health Education Policy
- Dragon School Code of Conduct and Practice
- Dragon School ICT Acceptable Use Policy (Pupils)
- Dragon School ICT Acceptable Use Policy (Staff)
- Dragon School Safer Recruitment Policy
- Dragon School Use of Cameras and Mobile Devices Policy
- Dragon School Use of School Issued Mobile Devices Policy
- Dragon School Whistleblowing Policy
- Keeping Children Safe in Education 2024
- National Minimum Standards for Boarding
- Prevent Duty Guidance: For England and Wales
- The Prevent Duty: departmental advice for schools and childminders
- Relationships Education, Relationships and Sex Education (RSE) and Health Education
- The use of social media for online radicalisation
- Working together to safeguard children 2023

2. SCHOOL COMMITMENT

It is our commitment to always act in the best interests of each Child and to put safeguarding and pastoral care at the heart of all we do. We do this by encouraging every Dragon pupil to 'reach for the sun' and to approach everyday life with kindness, courage and respect. We aim to equip all pupils with the necessary skills to tackle life with confidence, empathy and determination. We also aim to respond progressively to the modern world and ensure we lead with a proactive and restorative approach.

- We know that **children can only learn effectively if they feel safe**.

- We believe that **safeguarding is everyone's responsibility**. We equip all Staff with the knowledge and tools that they need in order to (a) identify potential safeguarding concerns and (b) deal with those concerns appropriately.
- We adopt a view that **'it could happen here'** when it comes to concerns around safeguarding. We are also aware that as a Boarding School, some of our children may be at an increased risk of having their safety and wellbeing compromised. We have created a multi-layered DSL team that is able to hold one another to account and make use of their specific knowledge in all different areas of School life in order to continuously assess the effectiveness of our safeguarding.
- We **work collaboratively with other safeguarding agencies** and with Parents in order to achieve the best outcomes for each Child. However, we reserve the right to act without notifying Parents if this is believed to be in the best interests of the Child.
- We aim to **foster a culture of safeguarding** within the School which allows children to feel safe and know that if they need to talk to someone within the School about an issue relating to their safety or wellbeing, they will be listened to.

The IICSA report was clear in its finding that 'despite 20 years of enhanced focus on safeguarding, schools are not as safe for children as they should be'. Ultimately, the School is committed to playing its part in changing this, and raising the profile of safeguarding in both its internal and external operations.

3. ROLES & RESPONSIBILITIES

Safeguarding Team

Senior Leadership Team and Governors

Role	Name of contact	Contact if	Contact details
Deputy Head Pastoral & DSL	Kath Harvey	You need to make a Disclosure. You have serious concerns about a child. You have concerns about safeguarding-related matters at the School.	Kath.harvey@dragonschool.org 07817179206 or 07955280847
Deputy DSLs (DDSL)			
Pre-Prep – Year 4 (DDSL)	Bruce Anderson	You have any concerns about a child in Pre-Prep or Year 4 (Lower School).	bruce.anderson@dragonschool.org 07713210960
Head of Pre-Prep (DDSL)	Annie McNeile	You need to make a Disclosure about a child at the Pre-Prep. You have serious concerns about a child in Pre-Prep.	annie.mcneile@dragonschool.org 01865 315541

		You have concerns about safeguarding-related matters at the Pre-Prep.	
Senior Deputy Head (DDSL)	Katy Dallimore	You have concerns about safeguarding practices in boarding.	Katy.dallimore@dragonschool.org 07512301476
Upper School (DDSL)	Marykate Edwards	You need to make a Disclosure about a child in Upper School. You have serious concerns about a child in Upper School.	marykate.edwards@dragonschool.org 01865 315592
Middle School (DDSL)	Louise Tattersall-King	You have any concerns about a child in Middle School.	Louise.tattersall@dragonschool.org 01865 315598
EYFS (DDSL)	Emma Gage	You have any concerns about a child in EYFS.	emma.gage@dragonschool.org 01865 315541
Pastoral and Safeguarding Coordinator (DDSL)	Maxine McConville	You need to arrange a meeting for a safeguarding-related matter. You need direction and advice about a safeguarding-related issue.	maxine.mcconville@dragonschool.org 01865 315478
Safeguarding Nurse (DDSL)	Chris Wheeler	The Safeguarding Nurse will provide information and advice to the rest of the safeguarding team about medical issues which are potentially related to safeguarding.	chris.wheeler@dragonschool.org 01865 315511
Head	Emma Goldsmith	You have any concerns about the conduct of a member of staff towards a child.	head@dragonschool.org 01865 315401
Chair of Governors	Andrew Webb	You have any concerns about the conduct of the Head.	andrew.webb@dragonschool.org
Safeguarding Governors	Nathan Millard Harriet Gurprashad	You have any concerns about safeguarding practices at the School. The Safeguarding Governors will review the School's safeguarding-related policies and procedures annually and participate in twice-termly meetings regarding safeguarding practices at the School.	nathan.millard@dragonschool.org harriet.gurprashad@dragonschool.org

External Organisations	Contact number
Education Safeguarding Advisory Team / Local Authority Designated Officers (LADOs) Jo Lloyd Sandra Barratt Amie Pilcher Becky Langstone Sophie Kendall	01865 810603 Lado.safeguardingchildren@oxfordshire.gov.uk ESAT.safeguardingchildren@oxfordshire.gov.uk
Early Help and Locality Community Support Services (LCSS)	0345 050 7666 Lcss.central@oxfordshire.gov.uk
Multi Agency Safeguarding Hub (MASH) *Katrina Johnson*	0345 050 7666
Emergency services	101 or in emergencies 999
Prevent Helpline	0800 011 3764
Out of Hours Emergency Duty Team (EDT)	08450 507666

The Deputy Head Pastoral and DSL and Head of Pre-Prep School are members of the School Leadership Team and have day-to-day responsibility for the co-ordination, management and operation of safeguarding within the School. The DSL will ensure that a Deputy DSL is available at all times in their event of their absence.

However, we believe that **safeguarding is everyone's responsibility**. Therefore, whilst the roles listed above are important and create a valuable structure around our culture of safeguarding, this is not an exclusive list of those who carry responsibility for safeguarding within the School. Parents should also note that minor concerns about their children's experience at the School (including issues around social experiences and minor welfare issues) are most appropriate to be discussed with their Form Tutor or Head of Year. If it is considered that any issues raised via those channels crosses over into a safeguarding issue, it will be referred to the DSL.

4.   TRAINING

Staff are trained in safeguarding (a) prior to commencing employment at the School (including in the Prevent Duty), (b) at the point of induction, (c) during each INSET and (d) statutory training is refreshed every three years. The DSL and the DSL team (as well as key staff with specific pastoral responsibilities) undergo additional safeguarding training via OSCB, which is refreshed every two years.

All Staff are aware that safeguarding forms part of their role and this includes the roles and responsibilities they have in relation to filtering and monitoring.

5.   HOW TO MANAGE SAFEGUARDING CONCERNS, DISCLOSURES AND REFERRALS

Contact details for the external agencies referred to in this section are listed on Page 6.

All concerns, disclosures and referrals must be recorded on the School systems – iSAMS or MyConcern depending on the nature of the concern.

If a member of Staff has a safeguarding concern about a Child

Has the child been harmed or are they at risk of immediate harm?	
Yes	No
Contact the DSL (or their nominated deputy) immediately. In the event of their absence, contact Children's Social Care (and the police, if appropriate).	Contact the DSL (or DDSL) as soon as possible.
The DSL will • Consider if there is a requirement for immediate medical intervention and/or sufficient grounds for suspecting significant harm. • If there is, a referral to Children's Social Care via the MASH (and the police, if appropriate) will be made. • The referral process may include LCSS involvement. • All details of the decision-making process will be recorded in MyConcern.	
If it is appropriate, the School will discuss their concerns with the Child's parents and seek agreement before making a referral to Children's Social Care or LCSS. However, if it is considered that this may place the child at increased risk, impact a potential police investigation, or the School is so advised by an external agency, the School will not contact the Child's parents. If there are doubts or reservations about involving the Child's family, the DSL will clarify the best way forward with Children's Social Care, the LCSS or the Police. The Child's views will also be taken into account. In the event that the Child needs <u>urgent</u> medical attention and there is suspicion of parental abuse causing the medical need, the DSL will seek advice from the MASH.	The DSL will • Actively monitor the situation • Consider the Early Help process • Contact the LCSS
In all cases	
Make a record on the appropriate School system. Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance '<u>For Organisations</u>' which includes information about your obligations and how to comply, including protecting personal information and providing access to official information.	

If a member of Staff receives an allegation or disclosure of Abuse from a Child or about a Child

Receive	• Don't ask the child to come back later • Listen to what is being said, without displaying shock or disbelief • Accept what is said and take it seriously • Make a note of what has been said as soon as practicable
Reassure	• Reassure the pupil, but only so far as is honest and reliable • Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential' • Do reassure e.g. you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

Respond	• Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
	• Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
	• **'TED'** is helpful to remember.
	    ○ *Do you want to TELL me a bit more about that?*
	    ○ *Can you EXPLAIN a little more for me?*
	    ○ *Are you able to DESCRIBE that for me?*
	• Do not ask the child why something has happened.
	• Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible
	• Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be the DSL and that they are experienced in helping children.
	• Ask the child if they would prefer to be there with you when explaining the situation to the DSL. Many children prefer to feel a greater sense of control over their information and experience.
	• Be mindful of the child's wishes concerning terminology, particularly the use of the word 'victim' as the child may not wish to be described in this way.

Report	• Share concerns with the DSL as soon as possible. This should not be by email. The DSL will then share with appropriate members of staff, including the Head. • If you are not able to contact the DSL or a DDSL, and the child is at risk of immediate harm, contact MASH or Police immediately
Record	• Make notes at the time, and record them on the appropriate School system as soon as possible. • Keep your original notes, scan these and upload them to the record in My Concern. Once uploaded, notes must be shredded for reasons of confidentiality. • Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words • Complete a body map to indicate the position of any noticeable bruising • Record facts and observable things, rather than your 'interpretations' or 'assumptions.' Eg. Describe a behaviour (head was on the desk and the pupil was not able to maintain eye contact), rather than recorded our reaction to the behaviour (the child was being lazy and rude, unwilling to maintain eye contact).
Remember	• Support the child: listen, reassure, and be available.

	• Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.
	• Get some support for yourself if you need it. You may speak to the DSL who is able to signpost you towards additional support if required.
Review	• Has the action taken provided good outcomes for the child?
	• Did the procedure work?
	• Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
	• Is further training required?
Recovery	Dealing with a disclosure from a child, and a child protection case, is likely to be a stressful experience. The member of staff should therefore consider seeking support for him/herself and discuss this with the DSL.

<u>Record Keeping</u>

The School uses two separate third party platforms to log concerns relating to safeguarding and the wellbeing of students. These are maintained confidentially and in line with GDPR requirements as well as KCSIE, although it must be noted that our Safeguarding duties take priority over our GDPR duties (meaning that if there is a requirement for the School to share Safeguarding information held on our School systems, for example with the Police or another external agency, we must comply with that requirement). Staff know not to share concerns about Children via email.

- **ISAMS Wellbeing Manager Concern entries** are used to track patterns of behaviour and behavioural concerns which may reasonably be believed to relate to safeguarding. Any data submitted is reviewed weekly by the DSL and shared with Staff on a need-to-know basis in order to help identify patterns and monitor the consistency/efficacy of any interventions. At the end of each half term, the DSL will share any key (anonymous) trends from this data with Staff.
- **My Concern** allows Staff to report any welfare or safeguarding concerns confidentially to DSL team. Staff will be directed to input description of concern, with any relevant actions and outcomes (if known). The DSL team will follow up at earliest opportunity and advise on follow up steps.

When making records of concerns on these systems, please include the following information:

- Dates and times of observations made
- Dates and times of any discussions around the observations made
- Any injuries
- Any questions asked
- Any explanations provided
- Any actions taken
- Any verbatim words/phrases used by the child

*As well as recording concerns, discussions and decisions, the safeguarding team should keep a record of the rationale for any decisions made.

If a member of Staff receives an allegation of Child-on-Child abuse against a Child

Details of the allegation should be referred to the DSL/DDSL immediately
Is a strategy discussion with any external agencies or the Police required?

Yes	No
The DSL/DDSL will consult those agencies and agree the information that can be disclosed in advance of informing the Parents of the Child responsible for the alleged Abuse.	The DSL/DDSL will inform the Parents of the Child responsible for the alleged Abuse as soon as possible.
The DSL/DDSL will inform the Parents of the Child who has experienced the alleged Abuse.	
All Parents should be kept informed about the progress of incidents (including the outcome of any internal sanctions) in all cases other than where there is a criminal prosecution.	
Appropriate support tailored to the needs of the Children involved will be put in place for all Children involved.	
In all cases	
Make a record on the appropriate School system and consider if any procedural issues were identified.	

If a member of Staff is concerned about or receives an allegation against another member of Staff

It may feel unsettling to receive allegations against fellow colleagues, particularly where there are proximate professional relationships and friendships. However, a Child's interest must always come first and all allegations must be received equally and reported accurately.

This procedure should be used where it is alleged and/or there are grounds to reasonably be concerned that a member of Staff has:

- behaved in a way that has harmed a child, or may have harmed a Child;
- possibly committed a criminal offence against or related to a Child;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to Children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with Children (including Transferable Risks).

Is the concern about the Head or a member of Staff?	
Head	**Staff**
Raise the concern with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted.	**Raise the concern** with the DSL or the Head as soon as possible.
Depending on the circumstances, the Chair of Governors may wish to involve the Police (e.g. if the Head is deemed to be an immediate risk to Children or there is evidence of a possible criminal offence).	The Head or the DSL will meet with the Director of HR to establish next steps. If concerns pose an immediate risk to Children, the involvement of Police and LADO will be actioned.
Referral - The Chair of Governors will contact the Police or LADO, who will determine the next steps to be taken, including as to the requirement for an investigation and/or a MASH referral.	**Referral** - The Police or LADO will determine the next steps to be taken, including as to the requirement for an investigation and/or a MASH referral.
A record of concern will be stored within Confide or LADO depending on nature of concern.	

Where a concern relates to an individual employed by a supply agency or contractor, the School will notify that person's employer so that any potential patterns of inappropriate behaviour can be identified.

If a member of Staff is concerned about safeguarding practices within the School

The School adopts the guidance from KCSIE (paragraphs 74-76) regarding how Staff should manage any concerns that they have about safeguarding practices within the School. It is the duty of staff to raise such concerns, should they exist, at any time and no member of staff will be treated to any detriment for so doing. We also have a specific Whistleblowing Policy to support this.

Special arrangements for EYFS

- Ofsted will be informed of allegations against any person living, working, or looking after children on the EYFS premises, or of any other abuse alleged to have taken place on the premises. Ofsted will also be informed of any action taken as a result of the allegation.
- The notification to Ofsted will take place as soon as practicable and within 14 days at the latest.

Child Safeguarding Practice Reviews (CSPRs)

We will participate in Child Safeguarding Practice Reviews (CSPRs), other reviews and file audits as and when required to do so by the Oxfordshire Safeguarding Children's Board. We will ensure that we have a clear process for gathering the evidence required for reviews and audits and embed recommendations into practice and complete required actions within agreed timescales.

Low Level Concerns

Low level concerns are not necessarily insignificant; but they are managed differently to formal allegations. The School takes all concerns about safeguarding seriously and managing low level concerns effectively enhances the overall culture of safeguarding.

Who does the low level concern relate to?		
Yourself*	Another member of Staff	A Governor
Raise the concern with the DSL or the Head as soon as possible and in any event within 24 hours. This may be done verbally or by way of written summary.	**Raise the concern** with the DSL or the Head as soon as possible and in any event within 24 hours. If the low level concern relates to the Head or there is a conflict of interest in referring it to the Head, please refer it to the Chair of Governors. This may be done verbally or by way of written summary.	**Raise the concern** with the Chair of Governors or the Head. This may be done verbally or by way of written summary.
The Head/DSL will consider whether or not the concern reported warrants any referral to the LADO (including on a no-names basis). They will then: • Speak to the person who has raised the concern; • Speak to anyone who witnessed the behaviour (unless advised not to do so by the LADO, where consultation has been sought)		

• Speak to the person who is the subject of the concern (unless advised not to do so by the LADO where consultation has been sought).
The Head/DSL will review the information gathered and determine whether the behaviour: • Is consistent with the School Code of Conduct and/or the law;   • Constitutes a low level concern;   • Warrants any further advice from or referral to the LADO.
The Head/DSL will ensure that appropriate and detailed records are kept of all conversations with all parties involved. To the extent that the concern raises separate conduct issues, these will be referred to the Director of HR.
The Head/DSL will keep the person who has been the subject of the concern updated as to any decisions or further action taken.

Staff should feel supported and encouraged to share concerns about their own behaviour if they need to, e.g. if they have found themselves in a situation that may be misinterpreted or compromising. Staff may also reflect on their own behaviour and realise that they have fallen below the requisite standards. Self-referral in these circumstances is:

- Self-protective;
- Demonstrates appropriate awareness; and
- Contributes to maintaining high standards of conduct and behaviour.

Examples of Low Level Concerns:

- Being over-friendly with children
- Having favourites
- Being over aggressive with a child

Where a low-level concern relates to an individual employed by a supply agency or contractor, the School will notify that person's employer so that any potential patterns of inappropriate behaviour can be identified.

As well as maintaining appropriate records relating to Low Level Concerns on the School systems, the DSL maintains the record for Low Level Concerns via Confide. This is reviewed once a term by both the Head and the Safeguarding Governor. As well as providing a clear record of concerns, this Log enables the School to track trends or themes (e.g. types of concern, processes used to resolve them) which supports the continuous improvement of the School's safeguarding practices and any obvious additional training needs.

The information retained on the Low Level Concerns Log is retained for the same duration as the individual's personnel file, but will not be included in any onward reference except where the concern has been deemed significant enough to have been referred to the LADO or otherwise relates to matters which would normally be included in a reference (e.g misconduct or poor performance).

6. SAFEGUARDING CHILDREN WITH SEN/D AND OTHER AREAS OF INCREASED RISK

The School acknowledges that children with SEN/D can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. The IICSA report identified that disabled children are almost three times more likely to experience sexual violence than non-disabled children, and the 2019 Office for National Statistics Crime Survey recorded that adults with a disability were twice as likely to have experienced child sexual abuse than those without a disability.

Staff training includes specific content around how to identify possible indicators of abuse within this group. In particular, Staff know not to assume that behavioural challenges or changes are necessarily linked to a Child's SEN profile or formal diagnosis.

The School supports children with SEN/D by ensuring relevant staff are aware of the pupil's profile and strategies required to support their educational development. Regular staff training is provided during INSETs to build awareness and confidence in supporting various needs. The Pastoral and Safeguarding team regularly monitor individual pupils (including those with SEN/D) to ensure that the appropriate provision is provided.

Other factors that can increase the risk of compromise to a child's safety or wellbeing include:

- CWCF status;
- Parental safety and wellbeing (including living in a home where domestic violence is taking place or where Parents are misusing drugs or alcohol);
- Boarding at School, particularly from overseas
- Pupils with protected characteristics or who are perceived to have protected characteristics or who are associated with others who have protected characteristics
- Girls if there is evidence, they are being disproportionately subjected to sexual violence or sexual harassment.

There are also factors that may reduce or impair a Child's capacity to communicate effectively about their own concerns for their safety and wellbeing or make disclosures, including having English as an additional language.

Historic safeguarding concerns

We acknowledge that former pupils of the School may have legitimate concerns relating to their experiences and the safeguarding practices that were in place at the time. The School is committed to working sensitively and compassionately with those who approach the School with historic safeguarding concerns. In the event of a disclosure being made, the School is obliged to report the matter to the police and LADO.

If you need to contact the School about historic safeguarding concerns, please direct your communications to the COO (martin.johnson@dragonschool.org) in the first instance.

7. SCHOOL LIFE

There are many ways in which safeguarding is supported and amplified by other areas of School life, and the safeguarding team regularly meets and reviews ways to increase the profile and reach of their work throughout the School community, including via Character and Health Education weekly lessons, assemblies, Tutor time, Parent Forums and Dragon News.

Early Help

To provide clear opportunity for children to feel listened to and to ensure we have a proactive early help structure in place, the following measures are provided:

- At the start of each term, the Pastoral team are signposted to all pupils in assembly. A 'Help is at Hand' poster is displayed in all classrooms, outlining key Pastoral staff, including the 'Independent Person'.
- Pastoral Office – Pupils are notified regularly that the Pastoral Office is staffed throughout the day and is a place they can visit when they need help or time out.
- School counsellor – Pupils can self-refer if they would like time to talk with our School Counsellor.
- Liaising and working together with other support services and those agencies involved in safeguarding children, including Early Help and preventative services as required in Working Together to Safeguarding Children 2023: https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
- Acknowledging the importance of 'contextual safeguarding', https://contextualsafeguarding.org.uk/ which considers wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare.
- Wellbeing and Mental Health – The School's Wellbeing Lead works on a universe level (all pupils) to educate on regular wellbeing themes (e.g. healthy habits, sleep, hygiene etc...) and our Mental Health Lead supports 1:1 intervention, where pupils might be requiring more tailored support, which leads into our middle intervention.

Character and Health Education (C&HE)

The School teaches a curriculum of Character and Health Education (which comprises Personal, Social, Health and Economic Education (PSHEE) and Relationships and Sex Education (RSE)) which supports our child-centred approach to safeguarding. This is aimed to equip Children with the information and support they need to recognise potential compromises to their safety and wellbeing. The C&HE curriculum supports the school in addressing and minimising the risk of child-on-child abuse, including sexual behaviours, sexual violence, and sexual harassment (which could take place on or off-line).

For more information please review our Character and Health Education Policy.

8. SITE SECURITY

All staff members have a responsibility to ensure our buildings and grounds are safe, this includes ensuring the safety of any visitors into school.

The school will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

9. QUALITY ASSURANCE

We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures.

The school's senior management and the governing body will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

10.POLICY REVIEW

This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle.

The Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures.

APPENDIX A: THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD

Managing referrals:

- Refer cases to MASH and the police, where appropriate, in a timely manner avoiding any delay that could place the child at increased risk
- Refer to the Oxfordshire Threshold of needs to assist with decision making - Oxfordshire-Threshold-of-Needs-2021.pdf (oscb.org.uk)
- Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding, including contextual safeguarding.
- Have responsibility to ensure there is at least one key adult for 'Operation Encompass'* and a point of contact for Child Exploitation. *Guiding principles of the scheme are here https://www.operationencompass.org/school-participation. An annual information letter must be sent to parents.
- To ensure that the Local Authority are notified if children are persistently absent or missing from education

Record keeping:

- Keep detailed, accurate, secure written (or online) records of all safeguarding and welfare concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.
- Schools should have at least two emergency contacts for every child in the school in case of emergencies and in case there are welfare concerns at the home.
- Maintain a chronology of significant incidents for each child with safeguarding concerns, including a record of decisions made and the reasons for those decisions.
- Ensure such records are kept confidentially and securely and separate from the child's educational record.

- When a child leaves our school will contact the Designated Safeguarding Lead at the new school or college and will ensure that the safeguarding file is forwarded to the receiving setting within 5 school days, retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving setting and/or evidence of recorded delivery.

Multi-agency working and information sharing:

- The DSL recognises and is committed to their responsibility to work with other professionals and agencies in line with statutory guidance.
- Our School is not the investigating agency when there are child protection concerns. We will, however, contribute to the investigation and assessment processes as required. We recognise the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

Training:

The DSL will ensure all staff undertake appropriate annual updates in order to:
- be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness
- understand the assessment process for providing early help and intervention e.g. OSCB threshold of need, preventative education, and the local offer.
- have a working knowledge of how the local authority conducts initial and review child protection (CP) case conferences and contribute effectively to these
- be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers, young carers, those who are privately fostered, susceptible to exploitation, radicalisation and subject to seeing, listening or hearing domestic abuse.
- Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them.
- Ensure each member of staff has read and understood the school's safeguarding policy and procedures, including providing induction on these matters to new staff members. Induction and training must include the school's behaviour policy and the school's procedures for managing children who are absent from education, as well as the staff code of conduct, the child protection policy, responsibilities in relation to filtering and monitoring in relation to ICT and dealing with disclosures and managing allegation processes.
- Organise face-to-face whole-school Safeguarding training for all staff and governors at least **every three years**.
- The DSL and DDSLs will ensure their training remains in date (every 2 years)
- All staff should be aware of key policies within their school which supports safeguarding and these should be explained to them as part of staff induction.

- Ensure the school allocates time and resource every year for relevant staff members to attend training and receive continuous professional development opportunities.
- Maintain accurate records of induction, ongoing training, and continual professional development (CPD) relating to safeguarding.

Awareness raising:

- Ensure our school's child protection policies are known, understood and used appropriately
- Ensure our school's safeguarding policy is reviewed annually (as a minimum) and the procedures are updated and reviewed regularly
- Ensure our safeguarding policy is available publicly to help parent/carers to understand the school's responsibilities in relation to safeguarding.
- Ensure that all staff are aware of the school's policy on ICT and understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring**.**

Quality assurance:

- Monitor the implementation of and compliance with policy and procedures, including periodic audits of Safeguarding files (at a minimum once a year).
- Complete the 175/157 annual safeguarding report and submit to the Local Authority
- Provide regular reports to the governing body detailing changes and reviews to policy, training undertaken by staff members and relevant data about numbers of children in need of help. support and safeguarding.
- Take lead responsibility for remedying any deficiencies and weaknesses identified in Safeguarding arrangements.

Support for staff:

- The school will have a framework for providing an opportunity for staff who are working directly with vulnerable young people to have regular access to an appropriate manager to talk through and reflect on their involvement with the child's case.

APPENDIX B: ABUSE AND NEGLECT

Child-on-child abuse

Staff are aware that children can abuse other children and know that even where there are no reported cases of child-on-child abuse, this does not mean that it's not happening. **The School does not tolerate child-on-child abuse, and concerns and allegations regarding conduct between children will be taken seriously.**

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

- Bullying (including cyberbullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse.
- Sexual violence and sexual harassment, (including 'up-skirting' and youth-produced sexual imagery*).

- Initiation/hazing-type violence and rituals.
- Intrafamilial harm (with consideration given to the need to support siblings.)

*It is against the law to take, make, share or possess images and pseudo-photographs of a Child. Therefore, a Child who engages in the creation or sharing of nude photographs of themselves or another Child is committing a crime.

The School will respond to any incidents relating to these types of offences in line with government guidance and the following:

- Any device involved will be confiscated and set to flight mode or switched off.
- The incident will be referred to the DSL as soon as possible.
- The DSL should hold an initial strategy meeting with appropriate staff.
- There should be subsequent discussions with the Children involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm.
- At any point in the process if there is a concern a Child has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Abuse

Abuse is any 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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

The harm may be physical, emotional, sexual and can also include the impact of witnessing the ill-treatment of others (e.g. domestic violence). Neglect is also a form of abuse, and is in fact the most common form.

Knowing what to look for is vital to the early identification of abuse and neglect. Abuse, neglect and safeguarding issues rarely exist in isolation. In most cases, multiple issues will overlap with one another.

Staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If Staff are unsure, they should **always** speak to the DSL.

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

The following indicators of physical abuse should increase concern:

- Bruising:
  - In multiples (especially on the head and face)
- In clusters (e.g. fingertip bruising, caused by being grasped)

- Around the neck and behind the ears (the most common abusive injuries are to the head)
- On the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument (e.g. linear (stick), parallel (belt) or the marks of a buckle)
- Bite marks

- Deliberate burning may also be indicated by the pattern of an instrument or object (e.g. electric fire, cooker, cigarette)
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In a School, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. Therefore, concern should be increased when:

- The explanation given does not match the injury
- The explanation uses words or phrases that do not match the vocabulary of the child (adult words)
- No explanation is forthcoming
- The Child (or the Parent) is secretive or evasive
- The injury is accompanied by allegations of abuse or assault

You should be concerned if the Child or young person:

- Is reluctant to have Parents contacted
- Runs away or shows fear of going home
- Is aggressive towards themselves or others
- Flinches when approached or touched
- Is reluctant to undress to change clothing for sport

- Wears long sleeves during hot weather
- Is unnaturally compliant in the presence of Parents
- Has a fear of medical help or attention
- Admits to a punishment that appears excessive.

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

The following indicators of emotional abuse should increase concern:

- Developmental issues (including delays in physical, mental, and emotional development; poor performance; speech disorders, particularly when they come on suddenly).

- Behaviour (acceptance of excessive punishment, overreaction to mistakes, continual self-deprecation, neurotic behaviour, self-mutilation, suicide attempts, drug abuse, running away, stealing, acting out, poor trust in adults, regressive behaviour, eating disorders, destructive tendencies, arriving early at school and leaving late).
- Social issues (physical or social withdrawal, over-compliance, insecure/clinging behaviour, poor relationships).
- Emotional responses (extreme fear of new situations or people, inappropriate emotional responses, fear of parents being contacted, self-disgust, low self-esteem, lack of concentration, extremes of passivity or aggression).

Most harm is produced in *low warmth, high criticism* homes, not from single incidents. It is hard to define and prove but it is chronic and will have a long-term impact if not dealt with appropriately.

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. Both men and women can commit acts of sexual abuse.

The following indicators of sexual abuse should increase concern:

- **Physical observations** (damage to body, evidence of sexually transmitted diseases, unexpected pregnancy, soreness in genital area, anus or mouth or other medical problems such as chronic itching, unexplained recurrent urinary tract infections and discharges or abdominal pain).
- **Behavioural observations** (age-inappropriate sexual knowledge or behaviour, hinting at experience of sexual behaviour, inexplicable decline in performance, depression, lack of concentration, social withdrawal, over-compliance, aggression, poor trust or fear of adults, regressive behaviour, self-harm, creating sexuality explicit pics, eating disorders, concerns about removing clothing).

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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment), protect a child from physical and emotional harm or danger, ensure adequate supervision (including the use of inadequate care-givers), or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following indicators of neglect should increase concern:

- **Physical indicators** (hunger, stealing food, poor personal hygiene, underweight, inappropriately dressed, poor state of clothing, untreated illnesses or injuries).
- **Behavioural indicators** (tiredness, frequent absence or lateness, missed medical appointments, social isolation, frequently unsupervised, stealing or scavenging).

APPENDIX C: Further information

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM or already having suffered FGM. Harmful Practices - Oxfordshire Safeguarding Children Board (oscb.org.uk)

- **Indicators -** There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines, and Chapter 9 of those Guidelines (pp42-44) focuses on the role of schools and colleges. Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to schools and colleges.
- **Actions -** If staff have a concern, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Mandatory reporting commenced in October 2015. These procedures remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.
- **Mandatory Reporting Duty** -From October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve the Integrated Front Door as appropriate.

Fabricated or Induced Illness

Staff must be aware of the risk of children being abused through fabricated or induced illness (FII). There are three main ways of the carer fabricating or inducing illness in a child.

These are not mutually exclusive and include:
- fabrication of signs and symptoms. This may include fabrication of past medical history

- fabrication of signs and symptoms and falsification of hospital charts and records and specimens of bodily fluids. This may also include falsification of letters and documents
- induction of illness by a variety of means

Where this is identified and considered a risk a referral will be made to the MASH for support and guidance. School may involve other agencies in making their assessments. That could include school nurse, community paediatrician, occupational therapists for example.

Gang and Youth / Serious Violence

Children and Young People who become involved in gangs are at risk of violent crime and as a result of this involvement are deemed vulnerable. Agencies and professionals have a responsibility to safeguard these children and young people and to prevent further harm both to the young person and their potential victims. Risks associated with gang activity include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs, knife crime, sexual violence and substance misuse

https://www.gov.uk/government/publications/serious-violence-strategy

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

A number of the indicators for CSE and CCE may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home.
- have been the victim or perpetrator of serious violence (e.g. knife crime)

Faith Based Abuse

Our policy recognises the 'National Action Plan to Tackle Abuse linked to faith or belief' which describes this abuse as:

'*Not about challenging people's beliefs, but where beliefs lead to abuse that must not be tolerated. This includes belief in witchcraft, spirit possession, demons or the devil, the evil eye, or djinns, dakini, kindoki, ritual or muti murders and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation. The beliefs which are not confined to one faith, nationality, or ethnic community*.'

When this type of abuse is suspected staff will make a referral to the MASH Team for support and guidance.

https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief

Risk of Trafficking

Article 3 of the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organised Crime to the UN Convention (2000) (ratified by the UK on 6 February 2006) defines trafficking as:

- "Trafficking of persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.
- The consent of a victim of trafficking in persons to the intended exploitation set forth in sub-paragraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used.
- The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered "trafficking in persons" even if this does not involve any of the means set forth in sub-paragraph (a) of this article.
- "Child" shall mean any person under eighteen years of age.

Children trafficked into the country may be registered at a school for a term or longer, before being moved to another part of the UK or abroad. This pattern of registration and de-registration may be an indicator that a child has been trafficked. It has been identified as a particular concern in schools which are situated near ports of entry, but practitioners should be alert to this possibility in all schools. However, practitioners should always bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, traveller or migrant families – who collectively go missing from school.

If a member of the school staff suspects that a child may have been trafficked, they should act immediately to inform the senior member of staff with designated responsibility for child protection and ensure that police or local authority children's social care are contacted immediately.

Risks Associated with Parent/Carer Mental Health

The majority of parents who suffer mental ill-health can care for and safeguard their children and/or unborn child.   Some parents, however, will be unable to meet the needs and ensure the safety of their children.

Our approach is to recognise, seek support, instil preventive factors and monitor.   Designated Safeguarding Lead should seek support through Early Help team but escalate to the MASH Team if they are concerned that the child involved is being placed at immediate risk of harm.

Drugs and Alcohol

Children can be at risk of drugs and alcohol directly and indirectly. They may be at direct risk of having access to these substances (see guidance on gangs) or indirectly because they effect family life at home through use by parents/carers, siblings, child-minders etc. Risks associated with drugs and alcohol and should be built into the curriculum policy.

More details can be found at: Substance Misuse - Oxfordshire Safeguarding Children Board (oscb.org.uk)

Honour Based Violence and Forced Marriages

Honour Based Violence and Forced Marriage refers to a collection of practices used to control behaviour within families to protect perceived cultural or religious beliefs and honour. Violence can occur when offenders perceive that a relative has shamed the family or community by breaking their 'code of honour'. Honour Based Violence cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, HBV may exist.

'A forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.' In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

For more information see:

http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/

http://www.karmanirvana.org.uk/

Managing Allegations against School Staff (including those accessing the school premises)

The Local Authority Designated Officer for Allegations (LADO) must be told of allegations against adults working with children and young people within 24 hours. This includes
allegations relating to individuals or organisations using the school premises for the purpose of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

Chairs of Governors should refer to this guidance if there is an allegation against the headteacher. This includes all cases that meet the harm threshold where a person is alleged to have:
- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offence against, or related to, a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children and is known as transferable risk. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO)

There are two levels of allegation/concern:

- allegations that may meet the harms threshold (see definition above)
- allegation/concerns that do not meet the harm threshold – referred to as 'low level concerns'

Governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold. Concerns may arise in several ways and from a number of sources. For example: suspicion, complaint or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

'Low Level Concerns' - Creating a culture in which all concerns about adults, including allegations that do not meet the harm threshold, are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favorites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils

Such concerns should always be recorded and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified

The Local Authority Designated Officer team are contactable by phone on 01865 810603 or by email at lado.safeguardingchildren@oxfordshire.gov.uk
 An Allegation and Consultation Referral Form must be completed by the Headteacher or manager in full and forwarded to the LADO via email within 24 hours of the concern being raised.

Preventing Radicalisation

Guidance for Preventing Radicalisation

Protecting children from the risk of radicalisation is an important aspect of safeguarding. Radicalisation is the name given to the process that moves a person to legitimise their support or use of violence for a specific cause, e.g. an extreme political or religious position. Most cases of radicalisation are for unclear or mixed ideologies, but the second most common form of radicalisation in the UK is for extreme right-wing politics.

The School follows the guidance issued by the government to schools and childcare providers in its approach to dealing with concerns of radicalisation. In particular:

- *We are committed to working in partnership with OSCB and other bodies where we have concerns regarding the potential radicalisation of a Child;*
- *Prevent Duty training forms an important part of the School's overall safeguarding training provision for Staff;*
- *We have IT systems (Smoothwall) in place as we are aware that the use of technology and social media can be central to the radicalisation of a Child.*
- *Our Pastoral Education provision covers topics including radical political and religious positions and their impact on society. There is more information about our Pastoral Education provision in the context of safeguarding under 'School Life' section.*

The School is aware and realistic about the challenges and potential risks to safeguarding that are presented by a Child's use of technology, and particularly the internet and social media. The School categorises these risks into the following broad categories:

- **Content:** being exposed to illegal, inappropriate or harmful material;
- **Contact:** being subjected to harmful online interactions with others; and
- **Conduct:** personal online behaviour that increases the likelihood of or causes harm.

We have specific policies in place which govern both the children's and Staff's use of technology within the School, and these (in conjunction with our Behaviour Policy and relevant provide a robust structure for how Children's safety and wellbeing online can be managed and supported.

Children's use of technology within School is appropriately filtered and monitored by a third-party provider, Smoothwall. Children are made aware of this via the ICT Acceptable Use Policy linked above. Smoothwall alerts the School to a Child's access to content that is deemed concerning or inappropriate.

We know that many Children have access to technology at home with a spectrum of monitoring and supervision provided. The School reserves the right to investigate and monitor any personal devices when they are allowed into School in accordance with appropriate. Within C&HE and ICT Curriculum with cover regular themes on Digital Safety and Health.

Protecting children from the risk of radicalisation should be part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent susceptible people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

From 1 July 2015 all schools are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 ('The CTSA 2015'). Schools must have regard to statutory PREVENT GUIDANCE

issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools' responsibility to the need to prevent people from being drawn into terrorism. " This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes:
- risk assessment
- working in partnership
- staff training
- IT policies

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty. The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements consider the policies and procedures of Local Safeguarding Children Board(LSCBs).

Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales.

The **Prevent** guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about online safety more generally. Further information and guidance are available on the OSCB website: Radicalisation - Oxfordshire Safeguarding Children Board (oscb.org.uk)

The Department for Education has also published advice for schools on the Prevent duty and is intended to complement the Prevent guidance and signposts other sources of advice and support. https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

Channel
School staff should understand when it is appropriate to make a referral to the Channel team. Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be susceptible to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages and an individual will be required to provide their consent before any support delivered through the programme is provided.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are at risk of being drawn into terrorism and, where considered appropriate and necessary, consent is obtained, and support arranged and provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges are required to have regard to Keeping Children Safe in Education and, as partners, are required to cooperate with local Channel panels. Channel guidance can be found here:

https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance

Children Who Are Absent from Education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are absent for prolonged periods or missing from education in their area.

Children who have unexplainable and/or persistent absences from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. School staff should follow the school's procedures for dealing with children who are persistently absent and children missing education to identify such abuse as early as possible and, in the case of absent pupils, this helps prevent the risk of them becoming a child absent from education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and have a social worker (such as a child who is a child in need, who has a child protection plan or is a child we care for), where being absent from education may increase known safeguarding risks within the family or in the community. See 'working together to improve school attendance' for further guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1099677/Working_together_to_improve_school_attendance.pdf

Schools should put in place appropriate safeguarding policies, procedures and responses for children who are identified as absent or missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers. An appropriated response is needed when a child has poor attendance or is regularly missing education. https://www.gov.uk/government/publications/children-missing-education

All schools must inform their local authority of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education, have ceased to attend school and no longer live within reasonable distance of the school at which they are registered
- have been certified by an appropriate medical practitioner as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of the period
- have been permanently excluded

The local authority must be notified when a school is to delete a pupil from its register under the above circumstances. Schools should contact the Admissions Team: Tel: 01865 815175. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All schools must inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

Child Sexual Exploitation & Child Criminal Exploitation

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be treated as exploitation. As well as being physical, it can be facilitated and/or take place online.

Child Sexual Exploitation (CSE)
CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any

child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). CCE indicators can also be indicators of CSE, as can children who have older boyfriends or girlfriends and children who suffer from sexually transmitted infections or become pregnant.

The department provide: Child sexual exploitation: guide for practitioners
A full list of indicators can be found here: Child Sexual Exploitation - Oxfordshire Safeguarding Children Board (oscb.org.uk)

Child Criminal Exploitation (CCE)
While there is still no legal definition of 'Child Criminal Exploitation' or CCE, it is increasingly being recognised as a major factor behind crime in communities, while also simultaneously victimising vulnerable young people and leaving them at risk of harm. A simple definition of CCE is: CCE often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, drugs (especially cannabis), alcohol or even food and accommodation.

County Lines is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines.' They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence, and weapons, including knives, corrosives, and firearms. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery and missing persons and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities. Further information can be found here: Child Criminal Exploitation - Oxfordshire Safeguarding Children Board (oscb.org.uk)

Sexual Harassment, Violence, Harmful Sexual Behaviours (inc. child on child abuse, consent and 'upskirting')
Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration and sexual assault.

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing. DfE guidance situates sexual violence, sexual harassment, and harmful sexual behaviour in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable and not 'banter' or an inevitable part of growing up. Advice about tackling and reporting sexual harassment in schools and colleges is available in the DFE guidance Keeping Children Safe in Education.

It should be recognised that these issues are likely to occur, and so schools should have procedures in place to deal with them. Groups at particular risk include girls, students who are questioning their gender, identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+), or are perceived by peers to be LGBT+, and pupils with SEND. We recognise that these children can be targeted by other children, so it is vital your school provide a safe space for these children to speak out and share their concerns with members of staff. Pupils are protected from 'upskirting', bullying, homophobic, biphobic and transphobic behaviour, racism, sexism and other forms of discrimination Staff have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding

https://www.gov.uk/government/consultations/human-rights-act-reform-a-modern-bill-of-rights/outcome/human-rights-act-reform-a-modern-bill-of-rights-consultation-response ,

Our school acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Schools must record incidents across the whole spectrum of sexual violence, sexual harassment and harmful sexualised behaviours so that they can understand the scale of the problem in their own schools and make appropriate plans to reduce it.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies. Victims of harm should be supported by the school's pastoral system, their wishes and feelings considered and they understand the law on child-on-child abuse is there to protect them, not criminalise them.

The appropriate safeguarding lead person should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

Upskirting
'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

Consent
Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity

and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: Rape Crisis England & Wales -

Sexual consent

> • a child under the age of 13 can never consent to any sexual activity
>
> • the age of consent is 16

Digital Safety, Remote Learning and Filtering & Monitoring

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate.

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

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other
- **conduct:** online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/)

The appropriateness of any filters and monitoring systems are a matter for individual schools and will be informed in part, by the risk assessment required by the Prevent Duty.

To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards (see below link) which set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

Governing bodies and proprietors understand their responsibilities for periodically reviewing the effectiveness of these procedures and the standards and will discuss this with IT staff and service providers, discussing what more needs to be done to support schools and colleges in meeting this

standard. This includes an understanding of responsibilities to have an appropriate level of security protection and an understanding of evolving cyber-crime technologies and e-security.

Monitoring and filtering standards: https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges

Cyber security standards: https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges

The policy for remote learning demonstrates an understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely. The school maintains the capability to provide remote education when it is not possible for some or all of their pupils to attend in person.
https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools

Pre-Appointment Checks and Safer Recruitment
Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

When appointing new staff, schools and colleges must:
- verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website
- obtain (via the applicant) an enhanced DBS certificate (including barred list information for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, follow advice on the GOV.UK website
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate and verify professional qualifications, as appropriate
- verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.
- carry out an online search on shortlisted candidates to help identify any issues that are publicly available online. Shortlisted candidates will be informed before online searches are carried out. Ensure that evidence of these checks has been retained
- the school will ensure that contractors and providers are aware of the school's safeguarding policy and procedures and that this will be referred to and followed if an allegation is made regarding a member of their agency. The school will require that employees and volunteers provided by these organisations use the school's procedures to report concerns.
- we will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges,*

2024. If assurance is not obtained, permission to work with our children or use our school premises may be refused.

In addition:

- independent schools, including academies and free schools, must check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State
- maintained schools must check that the Governing body is not subject to a section 128 direction made by the Secretary of the State
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State for prohibition checks or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012
- all schools and colleges providing childcare must ensure that appropriate checks are carried out to ensure that individuals employed to work in reception classes or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.

The Education and Training (Welfare of Children) Act 2021 extended safeguarding provisions to providers of post 16 Education: 16-19 Academies, Special Post-16 institutions and Independent Training Providers.

Single Central Record

Schools and colleges must keep a single central record. The single central record must cover the following people:

- all staff (including supply staff and teacher trainees on salaried routes) who work at the school. In colleges, this means those providing education to children
- The information that must be recorded in respect of staff members (including teacher trainees on salaried route) is whether the following checks have been carried out or certificates obtained and the date on which each check was completed/certificate obtained
- an identity check / a barred list check / an enhanced DBS check / certificate / a prohibition from teaching check
- further checks on people who have lived or worked outside the UK – overseas checks/right to work
- a check of professional qualifications and a check to establish the person's right to work in the United Kingdom.
- For supply staff, schools should also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff and the date that confirmation was received.
- The details of an individual should be removed from the single central record once they no longer work at the school or college. The SCR will be monitored and reviewed termly to ensure compliance by the Governing Body and the school's Leadership Team.