EF ACADEMY

International
Boarding Schools

EF ACADEMY OXFORD SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURES

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Individuals involved in developing the document:	Rob Tasker (Deputy Head of School) Anna Ireland (VP Operations)
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Key school contacts

Designated Safeguarding Lead (DSL)	Rob Tasker (Deputy Head of School) Email: rob.tasker@ef.com Telephone number (term time): 01865 759667 Mobile number (term time): 07863543983 Holiday contact number: 07863543983
Principal (DDSL)	Dona Jones Email: dona.jones@ef.com Telephone (term time): 01865 759667 Mobile number (term time): 07763454535 Holiday contact number: 01865 759667
Deputy Designated Safeguarding Lead (DDSL)	Donna Balsdon (Boarding Lead) Email: donna.balsdon@ef.com Telephone (term time): 01865 759667 Mobile number (term time): 07773208160 Holiday contact number: 07773208160
Deputy Designated Safeguarding Lead (DDSL)	Alyona Lake (Pathway Manager) Email: alyona.lake@ef.com Telephone (term time): 01865 759667 Mobile number (term time): 07790374736 Holiday contact number: 07790374736
Deputy Designated Safeguarding Lead (DDSL)	Kate Krivich (Pathway manager) Email: Kate.krivich@ef.com Telephone (term time): 01865 759667 Mobile number (term time): 07790374737 Holiday contact number: 07790374737
Principal	Dona Jones Email: dona.jones@ef.com Telephone (term time): 01865 759667 Mobile number (term time): 07763454535 Holiday contact number: 01865 759667
Governance Arrangements: **Representative** of the EF Academy Leadership Team (Governance)	Anna Ireland Email: anna.ireland@ef.com Telephone number: 01865 759667

Governance Arrangements: **Nominated Safeguarding Lead** for EF Academy Leadership Team (Governance)	Anna Ireland Email: anna.ireland@ef.com Telephone number: 01865 759667

Key external contacts

Designated Officer(s) of the local authority	Jo Lloyd Telephone number: 01865 810603 Email: lado.safeguardingchildren@oxfordshire.gov.uk Local Authority Designated Officer (LADO) - Oxfordshire Safeguarding Children Board (oscp.org.uk)
Oxfordshire children's social care department[1]	Telephone number: 0345 050 766 Email: LCSS@oxfordshire.gov.uk Out of hours emergency: 0800 833 408 Duty team telephone number: 01865 519 800 Children's social care request for service form for professionals (oxfordshire.gov.uk)
Oxfordshire Safeguarding Partners	Telephone number: 0345 050 7666 Email: oscb@oxfordshire.gov.uk About Us - Oxfordshire Safeguarding Children Board (oscb.org.uk)
FGM reporting - non-emergency police contact number	101
School's Police liaison officer (SSO)	Via Education Safeguarding Advisory Team Telephone number: 01865 810603 Email: ESAT.safeguardingchildren@oxfordshire.gov.uk
Prevent partners and advice about extremism	**Channel Police Practitioner** Telephone number: 0345 050 7666 Email: preventreferrals@thamesvalley.pnn.police.uk Reporting: https://www.gov.uk/report-terrorism

[1] If you think a child or young person is at risk or being abused or neglected, contact the children's social care team at their local council. If you do not know where they live, contact your local council's team, the NSPCC or the Police for advice

	Non-emergency DfE advice 020 7340 7264 counter-extremism@education.gsi.gov.uk
UK Safer Internet Centre	0344 381 4772 helpline@saferinternet.org.uk
NSPCC whistleblowing helpline	Weston House 42 Curtain Road London EC2A 3NH Telephone: 0800 028 0285 Email: help@nspcc.org.uk https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/
Report Abuse in Education helpline	A dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance, including for non-recent abuse. 0800 136 663 or email help@nspcc.org.uk

1 Aims

1.1 This is the Safeguarding and child protection policy and procedures of EF Academy Oxford (the **School**). The aims of this policy are as follows:

1.1.1 to actively promote the well-being of students;

1.1.2 to safeguard and promote the welfare of children, staff and others who come into contact with the School and to protect them from harm;

1.1.3 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse, neglect and / or exploitation;

1.1.4 to raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature;

1.1.5 to raise staff awareness about the School's safeguarding expectations;

1.1.6 to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;

1.1.7 to ensure consistent good safeguarding practice throughout the School, to include the promotion of a zero tolerance approach to child-on-child sexual violence and harassment in which students are confident to report it and staff are confident to identify and respond to it; and

1.1.8 to promote a whole school culture of safety, equality and protection.

1.2 Every student should feel safe and protected from any form of abuse, neglect and exploitation.

1.3 All staff should understand the indicators of abuse neglect and exploitation and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for the School community are set out in Appendix 1.

1.4 Members of the School community (to include alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively and appropriate action taken.

1.5 Anyone about whom a concern is raised should feel confident that they will be supported and the matter will be handled sensitively and that appropriate action will be taken.

1.6 This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the School to ensure that the best interests of students underpins and is at the heart of all decisions, systems, processes and policies.

1.7 Although this policy is necessarily detailed, it is important to the School that our safeguarding policies and procedures are transparent, clear and easy to understand for staff, students, parents and carers. The School welcomes feedback on how we can continue to improve our policies.

2 Scope and application

2.1 This policy applies to the whole School

2.2 This policy applies at all times including where students or staff are away from the School, whether they are on school-arranged activities or otherwise, and whether or not the School is open. It will therefore apply out of School hours and in the holidays.

2.3 This policy applies to core School activities and to out of hours and commercial activities.

2.4 This policy is designed to address the specific statutory obligations on the School to safeguard and promote the welfare of children.

3 Regulatory framework

3.1 This policy has been prepared to meet the School's responsibilities under the following legislation:

3.1.1 Children Act 1989;

3.1.2 Children Act 2004;

3.1.3 Safeguarding Vulnerable Groups Act 2006;

3.1.4 Children and Social Work Act 2017;

3.1.5 Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**); and:

3.1.6 Equality Act 2010.

3.2 This policy has regard to the following standards, guidance and advice:

3.2.1 *Further educational residential accommodation: national minimum standards (Department for Education, in force from 1 September 2018).*

3.2.2 Statutory guidance:

(a) Keeping children safe in education (DfE, September 2026) (**KCSIE**);

(b) Working Together to Safeguard Children 2026 (**WTSC**);

(c) Prevent Duty guidance for England and Wales (HM Government, December 2023);

(d) Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020);

(e) Children missing education (DfE, August 2025);

(f) Relationships education, relationships and sex education and health education guidance (DfE, September 2021);

(g) Channel duty guidance: protecting people susceptible to radicalisation (HM Government, October 2023);

(h) PACE Code C 2019

3.2.3 Non-statutory advice:

(a) What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);

(b) Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, September 2026);

(c) Behaviour in schools: advice for headteachers and school staff (DfE, February 2024);

(d) Working together to improve school attendance (DfE, July 2026);

(e) Meeting digital and technology standards in education (DfE, maintained);

(f) Sharing nudes and semi-nudes: advice for education settings working with children and young people (DSIT and UKCIS, March 2024);

(g) Searching, screening and confiscation: advice for schools (DfE, in force from July 2023);

(h) Teaching online safety in schools (DfE, January 2023);

(i) Harmful online challenges and online hoaxes (DfE, February 2021);

(j) Multi-agency practice principles for responding to child exploitation and extra-familial harm (TCE support programme);

(k) Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017);

(l) Forced marriage resource pack (Home Office, May 2023);

(m) Virginity testing and hymenoplasty: multi-agency guidance (DHSC, updated August 2025);

(n) Educate Against Hate (HM Government, maintained);

(o) Managing the risk of radicalisation in your education setting (DfE, September 2023);

(p) Equality Act 2010: advice for schools (DfE, June 2018);

(q) After-school clubs, community activities and tuition: safeguarding guidance for providers (DfE, February 2026); and

(r) Sponsorship Duties (UKVI, August 2026)

3.2.4 Mobile phones in schools: guidance (DfE, February 2024). Oxfordshire Safeguarding Partners Threshold of Needs guidance.: Threshold of needs - Oxfordshire Safeguarding Children Board (oscb.org.uk)

3.3 The following School policies, procedures and resource materials are relevant to this policy:

3.3.1 Access & Inclusion Policy (Appendix 3 of Academic Policy);

3.3.2 Alcohol, Smoking and Substance Abuse Policy;

3.3.3 Anti-bullying Policy;

3.3.4 Behaviour Policy;

3.3.5 Code of Conduct for Staff;

3.3.6 Complaints Policy;

3.3.7 Crisis Management Policy;

3.3.8 DBS Policy;

3.3.9 E-Safety Policy;

3.3.10 Equality Opportunities Policy;

3.3.11 First Aid Policy;

3.3.12 Independent Listener Procedures;

3.3.13 Missing Persons Procedure;

3.3.14 Positive Mental Health & Wellbeing Policy;

3.3.15 Recruitment Policy;

3.3.16 Risk Assessment Procedures;

3.3.17 Searching & Confiscation Policy;

3.3.18 Concerns Policy;

3.3.19 Whistleblowing Policy;

3.3.20 Use of Reasonable Force Policy;

3.3.21 Risk Assessment Policy.

4 Publication and availability

4.1 This policy is published on the School website.

4.2 This policy is available in hard copy on request.

4.3 A copy of the policy is available for inspection from the School's-DSL or any DDSL during the School day.

4.4 This policy can be made available in large print or other accessible format if required.

4.5 This policy and all policies referred to in it are also available to staff on the School's GlobalNet intranet page.

5 Definitions

5.1 Where the following words or phrases are used in this policy:

5.1.1 References to the **Proprietor** are references to EF International Academy UK Ltd;

5.1.2 References to **working days** mean Monday to Sunday during term time and Monday to Friday outside of term time. The dates of terms are published on the School's

website and GlobalNet intranet page. If referrals to an external agency are required outside term time, references to **working days** are to the days on which the relevant external agency is working.

5.1.3 **Safeguarding** is the protection of people from harm.

5.1.4 **Safeguarding and promoting the welfare of children** is defined in KCSIE 2026 as:

(a) providing help and support to meet the needs of children as soon as problems emerge;

(b) protecting children from maltreatment, whether that is within or outside the home, including online;

(c) preventing impairment of children's mental and physical health or development;

(d) ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

(e) taking action to enable all children to have the best outcomes.[2]

5.1.5 **CSC** means Children's Social Care and includes, depending on the context, the team based in the local authority where the School is located and, where appropriate, the team based in the local authority where the child is a resident.

5.1.6 **DSL** means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.

5.1.7 **Designated Officer** means designated officer at the local authority (often referred to as the LADO). The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners

5.1.8 **Local Safeguarding Partners** means the three safeguarding partners (local authority, Integrated Care Systems' (**ICSs**) and the chief officer of police for an area any part of which falls within the local authority area) who make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

5.1.9 References to **harmful sexual behaviour** in this policy refer to problematic, abusive and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.

5.1.10 Reference to **staff** includes all those who work for or on behalf of the School, regardless of their employment status, including contractors, supply staff, volunteers and the EF Academy Leadership Team (Governance) unless otherwise indicated.

5.1.11 Senior Leadership Team (**SLT**) comprises of the Principal, Deputy Head of School (DSL), and Director of Admissions.

[2]

6 Responsibility statement and allocation of tasks: the School's approach to safeguarding leadership

6.1 The Proprietor has overall responsibility for all matters which are the subject of this policy, including:

6.1.1 legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of students at the school, having regard to relevant guidance issued by the Secretary of State;

6.1.2 strategic leadership responsibility for the School's safeguarding arrangements; and

6.1.3 specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE.

6.2 The Proprietor:

6.2.1 appoints a lead on safeguarding matters from the EF Academy Leadership Team (Governance), whose contact details are set out in the School contacts list at the front of this policy;

6.2.2 ensures that all UK based members of the EF Academy Leadership Team (Governance) receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance;

6.2.3 ensures it discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have;

6.2.4 ensures that appropriate arrangements are in place for the whole EF Academy Leadership Team (Governance) to discharge their function, including appropriate consideration of safeguarding matters at EF Academy Leadership Team (Governance) meetings and a holistic annual review of safeguarding; and

6.2.5 establishes appropriate delegation arrangements at School level, led by the Principal and DSL, to enable the School to discharge its safeguarding duties effectively.

6.3 To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

Task	**Allocated to**	**When / frequency of review**
Keeping the policy up to date and compliant with the law and best practice	DSL	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	DSL	As required, and at least termly
Seeking input from interested groups (such as students, staff, parents) to consider	Principal and DSL	As required, and at least annually

Task	Allocated to	When / frequency of review
improvements to the School's processes under the policy		
Formal annual review of the School's safeguarding policies and procedures and their implementation.	Proprietor	At least annually
Assessing the adequacy of safeguarding arrangements for those who use or hire premises	Proprietor	Before commencement of arrangement and thereafter at least annually

6.4 **Principal**

6.4.1 The Principal is responsible for the overall management of the School and for the management of concerns and allegations about staff.

6.4.2 The Principal ensures that the School's policies and procedures, adopted by the governing body and proprietor (particularly those concerning referrals of cases of suspected abuse and neglect) are understood, and followed by all staff.

6.5 **Designated Safeguarding Lead (DSL)**

6.5.1 The DSL is a senior member of staff of the School's leadership team with the necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety) and understanding the filtering and monitoring systems and processes in place) throughout the School.

6.5.2 The DSL has the appropriate status and authority within the school to carry out the duties of the post, and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the School contacts list at the front of this policy. The main responsibilities of the DSL are set out in Annex C of KCSIE.

6.5.3 The DSL will also liaise with the Principal to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles to whom the provisions of PACE Code C and any other code of practice apply.

6.5.4 The DSL will take lead responsibility for students who are looked after children.

6.5.5 The DSL will also undertake the role of senior mental health lead and is responsible for developing a holistic approach to promoting and supporting the mental wellbeing of students and staff.

6.5.6 If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL. The Deputy DSL's details are also set out in the School contacts list at the front of this policy.

6.6 **All Staff**

6.6.1 All staff, including those who do not work directly with children, must read Part One of KCSIE 2026 in full. The School will record completion and understanding and ensure staff know how to access the full guidance.

6.6.2 Safeguarding is everyone's responsibility. Staff must maintain a child-centred approach, act without delay, and share information when necessary to protect a child. Data protection is not a barrier to necessary and lawful safeguarding information-sharing. Records should include the concern, actions, decisions, rationale and outcomes.

7 Specific safeguarding duties in relation to children

7.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility.

7.2 The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.

7.2.1 The School will:

(a) understand its role in the safeguarding partner arrangements: - Safeguarding procedures, guidance and resources - Oxfordshire Safeguarding Children Board (oscp.org.uk) - and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the Oxfordshire Safeguarding Partners;

(b) be alert to signs of abuse whether in school, within the child's family or from outside, and take steps to protect individuals from any form of abuse, or neglect or exploitation whether from an adult or another child;

(c) include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from abuse;

(d) promote the systems in place for children to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;

(e) take active steps to promote school attendance;

(f) allow staff to determine how best to build trusted relationships with students which facilitate communication within the parameters of the staff code of conduct;

(g) deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and / or welfare plans;

(h) design and operate procedures which, so far as possible, ensure that staff students and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;

(i) prepare staff to identify children who may benefit from early help and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in KCSIE or WTSC;

(j) be alert to children who are at potentially greater risk of harm (both online and offline) including children who need a social worker and children requiring mental health support;

(k) be alert to the needs of students with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and where additional barriers can exist when detecting abuse or neglect;

(l) encourage a culture of listening to students and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the School to protect them;

(m) operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

(n) assess the risk of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

(o) identify students who may be susceptible to extremist ideology and radicalisation and know what to do when they are identified; and

(p) consider and develop procedures to deal with any other safeguarding issues which may be specific to individual students in the School or in the local area.

(q) ensure that appropriate policies and procedures are in place to ensure the safety, wellbeing and protection from exploitation of the children which it sponsors to study in the UK under the Child Student route. Including: ensuring the children's living arrangements meet the requirements of the route, sites at which children are taught or accommodated meet all legally required standards and all staff coming into contact with children have current enhanced Disclosure and Barring Checks.

7.3 Staff may follow the School's Whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details). Staff may also report concerns direct to the School's Local Authority if they consider that the School has failed to deal with concerns appropriately.

7.4 **Safeguarding in a 16–19 international school**

7.4.1 For safeguarding purposes, a child is a person under 18. Concerns about students aged 18 or over must be considered under adult safeguarding arrangements where appropriate, while also considering risks to any person under 18 and the School's duty of care. Staff must consult the DSL and, where appropriate, adult social care or other relevant agencies.

7.4.2 Students living away from home, studying internationally, using a language other than English, or dependent on adults for accommodation, guardianship, immigration sponsorship or financial support may face additional barriers to seeking help. Staff should use accessible communication or interpretation where needed, explain

confidentiality and its limits, and consider whether living arrangements, travel, guardianship or dependency create safeguarding risks.

8 Reporting obligations of staff

8.1 Reporting obligations generally

8.1.1 Staff members should maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a student, staff members should always act in the **best** interests of the student.

8.1.2 Staff should be aware that students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may not recognise their experiences as harmful e.g. a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and / or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of protection.

8.1.3 All staff have a duty to:

(a) report any concerns they may have about the safety and / or well-being of students;

(b) report any concerns they may have about the safety and / or well-being of other persons associated with the School;

(c) report any safeguarding concerns about staff or anyone else associated with the School; and

(d) follow up on any such reports to ensure that appropriate action is or has been taken.

8.1.4 The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of the SLT senior leadership team or directly to children's social care (whether the School's local authority or that local to the child's home address) or police in their absence for guidance.

8.2 What to do if staff have a concern about a student's welfare

8.2.1 If staff have **any concern about a student 's welfare**, they should follow the procedures in this policy and report their concern to the DSL (or the DDSL in the DSL's absence) **immediately**.

(a) The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy;

(b) See Appendix 2 for guidance about what to do when receiving a disclosure and paragraph 24 below relating to recording a concern.

8.2.2 Staff must immediately report to the DSL (or the DDSL in the DSL's absence):

(a) any concern they have about a student who has suffered an injury, or is marked, or bruised in a way which is not obviously related to the normal knocks or scrapes received in play;

(b) any explanation offered, by child (young person), parent or carer, which appears inconsistent or dubious;

(c) any behaviour or change in behaviour which could suggest a child may have been abused (e.g. strange drawings or play, withdrawn;

(d) any comments children or young people make which give cause for concern;

(e) any worries a child or young person may be suffering from inadequate care, ill treatment, or emotional maltreatment;

(f) any concerns a child or young person is displaying signs or symptoms of abuse or neglect;

(g) any major changes in a child's or young person's behaviour, including non-attendance or tardiness;

(h) any suggestion or disclosure of abuse from any person;

(i) any concerns related to person(s) who may pose a threat to children/ young people (e.g. living in a household with children present).

8.2.3 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support to an emerging problem or to a potentially unmet need, or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989. Teachers must report known cases of female genital mutilation (**FGM**) to the police. See Appendix 1 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

8.2.4 If the concern involves an **allegation or concern raised about a member of staff**, supply staff, contractors or volunteers this must be reported in accordance with the procedures set out in Appendix 4 and parts 1 and 4 of KCSIE.

8.2.5 **What if the DSL is unavailable?**

(a) The DSL or the DDSL should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of School hours.

(b) If in exceptional circumstances the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the SLT and / or advice should be taken from children's social care. Their contact details are set out at the front of this policy.

(c) Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and / or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See section 11 below for further details on making a referral.

(d) Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL, or a member of the SLT, as soon as is practically possible.

8.3 **Action by the DSL**

8.3.1 On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the appropriate Local Safeguarding Partners procedures and referral threshold document. Such action may include:

(a) managing any support for the student internally via the School's own pastoral support processes, seeking advice from children's social care where required (see 9 below);

(b) undertaking an early help assessment (which generally requires parental consent) (see 10 below); or

(c) making a referral for statutory services (see 11 below).

8.3.2 The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

8.3.3 Where the concern relates to the welfare of a student who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, children's social care.

8.3.4 If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the student's situation does not appear to be improving.

9 Managing support for students internally

9.1 The School has a framework for the identification, assessment, management and review of risk to student welfare, so that appropriate action can be taken to reduce the risks identified. See section 23 and the School's Concerns policy section.

9.2 The School will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from CSC where necessary.

10 Early help assessment, Family Help and escalation

10.1 When a student needs additional support, the School will consider universal services, community-based early help and, where appropriate, targeted early help or Family Help under current local arrangements. The DSL will identify the appropriate pathway, seek advice, involve the student and family where safe and appropriate, and coordinate support with relevant agencies.

10.2 If circumstances do not improve, risks increase or the threshold for statutory intervention is met, the School will escalate without delay to children's social care and/or police. The School will contribute to multi-agency assessments and plans, share relevant information lawfully and proportionately, and record decisions and reasons.

10.3 Early help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to parents, children or whole families, and is generally supported by CSC in consultation with the family.

10.4 The School understands that providing early help is more effective in promoting the welfare of children than reacting later.

10.5 The School's safeguarding training includes guidance about early help processes and prepares all staff to identify children who may benefit from early help. Staff are mindful of

specific safeguarding issues and those students who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:

10.5.1 is disabled or has certain health conditions and has specific additional needs;

10.5.2 has special educational needs (whether or not they have a statutory education, health and care plan);

10.5.3 has a mental health need;

10.5.4 is a young carer;

10.5.5 is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

10.5.6 is frequently missing / goes missing from education, home or care;

10.5.7 has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Student Referral Unit;

10.5.8 is at risk of modern slavery, trafficking, sexual or criminal exploitation;

10.5.9 is at risk of being radicalised or exploited;

10.5.10 has a parent or carer in custody or is affected by parental offending;

10.5.11 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;

10.5.12 is misusing alcohol or other drugs themselves;

10.5.13 is at risk of "honour based" abuse such as Female Genital Mutilation or Forced Marriage;

10.5.14 is a privately fostered child.

10.6 A member of staff who considers that a student may benefit from early help should keep a written record of their concerns and in the first instance discuss this with the DSL (see paragraph 24 below and Appendix 2 for further guidance). The DSL will consider the appropriate action to take in accordance with the child's Safeguarding Children Partners menu of early help services (see Early Help and the Locality Community Support Service (LCSS) - Oxfordshire Safeguarding Children Board (oscp.org.uk)) and their referral threshold document and will support staff in liaising with parents and other agencies and setting up an inter-agency assessment as appropriate.

10.7 If early help is appropriate, the DSL will generally lead on liaising with relevant external agencies and setting up inter-agency assessment as appropriate.

10.8 The role of the DSL in this process will include, but not be restricted to the following actions:

10.8.1 The development of a support plan for the student in line with the Oxford Children's Services Common Assessment Framework documentation;

10.8.2 Frequent and regular contact with the student's parent(s) if appropriate, to ensure the parent(s) are aware of the concerns and can contribute toward the support plan;

10.8.3 Frequent and regular contact with the House Parent Team (most likely, through the Boarding Lead) and/or Pathway Manager Team;

10.8.4 Liaison with external agencies to provide support and intervention where necessary, these can include liaison with the child's or young person's GP, Oxfordshire and Adolescent Mental Health (CAMHS) Services.

10.9 Where a student is identified as being vulnerable, the DSL will review the support plan for the student on a fortnightly basis. This will continue until such times as the School judges, with the parent(s) agreement, the child or young person is no longer at risk.

10.10 If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role. In some cases, school staff may be required to take a lead role.

10.11 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the student's situation appears to be getting worse, or does not appear to be improving.

10.12 EF Academy Oxford uses a traffic light approach to monitoring and assessing our 'Early help' provision within weekly Pastoral Leadership Team review meetings on the "UPAWS" spreadsheet.

11 Making a referral

11.1 Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) should be made immediately.

11.2 "Harm" is the "ill treatment or impairment of the health or development of a child."[3] Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child."

11.3 The contact details for the School's CSC team are set out at the front of this policy.

11.4 Anyone can make contact with CSC to discuss concerns before a referral is made. This includes professional as well as a child themselves, family members and members of the public. The child's local safeguarding partners will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting CSC.

11.5 **Statutory assessments**

11.5.1 Children's social care may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

(a) **Children in need**: *A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled*. Children in need may be assessed under section 17 of the Children Act 1989.

[3] Section 31 Children Act 1989

(b) **Children suffering or likely to suffer significant harm**: Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that *a child is suffering, or is likely to suffer, significant harm*.

11.6 Anybody can make a referral. Staff required to make a direct referral may find helpful the flowchart set out on page 24 of KCSIE and the flowcharts set out in Chapter 3 of WTSC for information about the likely actions and decisions required.

11.7 Parental consent is not required for referrals to statutory agencies but staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

11.7.1 personal details of the child including the child's developmental needs;

11.7.2 detailed information about the concern;

11.7.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

11.8 If the referral is made by telephone, this should be followed up in writing.

11.9 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

11.10 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

11.11 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves.

12 Allegations against students - child-on-child abuse

12.1 Allegations against students should be reported in accordance with the procedures set out in this policy in Appendix 3. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

12.2 All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all students involved, including support from external services as necessary.

13 Extra-familial harm

13.1 Safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside the School, inside and outside of home and online.

13.2 All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare, and should record these appropriately.

13.3 Where relevant Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

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

14 Risk assessment

14.1 Where a concern about a student's welfare is identified, the risks to that student's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

14.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual student welfare plans (IHCP). Regardless of the form used, the School's approach to promoting student welfare will be systematic and student focused.

14.3 The Principal has overall responsibility for ensuring that matters which affect student welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

14.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

15 What to do if staff have a safeguarding concern about someone else's welfare

15.1 Staff who have safeguarding concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.

15.2 In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.

16 Allegations made and or / concerns raised about staff and others in School

16.1 The School has a policy and procedures for managing allegations made and / or concerns raised about any adult working for, or on behalf of, the School, whether paid or unpaid, or any Other Adult (as defined in 2.3 of Appendix 4) which may affect the safety and welfare of children.

16.2 The procedures in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harms threshold. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, unfounded, false, or unsubstantiated allegations. The policy and procedures are set out in Appendix 4 and follow the guidance in Parts 1 and 4 of KCSIE.

16.3 The School will follow its employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.

16.4 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with students, parents, colleagues

and any other person who comes into contact with the School. This guidance is contained in the School's Safer Recruitment policy and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with students.

17 Informing parents

17.1 Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Principal, the Designated Officer(s), children's social care, the police and / or the student before discussing details with parents.

17.2 In all cases, the DSL will be guided by the Oxfordshire Safeguarding Partners referral threshold document.

17.3 See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

18 Additional reporting

18.1 In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

18.1.1 **Health and Safety Executive**

(a) The School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the School's Health and Safety Policy for further details about this.

18.1.2 **Disclosure and Barring Service** (**DBS**)

(a) A referral to the DBS will be made promptly if the criteria are met. See Appendix 4 for further details.

18.1.3 **Teaching Regulation Agency** (**TRA**)

(a) Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed, or would have been dismissed if he / she had not resigned. See Appendix 4, for more details.

18.1.4 **Insurers**

(a) The School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

(b) Care should be taken to ensure this is done before renewal to ensure that the School complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

18.1.5 **Boarding Schools Association** (**BSA**)

(a) The School will report safeguarding matters to the BSA as required by their Safeguarding Charter.

18.1.6 **UK Visas and Immigration**

(a) In the event that a student holding a Student visa sponsored by the School under the Points Based System goes missing, the School will report to UKVI if the student misses ten consecutive expected contact points.

(b) Each day that the School's attendance register is completed it is treated as a contact point for these purposes

(c) The report will be made by the School's Level 1 user via the Sponsor Management and in accordance with prevailing UKVI guidance.

19 Safer recruitment, regulated activity and premises

19.1 Suitability checks must follow KCSIE 2026 and current DBS guidance, taking account of the role, duties, frequency and nature of contact with children, whether activity is regulated, and whether the individual is directly employed or supplied by another organisation. The School must assess and record the applicable legal criteria rather than assume a check is or is not required because a role is occasional, supervised or contracted.

19.1.1 The School is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the School's Safer Recruitment policy.

19.1.2 The School maintains a single central register of appointments for all staff.

19.2 Contractors, agency and supply staff, visiting professionals, volunteers, speakers and adults using or hiring School premises must be subject to appropriate safeguarding checks, reporting routes, risk assessment and supervision where required. Safeguarding risks must be assessed before third-party use of premises and reviewed periodically.

19.2.1 The School's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the School's separate Visitors policy.

20 Use of mobile electronic devices and smart technology

20.1.1 The School's policy on the use of mobile technology, including phones and cameras, in the School, is as follows:

20.1.2 the School's Acceptable use policy for students sets out the expectations on all students in the School;

20.1.3 all staff should use mobile devices and cameras and other electronic devices with imaging and sharing capabilities in accordance with the guidance set out in the staff Code of Conduct;

20.1.4 parents of all students may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

20.1.5 The School allows access to the internet onsite. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage.

20.1.6 The School's approach to online safety is set out in the School's E-safety safety policy and Acceptable use policy.

20.2 Rules on mobile phones and personal devices must be clear, consistently applied and communicated to students, staff, parents and visitors. They must address use during lessons and activities, recording or photographing others, sharing images, online harassment and responses to misuse. Searches or confiscation must be undertaken only by authorised staff and in accordance with current law, guidance and School procedures.

20.3 Staff must not use personal devices or personal accounts to communicate privately with students or store student images or safeguarding information. Any approved exception must comply with the staff Code of Conduct, data protection and School recording and storage arrangements.

21 Online safety, filtering and monitoring

21.1 Online-safety arrangements must address risks from social media, messaging, gaming, livestreaming, AI tools and other digital services, including grooming, exploitation, cyberbullying, misogyny, radicalisation, coercion, image-based abuse and harmful content. Online and offline risks should be considered together.

21.2 The proprietor and senior leaders will ensure filtering and monitoring arrangements are appropriate to the School's setting and risks, reviewed regularly and understood by relevant staff. The DSL will work with those responsible for filtering and monitoring to understand system capabilities, alerts, limitations, escalation routes and recording. Provision will be reviewed at least annually and after significant incidents, without imposing unnecessary barriers to legitimate learning.

22 Training

22.1.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles[4].

22.1.2 The level and frequency of training depends on the role of the individual member of staff.

22.1.3 The School maintains written records of all staff training.

22.1.4 All training will be carried out in accordance with Oxfordshire Safeguarding Partners procedures where possible.

22.1.5 **Induction**

22.1.6 All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant includes the provision of copies of):

(a) this policy;

(b) the role, identity and contact details of the DSL and DDSLs;

(c) the Behaviour policy for students and Use of Reasonable Force Policy;

(d) the Anti-bulling policy, which includes details of the School's policy on cyberbullying and prejudice-based and discriminatory bullying ;

(e) the staff Code of Conduct including the Whistleblowing policy, E-Safety Policy including acceptable use policy for staff, Positive Mental Health and Well-being Policy;

(f) the safeguarding response to children who are absent from education, particularly on repeat occasions and / or prolonged periods;

(g) the School's approach to online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;

(h) safeguarding training in accordance with Oxfordshire Safeguarding Partners' procedures including guidance on managing a report of child-on-child harmful sexual behaviour;

(i) where determined appropriate by the Proprietor, a copy of Annex A of KCSIE for those staff not working directly with children; or

(j) a copy of Part 1 and, where appropriate, Annex B of KCSIE for school leaders and those who work directly with children; and

(k) appropriate Prevent duty training.

22.1.7 All staff will sign to say they have read the above documents and completed the specified training within two weeks of the start of the academic year. New staff members, starting employment at any point during the academic year will be provided with the documents prior to the commencement of their employment and must undertake the specified training within the first week of their employment, and sign to say they have read the documents and completed the specified training.

22.2 **Safeguarding training**

22.2.1 Staff not working directly with children will receive a copy of this policy and, where determined appropriate by the Proprietor, Annex A of KCSIE and will be required to confirm that they have read and understand these;

22.2.2 School leaders and all staff working directly with children will receive a copy of this policy and Part 1 and where appropriate, Annex B of KCSIE, and will be required to confirm that they have read and understand these.

22.2.3 Members of the SLT (including the Principal) and the Nominated EF Academy Leadership Team (Governance) Safeguarding Lead will receive a copy of this policy and be expected to read all of KCSIE.

22.2.4 The Principal and all staff members will undertake appropriate safeguarding training which will be updated at least annually and following consultation with the Oxfordshire Safeguarding Partners. In addition, all staff members will receive informal safeguarding and child protection updates including online safety via email, ebulletins and staff meetings on a regular basis and at least annually.

22.2.5 Staff development training will also include training on online safety which should, amongst other things, include an understanding of the filtering and monitoring systems and processes in place in the school, searching students for prohibited and

banned items, and Prevent duty training assessed as appropriate for them by the School.

22.2.6 Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child-on-child abuse, harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudiced-based and discriminatory bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

22.2.7 Pastoral Leaders are required to be trained at LSCB Foundation Level 3 (e.g. DSL, Deputy DSLs, Pathway Managers, Boarding Lead etc.) will update to that level every **two** years. The Principal and members of staff engaged in regulated activity have regular child protection training renewed as specified by the Oxford LSCP and ESAT Level 3 by being trained/ refreshed at least every **two** years. Members of the SLT are also trained in Safe Recruitment.

22.2.8 Temporary and voluntary staff are made aware of the arrangements for reporting when they enter the School for the first time, and if they are working in the School or residences for longer than 24 hours, they will be given safeguarding training by the DSL or other OCSB Foundation level 3 trained staff.

22.2.9 All UK based members of the EF Academy Leadership Team (Governance) receive safeguarding training (including online safety) on induction. This training will equip with the knowledge to provide strategic challenge to test and assure themselves that the School's safeguarding policies in place are effective and support a robust whole school approach to safeguarding. This training will be regularly updated.

22.2.10 The Nominated EF Academy Leadership Team (Governance) Safeguarding Lead and nominated UK based Governance Representative will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. As part of that training the Nominated Board Level Safeguarding Lead will be expected to read the entirety of KCSIE. All other UK based members of the EF Academy Leadership Team (Governance) will be expected to read Part 2 of KCSIE.

22.2.11 The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings and professional development reviews. This includes information on how staff can report concerns occurring out of hours / out of term time and should, where appropriate, refer to the School's risk assessment for out of hours /out of term safeguarding arrangements.

22.2.12 **Designated Safeguarding Lead** (**DSL**)

(a) The DSL and Deputy DSLs will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working, enhanced child protection training offered by the LSCP (Oxfordshire) and Prevent awareness training and will be updated at least every two years.

(b) In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex C of KCSIE.

(c) Prevent duty training will be consistent with the Government's Prevent training for schools. See Educate Against Hate (HM Government, maintained) for further details.

(d) The DSL and Deputy DSLs will also receive School's in-house Safeguarding, Reporting Procedures and Safe Working Practice training annually.

22.3 **Teaching students about safeguarding**

22.3.1 The School teaches students about safeguarding through the curriculum and PSHE. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.

22.3.2 The School recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

22.3.3 Students are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through relationships and sex education and PSHE education appropriate to their age and stage of development thought within the Pathway Programme. It will tackle issues such as: healthy and respectful relationships, boundaries and, consent, stereotyping prejudice and equality, body confidence and self-esteem, how to recognise abusive relationships, including coercive and controlling behaviour, concepts and laws relating to sexual consent, sexual exploitation, abuse, grooming, harassment, rape, domestic abuse, so-called "honour based" violence and how to access support, what constitutes sexual harassment and sexual violence and why these are always unacceptable.

22.3.4 To support this, the School has an induction programme that encompasses safeguarding presentations from the, the School's Pathway Managers, boarding team, Deputy Head of School and Principal.

22.3.5 Students are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. The School's student handbook sets out in writing what students should do if they have a worry or complaint.

22.3.6 The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities so that students learn how to keep themselves safe on-line and when accessing remote learning. The Proprietor of the School has ensured appropriate filters and monitoring systems are in place and meet the DfE's filtering and monitoring standards (see the E- safety policy) and is mindful that this should not lead to unnecessary restrictions on learning.

22.3.7 The School keeps in regular contact with parents and carers to reinforce the importance of students being safe online and make them aware of the systems in place to filter and monitor online use and the sites students will be expected to access during learning.

23 Monitoring and review

23.1 The DSL and proprietor will review this policy against the full KCSIE 2026 guidance, local safeguarding partnership procedures and current statutory guidance. The review should include staff understanding, referral pathways, child-on-child abuse, online safety and filtering/monitoring, safer recruitment, boarding and living arrangements, and provision for students aged 18 or over.

23.2 The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Proprietor as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the School's safeguarding arrangements.

23.3 Any safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Proprietor. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses with regards to safeguarding arrangements at any time will be remedied without delay.

23.4 This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

23.5 The Proprietor will also undertake an annual review of this policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety and filtering and monitoring provision, supported by an annual risk assessment that considers and reflects the risks its students face.

23.6 Following a serious safeguarding incident, the School will consider whether a review is required, identify learning and actions, assign responsible individuals and deadlines, and monitor completion. The annual safeguarding report should address themes, referrals, training compliance, incidents, learning and the effectiveness of safeguarding arrangements.

23.7 The DSL will work with the Nominated EF Academy Leadership Team (Governance) Safeguarding Lead to prepare a written report commissioned by the Proprietor. The written report should address how the School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled, including lessons learned; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Proprietor should also consider independent corroboration, such as:

23.7.1 inspection of records or feedback from external agencies including the Designated Officer(s);

23.7.2 reports of ISI, BSA and Local Authority

23.7.3 the outcome of any relevant complaints, claims or related proceedings; and

23.7.4 press reports.

23.8 The Proprietor will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the Proprietor will be made.

24 Record keeping

24.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. This will also help if / when responding to any complaints about the way a case has been handled by the School. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:

24.1.1 a clear and comprehensive summary of the concern;

24.1.2 details of how the concern was followed up and resolved; and

24.1.3 a note of any action taken, decisions reached and the outcome.

24.2 The child protection file should also include:

24.2.1 names (including any previous names), address and date of birth of student;

24.2.2 names and contact details of persons with whom the student usually resides;

24.2.3 names and contact details of all persons sharing parental responsibility (if different from above);

24.2.4 emergency contact details (if different from above);

24.2.5 any relevant court orders in place including any that affect any person's access to the student (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.);

24.2.6 if the student is or has a Student Protection Plan (formerly known as being on the Student Protection Register);

24.2.7 name and contact details of key professionals in other agencies, including GP;

24.2.8 any other factors which are likely to affect the safety and welfare of the student;

24.2.9 the student welfare file will be kept inane-secure filing system and will be transferred to the student's new school upon leaving.

24.3 The information created in connection with this policy may contain personal data. The School 's use of this personal data will be in accordance with data protection law. The School has published on its website privacy notices which explain how the School will use personal data.

24.4 All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

24.5 Insofar as student records are concerned:

24.5.1 Staff must record all concerns about a student on the School's pro forma record which is available in Appendix 6 and GlobalNet intranet page. Guidance on record keeping is set out in Appendix 2.

24.5.2 The DSL will open a child protection file following a report to them of a child protection concern about a student. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

24.6 **Information sharing and multi-agency working**

24.6.1 The School will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The School will always act in order to safeguard and promote the welfare of others.

24.6.2 The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of students, which is always the School's paramount concern. Schools have clear powers to share, hold and use information for these purposes and the UK GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

24.6.3 When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK GDPR and Data Protection Act 2018. The School will also have regard to its data protection policies. The School's School Technology & Process Manager will work with the DSL as appropriate to determine what should be disclosed.

24.6.4 The School will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.

24.6.5 Where allegations have been made against staff, the School will consult with the Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

24.6.6 While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

25 Version control

Date of adoption of this policy	September 2025
Date of last review of this policy	September 2026
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Policy owner (SLT)	Deputy Head of School & Designated Safeguarding Lead
Policy owner (Proprietor)	Nominated Safeguarding Lead for EF Academy Leadership Team (Governance)

Appendix 1 Forms of abuse, neglect and exploitation and specific safeguarding risks

1 Abuse, neglect and exploitation

1.1 Staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or Deputy).

1.2 Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

2 Indicators of abuse and neglect

2.1 **Abuse**: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including when they see, hear or experience its effects. 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. They may be abused by an adult or adults or by another child or children.

2.2 **Physical abuse:** 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.

2.3 **Emotional abuse**: 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 and prejudiced-based or discriminatory bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

2.4 **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it. The school policy and procedures can be found in Appendix 3.

2.5 **Neglect**: 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.

3 Signs of abuse

3.1 Possible signs of abuse include, but are not limited to:

3.1.1 the student says they have been abused or asks a question or makes a comment which gives rise to that inference;

3.1.2 there is no reasonable or consistent explanation for a student's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;

3.1.3 the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the student's behaviour;

3.1.4 the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

3.1.5 the student's development is delayed, the student loses or gains weight or there is deterioration in the student's general well-being;

3.1.6 the student appears neglected, e.g. dirty, hungry, inadequately clothed;

3.1.7 the student is reluctant to go home, or has been openly rejected by their parents or carers; and

3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

3.2 Mental health problems can also be a sign of abuse, neglect or exploitation.

3.3 The Oxfordshire Safeguarding Partners can provide advice on the signs of abuse and the DfE advice What to do if you're worried a child is being abused (March 2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

4 Specific safeguarding issues

4.1 Statutory guidance acknowledges the following as specific safeguarding issues:

4.1.1 child abduction and community safety incidents;

4.1.2 children and the court system;

4.1.3 children missing from education (see section 5 below);

4.1.4 children with family members in prison;

4.1.5 child criminal exploitation and child sexual exploitation (see section 7 below);

4.1.6 county lines (see section 8 below);

4.1.7 serious violence (see section 9 below);

4.1.8 modern slavery and the national referral mechanism;

4.1.9 cybercrime; (see section 10 below)

4.1.10 domestic abuse (see section 11 below);

4.1.11 homelessness;

4.1.12 mental health;

4.1.13 so-called "honour-based" abuse (including Female Genital Mutilation and Forced marriage) (see sections 12, 13 and 14 below);

4.1.14 preventing radicalisation (see section 16 below);

4.1.15 child-on-child abuse (see Appendix 3);

4.1.16 sexual violence and sexual harassment between children in schools and colleges (see Appendix 3);

4.1.17 serious violence;

4.1.18 upskirting (see section 19.12 below).

4.2 Further advice and links to guidance on these specific safeguarding issues can be found in Annex B of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

5 Children who are absent from education

5.1 Children being absent from school, particularly repeatedly and / or for prolonged periods and children missing education, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called "honour based" abuse or risk of forced marriage. School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a student from the School gives rise to a concern about their welfare.

5.2 Where reasonably possible the School will hold more than one emergency contact for each student.

5.3 The School shall inform the local authority of any student who is going to be added to or deleted from the School's admission register outside of standard transition times in accordance with the requirements of the School Attendance (Student Registration) (England) Regulations 2024.

5.4 This will assist the local authority to:

5.4.1 fulfil its duty to identify children of compulsory school age who are missing from education; and

5.4.2 follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.

6 Elective Home Education (EHE)

6.1 Where a parent expresses their intention to remove a student from School with a view to educating at home, the School will work with the local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision has been made. This is to ensure parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable, and / or has a social worker.

7 Child Sexual Exploitation (CSE) and Child criminal exploitation (CCE)

7.1 Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:

7.1.1 in exchange for something the victim needs or wants e.g. money, gifts or affection; and / or

7.1.2 for the financial advantage or increased status of the perpetrator or facilitator; and / or

7.1.3 through violence or threat of violence to victims (and their families).

7.2 Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.

7.3 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

7.4 International students may be particularly vulnerable to trafficking, particularly those who are or will be in the UK without their parent(s) or legal guardian, and schools which hold a Child Student sponsor licence may be targeted by traffickers as a means of facilitating a child's entry to the UK for the purposes of CSE or CCE.

7.5 The victim may have been exploited even if the activity appears consensual.

7.6 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

7.7 Some of the following can be indicators of both CSE and CCE, including children who:

7.7.1 appear with unexplained gifts, money or new possessions;

7.7.2 associate with other young people involved in exploitation;

7.7.3 suffer from changes in emotional well-being;

7.7.4 misuse drugs and alcohol;

7.7.5 go missing for periods of time or regularly come home late; or

7.7.6 regularly miss school or education or do not take part in education.

7.8 Children who have been exploited will need additional support to help maintain them in education.

7.9 CSE 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.

7.10 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 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). The above CCE indicators can also be indicators of CSE, as can children who:

7.10.1 have older boyfriends or girlfriends; or

7.10.2 suffer from sexually transmitted infections or become pregnant.

8 County lines

8.1 County lines [5] is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

8.2 Children are 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 and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

8.3 Number of the indicators for CSE and CCE as detailed above (and in Annex B of KCSIE) may also be applicable to children involved in county lines.

8.4 Additional reporting duties:

8.4.1 if a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of

[5] See the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance for more information.

availability of local services / third sector providers who offer support to victims of county lines exploitation;

8.4.2 where a student may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism [6] should be considered.

9 Serious violence

9.1 Indicators which may signal children are at risk from, or are involved with serious violence crime may include:

9.1.1 Increased absence from school;

9.1.2 a change in friendships or relationships with older individuals or groups;

9.1.3 a significant decline in performance;

9.1.4 signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;

9.1.5 unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

9.2 Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence e.g. being male, having frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further advice for schools is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance**.**

10 Cybercrime

10.1 Cybercrime is a criminal activity committed using computers and / or the internet. It's broadly categorised as either "cyber-enabled" (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or "cyber-dependent" (crimes that can only be committed by using a computer).

10.2 Cyber-dependent crimes include:

10.2.1 unauthorised access to computers (illegal hacking) e.g. accessing a school's computer network to look for test papers or change grades awarded;

10.2.2 denial of Service (**Dos** or **DDos**) attacks or "booting" - attempts to make a computer, network or website unavailable by overwhelming it with internet traffic;

10.2.3 making, supplying or obtaining malware e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with intent to commit further offence.

10.3 Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

[6] For further information and a definition of trafficking, see: National Crime Agency - modern slavery and human trafficking and the DfE and Home Office guidance: Trafficking: safeguarding children

10.4 The DSL (or Deputy) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme which intervenes when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

11 Domestic abuse

11.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but not limited to, psychological, physical, sexual, financial or emotional.

11.2 Children can be victims of domestic abuse. They may see hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long term impact on their health, well-being, development and ability to learn.

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

11.4 Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex B of KCSIE. This includes details about Operation Encompass which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children.

12 So-called "honour-based" abuse

12.1 All forms of so-called "honour-based" abuse are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.

12.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

13 Female genital mutilation (FGM)

13.1 FGM is a form of so-called "honour-based" abuse. It 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.

13.2 There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-43 of the Multi-agency statutory guidance on FGM (HM Government, July 2020) (pages 61-63 focus on the role of schools).

13.3 All staff must be aware of the requirement for teachers 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. The report should be

made orally by calling 101, the single non-emergency number. 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 students. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

13.4 If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory reporting of female genital mutilation - procedural information (January 2020) for further details about the duty.

13.5 Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by the School's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

14 VAWG, misogyny and prejudice-based abuse

14.1 The School recognises violence against women and girls (VAWG), misogyny and harmful gender-based attitudes as safeguarding concerns. Staff should be alert to sexist or misogynistic language, harassment, sexualised bullying, coercive control, stalking, image-based abuse and behaviours that normalise or escalate abuse. Concerns must be addressed even where presented as humour or peer culture.

14.2 Safeguarding concerns include abuse or harassment linked to race, ethnicity, religion or belief, sex, sexual orientation, disability, gender reassignment or other personal characteristics. This includes racism, faith-based prejudice, discriminatory language, threats, exclusion and online abuse. Staff must report concerns to the DSL and follow safeguarding, behaviour, equality and anti-bullying procedures.

15 Forced marriage

15.1 Forced marriage is also a form of so-called "honour-based" abuse. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

15.2 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.

15.3 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 39-44 of the Multi-agency guidelines: handling case of forced marriage (HM Government, April 2023).

15.4 Staff should speak to the DSL if they have any concerns. Pages 79-84 of the Multi-agency guidelines: handling case of forced marriage (HM Government, April 2023) focus on the role of schools in detecting and reporting forced marriage and the

Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fco.gov.uk for advice and information.

16 Radicalisation and the Prevent duty

16.1 The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

16.2 The School aims to build students' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

16.3 The School has adopted the government's definitions for the purposes of compliance with the Prevent duty:

16.4 **Extremism:** "*vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas*"

16.5 **Radicalisation:** "*the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups.*"

16.6 **Terrorism**: "*an action that endangers or causes serious violence to a person / people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause*."

16.7 Although there is no single way of identifying an individual who is likely to be susceptible an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

16.8 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of 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 the DSL making a Prevent referral.

16.9 Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel duty guidance: protecting people susceptible to radicalisation (HM Government, October 2023) The DfE and Home Office's briefing

note The use of social media for online radicalisation (DfE, July 2015) includes information on how social media is used to radicalise young people and guidance on protecting students at risk. Further information and guidance are available on the OSCB website: Radicalisation - Oxfordshire Safeguarding Children Board (oscp.org.uk).

17 **Child-on-child abuse**

17.1 All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or online.

17.2 The School's policy and procedures for dealing with child-on-child abuse can be found in Appendix 3 below.

18 **Online safety**

18.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

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

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

18.3.1 **content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

18.3.2 **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 purposes.

18.3.3 **conduct**: personal 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); and

18.3.4 **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If students, students or staff are at risk, it should be reported to the Anti-Phishing Working Group.

19 **Sharing nudes and semi-nude images and videos**

19.1 Consensual and non-consensual sharing of nudes and semi-nude images and / or videos can be signs that children are at risk.

19.2 "Sharing nudes and semi-nudes" means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can

also involve sharing between devices offline e.g. via Apple's AirDrop. This is also known as sexting or youth produced sexual imagery. This includes the sharing of digitally manipulated or AI-generated nude and semi-nude images.

19.3 The School treats all incidences of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy.

19.4 Members of staff must not intentionally view any nude or semi-nude images which are reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images , members of staff should describe the content of the images as reported to them.

19.5 The DSL may in exceptional circumstances view images with the prior approval of the Principal and only where:

19.5.1 it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;

19.5.2 it is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the student or parent in making a report; or

19.5.3 a student has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the school's devices or network.

19.6 Where viewing an image is unavoidable:

19.6.1 viewing should take place on School premises wherever possible;

19.6.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);

19.6.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;

19.6.4 full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;

19.6.5 any member of staff who views an indecent image should be given appropriate support.

19.7 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

19.8 If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

19.9 If external agencies do not need to be involved, the School must consider the deletion of any images. Students should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

19.10 If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

19.11 Where a student receives unwanted images, the School should advise the student and their parents of options that may be available to block the sender or to change the student's mobile phone number or email address.

19.12 The UK Council for Internet Safety's advice note Sharing nudes and semi-nudes: advice for education settings working with children and young people (DCMS and UKCIS, March 2024) contains details of support agencies and provides further information for schools on how to responding to incidents of sharing nudes and semi-nudes.

20 Self-generated intimate image and AI-generated content

20.1 Procedures apply to self-generated intimate images or videos, including content created, altered or circulated using AI, deepfakes or image-manipulation tools. Staff must not view, copy, download, print, forward or ask a student to send such material. Staff should refer immediately to the DSL and follow current national guidance, preserving relevant information without reproducing the image.

20.2 The DSL will consider the student's safety and wishes, coercion, threats, extortion, distribution, ages of those involved and whether referral to police or children's social care is required. Staff must not promise that an image can be deleted or kept entirely confidential.

21 Upskirting

21.1 Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

21.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

21.3 The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.

21.4 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images / sexting.

22 Special educational needs and disabilities or physical health issues

22.1 The School welcomes students with special educational needs and disabilities (SEND) and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's policy on special educational needs and learning difficulties and disability policy.

22.2 Additional barriers can exist when detecting the abuse or neglect of students with SEND or certain medical or physical health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:

22.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's condition without further exploration;

22.2.2 students with SEND or certain health conditions may be more prone to peer group and isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;

22.2.3 some students may be unable to understand the difference between fact and fiction in online content and can repeat the content / behaviour in school without understanding the consequences; and

22.2.4 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

22.3 The School should consider providing extra pastoral support and attention for these students, along with ensuring any appropriate support for communication is in place.

23 Looked after children and previously looked after children

23.1 The Proprietor ensures that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:

23.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;

23.1.2 contact arrangements with birth parents or those with parental responsibility;

23.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him / her.

23.2 The DSL maintains these details, including contact details of the child's social worker. See 6.5.4 in the policy for the DSL's role in relation to students who are looked after children.

24 Care leavers

24.1 The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

25 Children who are lesbian, gay, bi or trans (LGBT)

25.1 The School recognises that students who are or perceived to be LGBT are vulnerable to being targeted by other children.

25.2 LGBT inclusion is taught as part of the statutory relationships education /RSE / PSHE curriculum.

25.3 All staff are aware of these vulnerabilities and the School endeavours to provide a safe space to speak out or share concerns.

26 Mental health, young carers and additional vulnerabilities

26.1 Mental health difficulties may indicate abuse, neglect or exploitation, or may arise independently. Staff must not assume a mental-health presentation is solely a wellbeing issue. Safeguarding concerns must be reported to the DSL and considered alongside attendance, relationships, online experiences and other indicators. Where there is immediate risk of self-harm, suicide or other serious harm, staff must follow emergency procedures and seek urgent support.

26.2 The School will consider whether a student is a young carer or has caring responsibilities affecting attendance, wellbeing, development, safety or access to education. Students with SEND, disabilities, health conditions, communication needs or other vulnerabilities may face additional barriers to disclosing abuse. Staff must make reasonable adjustments and avoid dismissing concerns as a consequence of a student's needs or behaviour.

27 Students questioning their gender

26.1 Where a student is questioning their gender or raises concerns about gender identity, staff must respond respectfully and sensitively, without discrimination. The student's safety, wellbeing, privacy, age, maturity and individual circumstances must be considered. Staff should consult the DSL and follow current statutory guidance and School procedures before decisions about information-sharing, parental involvement, records, facilities or support. Staff must not promise secrecy or act outside the agreed safeguarding process.

Appendix 2 Concerns about a child - guidance for staff

1 **Receiving a disclosure**

1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.

1.2 Do not ask leading questions, i.e. a question which suggests its own answer. Use "tell me, explain to me, describe to me" (**TED**) questioning. It is particularly important not to continue questioning a student if they disclose something which suggests that a criminal offence may have been committed - the Police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings.

1.3 Take the student to the School Nurse (**DDSL**) if there is a medical need and do not examine the injury yourself.

1.4 Reassure the student they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

1.5 Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.

1.6 Keep a sufficient written record of the conversation (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.

1.7 Pass on the record when reporting the concern in accordance with this policy.

2 **Recording a concern**

2.1 Staff must record all concerns in writing.

2.2 Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:

2.2.1 the student's details: name; date of birth; address and family details;

2.2.2 date and time of the event / concern / conversation;

2.2.3 a clear and comprehensive summary of the event/concern / conversation;

2.2.4 details of how the concern was followed up and resolved,

2.2.5 a note of any action taken and by whom, decisions reached and the outcome;

2.2.6 the name and position of the person making the record.

2.3 The School has a pro forma record which should be completed and passed on when reporting the matter in accordance with this policy. This pro forma is available Appendix 6 and GlobalNet. The record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

3 Use of reasonable force

3.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard students. "Reasonable" in these circumstances means using no more force than is needed.

3.2 Staff should refer to Appendix 4 of the School's Behaviour and discipline policy and the Staff code of conduct for more detailed guidance about the use of reasonable force.

Appendix 3 Dealing with allegations of child-on-child abuse

1 **Child-on-child abuse**

1.1 Children of any age can abuse other children (often referred to as child-on-child abuse) and this can happen inside and / or outside school and / or online. This includes, but is not limited to:

1.1.1 bullying (including cyber-bullying and prejudice-based and discriminatory bullying);

1.1.2 abuse within intimate personal relationships between peers (teenage relationship abuse);

1.1.3 physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);

1.1.4 sexual violence, such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bras, unwanted kisses or embraces) possibly with an online element which encourages sexual violence;

1.1.5 sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

1.1.6 causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

1.1.7 consensual and non-consensual sharing of nude and semi-nude images (also known as "sexting" or "youth produced sexual imagery") means the taking and sending or posting of nude or semi-nude images, videos or lives streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop. This includes the sharing of digitally manipulated or AI-generated nude and semi-nude images;

1.1.8 upskirting, typically involving taking a picture under a person's clothing without their permission, 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;

1.1.9 initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element).

2 **The School's approach to child-on-child abuse**

2.1 The School does not tolerate child-on-child abuse, including sexual violence, sexual harassment, misogynistic behaviour, coercive or controlling behaviour, bullying, discriminatory abuse, or non-consensual creation or sharing of intimate images. Such behaviour may occur in person, online, in relationships, in boarding accommodation or outside School. Staff must report concerns even where behaviour is described as banter, a joke, consensual or part of a relationship.

2.2 Responses must be prompt, proportionate and informed by the victim's wishes and feelings, without making those wishes determinative. The School will consider the safety and support needs of all students involved, assess immediate and ongoing risks, avoid victim-blaming and inappropriate mediation, and refer to children's social care and/or police where indicated. Safety plans and support must be reviewed as circumstances change.

2.3 Staff understand that, even if there are no reports of child-on-child abuse at the School, it does not mean it is not happening; it may be the case that it is just not being reported. Staff understand the importance of reporting any concerns regarding child-on-child abuse to the DSL (or the DDSL in the DSL's absence).

2.4 Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The School will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours (by, for example, dismissing sexual harassment as "banter", "having a laugh" or "part of growing up" can lead to a culture of unacceptable behaviours, an unsafe environment for children and its worst to a culture that normalises abuse.

2.5 All staff should challenge inappropriate behaviour between students and anyone who suffers, witnesses or hears of abuse of any form between students is asked to report it in accordance with this policy and / or the School's behaviour and discipline and anti-bullying policies, so that appropriate action can be taken.

2.6 Appropriate action will involve supporting all members of the School community who may be involved as a priority. This may require investigation by the School or other agencies. Until investigations have been undertaken and findings made, the School will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have occurred at school, or when the student involved was under the school's care and whether or not the student is under 18, as an issue which may impact student welfare. Disciplinary action will follow separately, if appropriate.

2.7 The School takes the following steps to minimise the risk of Child-on-Child abuse:

2.7.1 classroom behaviour expectations are set out by staff and should ensure all students feel comfortable in their learning environment;

2.7.2 staff are on duty around and before school, during break times and during lunchtime;

2.7.3 via PSHE and during the normal running of the school day, students are encouraged to treat each other with respect and understanding;

2.7.4 all allegations of Child-on-Child abuse are dealt with immediately, in consultation with all parties, and often include mediation meetings between students, where appropriate.

2.8 All students are appointed a Pathway Manager, they meet regularly, which is an ideal opportunity to discuss any concerns. Staff are a presence within the residence buildings ensuring any inappropriate/ unacceptable behaviour is tackled immediately. Students also have access to *other* house parents as well as the Boarding Lead.

3 Sexual violence and sexual harassment (SVSH)

3.1 Where the misconduct may constitute sexual violence [7] (rape, assault by penetration, sexual assault [8] or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. SVSH is never acceptable.

3.2 Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims of SVSH and more likely it will be perpetrated by boys.

3.3 SVSH can occur between two or more children of any age or sex from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. SVSH exists on a continuum and may overlap. Addressing inappropriate behaviour (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating harmful sexual behaviour.

3.4 The 2021 Ofsted report concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The School acknowledges this and that children are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

4 Management of allegations of child-on-child SVSH

4.1 The initial report

4.1.1 The School recognises that it is not easy for children to tell staff about abuse. Staff are trained in signs of abuse and required to look out for them and act upon them; and to respond to all reports of abuse, however they are reported and whether they are made by victims directly or third parties.

4.1.2 The School acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of SVSH. Staff are also trained in how to receive a report. Where possible they should be accompanied by the DSL or other member of staff.

4.1.3 They should:

(a) listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;

(b) where possible they should ask open questions about whether student(s) have been harmed, the nature of the harm or if they may be at risk of harm;

[7] When referring to sexual violence the statutory guidance refers to sexual offences under the Sexual Offences Act 2003 as described above

[8] Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom / breasts / genitalia without consent, can still constitute sexual assault).

(c) where there is an online element, considering the searching, screening and / or confiscation of devices and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child; [9]

(d) explain the next steps and how the report will be progressed;

(e) make a written record of the report (recording the facts as the child has presented them);

(f) inform the DSL (or Deputy) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

4.2 **DSL's considerations**

4.2.1 Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. These decisions are made on a case by case basis taking all of the circumstances into account, in the best interest of the students involved. The School's response is led by the DSL who will always have regard to Part 5 of KCSIE in the management of the issue.

4.3 **School's considerations**

4.3.1 The School will consider:

(a) the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the school may have to take action to protect other children;

(b) the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour [10] has been displayed;

(c) the ages and developmental stages of the children involved and any imbalance between them;

(d) if there is an intimate personal relationship between the children;

(e) whether there are any ongoing risks to those involved;

(f) the time and location of any incident, and any action required to make the location safer;

(g) the wider context.

[9] School staff can search students with their co-operation for any item. If a student refuses to co-operate staff may use reasonable force to search students if they have reasonable grounds for suspecting a student is in possession of a prohibited item or is likely to be used to commit an offence or cause personal injury or damage to property. The decision to use reasonable force should be made on a case by case basis. See https://www.gov.uk/government/publications/searching-screening-and-confiscation for further information.

[10] Hackett's sexual behaviours across a continuum table - which helps to identify whether sexual behaviours are normal, inappropriate, problematic, abusive or violent may be helpful here.

4.3.2 Before deciding how best to support and protect those involved the School will undertake immediate risk and needs assessments. These will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve suspension pending investigation. Risk and needs assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.

4.3.3 The School will make a proportionate response to these matters in light of the circumstances and the factors identified above. And decide, if any, further action is appropriate.

4.3.4 The School will do all it reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

5 Investigations and findings

5.1 The School will record the findings of investigations undertaken by the police and / or the CPS, and if the police decide not to take any further action, will consider whether investigation should be undertake or commissioned by the School to enable it to determine, whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances whether this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances the School should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.

5.2 The School should continue to support those involved, with reference to the range of support options set out in Part 5 of KCSIE and should also consider whether further referral and / or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and/ or harmful sexual behaviours identified or the victim where concerns were found to be deliberately invented or malicious.

Appendix 4 Raising allegations and low level concerns

1 Key contact information

1.1 Below is the key contact information you may need to raise an allegation or low level concern under this policy.

Principal	Dona Jones Email: dona.jones@ef.com Telephone (term time): 01865 759667 Mobile number (term time): 07763454535 Holiday contact number: 01865 759667
Representative of EF Academy Leadership Team (Governance)	Anna Ireland Email: anna.ireland@ef.com Telephone number: 01865 759667
Safeguarding Lead EF Academy Leadership Team (Governance)	Anna Ireland Email: anna.ireland@ef.com Telephone number: 01865 759667
LADO	Email: lado.safeguardingchildren@oxfordshire.gov.uk Telephone number: 01865 810603

2 Purpose and application

2.1 **Purpose:** the School takes safeguarding extremely seriously. It is of paramount importance that we maintain an open and transparent culture in which all concerns about adults are shared promptly, responsibly and with the right person.
We recognise the importance of ensuring adults who work with, or otherwise come into contact with children, do so in a way that is consistent with our values, culture and expected standards of behaviour. We also recognise that concerns may arise in several ways and from a number of sources. The purpose of this policy is to provide a framework for all concerns to be raised, recorded and dealt with effectively by the School.

2.2 **Application:** the Policy applies to all adults working in or on behalf of the School (whether on a paid or unpaid basis), including EF Academy Leadership Team (Governance), supply staff, volunteers and contractors (**Staff**).

2.3 **Other adults:** although this policy directly relates to those who work for the School, the School recognises that its safeguarding role extends to the protection of everyone associated with it, including adults who do not work for the School. Should concerns be raised about people who are not Staff or students, then they should be reported to the Principal or DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.

2.4 **Statutory guidance:** this policy has regard to the following statutory guidance:

2.4.1 *Keeping children safe in education* (September 2026) (**KCSIE**). Part Four of KCSIE deals with allegations made and concerns raised about staff, supply staff, volunteers and contractors, who are all adults working for, or on behalf of, the School. It distinguishes between two categories of concerns / allegations that can be raised about Staff. These are:

(a) concerns that do not meet the harm threshold, otherwise known as "low level concerns"; and

(b) allegations that may meet the harm threshold.

2.4.2 *Working together to safeguard children 2026* (**WTSC**), which requires policies to be put in place setting out the process, including timescales for investigation and what support and advice will be available to individuals against whom allegations have been made. WT requires schools to have regard to KCSIE in order to fulfil their duties in respect of safeguarding and promoting the welfare of children.

3 Key Staff duties

3.1 **Staff behaviour:** all Staff must comply with the School's Code of Conduct which sets out appropriate and expected standards of behaviour.

3.2 **Duty to report:** as a member of Staff, you must immediately follow this policy to report **any** concerns you have about the conduct of a member of Staff or any other adult (which could include adults not employed by the School). This includes any concern however it arises, for example, behaviour you have witnessed, a concern raised with you by a colleague, student, parent or another adult, or as a result of checks or information brought to your attention.

3.3 **Duty to self-refer:** you must refer yourself to the Principal where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.

3.4 **A culture of sharing:** All Staff have a positive obligation to support the School's culture of openness and sharing without fear of reprisal.

4 What needs to be reported?

4.1 **Reporting all concerns:** all concerns must be raised whether they are considered to be "low level" concerns or conduct which may meet the harm threshold.

4.2 **Low level concerns:** a low level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and / or the staff Code of Conduct, whether inside or outside of work. No concern is too small or minor to raise under this policy.

4.3 **Concerns that meet the harm threshold:** allegations that may meet the harm threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual has:

4.3.1 behaved in a way that has harmed a child, or may have harmed a child; and / or

4.3.2 possibly committed a criminal offence against or related to a child; and / or

4.3.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and / or

4.3.4 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 the School which creates a transferable risk.

4.4 **Definition of Harm:** it is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm but to assist your understanding of what may amount to "harm" you should consider the following:

4.4.1 the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, encouraging people to apply a "normal, everyday meaning";

4.4.2 the Children Act 1989 defines:

(a) "harm" as "ill-treatment or the impairment of health or development [including, for example, impairment suffered from seeing or hearing the ill treatment of another]";

(b) "ill-treatment" as including "sexual abuse and forms of ill treatment which are not physical";

(c) "health" as "physical or mental health".

5 How to raise concerns and allegations

5.1 **Raising low level concerns:** Where you have a low level concern in respect of any member of Staff, you must report the matter immediately. You can raise this with the Principal.

5.2 **Duty of the DSL to refer concerns to the Principal:** the Principal remains the ultimate decision-maker in respect of all low level concerns. Save for in cases involving the Principal, the DSL therefore promptly report any concern raised with them to the Principal. Wherever possible the DSL must speak to the Principal in person about the concern as soon as possible after the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Principal in person about the concern, the DSL must email the Principal with a summary of the concern on the same day the concern is raised.

5.3 **Concerns about Staff:** where you have a concern about the conduct of a member of Staff (other than the Principal) that may meet the harm threshold you must raise this immediately with the Principal.

5.4 **Concerns involving the** Principal **and conflicts of interest:** where you identify a concern about the Principal, you must report the matter immediately to the Representative of the EF Academy Leadership Team (Governance) without first notifying the Principal.

5.5 **Concerns involving members of EF Academy Leadership Team (Governance)**: where you identify a concern about a member of the EF Academy Leadership Team (Governance) or member of the School's SLT, you must report the matter immediately to the Representative of the EF Academy Leadership Team (Governance) or the Nominated EF Academy Leadership Team (Governance) Safeguarding Lead. If either of these people is the subject of an allegation, you must report the matter to the LADO.

5.6 **Concerns involving individuals / organisations using School premises:** where the School receives an allegation relating to an incident that happened when an individual or organisation was using the premises for the purposes of running activities for children (e.g. community groups, sports associations, or service providers that run extra-curricular activities) it will follow its own safeguarding policies and procedures, including informing the LADO.

5.7 **Reports to the DSL:** If it is not possible for you to make a report to the Principal or Representative of the EF Academy Leadership Team (Governance) or Nominated EF Academy Leadership Team (Governance) Safeguarding Lead, you must instead immediately make a report to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Principal or, where appropriate, the Representative of the EF Academy Leadership Team (Governance) and the Nominated EF Academy Leadership Team (Governance) Safeguarding Lead.

6 The School's response to concerns and allegations

6.1 **Appropriate action:** the School will ensure that appropriate action is taken to address concerns that are raised under this policy.

6.2 **Assessing concerns:** The Principal or, if the concern relates to the Principal, the Representative of the EF Academy Leadership Team (Governance) or the Nominated EF Academy Leadership Team (Governance) Safeguarding Lead will determine whether the concerns raised are low level or potentially meet the harm threshold. The DSL, the Principal, the Representative of the EF Academy Leadership Team (Governance) and the Nominated EF Academy Leadership Team (Governance) Safeguarding Lead have all been trained to assess concerns, and to record and address them appropriately.

6.3 **Low level concerns:** If the School determines the concern is a low level concern, then the School will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the School's capability or disciplinary procedures.

6.4 **Borderline cases:** the Principal or, if the concern relates to the Principal, the Representative of the EF Academy Leadership Team (Governance) or the Nominated EF Academy Leadership Team (Governance) Safeguarding Lead may take advice from the LADO in borderline cases in order to establish whether the concern is a low level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold is met.

6.5 **Referral:** where the Principal or, if the concern relates to the Principal, the Representative of the EF Academy Leadership Team (Governance) considers the concerns raised potentially meet the harm threshold, the Principal or, if the concern relates to the Principal, the Representative of the EF Academy Leadership Team (Governance) will make a report to the LADO before further action is taken. The

Principal or, if the concern relates to the Principal, the Representative of the EF Academy Leadership Team (Governance) may also seek advice from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this policy.

6.6 **Responding to an allegation that may meet the harm threshold:** where an allegation is made that may meet the harm threshold, the School will take advice from and co-operate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The School will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so, and will keep the LADO informed of the action it is taking.

6.7 **Case Manager:** where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, a "Case Manager" will be appointed by the School to lead the investigation. The Case Manager will be either the Principal or a person with appropriate authority appointed by the Principal. Where the Principal is the subject of an allegation, the Case Manager will usually be either the Representative of the EF Academy Leadership Team (Governance) or Nominated EF Academy Leadership Team (Governance) Safeguarding Lead.

7 Disclosure of information about concerns and allegations

7.1 **Informing the individual of a concern:** the School will in most cases inform the individual concerned about any low level concern that is raised about them.

7.2 **Informing the individual of an allegation where appropriate:** the Case Manager will consult with the LADO in order to agree if and when it is appropriate to inform the individual of the allegation.

7.3 **Communication and support for the individual subject to an allegation:** if and when it is appropriate to inform the individual of the allegation against them, the Case Manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.

7.4 **Informing the child's parents / carers where appropriate:** the Case Manager will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The Case Manager will also agree with the LADO what information shall be shared with the parents / carers of the child / children as the case progresses. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

7.5 **Reporting restrictions:** the School is mindful of and will comply with the reporting restrictions under section 141 Education Act 2002 which prevent the identification of a teacher who is the subject of such an allegation in certain circumstances.

7.6 **Involvement of external agencies:** where the LADO(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the individual subject to the allegation, or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

7.7 **Concerns about supply staff and contractors:** where a concern / allegation has been made in respect of a member of supply staff or a contractor, the concern / allegation may be notified to their employer. Where a Case Manager has been appointed to investigate an allegation, the Case Manager will consult with the LADO before sharing any information with the individual's employer.

8 **Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency**

8.1 **Report to the DBS:** the School is under a legal duty to make a referral to the DBS where a member of Staff is removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child. The DBS will then consider whether to impose sanctions which may restrict or prevent that person from working with children in future.

8.2 **Report to the Teaching Regulation Agency:** if a teacher is dismissed because they are found to have committed serious misconduct, or their conduct has breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the School will also make a referral to the Teaching Regulation Agency. The Teaching Regulation Agency will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in future.

9 **Record keeping**

9.1 **Records of low level concerns:** low level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition all low level concerns, including those that have not been addressed formally under the School's procedures, will also be stored securely in a central file (**Concerns and Allegations Record**).

9.2 **Recording low level concerns:** the Concerns and Allegations Record will set out the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous the School will try to accommodate this as far as reasonably possible, but cannot guarantee anonymity in all circumstances. Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record

9.3 **Records of allegations that may meet the harm threshold:** details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Concerns and Allegations Record. The individual's personnel file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken in response to the allegation.

9.4 **Storage and security of Concerns and Allegations Record:** the Concerns and Allegations Record will be stored in a shared password protected OneDrive folder and will be accessible by the Deputy Head, the Representative of the EF Academy Leadership Team (Governance), the Nominated EF Academy Leadership Team (Governance) Safeguarding Lead and the DSL only.

9.5 **Malicious or false low level concerns and allegations:** details of low level concerns and allegations found to be malicious or false will be removed from personnel records and the Concerns and Allegations Record.

9.6 **Retention of records:** in line with the School's information and records retention policy, information stored on staff personnel files about low level concerns and allegations that may meet the harm threshold, and the Concerns and Allegations Record, will be retained by the School indefinitely. The School may in future be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

10 References

10.1 **Low level concerns:** low level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the School's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.

10.2 **Allegations that meet the harm threshold:** allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The School will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

11 Questions

11.1 **Contact:** please contact DSL if you have any questions about this policy.

Appendix 5 DSL Team Safeguarding Poster

SAFEGUARDING

Safeguarding is EVERYONE'S responsibility @ EF Academy Oxford

We are ALL responsible for the welfare of our students, peers and colleagues



Rob Tasker
Deputy Head

Designated Safeguarding Lead

01442 734439
rob.tasker@ef.com



Dona Jones
Principal

Deputy Designated Safeguarding Lead

01865 759667
dona.jones@ef.com



Donna Balsdon
Boarding Lead

Deputy Designated Safeguarding Lead

07773208160
donna.balsdon@ef.com



Alyona Lake
Pathway Manager

Deputy Designated Safeguarding Lead

07790374736
alyona.lake@ef.com



Kate Krivich
Pathway Manager

Deputy Designated Safeguarding Lead

07983803068
kate.krivich@ef.com



Anna Ireland
Vice President Operations

Designated Lead (Governance)

01865 759667
anna.ireland@ef.com

If you think a child is in immediate danger, call the police on: 999

Immediate concern:

If there is an immediate concern where a child id deemed "at risk" or has potentially suffered "significant harm", the MASH team should be contacted immediately.

Please call MASH on 0345 050 7666 during office hours. Outside office hours call the Emergency Duty Team on 0800 833 408

Concerns or allegations about a professional working with children:

If you are a staff member, student, or visitor and have concerns about a member of staff, please inform the Head of School or the Local Authority Designated Officer on 01865 810603

Appendix 6 Safeguarding Concern Reporting Form (Click here)

To be completed by the reporting staff member. Once complete this form must be passed immediately to **Rob Tasker (DSL)** or, if he is not available, to **Kate Krivich and Alyona Lake (DDSLs).**

Name of Staff Member completing the form	
Date of Concern / Disclosure	
Time of Concern / Disclosure	
Location or Situation of Concern / Disclosure	

Name of Student:			
Gender:	Age:	Date of Birth:	Nationality:

Overview of Concern, questions asked of the child, and Action Taken:

To be completed by the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead:

Immediate Action Taken:

Action Plan

Referral to OSCB	Y/N	n/a	Details	
Is the Deputy Head of School Aware?	Y/N	n/a	Details	
Referral to Police	Y/N	n/a	Details	
Parents contacted	Y/N	n/a	Details	

Additional Actions

Action	Date and time	Outcome

Name:	Date:
Position:	Signature: