



**EF ACADEMY**

International  
Boarding Schools

# **OXFORD SAFEGUARDING POLICY 2022-23**

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| <b>Document title:</b>                                  | Safeguarding Policy  |
| <b>Date Created:</b>                                    | September 2015   |
| <b>Author:</b>  | Mark Fletcher-Single (of 2018, 2019, 2020, 2021 and 2022 docs.)  |
| <b>Individuals Involved in Developing the Document:</b> | <p>previous Head of School (Paul Ellis) left EF Academy at end of academic yr. 2020-21</p> <p>previous Deputy Head (Joan Wilisoni)</p> <p>previous Head of Boarding (Emma Clarke) left EF Academy at end of academic yr. 2019-20</p> <p>Mark Fletcher-Single (previously Deputy Head &amp; DSL, Head of School from Aug.'21)</p> <p>Tina Desmond DSL from Sept.'22</p>   |
| <b>Document Purpose:</b>                                | Defines the School's approach to child protection and how it fulfils its legal and regulatory safeguarding responsibilities. (From Sept.'22 - i.e. Jul.'22 updates - more focus has been directed to <i>how</i> we put in place our procedures relating to Sept.'22's KCSiE doc., too.)  |
| <b>Related Documents:</b>                               | <p>Academic Policy: SEND</p> <p>Alcohol, Smoking and Substance Abuse Policy</p> <p>Anti-Bullying Policy</p> <p>Behaviour Policy</p> <p>Code of Conduct for Staff</p> <p>Complaints Policy</p> <p>Crisis Management Policy</p> <p>DBS Policy</p> <p>E-Safety policy</p> <p>First Aid Policy</p> <p>Independent Listener Procedures</p> <p>Missing Persons Procedure</p> <p>Positive Mental Health and Well-being Policy</p> <p>Recruitment Policy</p> <p>Risk Assessment Procedures</p> <p>Searching &amp; Confiscation Policy</p> <p>Concerns Policy</p> <p>Whistleblowing Policy</p> <p>Use of Reasonable Force Policy</p> <p>The prevent duty: for schools and childcare providers June 2015 (DfE)</p> |

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|                        | <p>Revised Prevent Duty Guidance for England and Wales (April 2021)</p> <ul style="list-style-type: none"> <li>- Protecting children from radicalisation: the prevent duty - Guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism (updated August 2015).</li> </ul> <p>Counter-Terrorism and Border-Security Act 2019<br/>Working Together to Safeguard Children July 2018 (DfE)<br/>Keeping Children Safe in Education September 2022 (DfE), including:</p> <ul style="list-style-type: none"> <li>- Sexual violence and sexual harassment between children in schools and colleges (September 2021)</li> <li>- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people December 2020</li> <li>- Mental Health and Behaviour in Schools (advice for schools) November 2018 (noting also Promoting and supporting mental health and wellbeing in schools and colleges June 2021, and a range of resources available including from Public Health England)</li> <li>- Preventing and Tackling Bullying (advice for schools)</li> </ul> <p>Multi-agency statutory guidance on FGM July 2020<br/>Relationships education, relationships and sex education (RSE) and health education (DfE, updated July 2019, last updated 2020)</p> |
| <b>Recent Updates:</b> | <p>August 2018 (Joan Wilisoni) - updates to reflect staff changes and changes to KCSiE in September 2018 and WTTSC July 2018.</p> <p>October 2018 (Paul Ellis and Mark Fletcher-Single) - to reflect Multi-agency statutory guidance on FGM.</p> <p>May 2019 - P. Ellis &amp; M. Fletcher-Single, to reflect change of DSL roles; key update from Counter-Terrorism and Border-Security Act 2019; flowcharts for actions following missing students; support flowcharts for Prevent and Channel; OSCB Prevent contacts</p> <p>June'20 (Mark Fletcher-Single) - additional information and details of relevant procedural changes to incorporate the development of our COVID-19 Policy</p> <p>updates to reflect staff changes and changes to KCSiE in September 2020</p>  |

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|   | <p>Aug.'21 (Mark Fletcher-Single):</p> <ul style="list-style-type: none"> <li>- developed information and details of relevant procedural changes to incorporate the development of our Covid-19 Policy</li> <li>- reviewed following advice from Barbara Lewin's Safeguarding training (Nov.'20)</li> <li>- reviewed to reflect the recent Feb.'21 consultation period of Boarding Schools: National Minimum Standards</li> <li>- reviewed because of the School's leadership restructure during academic yr. Aug.'21 to Jul.'22</li> <li>- updates to reflect staff changes and changes to KCSiE in Sept.'21</li> <li>- Appendices 1 (Contacts), 3 (Safeguarding Concern Form), 6 and 7 updated</li> </ul> <p>Jul.'22 (Mark Fletcher-Single):</p> <ul style="list-style-type: none"> <li>- reviewed to reflect the changes to National minimum standards for boarding schools (from 5<sup>th</sup> Sept.'22)</li> <li>- reviewed to reflect change of DSL roles and updates to staff changes and changes to KCSiE in Sept.'22</li> <li>- Appendices 1 (Contacts), 3 (Safeguarding Concern Form), 6 and 7 updated</li> </ul> |
| Current version approved by Executive Committee Member with responsibility for Safeguarding | Anna Ireland - Jul.'22<br>(VP Operations UK)   |
| Date of Next Review:  | July 2023  |



## Safeguarding Policy

(Formerly titled 'Child Protection Policy')

### Purpose and Aim of this Safeguarding Policy

EF Academy Oxford is a private further education (PFE) college for international students aged over 16, and we are committed to safeguarding and to promoting the welfare of all of our students. Each student's welfare is of paramount importance. All staff and volunteers will endeavour to work together to encourage the development of an ethos of openness and challenge, which embraces difference and diversity and respects the rights of all members of the community.

This Policy is reviewed at least annually by the Executive Committee, the Head of School, Designated Safeguarding Lead (DSL) and the Senior Leadership Group, and more frequently if legislation or guidance requires. Please note, the Deputy Head Pastoral's responsibilities, or *roles*, will be covered by the Head of School during the School's continued leadership restructure in the academic year Aug.'22 to Jul.'23, and from Sept.'22, Tina Desmond (Head of Boarding) will be the School's **Designated Safeguarding Lead (DSL)**.

This policy applies to all adults, including volunteers, working in or on behalf of the School who are required to read it and sign a declaration they understand their responsibilities under this policy. In addition, all staff sign they have read and understand their responsibilities as detailed in Part one: Safeguarding information for all staff in DfE's KCSiE guidance doc. (link below).

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1101457/KCSiE\\_2022\\_Part\\_One.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101457/KCSiE_2022_Part_One.pdf)

The purpose of this policy is to protect children and young people at EF Academy Oxford and to provide our staff with the overarching principles that guide our approach to safeguarding. EF Academy Oxford believes a child (young people) should never experience abuse of any kind and all children (and young people) have a right to a safe environment in which to live and study. At the School, **we all have a responsibility to promote the welfare of all children and young people, and to keep all of them safe**. We are committed to practice in a way that protects them.

If you have a concern about a child, contact one or more of the following people or agencies. If a child is in danger or at risk of immediate harm dial 999 and ask for the Police.

## School Contacts

| Name   | Role   | Contact Details   |
|--|--|---|
| <b>Tina Desmond</b>  | <b>Designated Safeguarding Lead (DSL)</b><br>Head of Boarding  | EF Academy Oxford<br>Pullens Lane<br>Oxford<br>Oxfordshire<br>OX3 0DA<br>Tel. 01865 759667 / <b>07971117525</b><br>Email <a href="mailto:tina.desmond@ef.com">tina.desmond@ef.com</a>   |
| Joan Wilisoni<br>(Pathway Manager)<br><br>Chloe Lammas<br>(Deputy Head of Boarding)                                      | DSL Deputies   | EF Academy Oxford<br>Pullens Lane<br>Oxford<br>Oxfordshire<br>OX3 0DA<br><br>Joan Wilisoni<br>Tel. 07790 374736<br>Email <a href="mailto:joan.wilisoni@ef.com">joan.wilisoni@ef.com</a><br><br>Chloe Lammas<br>Email <a href="mailto:chloe.lammas@ef.com">chloe.lammas@ef.com</a> |
| Anna Ireland   | Executive Committee<br>Member with responsibility<br>for Safeguarding  | Tel. 07917 712317<br>Email <a href="mailto:anna.ireland@ef.com">anna.ireland@ef.com</a>   |
| <b>External Contacts</b>   |  |   |
| Oxford Children's Services<br>Safeguarding Hub   | Oxford Children's Services Safeguarding Hub: 01865 815843, ask to be put through to the Safeguarding Hub. Outside of office hours you can call the Emergency Duty Service on: 0800 833408<br><a href="mailto:oscb@oxfordshire.gov.uk">oscb@oxfordshire.gov.uk</a>  |   |
| Alison Beasley<br>The Local Authority Designated Officer (LADO) &<br>Oxfordshire Local Authority Designated Officer team | The Local Authority Designated Officer (LADO) for Oxford is Alison Beasley <a href="mailto:alison.beasley@oxfordshire.gov.uk">alison.beasley@oxfordshire.gov.uk</a> (tel. 01865 815956; mobile 07833 436649). Details of the LADO can also be found here: <a href="http://www.oscb.org.uk/professionals/lado/">http://www.oscb.org.uk/professionals/lado/</a><br><br>Oxfordshire Local Authority Designated Officer team - 01865 810603 / <a href="mailto:LADO.SafeguardingChildren@oxfordshire.gov.uk">LADO.SafeguardingChildren@oxfordshire.gov.uk</a><br>Donna Crozier - Assistant Designated Officer<br><a href="mailto:donna.crozier@oxfordshire.gov.uk">donna.crozier@oxfordshire.gov.uk</a> / 07901 331799<br>Sandra Barratt - Assistant Designated Officer |   |

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|                        | <a href="mailto:sandra.barratt@oxfordshire.gov.uk">sandra.barratt@oxfordshire.gov.uk</a> / 07785 453264<br>Lorna Berry - Assistant LADO<br><a href="mailto:lorna.berry@oxfordshire.gov.uk">lorna.berry@oxfordshire.gov.uk</a> / 07912 474375<br><br>Further contacts can be found at:<br><a href="https://www.activeoxfordshire.org/safeguarding-contacts">https://www.activeoxfordshire.org/safeguarding-contacts</a> |
| The Emergency Services | 999  |

Safeguarding is the process of protecting children (under 18s), young people, international students in a residential setting, and vulnerable adults from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables them [children (under 18s), young people, international students in a residential setting, and vulnerable adults] to have optimum life chances and enter adulthood successfully.

EF Academy Oxford is committed to safeguarding and promoting the welfare of children and young adults and expects all staff and volunteers to share this commitment. We believe every child and young person has a right to feel safe and protected from any situation or practice that may result in them being physically or psychologically harmed.

### Links to Relevant Law and Guidance

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely:

- Our statutory duty under section 175 of the Education Act 2002 to ensure arrangements are in place for safeguarding and promoting the welfare of children.
- Our duties under the Children Acts 1989 and 2004 which enshrine the welfare of children as paramount, the United Nations Convention of the Rights of the Child, 1991, the Data Protection Act 1998, the Sexual Offences Act 2003, the Protection of Freedoms Act 2012 and the relevant government guidance on safeguarding children, such as Working Together to Safeguard Children 2018, to work together with other organisations and partners in order to achieve this.
- Our commitment under Keeping Children Safe in Education 2022 and updates to the guidance contained therein for all staff to make safeguarding and promoting the welfare of children and young people is **everyone's priority**. **Everyone** who comes in contact with students and their families and carers has a role to play in safeguarding them. Children includes everyone under the age of 18 (KCSiE, 2022), and from advice from Barbara Lewin's Safeguarding training (Nov.'20), international students in a residential setting.
- All our staff read at least Part one (and those working directly with children Annex A) of KCSiE Sept.'22 (and updates as issued) and sign to say they have read it.
- Our Common Law duty to protect and keep children safe whilst in our care and should consider at all times what is in the best interests of the child or young person.

Furthermore, we fully acknowledge our responsibilities for child protection and recognise through our day-to-day contact with children and young people, school staff are well placed to identify signs of risk and harm.

- We recognise our particular setting as a predominantly international, fully boarding school requires us to ensure safeguarding is understood and implemented at all levels.
- We recognise for student high self-esteem, confidence, risk awareness and good lines of communication help to reduce risks.
- We recognise for some students, school may be the only stable, secure and consistent environment in their lives.
- We will make all parents / carers aware of the role and responsibilities of the School with regard to safeguarding and promoting welfare and of the existence of this and other related policies (listed below).
- We make all students aware of how we safeguard them through induction at the School and in residences, and through our pastoral support structures.
- This policy should be read in connection with other safeguarding related school policies and procedures:

Academic Policy: SEND  
 Alcohol, Smoking and Substance Abuse Policy  
 Anti-Bullying Policy  
 Attendance Policy  
 Behaviour Policy  
 Code of Conduct for Staff  
 Complaints Policy  
 Crisis Management Policy  
 DBS Policy  
 E-Safety policy  
 Equality Opportunities Policy  
 First Aid Policy  
 Independent Listener Procedures  
 Missing Persons Procedure  
 Positive Mental Health and Well-being Policy  
 Recruitment Policy  
 Risk Assessment Procedures  
 Searching & Confiscation Policy  
 SEND Policy and Procedure  
 Student Handbook  
 Concerns Policy  
 Whistleblowing Policy  
 Use of Reasonable Force Policy

## Objectives and Scope of Policy

To provide a safe, secure, inclusive and consistent environment for all children and young people regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, racial heritage, religion / belief, disability, sex (gender), sexual orientation, sexual identity, ethnic background, religious faith, appearance, issues in the family, ethnic or national origin or because of cultural background, linguistic background, special educational needs, or academic or sporting ability. We also recognise some children and young people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

Our goal is to provide an environment in which all students feel safe, supported, valued, respected and listened to by working in partnership with children and their parents, and other agencies.

### We will seek to keep children safe by:

- Emphasising that safeguarding and promoting the welfare of children and young people is **everyone's** responsibility.
- Putting in place mechanisms to assist staff and volunteers to understand and discharge their role and responsibilities as set out in Part one of KCSiE Sept.'22 and ensure all staff read at least Part one of KCSiE Sept.'22. Staff will receive annual in person safeguarding training and, at least, one 45 minute refresher training session (after the Winter break) each academic year.
- Establishing an environment in which children and young people feel safe and can learn, develop, feel valued and respected and have a voice.
- Adopting child protection and safeguarding practices through the procedures outlined in this policy and related policies and our code of conduct for all our staff.
- Adopting safe recruitment practices to check the suitability of staff, volunteers and visitors to the School. We will also ensure procedures are in place to prevent the unsupervised access to children and young people of adults who have not undergone such a checking process.
- Having measures in place to facilitate and promote the safe use of technology (in line with the local authority guidance on e-safeguarding) and developing and implementing an effective E-Safety provision through outside providers that supports our acceptable use policy and related procedures.
- Ensure staff are aware of what to do and who to inform should they become aware of a sexting incident.
- Raising awareness of children and young people and equipping them with the skills and knowledge needed to keep safe.
- Ensuring children and young people develop the ability to protect themselves and others from radicalisation and violent extremism through the promotion of British values.
- Having in place procedures for the identification and reporting of cases where harm or risk of harm to a child or young person is suspected and ensuring all staff are aware of such procedures.

- Supporting children and young people who have suffered abuse or neglect or who are otherwise vulnerable (e.g. children living away from home), where appropriate, in accordance with their agreed child protection / care plan.
- Monitoring and reviewing our safeguarding and child protection practices, procedures and internal training materials as required, but at least, annually.
- Ensuring the child's or young person's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individuals through ensuring there are systems in place for them [children and young people] to express their views and give feedback.
- Sharing information about child protection and good practice with students, parents, staff, and volunteers.
- Sharing concerns with agencies who need to know and involving parents and students appropriately.
- Ensuring clear reporting procedures for allegations or suspicions of abuse, in summary:
  - Allegations or suspicions of abuse against staff and volunteers are reported to the DSL, who will inform the Head of School and contact the LADO. Please note, the Deputy Head Pastoral's responsibilities, or *roles*, will be covered by the Head of School during the School's continued leadership restructure in the academic year Aug.'22 to Jul.'23, and from Sept.'22, Tina Desmond (Head of Boarding) will be the School's **Designated Safeguarding Lead (DSL)**.
  - Allegations or suspicions of abuse against the DSL are reported to the Head of School.
  - Allegations or suspicions of abuse against the Head of School are reported to EF Academy Oxford's VP Operations UK (contact details on page 6 of policy), without informing the Head of School, the VP Operations UK will contact the LADO, again without informing the Head of School.
  - Where a person is dismissed or removed or would have been had they not left of their own choosing, the Disclosure and Barring Service will be informed. Matters of professional misconduct will be referred to the National College for Teaching and Leadership.

### Working with other agencies

The School, through the DSL maintains positive working relationships with a number of external agencies to support the implementation of our safeguarding policy. These agencies include:

- Oxfordshire Safeguarding Children Board
- the local Police Intervention team
- local GPs and the NHS

## **Roles and responsibilities**

We recognise all staff, regardless of their role have a duty to safeguard children and young people and promote their welfare. Our policy applies to the whole school community: all teaching and non-teaching staff whether based at the School or in the residences, VP Operations UK, volunteers and visitors working in the School. The VP Operations UK is responsible for ensuring the annual monitoring and review of this policy using independent professional advice where appropriate.

### **The Senior Leadership Group (SLG) is responsible for:**

- Ensuring the School has a Safeguarding Policy and procedures in place that are in agreement with national and local authority guidance and inter-agency procedures, and the policy is made available in a range of formats.
- Ensuring the School maintains a safer recruitment protocol and ensures all necessary checks are applied to all staff and volunteers who work with children and young people.
- Ensuring the School has procedures in place for addressing allegations of abuse against staff and volunteers that are in accordance with guidance from the local authority and local inter-agency procedures.
- Establishing an environment in which children and young people are and feel safe, and can learn, develop, and have a voice.
- Providing a Designated Safeguarding Lead, Deputy Designated Safeguarding Leads and Pathway Manager pastoral leaders who are all known to parents / carers, staff and students.
- Ensuring quality teachers who know the children in our care really well and cater for their individual needs.
- Having an active and effective Student Council.
- Ensuring our buildings and site are secure and visitors to the School are properly checked and supervised.
- Ensuring we have up-to-date policies and procedures in place for Health & Safety, PSHE (including Sex and Relationships Education), Rewards, Behaviour and Sanctions (including Bullying, Racist and other discriminatory incidents and Use of Reasonable Force), Attendance, Equality, Anti-Bullying including internet / mobile, Whistleblowing and E-Safety (including mobile phones and photographic equipment).
- Ensuring these policies and procedures are fully understood and adhered to by all staff.
- Ensuring all staff are risk aware and carry out risk assessments as appropriate to their individual role and responsibilities.
- Ensuring all staff, Executive Committee members and regular visitors and volunteers have been made aware of the Keeping Children Safe in Education, Sept.'22 Part one (and for those working directly with children Annex A). There are copies of the document on the School intranet (Globalnet) and website. There is also a School specific Code of Conduct for Safe Working Practice.



- Ensuring staff and volunteers receive online or in-person training on at least an annual basis to assist staff to understand and discharge their role and responsibilities as set out in Part one of KCSIE Sept.'22. Ensure all staff sign a declaration to say they have read this document.
- Following the LSCBs (Oxford) procedures (Managing allegations and concerns regarding staff, carers and volunteers working with children and young people 2011, updated Jun.'19) for dealing with allegations and concerns about staff (paid or unpaid, temporary or permanent). Where such an allegation or concern arises, the DSL should be notified. The DSL will ensure the Local Authority Designated Officer (LADO) is notified within one working day. Where such an allegation is made against the DSL, the matter will be referred to the Head of School and the chair of the Executive Committee who will likewise notify the LADO within one working day.

Please note, the Deputy Head Pastoral's responsibilities, or *roles*, will be covered by the Head of School during the School's continued leadership restructure in the academic year Aug.'22 to Jul.'23, and from Sept.'22, Tina Desmond (Head of Boarding) will be the School's **Designated Safeguarding Lead (DSL)**. **The Head of School should ensure:**

- child protection policies and procedures approved by the EF Academy Oxford School Executive Committee are fully implemented, and adhered to by all staff
- staff undertake regular and appropriate training in child protection procedures
- any flaws or weaknesses regarding child protection procedures are addressed as a matter of urgency and without delay
- policies and procedures are extensively reviewed annually by the Head of School, DSLs and SLG
- all staff can access the School's Safeguarding Policy
- adequate resources and time are apportioned to enable the School's staff member with responsibility for child protection, currently the DSL, to carry out their responsibilities
- all staff and volunteers are given opportunity to raise concerns about weak or dangerous practice in regard to children's and young people's welfare, and such concerns are met with consideration and sensitivity

**The DSL should ensure:**

- all staff members know who the DSL and Deputy DSLs are, and achieves this by (a) producing information that is posted at school premises and (b) meets with all newly appointed staff within the first 5 days of their employment
- all staff understand their safeguarding responsibilities and can recognise how to identify possible signs of abuse or concern and how to report them
- all cases of suspected abuse are referred to the local authority children's social care and:
  - the designated officer(s) for child protection concerns (all cases which concern a staff member)
  - Disclosure and Barring Service (cases where a person is dismissed or left due to risk / harm to a child), and / or
  - Police (cases where a crime may have been committed) within 5 working days

- all new staff take part in induction training and ongoing training that includes safeguarding and safe working practices training to keep them aware of updates to the School's reporting procedures, relevant personnel and changes to legislation, etc.
- the DSL understands how OSCBs (Oxfordshire Safeguarding Children's Board) operate and be able to attend and contribute to these
- the DSL's training is in accordance with local agreed procedures (Level 3, refreshed at least every two years). The DSL keeps up-to-date with legislation, obtains access to resources and attends any additional relevant training courses the DSL, Safeguarding Executive Committee member or Head of School identifies as ensuring the School's safeguarding and child protection provision
- all staff are aware the DSL is the School's safeguarding expert and should be the first point of contact for advice, guidance and support on all child protection matters
- ensure appropriate safeguarding materials and guidance for students and staff are displayed, made available electronically and in hard copy where appropriate and are used to raise awareness of child protection practice

Annex C: Role of the designated safeguarding lead, is on pages 161 to 167 of Sept.'22's KCSiE doc. The *opening* paragraphs of this section are snipped below.

## Annex C: Role of the designated safeguarding lead

Governing bodies and proprietors should ensure an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

### Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

### **All staff and volunteers:**

- maintain at all times an '*it could happen here*' attitude
- are fully conversant with the School's policies and procedures to ensure the safety of all students is a priority
- attend appropriate training
- identify students who may be at risk
- understand children and young people with SEND are more vulnerable to various types of abuse
- inform the designated safeguarding lead of any concerns immediately
- all staff are trained to recognise staff in school are uniquely well-placed to observe any physical, emotional or behavioural signs which signify a student may be suffering harm
- the relationships between all school staff, House Parents and students is one which breeds respect, confidence and trust and therefore enables our students to feel able to make disclosures of abuse, and / or enables staff to discovering evidence of abuse

### **Further Detailed Guidance**

#### **Safer Recruitment and Selection**

The School pays full regard to DCSF guidance "Working Together to Safeguard Children July 2018" (first published Mar.'15) and all of the relevant updates to this and other safeguarding guidance, up to and including KCSiE Sept.'22.

We ensure all appropriate measures are applied in relation to everyone who works in school including volunteers, staff employed by our contractors (e.g. airport transfer drivers and catering staff at school and the residences that come into contact with our students).

The School's Safer Recruitment practice includes advertising that makes clear safeguarding is a priority at our school, a job description that makes clear when a role involves working with children and / or young people, a rigorous shortlisting procedure by panel, interviews with probing safeguarding questions with at least one person on the panel (two if possible) who has had safe recruitment training, checking the backgrounds of appointees, verifying identity and academic or vocational qualifications, obtaining professional references, checking prior employment history and establishing a candidate has the necessary health and physical capacity for employment.

Our adverts include clear definition of the positions being advertised (through the job or role description and person specification), the skills, abilities, experience, attitude, and behaviours required for the post, and the safeguarding requirements. Adverts will also include whether the post is exempt from the Rehabilitation of Offenders Act (RoA) 1974. The amendments to the RoA 1974 and the Exceptions Order 1975, 1023 and 2020, provide that when applying for certain jobs and activities, certain spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. The MOJ's

guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975, provides information about which convictions must be declared during job applications and related exceptions and further information about filtering offences can be found in the DBS filtering guide.

All potential employees undergo an enhanced Disclosure and Barring Service check. We recognise our responsibilities under the Vetting and Barring Scheme and understand our legal responsibility to refer to the agency any cases which fall within the referral guidance. The Head of School, or their nominated representative, ensures they have seen evidence of appropriate child protection checks and procedures for non-EFA staff who work with our students at other sites (e.g.: sports centres, residential trips, etc.). To ensure students' safety, the following checks are carried out in accordance with government requirements:

- a DBS Enhanced Disclosure is obtained for all staff in accordance with statutory guidance, including additional checks for staff with management or SLG responsibilities
- ALL teachers will be subject to additional checks to ensure they have not been prohibited from teaching or are subject of a suspension or conditional order imposed by the General Teaching Council for England (prior to abolition) that is still current
- a DBS Enhanced Disclosure for any staff following a significant break in service
- a single central record (SCR) is maintained by the Operations Manager, detailing the range of checks carried out on staff
- all new appointments to the School workforce who have lived outside the UK are subject to additional checks as appropriate

### Safe Professional Practice

Through induction and ongoing Safeguarding and Safe Working Practice training and materials, the School ensures staff:

- are fully conversant with this Safeguarding Policy and related policies
- take responsibility for their own actions and behaviour and know to avoid any behaviour which would lead to the questioning of their motivation and intentions
- carry out their duties in an open, transparent and professional manner and **maintain an ethos of openness and challenge**
- discuss or solicit advice from the DSL and / or school leadership group over any issue which is causing them concern or anxiety with regards to a child or the behaviour / attitude of an adult responsible for their care
- record and report any incidents or disclosures made
- are aware ignoring the law or other professional guidelines could result in criminal or disciplinary proceedings

The DSL will provide for a report to be sent within 5 working days to the Disclosures and Barring Service (DBS) if the School dispenses with a person's services because of unsuitability to work with children or would have done so had the person not resigned. Consideration is given to making a referral to the Teacher Regulation Agency (TRA) (formerly National College for Teaching and Leadership - NCTL) where a teacher has been dismissed (or would have been dismissed had he or she not resigned) and a prohibition order may be appropriate, because of 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute', or a 'conviction at any time for a relevant offence.'

## E-Safety

The School's E-Safety Policy clearly sets out the School's procedures for mobile technology which includes the management of access to 3G / 4G. For more detailed guidance please refer to the E-Safety Policy. All staff must be aware and have read our Guidance on Home Teaching and Learning doc., too (please see below).



Guidance on Home  
Teaching and Learning

## Guidance on Home Teaching and Learning

Home Teaching & Learning (HTL) will be implemented when a teacher(s) or student(s) is required to teach or learn from home due to an authorised absence *justifiable* inability to return to school. When HTL is implemented, the following guidelines are put in place. The intended outcome is the curriculum is at the forefront of the work and, as far as possible, student progress should not be negatively impacted.

It is essential all staff understand the safeguarding measures outlined within this doc., e.g. '**...ALL Zoom lessons should be recorded and uploaded.**', 'Teachers must be professionally dressed.', etc. and our Safe Professional Practice guideline (please see below).

## Cybercrime

Cybercrime is criminal activity committed using computers and / or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for e.g. a school's computer network to look for test paper answers or change grades awarded
- denial of service attacks or 'booting' - these are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above

Children and young people with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a student in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide Police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where 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.

Cyber Choices does not cover 'cyber-enabled' crime such as fraud, purchasing of line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general online safety.

### **Identification and reporting of cases where harm or risk of harm to a child or young person is suspected**

**All staff** are responsible for reporting any concerns about the welfare of a student to the Designated Safeguarding Lead. These concerns will then be followed up and dealt with appropriately by the DSL, who will ensure these confidential records are kept securely.

**It is the responsibility of the Designated Safeguarding Lead (DSL)** to have discussions with Social Care (Oxford Safeguarding Children Board's hub and / or the Police) when concerns arise regarding the safety of a student in this school. All such students are closely monitored, including attendance, and where extra concerns arise these are passed on to the appropriate agencies. **Advice and support** are offered to other members of staff dealing with a student for whom there are concerns.

**Through training**, all staff (teaching and non-teaching) will be made aware of all their responsibilities concerning safeguarding and child protection. They will be able to recognise the signs of abuse and understand their responsibilities to report when a child may be at risk of harm. Generalist training of all staff will be updated **yearly**. Pastoral Leaders are required to be trained at LSCB Foundation Level 3 (e.g. DSL, Deputy DSLs, Pathway Managers, Head of Boarding, Deputy Head of Boarding, etc.) will update to that level every **two** years. The Head of School and members of staff engaged in regulated activity have regular child protection training renewed as specified by the Oxford LSCB Foundation Level 3 by being trained / refreshed at least every **two** years. Temporary and voluntary staff are made aware of the arrangements for training and reporting. Members of the SLG are also trained in Safe Recruitment. (Training is explained more fully later).

The Head of School and DSL will ensure the School provides written referrals (on any required form) and recognises the importance of attendance at all meetings called when there is a concern regarding the safeguarding of a student. All children and young people who are deemed 'children in need' or 'looked after children' will have their own file and a chronology sheet regularly updated. The Designated Safeguarding Lead or the student's Pathway Manager will attend all relevant meetings. Please note, the Deputy Head Pastoral's responsibilities, or *roles*, will be covered by the Head of School during the School's continued leadership restructure in the academic year Aug.'22 to Jul.'23, and from Sept.'22, Tina Desmond (Head of Boarding) will be the School's **Designated Safeguarding Lead (DSL)**.

### **Procedure for reporting disclosures or suspicions of abuse or neglect**

Anyone can raise a concern and parental consent is not required for referral to statutory agencies.

- **Raise the concern with the School's Designated Safeguarding Lead (DSL)**, or if the DSL is not available, the Deputy DSLs or the Head of School.
- The DSL will refer cases of a child or young person in need to children's social care, or to the Police if a crime is thought to have been committed. This will happen as soon as possible but no later than one working day.
- **Refer your concerns directly to local Children's Services** directly as well via the Oxford Safeguarding Children Board's 'hub' 01865 815843 (all further contact details at the end of this policy) or the Early Help Centre.
- **Where there is risk of immediate serious harm to a child or young person** then a referral should be made to the Police (999) immediately. If there is no immediate risk of harm, the 101 Police number can be used, or the referral can be made to the 'hub' as indicated above.
- **If the child's or young person's situation does not appear to be improving, after the DSL is made aware**, the staff member who raised the concern should press for re-consideration.

### **Whistleblowing Policy**

Whistleblowing is exposing organisational misconduct, dishonesty, illegal or unethical activity. If an individual working for EF Academy Oxford has a genuine belief managers or colleagues are not acting appropriately, including responding to allegations of abuse or harm, the individual is obliged to raise this at the most appropriate level. The School's whistleblowing process enables workers to do this safely and without reprisal within EF Academy Oxford, wherever an individual may work. Please see the School's Whistleblowing Policy for details.

### **Children with Statements of Special Educational Needs**

EF Academy Oxford recognises, statistically, children and young people with behavioural difficulties, disabilities and specific learning difficulties and / or special educational needs are most vulnerable to

abuse. All staff that support or care for these children and / or young people are made aware of the extra need for vigilance for signs of abuse with regards to these children. (See also our SEND Policy.)

It is important to note, too, Lesbian, Gay, Bi or Trans (LGBT+): children and young people who are LGBT+ can be targeted by their peers. In some cases, a student who is perceived by their peers to be LGBT+ (whether they are or not) can be just as vulnerable as children who identify as LGBT+.

**Supporting Vulnerable Children and Children in Need** (we include 'young people', too)

A **child in need** is defined under the Children Act 1989 as 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. The School recognises some children are more vulnerable than others.

### Early help

**'Early help' means providing support as soon as a problem emerges at any point in a child's or young person's life.** Any child or young person may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- has a disability or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing / goes missing
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member (carer / guardian) in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child or young person, such as drug and alcohol misuse, adult mental health issues or domestic abuse
- has returned home to their family from care
- is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child

Pathway Managers, House Parents, Academic Tutors, Assistant Heads, etc. support all students and play an important role in supporting, monitoring and reporting any concerns relating to vulnerable and in need children. Early help, where the School identifies a child or young person may be more



vulnerable, a specific Pathway Manager will be allocated to them and required to undertake a full assessment of their needs. This will be discussed in the weekly Pastoral meetings. The DSL will oversee this process for the individual student. In the first instance, staff who consider a student may benefit from early help should discuss this with the School's DSL.

If early help is appropriate, the DSL will generally lead on liaising with relevant external agencies and setting up inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. The DSL will support staff in liaising with external agencies and professionals in an interagency assessment, as appropriate. If early help is appropriate, the matter will be kept under constant review and consideration given to a referral to children's social care if the student's situation does not appear to be improving or is getting worse. The role of the delegated staff in this process will include, but not be restricted to the following actions:

- The development of a support plan for the student in line with the Oxford Children's Services Common Assessment Framework documentation.
- Frequent and regular contact with the student's parent(s), to ensure the parent(s) are aware of the concerns and can contribute toward the support plan.
- Frequent and regular contact with the House Parent team (most likely, through the Head of Boarding).
- 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.

**All staff should be aware behaviours linked to drug taking and / or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and / or videos can be signs children and young people are at risk.** 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.

EF Academy Oxford uses a traffic light approach to monitoring and assessing our 'Early help' provision: **Welfarewatch** (please see Categorising Safeguarding Concerns slide below).

## Categorising Safeguarding Concerns



**RED** - 'Stop', act(!);  
immediate  
safeguarding concern /  
issue

**AMBER** - 'Ready',  
student on  
*Welfarewatch*

**GREEN** - 'Carry on...'

## Parents

We are committed to working with parents / guardians positively, openly and honestly. We endeavour to make sure all parents / guardians are treated with respect, dignity and courtesy. EF Academy Oxford will share with parents / guardians any concerns we may hold about their child unless to do so would put the student at risk. We encourage parents to discuss any concerns they may have directly with the School's Designated Safeguarding Lead and / or Pathway Manager for their child. We make parents aware of our Safeguarding Policy they are told they can view this policy online (on our website).

The School shares the common purpose with parents / guardians of keeping students safe from harm and promoting their wellbeing.

## Visitors to the School and residences

All non-school staff visitors (other than the post person and deliveries made to reception and visitors who come when there are no students present) to the School and residences will:

- be required to enter through the Cotuit Hall main reception **only**
- be required to sign in and out via the iPad app in reception for this purpose, and have their identification checked as necessary
- be issued with a visitors' badge which they must always wear when they are on school property, and which has contact details for reporting suspected abuse or disclosures on the reverse side, which will be pointed out to them when it is issued
- at our residences, all non-school staff visitors, including residents' family members, are requested not to use mobile phones in their possession that contain a camera / video function: visitors are restricted to the reception area for use of their mobile phone
- at the School and residences, when students are present, visitors will be escorted / supervised during their visit by a member of staff in regulated activity
- ~~Contractors are required to wear an EF-branded high-visibility vest~~ as a continuing (from Sept.'22) Covid-19 precautionary measure, continuing from last academic year, contractors will be required to wear their own high visibility vest and will be issued with a visitor's badge, too

## Curriculum and Learning (PSHE); Safeguarding-related Sessions for Students

The School is committed to ensuring students can develop an understanding of which behaviours help to protect them from risk, or are unacceptable or place them at risk, and the steps they can take to ensure their personal safety and welfare, including online.

To support this, we have an induction programme that encompasses safeguarding presentations from the Police (in Aug.'21 Matthew Foster presented 'Laws in the UK'), the School's Pathway Managers, the Boarding team, the Deputy Head and Head of School. Please note, the Deputy Head

Pastoral's responsibilities, or *roles*, will be covered by the Head of School during the School's continued leadership restructure in the academic year Aug.'22 to Jul.'23, and from Sept.'22, Tina Desmond (Head of Boarding) will be the School's **Designated Safeguarding Lead (DSL)**. In addition, a PSHE programme forms part of the weekly Pathway Support sessions. From their arrival at school, our students learn to whom they can talk to about their worries and concerns, both in and out of school and we value and promote their right to be listened to. Please also refer to our PSHE Policy and E-Safety Policy.

## Photography and Filming by EF Academy Oxford

### Using photographs of children and young people for publication

EF Academy recognises the use of photographs on websites and in other publications can pose direct and indirect risks to children and young people, and with regards to this we have put in place the following policy and procedure to address the safeguarding of our students:

- **Risk of identifying whereabouts of child or young person to groomers:** even though the student's personal identity (full name, address) is kept confidential, we recognise other details accompanying the photograph can make them identifiable and therefore vulnerable to individuals looking to 'groom' children for abuse.
- **Risk that photo itself may be used inappropriately by others:** photographs can easily be copied and adapted, perhaps to create images of child abuse, which can then find their way on to other websites.
- **Minimising these risks:** we establish the type of images that appropriately represent the organisation and the activity, and we think carefully about any images showing children and young people on our website and in our publications and blogs.
- We never supply the full name(s) of the student or students along with the image/s of any publications made public. e.g. for marketing purposes.
- We only use images of children and young people in suitable dress, recognising some activities our students are involved, such as swimming, gymnastics and athletics present a higher risk for potential misuse than others. Thus, our photographs of these types of activities focus on the activity rather than a particular child or young person and avoid showing the full face and / or body: for e.g., any photographs in the sea or a swimming pool would show them in the water or from the waist or shoulders up only.

### When using photographers:

- Our specialist marketing staff or teachers leading events provide a clear brief about what is considered appropriate in terms of content and behaviour.
- We issue the photographer with identification, which must always be worn whilst they are in school.

- We do not allow unsupervised access to students or one-to-one photography sessions at events, e.g. at graduation, our photographs of individual students in their gowns and their diplomas are not taken privately, but in full view.
- We do not allow photography sessions away from the event, for instance at a student's home getting ready for an event.
- If parents or other spectators are intending to photograph or video at an organised event, we also make them aware of what is permitted and what is not.

### **Parental permission for use of student's photographs**

In signing the terms and conditions to send their child to EF Academy Oxford, parents read a paragraph that says they and their children agree a student's name, photograph and achievement details may be used for promotions without written consent at the time or compensation. We also explain this in our Parent Handbook. The parental consent form covers the use of photographers or filmmakers at school events and the publication of the resulting films or photographs.

### **Reporting and Responding to Concerns regarding Photography and Filming**

Students and parents are informed if they have any concerns regarding inappropriate or intrusive photography, these should be reported to the teachers / other staff member organising and / or hosting / supervising the event. These reported concerns are dealt with via the same procedure our other child protection and safeguarding issues, ensuring the DSL is informed by the staff member.

**Safeguarding Training and Staff Inductions** (the Deputy Head's responsibilities, or *roles*, will continue to be covered by the Head of School during the School's leadership restructure, in the academic year Aug.'22 to Jul.'23).

**DSL; Head of School; ~~Deputy Head~~; Deputy Head of Boarding and a Pathway Manager**

The DSL (and Head of Boarding), Head of School, ~~Deputy Head (Pastoral)~~, Deputy Head of Boarding and, currently as of Jul.'21, one Pathway Manager have completed Level 3 Safeguarding 'in-person via Zoom' training.

#### **DSL and Pastoral team<sup>1</sup>**

The Designated Safeguarding Lead, the Deputy Designated Safeguarding Leads and those staff with specific responsibility for care undertake enhanced child protection training offered by the LSCB (Oxfordshire) and attend refresher training at 2 yearly intervals. All of these staff also receive the School's in-house Safeguarding, Reporting Procedures and Safe Working Practice Training each year.

#### **All Teaching and Non-Teaching Staff; New Staff Induction**

The Head of School and all other school-based and non-school staff, including those engaged in regulated activity and non-teaching staff, undertake appropriate in-person training as specified by the OSCB, to equip them to discharge their responsibilities for safeguarding and child protection effectively. This training is kept current by refresher training at yearly intervals. All staff, including teachers, tutors, administrative staff, pastoral staff, temporary staff and maintenance personnel, are provided with access to the School's Safeguarding Policy and informed of the School's child protection arrangements on induction.

In addition to their general induction from the DSL, and any specialised safeguarding training as laid out above, all new staff receive safeguarding induction training that includes:

- School Safeguarding Policy
- Keeping Children Safe in Education, 2022 Part 1 and Annex A (and updates regarding FGM, Peer-on-Peer Abuse, CSE and the Prevent Duty)
- Staff Code of Conduct

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<sup>1</sup>Current Oxford Safeguarding Children's Board Foundation / Level 3 trained staff positions: because of their specific involvement in the pastoral care of students, the training of these staff is refreshed every **two** years:

DSL (and Head of Boarding)

~~Deputy Head~~

Deputy DSLs

Pathway Manager

Head of School

- School Safeguarding Booklet (lays out procedure for reporting suspected abuse or disclosures to the DSL / Deputy DSLs)
- E-safety Policy (Online safety) including acceptable use of IT
- Anti-Bullying Policy
- Behaviour Policy
- Whistleblowing Policy

All staff sign to say they have read the above documents and completed the specified training within three weeks of the start of the academic year (Welcome Week and two teaching weeks max.). 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.

The DSL also provides *ad hoc* training sessions from time to time on trending issues, on request from staff or line managers, and conducts training audits to assess other safeguarding training needs throughout the School's provision. (General induction for all staff is given by the Deputy Head or an appropriate person designated by the Deputy Head and includes the Staff Code of Conduct.) Please note, the Deputy Head Pastoral's responsibilities, or *roles*, will be covered by the Head of School during the School's continued leadership restructure in the academic year Aug.'22 to Jul.'23.

### **Temporary and voluntary staff**

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.

### **Student Information**

The School maintains the following information in a separate student e-welfare file:

- names (including any previous names), address and date of birth of student
- names and contact details of persons with whom the student usually resides
- names and contact details of all persons sharing parental responsibility (if different from above)
- emergency contact details (if different from above)
- 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.)
- if the student is or has a Student Protection Plan (formerly known as being on the Student Protection Register)
- name and contact details of key professionals in other agencies, including GP

- any other factors which are likely to affect the safety and welfare of the student
- the student welfare file will be kept in an e-secure filing system and will be transferred to the student's new school upon leaving

## Types of **Abuse** and **Neglect**

**Abuse:** a form of maltreatment of a child or young person. Somebody may abuse or neglect a child or young person by inflicting harm or by failing to act to prevent harm. Children and young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children and young people may be abused by an adult or adults or by another child or children (or young person).

**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 or young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or young person.

Signs of Physical Abuse:

- burns, especially from cigarettes, that can't be explained
- injury marks that have a pattern, like from a hand, belt, or other objects
- injuries that are at different stages of healing
- medical or dental issues that go untreated
- avoid any kind of touch or physical contact
- be afraid to go home
- seem to always be on high alert
- wear clothing that doesn't match the weather - such as long sleeves on hot days - to cover up bruises
- withdraw from friends and activities

**Emotional Abuse:** the persistent emotional maltreatment of a child or young person such as to cause severe and adverse effects on their emotional development. It may involve conveying to a child or young person 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 or young person 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 and / or young people. These may include interactions beyond a their developmental capability as well as overprotection and limitation of exploration and learning, or preventing them from participating in normal social interaction.



It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children and young people frequently to feel frightened or in danger, or the exploitation or corruption of children and / or young people. Some level of emotional abuse is involved in all types of maltreatment of a child and young people, although it may occur alone.

Signs of Emotional Abuse:

- constant worry about doing something wrong
- speech problems or delays in learning and emotional development
- depression and low self-esteem
- doing poorly in school
- extreme behaviour, such as being way too obedient or way too demanding
- headaches and stomach aches with no clear cause
- the child or young person doesn't seem close to a parent or caregiver
- showing little interest in friends and activities
- becoming withdrawn

**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 or young person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for e.g. 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 and / or young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children / young people 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 and young people. The sexual abuse of children by other children is a specific safeguarding issue in education.

Signs of Sexual Abuse:

- avoiding a certain person for no clear reason
- bloody, torn, or stained underwear
- bruising or bleeding around the genitals
- pain or itching around the genitals that might cause problems walking or sitting
- pregnancy or STDs
- refusing to change clothes in front of others
- running away
- sexual activity or knowledge that people usually have only when they're older
- changes in language to sexually inappropriate language
- sexualised actions or play

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

Signs of Neglect:

- always looking dirty
- being left alone or in the care of other young children or young person
- eating more than usual at a meal or saving food for later
- doesn't get medical, dental, or mental healthcare
- missing a lot of school
- poor weight gain and growth
- becoming withdrawn

### **Specific safeguarding issues**

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For e.g., information for schools and colleges can be found on the TES website and NSPCC website. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- child sexual exploitation (CSE)
- children missing education
- children missing from home or care
- bullying including cyberbullying
- domestic abuse
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence / violence against women and girls (VAWG)
- hate
- so called honour-based violence (HCV)
- mental health
- missing children

- peer on peer abuse (child-on-child abuse)
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- trafficking

So called 'honour-based' violence (HBV), **now HBA**: 'Honour Based Abuse', encompasses crimes which have been committed to protect or defend the honour of the family and / or the community, including **Female Genital Mutilation (FGM)**, forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL.

### Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children and young people 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 which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn.

### Female Genital Mutilation (FGM)

Any member of staff who suspects that FGM has been carried out on a girl must contact the Police directly and immediately.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report personally to the police where they discover (either through disclosure by the victim or visual evidence or health care professionals) that FGM appears to have been carried out on a girl under the age of 18.

Those failing to report such cases will face disciplinary sanctions. Further guidance can be found in the multi-agency statutory guidance on FGM updated Jul.'20. ALL staff should know of and understand this doc.:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/912996/6-1914-HO-Multi\\_Agency\\_Statutory\\_Guidance\\_on\\_FGM\\_-\\_MASTER\\_V7\\_-\\_FINAL\\_July\\_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912996/6-1914-HO-Multi_Agency_Statutory_Guidance_on_FGM_-_MASTER_V7_-_FINAL_July_2020.pdf)

### **Further information on Female Genital Mutilation**

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk, but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM.

All staff should note girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs FGM may be about to take place, or may have already taken place, can be found on pages 16 and 17 of the Multi-Agency Practice Guidelines referred to above. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and children's social care. Further information can be found in the multi-agency statutory guidance on FGM updated Jul.'20.

### **Forced Marriage**

'Forced Marriage': forcing a person into a marriage, is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for e.g.). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools [we] can play an important role in safeguarding our students from forced marriage. There are a range of potential indicators a child or young person may be at risk of forced marriage, details of which can be found on pages 13 & 14 of the Multi-agency guidelines: Handling cases of forced marriage. All staff can also contact the Forced Marriage Unit if they need advice or information: (tel.) 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

## Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

## Preventing radicalisation (Prevent Duty)

Preventing children and young people from the risk of radicalisation is part of the Schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. From 1<sup>st</sup> July 2015, specified authorities, including all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (updated 2019), in the exercise of their functions to have 'due regard' to the need to prevent people from being drawn into terrorism. This duty is known as the **Prevent Duty**. Children and young people are vulnerable to extremist ideology and radicalisation. Similar to protecting children and young people from other forms of harms and abuse, protecting them from this risk is part of our school's safeguarding approach, too.

**Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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

There is no single way of identifying whether a child or young person is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to their vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings.

## Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. 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. A representative from school [DSL] may be asked to attend the

Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

As with other safeguarding risks, staff should be alerted to changes in student's behaviour, which, could indicate they may be in need of help or protection. Staff should use their judgement in identifying students who might be at risk of radicalisation and act proportionately. Effective engagement with parents / the family should also be sought. If you believe someone is at risk of **radicalisation** you can help them obtain support and prevent them becoming involved in terrorism by raising your concerns and making a referral. You can make a referral by telephoning the confidential Anti-Terrorist Hotline on 0800 789 321; you can also raise your concerns with the DSL or Deputy Designated Safeguarding Leads.

### **Further information on Preventing Radicalisation**

The Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

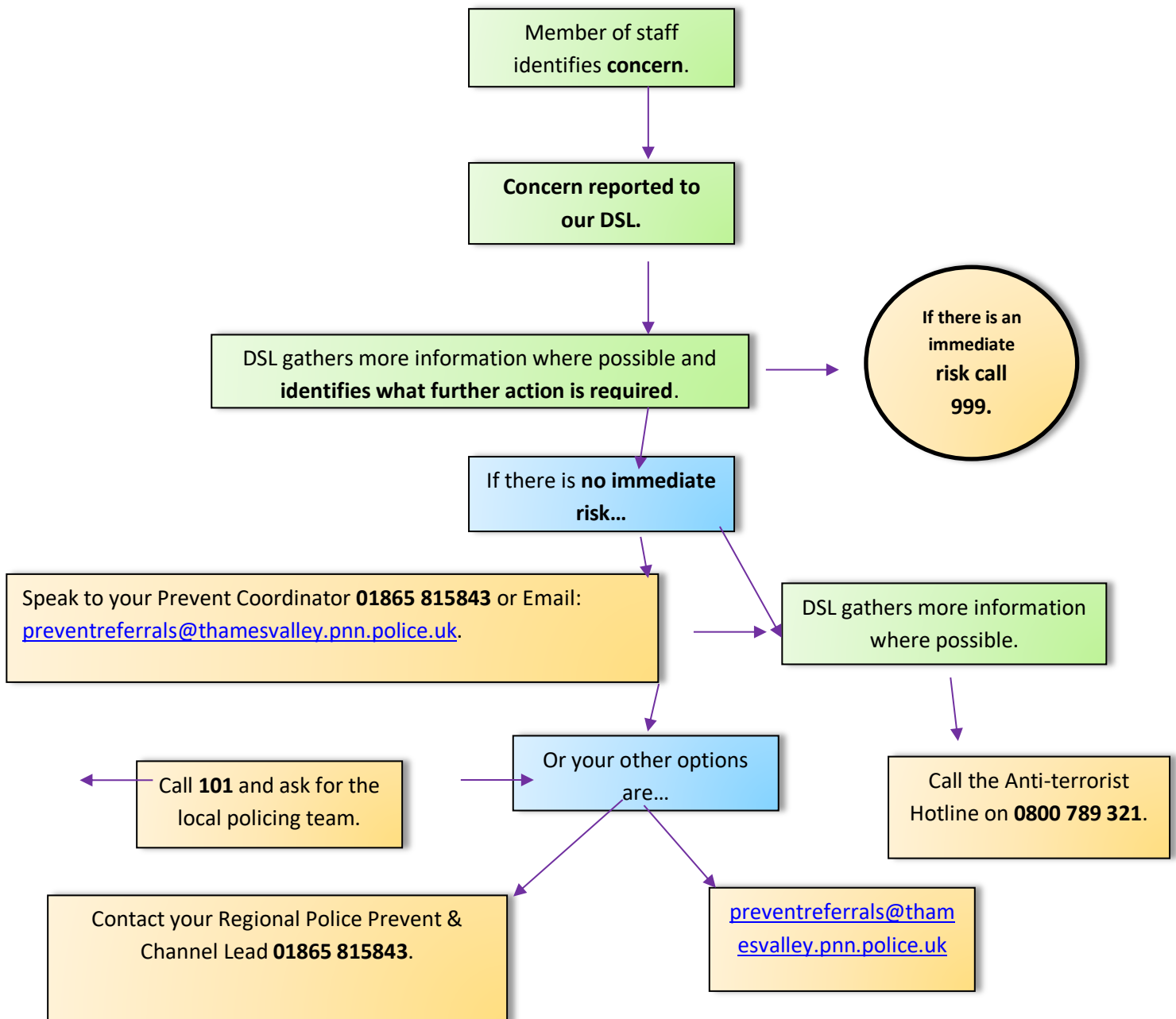
The Counter-Terrorism and Security Act 2015 also places a duty on local authorities to ensure Channel panels are in place. The panel must include the local authority and Chief Officer of the local Police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the Police and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. The Act requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the Police in undertaking the initial assessment as to whether a referral is appropriate.

The relevant provisions of the Act came into force on 12 April 2015. A new clause added to the 2019 Counter-Terrorism and Border Security Act makes it an offence to "view (or otherwise access) any terrorist material online", which also covers, for instance, streaming content.

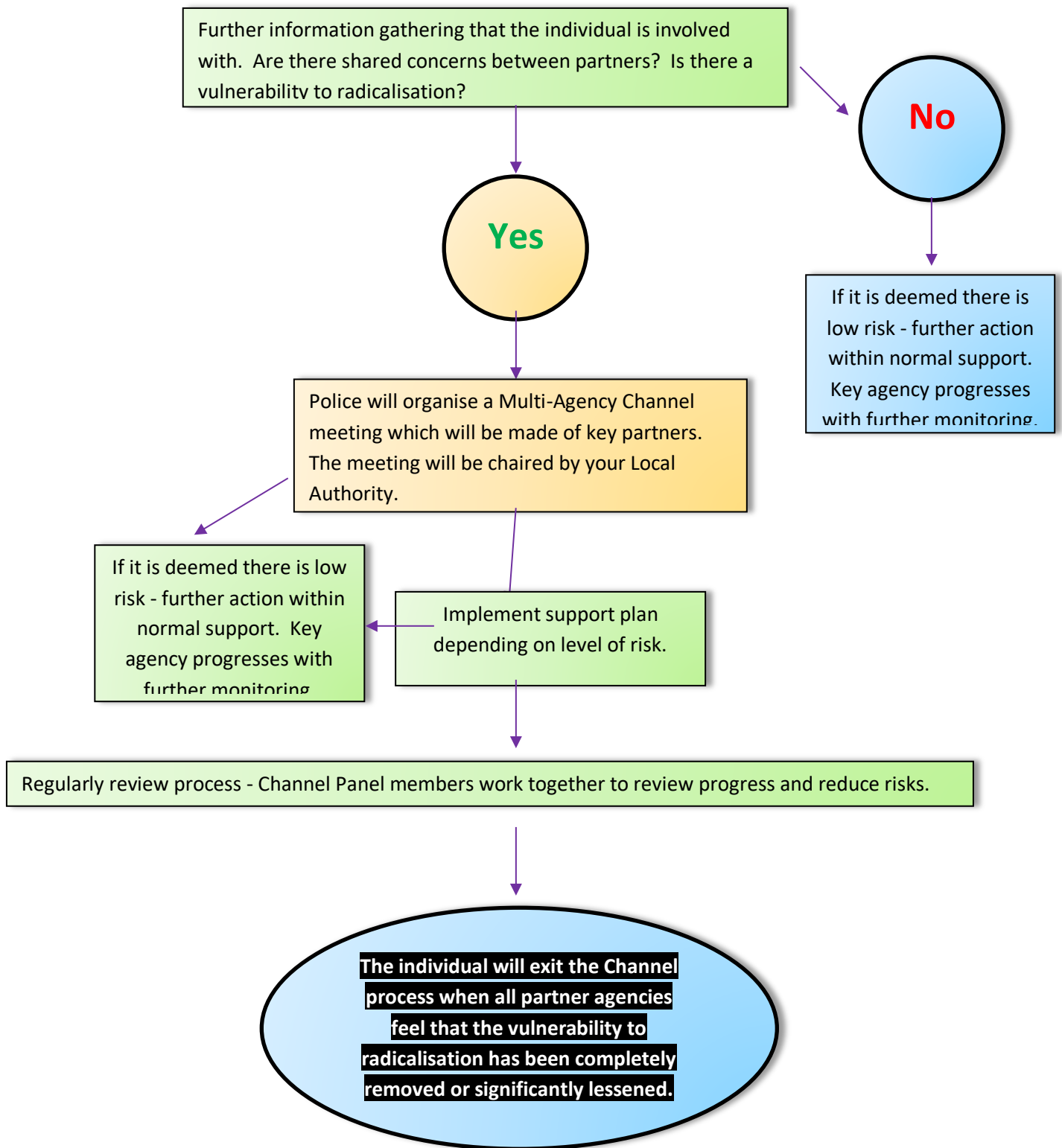
## Prevent and Channel

Process map for reporting a concern of a vulnerable individual.

It's important for you, as a member of staff, to know where to go if you've a concern that someone may be on the route to radicalisation. Below is a flow chart which aims to show the process as to which you can follow.



Once a referral has been made and enters the Channel process, the below process map illustrates what happens next?



Once a referral has exited the process, it will be reviewed at 6 and 12 months. If concerns remain, the individual can be re-referred.



## PREVENT LEADS FOR OXFORDSHIRE COUNTY COUNCIL

**OXFORDSHIRE COUNTY COUNCIL**  
Carys Alty-Smith (County Council Lead) .....carys.alty-smith@oxfordshire.gov.uk  
Amrik Panaser (Non-Schools Lead, Children & Young People) ... Amrik.Panaser@Oxfordshire.gov.uk  
Sarah Varnom (Schools Lead, Children & Young People) .....Sarah.Varnom@Oxfordshire.gov.uk  
Barry Armstrong (Schools Lead, Children & Young People) .....Barry.Armstrong@Oxfordshire.gov.uk  
Karen Fuller (Adult, Social Care Lead) .....Karen.Fuller@Oxfordshire.gov.uk

Oxford City Council Karen Crossan.....kcrossan@oxford.gov.uk  
Mike Grant Cherwell District Council..... Mike.grant@cherwell-dc.gov.uk  
Phil Measures West Oxfordshire District Council ..... .philip.measures@westoxon.gov.uk  
Liz Hayden South and Vale District Council ..... Liz.hayden@southandvale.gov.uk

**Thames Valley Police – Prevent Officers**  
Shaun Greenhough - 07900 709126.....Preventreferrals@thamesvalley.pnn.police.uk  
Tristan Khezzadeh ..... Tristan.Khezzadeh@thamesvalley.pnn.police.uk  
Mohamed Azad..... Mohammed.azad@thamesvalley.pnn.police.uk  
Out of office hours.....Call 101 and ask for the on call Special Branch Sergeant

**See overleaf for information about how to report your concern to prevent about an adult, child or young person at risk of radicalisation through first response safeguarding.**

### Child Sexual Exploitation

Child Sexual Exploitation (CSE): CSE is a form of sexual abuse. It involves exploitative situations, contexts and relationships where young people receive something (for e.g. food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise some young people who are being sexually exploited do not exhibit any external signs of this abuse.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact: it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex; can still be abused even if the sexual activity appears consensual; can include both contact (penetrative e.g. rape and oral sex and non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing) and non-contact sexual activity (such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet).

It can take place in person or via technology, or a combination of both; can involve force and / or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence; 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); can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Some of the following signs may be indicators of sexual exploitation:

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

CSE is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of drugs trafficking. The DSL or DDSL will consider a referral to the National Referral Mechanism as soon as possible if there are county line concerns, such as a student being a potential victim of modern slavery or human trafficking.

All staff should be aware of indicators, which may signal a student is at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate a student has been approached by or are involved with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. If staff have a concern about a student or a student makes a report to a member of staff, staff should follow the referral process in this policy. If staff are in any doubt about what to do, they should speak to the DSL or DDSL.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening / committing serious violence to others. Children and young people can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children and young people involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note the experience of girls who are criminally exploited can be very different to boys. The indicators may not be the same, however, we must remain aware girls are at risk of criminal exploitation, too. It is also important to note both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### **County lines**

County lines 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". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs

and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children and young people can be targeted and recruited into county lines in a number of locations including schools. They are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children and young people can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

### **Child-on-child sexual violence and sexual harassment**

It is important all staff are aware of sexual violence and the fact children and young people can, and sometimes do, abuse their peers in this way. When referring to sexual violence, it is reference to sexual violence offences under the Sexual Offences Act 2003, as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her / his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could be forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. The age of consent is 16: **sexual intercourse without consent is rape.**

As set out in Part one of Sept.'22's KCSiE, all staff working with children and young people are advised to maintain an attitude of '*it could happen here*', and this is especially important when considering child-on-child abuse. Sexual violence and sexual harassment can occur between two or more children or young people of any age and sex, it can occur also through a group sexually assaulting or sexually harassing a single child or young person or group. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

**EF Academy has a zero-tolerance approach to sexual violence and sexual harassment, it is never acceptable, and it will not be tolerated.** It should never be passed off as 'banter', "...just having a laugh...", "...boys being boys...", etc. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children and young people accepting it as normal and not coming forward to report it. It is essential all staff recognise, acknowledge, and understand the scale of any harassment and abuse, and even if there are no reports, it does not mean it is not happening, it may be the case it is just not being reported, and challenge 'physical behaviour' (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. Children and young people who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing.

### Sexual harassment

When referring to sexual harassment, its *term* means 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to: violate a child's or young person's dignity, and / or make them feel intimidated, degraded or humiliated and / or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual 'jokes' or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes
- displaying pictures, photographs or drawings of a sexual nature
- upskirting (this is a criminal offence)
- online sexual harassment, this may be standalone, or part of a wider pattern of sexual harassment, it may include:
  - consensual and non-consensual sharing of nude and semi-nude images and / or videos (taking and sharing nude photographs of U18s is a criminal offence)

- sharing of unwanted explicit content
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats
- coercing others into sharing images of themselves or performing acts they are not comfortable with online

### Upskirting

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

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children and young people with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. Ultimately, it is essential all victims are reassured they are being taken seriously and they will be supported and kept safe.

### Serious violence

All staff should be aware of the indicators, which may signal a student is at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate a child or young person has been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

### Reports concerning harmful sexual behaviour

Where a report concerns an allegation of sexual violence and / or sexual harassment, if possible two members of staff should be present when managing a report (preferably one of them being the DSL). The DSL should be informed as soon as practically possible if they were not involved in the initial report. Consideration of safeguarding all students involved in the report will be immediate. Following a report of sexual violence and / or sexual harassment the DSL will therefore consider the appropriate response. This will include:

- the wishes of the complainant (victim)
- the nature of the alleged incident
- the ages of the student involved
- any power imbalance between the students
- if the alleged incident is a one-off or sustained pattern
- any ongoing risks
- other related issues and context

Any response and action will, as always, have at the centre the best interests of the child or young person. The DSL will reassure any victim they are being taken seriously and they will be supported and kept safe. The victim will never be given the impression they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment in respect of each student affected by the abuse. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the "victim"
- the alleged "perpetrator" and
- the other children (and, if appropriate, staff) at the School

The DSL will consider as part of the School's response, the context within which such incidents and / or behaviours occur and the importance of anonymity. Risk assessments will be recorded (either written or electronic) and kept under review. The DSL will consider the risks posed to all students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the "victim" and alleged "perpetrator" and considerations regarding shared classes, sharing school premises, etc. Any professional risk assessment will inform the School's approach.

The Police may be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the Police. A report to the Police will generally be made in parallel with a referral to children's social care. If the DSL decides to make a referral to children's social care and / or a report to the Police against a "victim's" wishes, the reasons will be explained to the student and appropriate specialist support offered. The DSL will also work closely with children's social care and other agencies as required to ensure any action taken under this policy does not jeopardise any statutory investigation and to discuss how the alleged "perpetrator", staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a student is subject to bail, the DSL will liaise with the Police and children's social care to ensure the welfare and safety of all students and update the risk assessment and ensure relevant protections and measures are in place for all. The School will consider whether disciplinary action may be appropriate for any student(s) involved. Before deciding on appropriate action, the School will always consider its duty to safeguard all children and young people from harm; the underlying reasons for a child's or young person's behaviour; any unmet needs, or harm or abuse suffered by them; the risk they may pose to others; and the severity of the peer-on-peer abuse and the causes of it. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other students in school. The DSL will ensure where children move to another educational institution following an incident of peer-on-peer abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff. The School recognises good record-keeping and monitoring of sexual violence and sexual harassment reports is essential and assists the School in meeting its Public Sector Equality Duty.

### **Contextual Safeguarding**

All staff should be aware safeguarding incidents and / or behaviours can be associated with factors outside school and / or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether our students 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 exploitation, criminal exploitation, and serious youth violence.

### **Mental Health**

All staff should also be aware mental health problems can, in some cases, be an indicator a child or young person has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are well placed to observe students day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one. Where children or young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key staff are aware of how these experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken, informing our DSL. Reference should be made to:

- Mental Health and Behaviour in schools DfE guidance (November 2018)
- DfE guidance 'promoting and supporting mental health and wellbeing in schools', which details numerous resources available to schools, and



- Public Health England: Promoting children and young people's emotional health and wellbeing a whole school and college approach

If a member of staff is concerned about the mental health of a student, they should inform the DSL (or DDSL) immediately, as well as discuss the concern with the student's Pathway Manager. Initial discussions will take place between the DSL and the student's Pathway Manager, followed by an assessment process to ensure the correct support is in place for the student.

### Peer-on-Peer Abuse

Procedures for dealing with abuse by one or more students against another student. As well as having a right to attend school and learn in a safe environment, free from harm by adults, our students have a right to also be free from harm from other students. We recognise some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be to. An allegation of abuse would immediately become a 'high' level matter with the possibility of exclusion or expulsion to be dealt with by Head of School. **Peer on peer abuse should never be tolerated or passed off as 'just having a laugh' or 'part of growing up'.** Both the victim(s) of peer-on-peer abuse as well as the perpetrator(s) will be supported and thought given to whether s/he may be in need of early help or additional support.

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and young people, and within their relationships (both intimate and non-intimate). This is most likely to include, but may not be limited to:

- abuse in intimate personal relationships between peers
- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and / or encourages physical abuse)
- Sexual violence, such as rape assault by penetration and sexual assault (this may include an online element which facilitates, threatens and / or encourages sexual violence)
- Sexual harassment, such as sexual comments, jokes and online sexual harassment, or misogynistic messages which may be stand alone or part of a broader pattern of abuse
- the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images, nudes, videos and pornography to those who do not want to receive it
- 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
- 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 also include an online element), and

- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

The School recognises the gendered nature of peer-on-peer abuse (i.e. it is more likely girls will be "victims" and boys "perpetrators"). Even if there are no reports in school, it does not mean it is not happening, it may be the case it is just not being reported. As such, if staff have any concerns regarding peer-on-peer abuse, they should speak to our DSL. Peer-on-peer abuse can be associated with factors outside school and can occur online and offline and between children of any age or gender. The School therefore takes a contextual safeguarding approach to managing peer-on-peer abuse. **Peer-on-peer abuse is abuse and is never acceptable.**

The School recognises children and young people can be particularly vulnerable in residential settings, and are alert to the potential for peer-on-peer abuse. 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 Head of Boarding. All staff know to report any concerns to the DSL immediately. The School takes the following steps to minimise the risk of peer-on-peer abuse:

- classroom behaviour expectations are set out by staff and should ensure all students feel comfortable in their learning environment
- staff are on duty around the School before School, during break times and during lunchtime
- via PSHE and during the normal running of the School day, students are encouraged to treat each other with respect and understanding
- all allegations of peer-on-peer abuse are dealt with immediately, in consultation with all parties, and often include mediation meetings between students, where appropriate

The School's approach to sexting is as follows: the aim is to educate students about the dangers of making themselves vulnerable via social media, as well as highlighting the legalities surrounding sexting. If necessary, students will be referred to Early Help, by the DSL, for support and intervention. Staff are also referred to our E-Safety Policy. Where an issue of student behaviour or bullying gives 'reasonable cause to suspect a child or young person is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying Policy and / or and Behaviour Policy.

#### **What to do if staff suspect a student may be at risk or hears a report of peer-on-peer abuse**

Victims of peer-on-peer abuse will be supported by our pastoral system, including access to the School's Counsellor and any other support via external agencies as required. The allegation should be reported to the DSL who will immediately inform the Head of School (and OSCB in accordance with local procedures).

The DSL / Head of School will:

- Investigate if the incident is abuse, or an isolated instance of bullying or 'experimentation', in which case this will be handled in the normal framework for discipline.
- Determine the frequency, nature and severity of the incident.
- Ascertain if the victim was coerced by physical force, fear or by a student or students significantly older than himself / herself or with power or authority over him / her.
- Ascertain whether the incident involved a potentially criminal act.

If a staff member has a concern a student may be at risk of or experiencing abuse by their peer(s), or a child or young person may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so a course of action can be agreed. If it is established an investigation is necessary, the Head of School / DSL will inform the parents of all students involved and seek advice from OSCB.

Where there is reasonable cause to suspect a child or young person is suffering, or likely to suffer, significant harm, the School will report its concerns to the Local Authority Social care department immediately. In the event of disclosures about peer-on-peer abuse, all children and young people involved will be treated as being at risk and the safeguarding procedures in accordance with this policy will be followed.

The School recognises a child or young person is likely to disclose an allegation to someone they trust. All concerns / allegations of peer-on-peer abuse will be handled sensitively, appropriately and promptly and will be investigated including consideration of the wider context in which it may have occurred (as appropriate). The School treats all students involved as being at potential risk and ensures a safeguarding response is in place for both the student who has allegedly experienced the abuse, and the student who has allegedly been responsible for it. Immediate consideration will therefore be given as to how best to support and protect ALL involved / impacted. The School will take into account the views of the student(s) affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the student(s) and their parents following appropriate liaison with children's social care. The School should manage the student's(s') expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. All children and young people affected by peer-on-peer abuse will be supported by their Pathway Manager, the Pastoral team, the DSL and support from external agencies will be sought, as appropriate.

"Victims" will be reassured they are being taken seriously and they will be supported and kept safe. The School recognises children and young people with special educational needs and disabilities can be more prone to peer-on-peer group isolation than others, and will consider extra pastoral support for those students. A student against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the local

safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged "victim" and "perpetrator". If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the School will ensure, subject to the advice of the relevant local safeguarding partners, parents are informed as soon as possible and the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the relevant local safeguarding partners, such as children's social care and / or the Police as appropriate.

**Staff must immediately report to the DSL:**

- 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
- any explanation offered, by child (young person), parent or carer, which appears inconsistent or dubious
- any behaviour or change in behaviour which could suggest a child may have been abused (e.g. strange drawings or play, withdrawn)
- any comments children or young people make which give cause for concern
- any worries a child or young person may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns a child or young person is displaying signs or symptoms of abuse or neglect
- any major changes in a child's or young person's behaviour, including non-attendance or tardiness
- any suggestion or disclosure of abuse from any person
- any concerns related to person(s) who may pose a threat to children / young people (e.g. living in a household with children present)

**Responding to Disclosure**

EF Academy Oxford acknowledges those who disclose such sensitive information may do so with reluctance or difficulty, having chosen carefully to whom they will speak. Therefore, all staff will handle disclosures with extreme sensitivity. Such information cannot ever remain confidential, and staff will immediately relay what they have been told to the Designated Safeguarding Lead and make a written record of the exchange. **It is not the responsibility of staff to investigate.** They should try to glean enough information to hand on to the designated safeguarding lead in order s/he can make an informed decision of what to do next.

In the case of a disclosure, staff should:

- not make promises of confidentiality, there is a duty to share this information and for the Designated Safeguarding Lead (DSL) to refer to Children's Services and / or the Police
- listen to what is being said, without demonstrating shock or disbelief

- accept what is said
- reassure the child or young person, but only as far as is sincere: **don't make unrealistic or inappropriate promises**
- reassure and alleviate guilt, if the child or young person makes reference to it: for e.g., by saying 'You're not to blame...!', '...none of this is your fault...', etc.
- not interrogate the child or young person in any way: it is not appropriate to carry out any kind of investigation
- absolutely avoid leading questions (e.g. "Were you touched in an inappropriate place?"); ask open questions such as "Anything else you would like to tell me?": use **TED** questions (**T**ell, **E**xplain, **D**escribe)
- not view or forward any illegal images of a child where a report includes online elements, but *just* note what has been reported
- avoid asking the child or young person to repeat the disclosure for another staff member
- explain in an appropriate manner what needs to be done next and who will be informed
- write up the conversation - on our Safeguarding Concern Form (Concerns or Disclosure), Appendix 3 - as soon as possible afterwards; staff should bear in mind taking notes during the disclosure itself may not be appropriate to the situation
- record the date, time, place, any non-verbal behaviour, and write down as far as is possible, the words used by the child or young person (do not paraphrase); write down the questions you asked them
- record only statements and the observable, and avoid interpretations or assumptions
- discuss with the Designated Safeguarding Lead as soon as possible who will inform / consult with the Children's Safeguarding Services promptly and certainly within 24 hours
- IF THE CHILD DISCLOSES ANYTHING THAT WOULD LEAD YOU TO BELIEVE THAT A CHILD OR YOUNG PERSON IS IN IMMEDIATE DANGER OR IS AT RISK OF HARM, CALL THE LOCAL CHILDREN'S SAFEGUARDING BOARD AND / OR 999 IMMEDIATELY AFTER THE DISCLOSURE AND INFORM THE POLICE. Immediately afterwards, inform the DSL that you have done this.

Where a report includes online elements or the sharing of images, **staff are reminded not to view or forward any illegal images** of a student but note what has been reported. Further guidance can be found in the "Sharing nudes and semi-nudes: advice for education settings working with children and young people". Where there is a safeguarding concern, the School will ensure the student's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. The School manages this by ensuring the student (and their family where appropriate) is included in discussions regarding next steps and methods of support. They will be encouraged to give feedback at all stages, and will be supported by their trusted adult, as appropriate.

**Action by the Designated Safeguarding Lead (DSL)** (or deputy, or other senior staff member in their absence)

Following a disclosure, the DSL will consider:

- any urgent medical needs of the child or young person
- whether to make an immediate child protection referral to social care because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately OR not to make a referral at this stage
- whether an early help assessment is needed
- whether further monitoring is necessary
- wherever is possible, to inform parents, unless to do so could place a child or young person at risk of significant harm, compromise any criminal investigation and / or place the member of staff or others at risk

**The local safeguarding board must be informed and provided with the evidence within 24 hours of a disclosure or suspicion of abuse and the School will take no further action until the advice of the local safeguarding board has been obtained.**

If there is room for doubt as to whether a referral should be made, the DSL may consult with the OSCB hub or early help advisors on a "no names basis" without identifying the family or the child / young person. However, as soon as sufficient concern exists a child or young person may be at risk of significant harm, a referral will be made without delay. If the initial referral is made by telephone, the DSL will confirm the referral in writing to the OSCB hub within 24 hours. At all times the DSL will ensure the child's or young person's wishes or feeling are taken into account when determining what action to take and what services to provide.

### **Recording and monitoring**

The School will record:

- any disclosures / accounts from the child, young person or others, including parents (keeping original notes, signed and dated)
- all concerns, discussions, summary of meetings, decisions, actions taken (dated, timed and signed) and specific arrangements for further monitoring / review

All Child Protection documents on a child will be kept securely in a welfare file, separate from the student's main file. This will at all times be locked away and only accessible to the Head of School, the DSL and Deputy DSL's.

These records will be duplicated and transferred to any school or setting the child (i.e. under 18 year old's only) transfers to, clearly marked "Child Protection, Confidential, for attention of Designated Senior Person Child Protection".

## **Reporting procedures regarding allegations or suspicions of abuse against staff or volunteers**

The School's procedures for managing concerns / allegations against staff who are currently working in the School follows Department for Education statutory guidance and local safeguarding partners arrangements and applies when staff (including volunteers etc.) have / or are alleged to have:

- behaved in a way that has harmed a student, or may have harmed a student
- possibly committed a criminal offence against or related to a student, or
- behaved towards a student in a way that indicated they may pose a risk of harm if they were to work regularly or closely with children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside school, that might make them unsuitable to work with children 'transferable risk'. Advice can be sought from the LADO in assessing transferable risk).

The following reporting procedures must be followed by all staff:

- Allegations against staff and volunteers are reported to the Head of School. If the report is made to the DSL about a member of staff or volunteer, the DSL informs the Head of School.
- Allegations or suspicions of abuse against the DSL are reported to the Head of School.
- Allegations or suspicions of abuse against the Head of School are reported to the VP Operations UK (who has the responsibility for safeguarding without informing the Head of School).

Please note, the Deputy Head Pastoral's responsibilities, or *roles*, will be covered by the Head of School during the School's continued leadership restructure in the academic year Aug.'22 to Jul.'23, and from Sept.'22, Tina Desmond (Head of Boarding) will be the School's **Designated Safeguarding Lead (DSL)**.

Any such allegation should be reported immediately to the DSL as described above. The DSL must inform the LADO immediately and within one working day of all such allegations that come to an employer's attention of that are made directly to the Police. All allegations must be reported to the LADO by the DSL in the first instance before investigation commences. The LADO provides advice and presides over investigation of allegations or suspicions of abuse directed against anyone working in the School. The LADO must be informed of all allegations that come to the employer's attention.

*EF Academy recognises that such allegations, (as all others), may be untrue, malicious or unfounded. Staff are advised to bear this in mind at all times, maintain professional boundaries and be careful not to place themselves in a position which could lead to such an allegation. Safe Working Practice training, the School's Code of Conduct for Safe Working Practice and access to the DfE's Guidance Working Together to Safeguard Children 2018 are provided for this purpose.*

If an allegation is made against anyone working with children or young people in the School, the School will not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis (if local safeguarding procedures allow). All allegations should be investigated as a priority to avoid any delay.

### **Allegations that may meet the harms threshold**

All allegations which appear to meet the reporting criteria are to be reported straight away to the 'Case Manager' who is the Head of School (or VP Operations UK, as appropriate). Where the Head of School (and / or VP Operations UK, where applicable) is absent, or is the subject of the allegation or concern, reports should be made to the President of EF Academy. Where the Head of School is the subject of the allegation or concern, they must not be informed of the allegation prior to contact with the VP Operations UK, DSL and LADO.

**Welfare of the student:** where the case manager deems a student has been harmed, or there to be an immediate risk of harm to a child or young person, or if the situation is an emergency, the DSL (or DDSL) should contact Children's Social Care and, as appropriate (e.g. if there is evidence of a possible criminal offence), the Police immediately.

**Investigating and supporting the person subject to the allegation:** before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts and help determine if there is any foundation to the allegation, being careful not to jeopardise any future Police investigation, such as:

- Was the individual in the School at the time of the allegation?
- Could they have come into contact with the Student?

The School will endeavour to establish what initial information the LADO will require, and if in doubt check with the LADO before undertaking any initial enquiries, to ensure not to prejudice the position.

The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. The DSL should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or are made directly to the Police and / or children's social care. All discussions will be recorded in writing, and any communication with both the individual and the parents of the student(s) agreed with the Police / LADO. The case manager will ensure the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or



the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

**Suspension:** the case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the LADO, their HR adviser, KCSiE as well as the Police and children's social care, if relevant when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details. Where an allegation is made against a member(s) of the residence team, who normally lives in the student residence, the School will make alternative arrangements to accommodate that individual(s) away from all student residences.

**Support for the member of staff:** whilst the welfare of the student is paramount, appropriate welfare support should also be made for the member of staff. Information is confidential, and should not ordinarily be shared with other staff, children or parents not directly involved.

The case manager will ensure parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police. Where further investigation is required, the LADO and case manager will agree how and by whom the further investigation will be undertaken. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service (DBS) and / or Teaching Regulation Agency (TRA) should be made, noting the requirements of KCSiE. For instance:

- If: 1) the allegation is substantiated, and 2) the person is dismissed (including by an agency) or the School (or agency) ceases to use their services, or the person resigns or otherwise ceases to provide their services, then the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
- The employer has a legal requirement to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
  - engaged in relevant conduct in relation to children and / or adults
  - satisfied the harm test in relation to children and / or vulnerable adults, or
  - been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence
- In a case involving serious professional misconduct by a teacher, the case manager must consider whether to make a referral to the TRA. In certain cases, the TRA will consider whether to prohibiting the individual from teaching.

- Where the initial discussion leads to no further action, the case manager and the LADO should record the decision and justification for it, and agree on what information should be put in writing to the individual concerned and by whom.
- On conclusion of the case, the case manager should review the circumstances of the case with the DSL to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

**Settlement:** compromise or settlement agreements **will not** be used where there are allegations which indicate the person poses a risk of harm or may not be suitable to work with children and will not prevent a Police and / or school investigation, or referral to the DBS or TRA where the criteria are met. Failure to do so is a criminal offence. The School will continue its investigation if the person leaves, resigns or ceases to provide their services.

### **Allegation outcomes**

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSiE and a copy will only be provided to the individual concerned. Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions. Low level concerns (see below) should not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance. If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager should consider whether the child or young person and / or person who made the allegation is in need of help or may have been abused by someone else, in which case a referral to children's social care may be appropriate. If an allegation is shown to be deliberately invented or malicious, the Head of School will consider whether any disciplinary action is appropriate against a student(s) who made it in accordance with the School's Behaviour Policy, or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

### **Concerns that do not meet the harm threshold / Low-level concerns**

As part of our whole school approach to safeguarding, the School promotes an open and transparent culture in which all concerns about all adults working in or on behalf of EF Academy Oxford (including supply teachers, volunteers, contractors, etc.) are dealt with promptly and appropriately. The term 'low-level' concern does not mean it is insignificant. A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a *nagging doubt* - an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and

- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children and young people
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

Examples of such behaviour could include, but are not limited to:

- being over friendly with students
- having favourites
- taking photographs of students on their mobile phone
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door, or
- using inappropriate sexualised, intimidating or offensive language

It is crucial any such concerns, including those which do not meet the allegation / harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

### **Sharing / reporting a concern**

Low-level concerns about a member of staff should be reported to the Head of School. Where a low-level concern is raised about the Head of School, it should be shared with the VP Operations UK. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head of School. Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school, that concern should be shared with the Head of School and recorded and their employer notified about the concern, so any potential patterns of inappropriate behaviour can be identified.

If the staff member sharing the concern does not wish to be named, the School will respect this person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for e.g. where it is necessary in order to carry out a fair disciplinary investigation) and, for this reason, anonymity can never be promised to members of staff who share low-level concerns.

### **Self-Reporting**

Occasionally, an adult may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an adult may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own

actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

### **How should a low-level concern be responded to?**

The Head of School should:

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided
- review the information and determine whether the behaviour (i) is entirely consistent with the School's Code of Conduct and the law, (ii) constitutes a low-level concern, (iii) is serious enough to consider a referral to the LADO, or (iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO / other relevant external agencies
- where the Head of School or DSL is in any doubt whatsoever, they should seek advice from the LADO
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO / other relevant external agencies, where they have been contacted)

Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis. Advice should be sought from Human Resources and legal services (where necessary) about next steps. There are a number of potential outcomes e.g.

- If it is decided the low-level concern in fact amounts to behaviour which is entirely consistent with the organisation's Code of Conduct and the law, it will still be important for the Head of School to inform the individual in question what was shared about their behaviour, and to give them an opportunity to respond to it; in addition, the Head of School should speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the organisation's Code of Conduct and the law.
- Some will not give rise to any ongoing concern and, accordingly, will not require any further action.
- Others may be most appropriately dealt with by means of management guidance and / or training.
- A low-level concern may require a conversation with the individual about whom the concern has been raised. This should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.
- Some low-level concerns may also raise issues of misconduct or poor performance.

- Some concerns may trigger the organisation's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate.
- A referral to the LADO as the School believes the threshold has been met.
- The School should exercise their professional judgement and, if in any doubt, they should seek advice from other external agencies including the LADO.

The Head should review the central low-level concerns file periodically to ensure all such concerns are being dealt with promptly and appropriately, and any potential patterns of concerning, problematic or inappropriate behaviour are identified.

### **Recording concerns**

All procedures for recording and storing of records should comply with the School's Data Protection Policies. All low-level concerns should be recorded in writing by the Head of School. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous, that should be respected as far as reasonably possible.

The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this should be fairly recorded alongside the concern. The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated. There should be appropriate records of:

- all internal conversations - including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses
- all external conversations - for e.g., with the LADO / other external agencies
- the rationale for decisions
- any action taken

Records should be reviewed so potential patterns of concerning; problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the School that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. Adults about whom a low-level concern has been raised may have rights of access to such records, provided of course this would not also unreasonably disclose information of children or young people concerned.

The School will retain all records of low-level concerns (including those which are subsequently deemed by the Head of School to relate to behaviour which is entirely consistent with the Code of Conduct) in a central low-level concerns file (either electronic or hard copy). Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record. These records should be kept confidential and held securely, with access afforded only to a limited number of individuals such as the Head of School and the individual they report to (e.g. VP Operations UK). The Head of School may store the central low level concerns file with his / her other safeguarding and child protection records. Some low-level concerns may also involve issues of misconduct or poor performance, or they may trigger the disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.

If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO and, perhaps following consultation, a referral is made to them, then records relating to the low-level concern should be placed and retained on the staff member's personnel file. If a low-level concern (or group of concerns) is reclassified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central low-level concerns file to the staff member's personnel file and retained in accordance with Part four of KCSiE. When a staff member leaves and / or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

Low-level concerns should not be referred to in references unless they relate to issues which would ordinarily be included in a reference, for e.g. misconduct or consistent poor performance. It follows a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. Where a low-level concern (or group of concerns) has met the threshold for referral to LADO and found to be substantiated, it should be referred to in a reference. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference. The school will refer to Part four, of Keeping Children Safe in Education (DfE, 2022) for further advice and guidance.

**Situations to avoid include:**

- being alone with a student in a classroom with the door closed (including during any form of one-to-one tuition)
- allowing students to sit directly next to a driver in the passenger seat of a school related vehicle, e.g. a teacher's car or a taxi
- do not offer students a lift in your car unless not to do so would put the student at greater risk

- wearing inappropriate dress for the situation
- contact with students on social networking sites / exchanging emails or other forms of electronic communications unless strictly related to school matters and on the School's email addresses and / or school network to enable monitoring
- initiating any kind of physical contact with any student

*Staff should refer to the Code of Conduct for Safe Working Practices and the DfE publication 'Working Together to Safeguard Children...' for those working with children and young people in education settings for further advice, revisit the training materials on the school intranet and provided in the staff room or ask the DSL if they are in doubt about any situation.*

### **Use of 'reasonable force'**

The School recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND or with medical conditions. The School will consider its duties under the Equality Act 2010. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable students and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force. The School has a Use of Reasonable Force Policy.

### **Safeguarding allegations against other students**

Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found.

The allegation:

- is made against an older student and refers to their behaviour towards a younger student / child or a more vulnerable student / child
- is of a serious nature and possibly includes a criminal offence
- raises risk factors for other children or young people in the School
- indicates that other children or young people may have been affected by this student
- indicates that children or young people outside the School may be affected by this student

Examples of safeguarding issues against a student could include:

#### **Physical Abuse (e.g.)**

- violence, particularly pre-planned
- forcing others to use drugs or alcohol

### Emotional Abuse (e.g.)

- blackmail or extortion
- threats and intimidation

### Sexual Abuse (e.g.)

- indecent exposure, indecent touching, or serious sexual assaults
- forcing others to watch pornography or take part in sexting

### Sexual Exploitation (e.g.)

- encouraging other children or young people to attend inappropriate parties or engage in sexual acts
- photographing or videoing other children performing indecent acts

### Sexual Violence and Sexual Harassment (e.g.)

- rape
- assault by penetration
- sexual jokes or taunting or making sexual comments
- physical behaviour, such as: deliberating brushing against someone, or touching bottoms

### Sexting (e.g.)

- making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. **This includes imagery of yourself if you are under 18.**
- it is an offence to possess, distribute, show and make indecent images of children
- the Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18
- 'indecent' is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or District Judge to decide based on what the recognised standard of propriety is.

### Initiation / Hazing type violence and rituals (e.g.)

- encouraging other children or young people to engage in inappropriate sexual behaviour to become part of a group where there is a deprivation of privileges granted to other members
- stunt or skit events with degrading, crude, or humiliating acts such as sexual simulations or stimulations

### The School recognises:

- given a power imbalance, older students may attempt to influence the behaviour of younger students using any or all the above methods
- given the gendered nature of peer-on-peer abuse, male students may attempt to influence the behaviour of female students using any or all of the above methods



- children suffering from sexual exploitation themselves may be forced to recruit other children or young people under threat of violence
- children with SEND may be more vulnerable to peer-on-peer abuse

However, peer on peer abuse can be perpetrated by a student of any age or gender, against a student of any age or gender and **ALL peer-on-peer abuse is unacceptable and will be taken seriously.**

### **Minimising the risk of safeguarding concerns towards students from other students**

On occasion, some students will present a safeguarding risk to other students. The School should be informed by their family the young person raises safeguarding concerns, e.g. if they are coming back into school following a period of expulsion from another school for bullying, or have been in custody for an assault, or they have experienced serious abuse themselves. Due to the nature of our student body being from all over the world, we can only do this to protect students if families inform our offices in their nation. These students will need an individual risk management plan to ensure that other pupils are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding.

### **When an allegation is made by a student against another student**

The DSL and other key members of staff consider whether the complaint raises a safeguarding concern. If the initial staff dealing with the student(s) who makes the disclosure determine or suspect there is a safeguarding concern, the Designated Safeguarding Lead (DSL) should be informed immediately, just as they would if it is an adult perpetrator. A factual record will be made of the allegation, but no attempt at this stage will be made to investigate the circumstances.

The DSL contacts social services to discuss the case. It is possible social services are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a social services referral where appropriate. The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both students' e-files. If the allegation indicates a potential criminal offence has taken place, the Police will be contacted at the earliest opportunity and parents informed (of both the student being complained about and the alleged victim).

Where neither social services nor the Police accept the complaint, a thorough school investigation should take place into the matter using the School's usual disciplinary procedures. In situations where we consider a safeguarding risk is present in the form of a student enrolled at our school, a risk assessment will be prepared along with a preventative, supervision plan. We will monitor the plan and set a date for a follow-up evaluation with everyone concerned.

## Information sharing

Safeguarding information will often be special category personal data and the School will comply with data protection law and have due regard to the Department for Education's guidance 'Information sharing advice for safeguarding practitioners' (2018), and the relevant provisions of KCSiE when sharing such data. Personal information may be shared by the School with a third party (such as the Police or local authority) without consent if there is a lawful basis to do so such as where doing so is in order to promote a child's or young person's welfare or where their safety may be at risk. This is because the Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared without consent in certain circumstances.

Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The School operates its processes with the best interests of the student at its heart. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's and young people's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. EF Academy Oxford will ensure relevant staff comply with the relevant data protection principles when processing and sharing personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. As part of this, the School will ensure that members of staff:

- are confident of the processing conditions which allow them to process and share information for safeguarding purposes, including information which is 'special category personal data'
- understand 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data without consent in certain circumstances
- do not provide students' personal data where the sharing does not comply with data protection law
- when sharing information staff will ensure they comply with data protection policies and keep records of disclosures as required by these policies

## Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to, and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights directly applicable to us are:

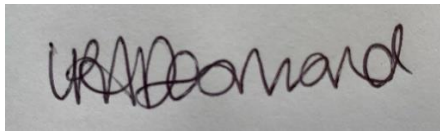
- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity

- Article 14: requires all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at <https://www.equalityhumanrights.com/en/human-rights>.

Any deficiencies or weaknesses in our Safeguarding Procedures will be remedied immediately by the Designated Safeguarding Lead when they become or are made aware of such weakness or deficiency.

Tina Desmond  
Designated Safeguarding Lead and Head of Boarding

A handwritten signature in dark ink, appearing to read 'Tina Desmond', on a light-colored background.

Date: Mon. 25<sup>th</sup> Jul.'22

Anna Ireland  
Executive Committee Member with responsibility for Safeguarding

A handwritten signature in black ink, appearing to read 'Anna Ireland', on a white background.

Date: Mon. 25<sup>th</sup> Jul.'22

Mark Fletcher-Single  
Head of School

A handwritten signature in black ink, appearing to read 'Mark Fletcher-Single', on a white background.

Date: Mon. 25<sup>th</sup> Jul.'22

## Appendix 1: Contacts

### Named personnel with designated responsibility for child protection

Staff member with designated responsibility for child protection (Designated Safeguarding Lead, DSL).

| Name  | Role  | Contact Details   |
|---|---|---|
| <b>Tina Desmond</b>   | <b>Designated Safeguarding Lead (DSL)</b><br>Head of Boarding         | EF Academy Oxford<br>Pullens Lane<br>Oxford<br>Oxfordshire<br>OX3 0DA<br>Tel. 01865 759667 / <b>07971117525</b><br>Email <a href="mailto:tina.desmond@ef.com">tina.desmond@ef.com</a>   |
| Joan Wilisoni<br>(Pathway Manager)<br><br>Chloe Lammas<br>(Deputy Head of Boarding) | DSL Deputies  | EF Academy Oxford<br>Pullens Lane<br>Oxford<br>Oxfordshire<br>OX3 0DA<br><br>Joan Wilisoni<br>Tel. 07790 374736<br>Email <a href="mailto:joan.wilisoni@ef.com">joan.wilisoni@ef.com</a><br><br>Chloe Lammas<br>Email <a href="mailto:chloe.lammas@ef.com">chloe.lammas@ef.com</a> |
| Anna Ireland  | Executive Committee<br>Member with responsibility<br>for Safeguarding | Tel. 07917 712317<br>Email <a href="mailto:anna.ireland@ef.com">anna.ireland@ef.com</a>   |

Contact Details for Children's Services for use in relation to children in need of help or who are the focus of concern.

Independent Chair of Oxford LSCB

Derek Benson

[Meet the team - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](https://www.oscb.org.uk):

Oxford Safeguarding Children Board

Oxford Council

County Hall

New Road  
Oxford  
OX1 1ND

Telephone: 01865 792422

To make a report directly to Oxford Children's Services Safeguarding Hub:  
01865 815843, ask to be put through to the Safeguarding Hub; [oscb@oxfordshire.gov.uk](mailto:oscb@oxfordshire.gov.uk)  
Outside of office hours you can call the Emergency Duty Service on: 0800 833408

#### Contact Details for the LADO

The Local Authority Designated Officer (LADO) for Oxford is Alison Beasley  
[alison.beasley@oxfordshire.gov.uk](mailto:alison.beasley@oxfordshire.gov.uk) (tel. 01865 815956 / 07833 436649), details of the LADO  
can be found here: <http://www.oscb.org.uk/professionals/lado/>

The LADO provides advice and presides over investigation of allegations or suspicions of abuse directed against anyone working in the School. The LADO must be informed of all allegations that come to an employer's attention.

#### Reporting Concerns about Radicalisation and Extremism

Staff would usually follow school safeguarding procedures for reporting concerns. They can also contact your local police force or dial 101 (the non-emergency number). The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk). Please note, this helpline is not intended for use in emergency situations, such as a child or young person being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

## Appendix 2: Designated Safeguarding Lead (DSL) - Job Description

The Designated Safeguarding Lead will take responsibility for safeguarding children in the setting. They have a responsibility to liaise with local statutory children's services agencies and with the Local Safeguarding Children's Board. They will provide support, advice and guidance to any other staff on an on-going basis and on any specified safeguarding issue as required.

### The role includes:

- Ensuring the setting is meeting its legal and statutory requirements.
- Undertaking an annual review and if needed updating safeguarding and child protection policies and procedures.
- Making sure safeguarding policies and procedures are fully implemented and followed by staff, students, and volunteers.
- Providing support, supervision and advice for any staff member, student and volunteer with a safeguarding or child protection concern.
- Keeping their own training up to date.
- Providing safeguarding induction for new staff, students, and volunteers.
- Ensuring all staff are trained and a register is kept of staff who have completed child protection training.
- Keeping all staff, students and volunteers informed of good practice and new legislation and guidance.
- Having an understanding of the referral procedures and know how to contact and establish links with local authority or Police.
- Liaising with and making referrals to appropriate agencies about children and young people where there are safeguarding concerns, including the Local Authority Designated Officer (LADO).
- Dealing with allegations against staff.
- Coordinating the early identification of vulnerable children and families and the involvement of mothers, fathers, and carers.
- Coordinating the development of integrated practice for vulnerable children and families.
- Coordinating and supporting the setting when working with a child or young person who has a child in need or a child protection plan.
- Setting up and managing clear, accurate and secure record keeping systems.
- Overseeing the provision for online safety at the school and training for online safety.

## Appendix 3: Safeguarding Concern Form (Concerns or Disclosure)

To be completed by the reporting staff member. Once complete this form must be passed immediately to Tina Desmond or, if she is not available, to Chloe Lammas, Joan Wilisoni or Mark Fletcher-Single.

|   |  |
|---|--|
| 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 Deputy Designated Safeguarding Lead

|                        |
|------------------------|
| Immediate Action Taken |
|                        |

#### Action Plan

|                              |     |     |         |  |
|------------------------------|-----|-----|---------|--|
| Referral to OSCB             | Y/N | n/a | Details |  |
| Is the 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: |

## Appendix 4: School Safeguarding Staff Conduct Guide

EF Academy has a duty to ensure professional behaviour applies to relationships between staff and students and all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. At all times, members of staff are required to work in a professional way with children and should avoid conduct which could lead to questions being asked about motivation and intent.

Staff should be aware of the dangers inherent in:

- working alone with a child
- physical interventions
- cultural and gender stereotyping
- dealing with sensitive information
- disclosing personal details inappropriately
- meeting students outside school hours or school duties

Staff should exercise particular care in settings of the following nature:

- social events
- the giving of gifts
- students in distress
- sporting activities
- showers and bathrooms
- residential buildings
- one-to-one situations
- educational visits
- transporting students: staff should not be alone in a vehicle with a student
- use of photography and other electronic media, including ICT
- particular caution should be exercised with social networking sites

### Expectations of Staff

Staff are expected to:

- Use the students' EF email for any communications. Never communicate with students through their personal email or social media accounts.
- *Not befriend ex-students on their personal Facebook or other social media outlet until at least 2 years has passed since the student(s) left school.*
- Understand the responsibilities which are part of their employment role and be aware appropriate sanctions will be applied where these are breached.
- Always act and be seen to act in the student's best interests.
- Avoid any conduct which would lead any reasonable person to question their motivation and intentions.

- Take responsibility for their own actions and behaviour.
- Be open to advice and feedback from colleagues.

Staff are also expected to avoid using their:

- position to gain access to information for their own advantage and / or a child's / young person's or family's detriment
- power to intimidate, threaten, coerce or undermine students
- status and standing to form or promote relationships with students which are of a sexual nature or which might become so

Where no specific guidance exists about particular situations or where staff are worried about how their actions might be interpreted, they are advised to:

- discuss the circumstances that informed their action (or proposed action) with the DSL; this will help to ensure the safest practices are employed and reduce the risk of actions being misinterpreted
- discuss any misunderstandings, accidents or threats with the DSL
- keep a record of discussions and actions taken

All members of staff must understand an allegation they have assaulted a child or young person, or placed a child or young person at risk of harm will be a multi-agency matter, involving the Police and Children's Services.

### **Use of 'reasonable force'**

The School has a Use of Reasonable Force Policy, and recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND or with medical conditions. The School will consider its duties under the Equality Act 2010. Any use of restraint by staff must be proportionate and lawful and will only be used when immediately necessary and for the minimum time necessary to prevent a student from doing or continuing to do any of the following:

- committing a criminal offence
- injuring themselves or others
- causing damage to property, including their own
- engaging in any behaviour prejudicial to good order and discipline, whether that behaviour occurs in a classroom or elsewhere

Where restraint is used by staff, this should be recorded in writing.

## School Safeguarding Quick Reference Sheet

The School's Designated Safeguarding Lead is **Tina Desmond (Head of Boarding)**. If you have a safeguarding concern, or any questions about safeguarding, please direct them to Tina. **No concern is too small to mention.** The DSL Deputies are Chloe Lammass, Joan Wilisoni and Mark Fletcher-Single. Anyone can raise a concern and parental consent is not required for referral to statutory agencies.

- Raise the concern with the School's Designated Safeguarding Lead (DSL), or if the DSL is not available, one of the Deputy DSLs (DDSL). You will probably be asked to fill in a Safeguarding Concern Form, the template for which will be emailed around at the start of each term and can also be found on Globalnet.
- The DSL will refer cases of a child or young person in need to children's social care; a child or young person at risk to children's social care or to the Police if a crime is thought to have been committed. This will happen as soon as possible but no later than one working day.
- You can refer your concerns directly to local Children's Services directly as well via Oxfordshire Safeguarding Children Board 01865 328563 (all further contact details at the end of this policy); out of hours you should call 0800 833 408.
- Where there is risk of immediate serious harm to a child or young person then a referral should be made to the police (999) immediately. If there is no immediate risk of harm, the 101 Police number can be used or the referral can be made to the 'hub' as indicated above.
- If the child's or young person's situation does not appear to be improving, after the DSL is made aware, you should press for re-consideration.

While there are many reasons that you might be concerned for a student, it can be helpful to consider in summary the four broad categories of abuse:

- **Physical:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or young person.
- **Emotional:** the persistent emotional maltreatment of a child or young person such as to cause severe and adverse effects on their emotional development. It may involve conveying to a child or young person they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- **Sexual:** 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 they are aware of what is happening.
- **Neglect:** the persistent failure to meet a child's or young person's basic physical and / or psychological needs, likely to result in the serious impairment of their health or development.

Please ensure you have read and understood the School's Safeguarding Policy.

## Appendix 5: Staff Safeguarding Booklet

The following booklet is distributed to all staff at the beginning of each academic year:

### YOU SHOULD

- treat everyone with respect
- provide an example for others
- respect a young person's right to privacy
- provide access for students to talk to others about any concerns they may have
- recognise and allow for the special needs of young people with disabilities and learning difficulties
- encourage students and staff to point out attitudes or behaviours they do not like or which make them feel uncomfortable
- avoid inappropriate physical contact
- use only the students school email address for any correspondence
- be mindful that someone may misinterpret your actions, no matter how well intended
- recognise that special caution is required in sensitive moments of communication when dealing with bullying, bereavement, or abuse
- respect the cultural, religious and ethnic backgrounds of those with whom you work

### YOU SHOULD NOT

- permit abusive peer activities (e.g. bullying, racial harassment, homophobic comments etc.)
- have any inappropriate physical or verbal contact with students
- engage in any inappropriate social contact with students in or out of school time
- have contact with students through personal social media such as personal Facebook, Twitter, texting or personal email
- jump to conclusions about others without checking facts
- show favouritism to any individual
- be drawn into any inappropriate attention-seeking behaviour such as crushes or tantrums
- make suggestive remarks or gestures
- rely on your good name or position to protect you
- believe "it could never happen to me"
- interview vulnerable students on your own

## Appendix 6: Student in Residence missing – flowchart

