



Safeguarding and Child Protection Policy

Document control

Item	Detail
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Policy summary

Cokethorpe is a community built on respect and integrity, and safeguarding is the foundation on which everything else rests. This policy sets out how we keep children safe: our safeguarding culture and the responsibilities of everyone who works here, the Designated Safeguarding Lead and the wider DSL team, how concerns are recognised, reported, recorded and escalated, early help and referral to children's social care, specific safeguarding issues including child-on-child abuse, online safety, filtering and monitoring, allegations and low-level concerns about adults, safer recruitment, training, and record keeping. It applies to everyone in the School community, including the Early Years Foundation Stage, and is drafted for implementation from 1 September 2026.

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1. Why this matters

Cokethorpe School is a community built on respect and integrity. Every child who comes through our gates has the right to feel safe, to be listened to, and to be treated with dignity. Safeguarding is the foundation on which everything else we do rests: a child who does not feel safe cannot flourish academically, socially or personally.

We believe that safeguarding is everyone's responsibility. It is not the work of one person or one team. It is the shared work of every adult in our community — teaching and support staff, governors, volunteers, trainee teachers, contractors and visitors — and it depends on all of us being alert, being curious, and acting on what we notice.

This policy explains what we are seeking to achieve, what every member of our community needs to do to achieve it, and what will happen when a concern is raised. It sets out clear, mandatory requirements where the safety of a child depends on them.

What we are seeking to achieve

- A culture in which children feel confident that they will be listened to, believed and helped.
- Adults who recognise the signs of abuse, neglect and exploitation, and who act on the smallest concern without waiting for certainty.
- Prompt, proportionate and well-recorded responses to every concern.
- Effective working with families and with our partner agencies, so that children and families receive the right help at the earliest opportunity.
- A safe environment, online and offline, in which risks are identified, understood and managed.
- Recruitment, induction and training arrangements that keep unsuitable adults out of our School and equip everyone else to do their part well.

What we ask of everyone

If you are worried about a child, tell the Designated Safeguarding Lead. Do this the same day. It is not your job to decide whether a concern is serious enough, to investigate, or to be certain. It is your job to notice and to report. **If you believe a child is in immediate danger, call the police on 999 and then inform the DSL.**

Throughout this policy, "must" indicates a mandatory requirement; "must not" a necessary prohibition; "should" expected practice where professional judgement is permitted; and "may" an optional or permitted action.

2. Scope and application

This policy applies to the whole School, including the Prep School, the Senior School, the Sixth Form and the Early Years Foundation Stage, and to all activities undertaken in the School's name, on or off site, including trips, visits, matches, extra-curricular activities and online.

It applies to all members of staff (including part-time, temporary, supply and peripatetic staff), trainee teachers, volunteers, governors, contractors, and individuals or organisations using the School premises for activities involving children.

"Child" means anyone who has not yet reached their eighteenth birthday. "Parent" includes carers, guardians and those with parental responsibility.

The DSL will consider whether a young person aged 18 or over remaining in School requires an adult safeguarding response, taking advice from the local authority where appropriate.

3. Key School contacts

Role	Name	Contact
Designated Safeguarding Lead (and Prevent lead)	Joe Hughes, Director of Safeguarding	jeh@cokethorpe.org / dsl@cokethorpe.org
Deputy Designated Safeguarding Lead	Sarah Orton, Head of Prep School	sao@cokethorpe.org
Deputy Designated Safeguarding Lead	Dale Baker, Prep Assistant Head (Pastoral)	drb@cokethorpe.org
Deputy Designated Safeguarding Lead	Megan Cooper, Deputy Head of the Sixth Form	mhdc@cokethorpe.org
Deputy Designated Safeguarding Lead	Michael Joiner, Head of Fifth Form	mjj@cokethorpe.org
Deputy Designated Safeguarding Lead	Amy Prior, Deputy Head – Pastoral and Wellbeing	acp@cokethorpe.org
The Head	Sarah Squire	sbs@cokethorpe.org
Chair of Governors	John Bennett	govjb@cokethorpe.org
Safeguarding and Child Protection Governor	Ester Leach	govel@cokethorpe.org
Designated teacher for looked-after and previously looked-after children	Sarah Orton, Head of Prep School	sao@cokethorpe.org
Mental Health Lead	Amy Prior, Deputy Head – Pastoral and Wellbeing	acp@cokethorpe.org
Senior leader responsible for filtering and monitoring	Joe Hughes, Director of Safeguarding	dsl@cokethorpe.org
Operation Encompass Key Adult	Joe Hughes, Director of Safeguarding	dsl@cokethorpe.org
Head of IT Services (filtering and monitoring systems)	Richard Goodwin	rg@cokethorpe.org

Key external contacts

Organisation	Telephone	Contact
Oxfordshire Multi-Agency Safeguarding Hub (MASH)	0345 050 7666 / 01865 519 800	www.oscb.org.uk/concerned-about-a-child/
Out of Hours Emergency Duty Team	0800 833 408	—

Locality and Community Support Service (LCSS) North	0345 2412703	LCSS.North@oxfordshire.gov.uk
LCSS Central	0345 2412705	LCSS.Central@oxfordshire.gov.uk
LCSS South	0345 2412608	LCSS.South@oxfordshire.gov.uk
Local Authority Designated Officer (LADO) / Designated Officer Team	01865 810603	Lado.safeguardingchildren@oxfordshire.gov.uk
Oxfordshire County Council Admissions (children missing education)	01865 815175	—
Police — emergency / non-emergency	999 / 101	—
Oxfordshire Safeguarding Children Partnership (OSCP)	—	oscp@oxfordshire.gov.uk
Ofsted (EYFS notifications)	0300 123 1231	—
NSPCC Whistleblowing Advice Line	0800 028 0285	help@nspcc.org.uk
Department for Education Prevent helpline	020 7340 7264	counter.extremism@education.gov.uk

4. Definitions

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

Child protection is the part of safeguarding concerned with protecting individual children who are suffering, or are likely to suffer, significant harm.

Abuse is a form of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children. The four categories of abuse — physical, emotional, sexual and neglect — are described at Appendix 1.

Early help means providing support as soon as a problem emerges, at any point in a child's life.

Family Help is the targeted, multi-disciplinary early help offer described in Working Together to Safeguard Children 2026, sitting between universal services and statutory intervention.

Significant harm is the threshold that justifies compulsory intervention in family life in the best interests of children, under the Children Act 1989.

5. Our safeguarding principles

- **The child's welfare is paramount.** Where the interests of a child and an adult conflict, the child's interests come first.
- **It could happen here.** We adopt an attitude of "it could happen here" and never assume that a concern is unfounded.
- **Professional curiosity.** We ask questions, look beyond the presenting behaviour and think about the whole child.
- **Child-centred and trauma-informed.** We listen to children, take their wishes and feelings into account, and recognise that children may not recognise or be ready to describe what is happening to them.
- **No single practitioner has the full picture.** We share information promptly and proportionately with the agencies that need it.
- **Early is better.** Providing help early is more effective than reacting later.
- **Every concern is recorded.** A concern that is not written down cannot be joined up with others.
- **Absence of reports is not evidence of absence.** The fact that no reports of a particular kind of abuse have been made does not mean it is not happening.

6. Roles and responsibilities

All staff, volunteers, trainee teachers and governors

Everyone who works in or for the School has a responsibility to provide a safe environment in which children can learn, and to be alert to signs that a child may need help or protection.

All staff **must**:

- read and understand **Part one of Keeping Children Safe in Education 2026 in full**, together with Annex B (the role of the DSL) where they work directly with children, and confirm in writing that they have done so;
- read and follow this policy, the Staff Behaviour Policy (code of conduct), the School's behaviour policy and the safeguarding response to children who are absent from education;
- know who the DSL and Deputy DSLs are and how to contact them;
- report any concern about a child to the DSL **immediately**, and make an initial written record the same day;
- report any concern about the behaviour of an adult in the School community, however minor, in accordance with sections 32 and 33;
- never promise confidentiality to a child, and never delay acting because they are uncertain;
- refer directly to children's social care or the police where a child is at immediate risk and the DSL and Deputy DSLs cannot be contacted. **Anyone can make a referral.**

Staff should be aware that children with special educational needs and disabilities, children with communication difficulties, very young children and children whose first language is not English

may communicate distress through behaviour rather than words, and may face additional barriers to being heard.

Designated Safeguarding Lead

The DSL takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems in place. The DSL is a member of the Senior Leadership Team, holds the status and authority — and the skills and experience — required to carry out the role, and has the time, funding, training, resources and support to do so.

The DSL is responsible for:

- managing referrals to children's social care, the police, the Channel programme, the Disclosure and Barring Service and the Teaching Regulation Agency;
- acting as the point of contact for the three safeguarding partners and supporting the School's contribution to Child Safeguarding Practice Reviews, audits and multi-agency meetings;
- deciding, and recording the rationale for, whether the threshold for a referral is met, and considering early help or Family Help where it is not;
- overseeing safeguarding records, their quality, security, retention and transfer;
- ensuring that safeguarding is reflected in the curriculum and in the School's culture;
- leading whole-staff safeguarding training and updates, and holding a record of who has been trained and when;
- raising awareness of this policy, ensuring it is reviewed at least annually and that it is available on the School website;
- helping to promote educational outcomes for children with a social worker and for looked-after and previously looked-after children;
- acting as the School's Prevent lead and as the Operation Encompass Key Adult;
- providing an annual safeguarding report to the Governing Body, and reporting to the Safeguarding Governor each term;
- completing the annual statutory safeguarding return under section 175/157 of the Education Act 2002.

Availability and cover

The DSL, or a Deputy DSL, **must** be available during school hours for staff to discuss any safeguarding concerns, and in person wherever possible. Cover arrangements **must** be robust: Deputy DSLs are trained to the same standard as the DSL, and concerns are received, monitored and acted on without delay whenever the DSL is unavailable, including out of hours and out of term where the School's activities require it.

Concerns and reports are received through CPOMS and through the shared safeguarding mailbox **dsl@cokethorpe.org**, which is monitored by the DSL and Deputy DSLs so that no report waits on the availability of one individual. Out of term time, the DSL creates a duty schedule to

ensure that the DSL or one of the Deputy DSLs is always on duty to deal with any urgent safeguarding matters arising. The DSL carries a school mobile phone so that they can be contacted in an emergency out of school hours. This number is made available to the LADO and MASH.

The DSL and Deputy DSLs undertake formal DSL training at least every **two years**, provided through the Oxfordshire Safeguarding Children Partnership, and update their knowledge and skills at regular intervals and at least annually. This now includes additional training on the safeguarding risks associated with artificial intelligence, reviewed at least annually.

While activities can be delegated to Deputy DSLs, the **ultimate lead responsibility for safeguarding and child protection remains with the DSL and must not be delegated.**

The Head

The Head is responsible for ensuring that this policy and its procedures are implemented and followed by all staff, that sufficient resources and time are allocated to enable safeguarding responsibilities to be discharged effectively, and that safeguarding is embedded in the culture of the School. The Head is the case manager for allegations against staff, other than allegations against the Head, and is the ultimate decision-maker in respect of low-level concerns.

The Governing Body

The Governing Body has strategic responsibility for the School's safeguarding arrangements and for ensuring that the School complies with its duties under legislation and statutory guidance.

The Governing Body will:

- ensure that this policy is in place, reviewed at least annually, published on the School website and effective in practice;
- ensure that all governors read Part one and Annex B of Keeping Children Safe in Education 2026, and undertake safeguarding and safer recruitment training;
- appoint a nominated Safeguarding and Child Protection Governor and a DSL, and ensure appropriate Deputy DSLs are appointed and trained;
- ensure that safeguarding is a standing item at Governing Body meetings, receive a termly report from the Safeguarding Governor and an annual safeguarding report from the DSL;
- ensure that the School has appropriate filtering and monitoring systems and that their effectiveness is reviewed at least annually and recorded;
- ensure children are taught about safeguarding, including online safety, through the curriculum;
- ensure safer recruitment procedures are followed and that a Single Central Record is properly maintained;
- ensure that procedures are in place to handle allegations against staff, including against the Head, and to manage low-level concerns;
- ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied **without delay**;

- undertake an annual review of safeguarding arrangements, including how the duties have been discharged.

The **Chair of Governors** is responsible for liaising with the LADO and partner agencies in the event of an allegation against the Head.

The Safeguarding and Child Protection Governor

The Safeguarding Governor provides challenge and support to the School's safeguarding arrangements. The role includes meeting the DSL at least termly, reviewing safeguarding records and training records on a sample basis, reporting to the Governing Body each term, and testing the effectiveness of arrangements rather than relying on assurance alone. The Safeguarding Governor does not carry operational responsibility for safeguarding decisions.

The Senior Leadership Team

The Senior Leadership Team is responsible for ensuring that safeguarding requirements are applied consistently across all areas of School life, for supporting the DSL, and for ensuring that deficiencies in safeguarding arrangements identified in their areas are remedied without delay. A named member of the Senior Leadership Team (the DSL) leads the annual review of filtering and monitoring effectiveness, supported by the Head of Digital Learning and the Head of IT Services.

7. Equality, inclusion and safeguarding

We are committed to a School in which every child is safe, respected and valued, and in which safeguarding is delivered fairly and without discrimination. We have regard to our duties under the **Equality Act 2010**, including in respect of the protected characteristics of age, disability, gender reassignment, race, religion or belief, sex and sexual orientation, and we make reasonable adjustments so that children with disabilities can access support on an equal footing.

Some children face additional barriers to being recognised as at risk, or to being believed. We are alert to the risk of **adultification bias** — where a child, and research indicates particularly a Black child, is perceived as older, more streetwise or more responsible for their own circumstances than their age warrants, with the result that their vulnerability is overlooked and a safeguarding response is not triggered. Staff **must** respond to the child in front of them as a child.

We recognise that children who are disabled, who have special educational needs, who are lesbian, gay or bisexual, who are questioning their gender, who are looked after, who are young carers, who have a mental health need or who are from a minoritised community may be at greater risk of harm and less likely to disclose. We are committed to anti-discriminatory and anti-racist safeguarding practice, and we challenge racism, misogyny, homophobia, transphobia and other discriminatory attitudes wherever we encounter them.

8. Recognising when a child may need help or protection

All staff **must** be able to recognise the indicators of abuse, neglect and exploitation set out at **Appendix 1**, and the specific safeguarding issues set out at **Appendix 2**. Staff should be alert in particular to:

- physical abuse, emotional abuse (which includes **verbal abuse such as persistent criticism**), sexual abuse and neglect;
- **child criminal exploitation and child sexual exploitation**, which may be committed or facilitated by an organised network or gang of which the victim may themselves appear to be a part, and which may constitute **modern slavery** requiring a referral through the National Referral Mechanism;
- **modern slavery**, including forced labour, domestic servitude and trafficking;
- **child-to-parent or caregiver abuse**, where a child causes harm to a parent, carer or sibling;
- serious violence, including the carrying, threatened use or use of weapons;
- children's mental health, including self-harm and suicidal ideation;
- domestic abuse, including where a child witnesses or is otherwise affected by it;
- children who are absent or missing from education, which can be a warning sign of a range of safeguarding concerns.

Staff **must not** wait for a pattern to emerge or for certainty before reporting. A single observation, however small, may be the piece of information that completes a picture held elsewhere.

9. What to do if you are worried about a child

The aim of this procedure is to give staff a clear framework for acting when they are concerned that a child is being harmed or is at risk of harm. The prime concern at every stage is the interests and safety of the child.

If a member of staff suspects abuse, sees indicators of abuse or a mental health concern, or receives a disclosure, they must:

1. Make an initial written record of the information on the same day.
2. Report it to the DSL or a Deputy DSL immediately.
3. Make an accurate factual record as soon as possible and within 24 hours, recording: the dates and times of their observations; the dates and times of any discussions in which they were involved; any injuries; explanations given by the child or adult; what action was taken; the actual words or phrases used by the child; and any questions the staff member asked (remembering not to ask leading questions). Records must be signed and dated by the author.
4. Complete a body map where there is noticeable bruising or injury.

5. In the absence of the DSL and Deputy DSLs, be prepared to refer directly to children's social care — and to the police if appropriate — where there is potential for immediate significant harm, or to carry out a named consultation with the LCSS if appropriate.

The DSL will consider whether immediate medical intervention is required. **Urgent medical attention must not be delayed because the DSL is not immediately available.**

Guidance on receiving a disclosure — the seven R's — is at **Appendix 3**. Where a disclosure relates to harmful sexual behaviour, two members of staff should be present wherever possible.

Following a report of concern, the DSL must:

6. Decide whether there are sufficient grounds for suspecting significant harm, in which case a referral must be made to children's social care, and to the police where appropriate. The rationale for the decision must be recorded, whether or not a referral is made.
7. Normally seek to discuss concerns about a child's welfare with the family and, where possible, seek their agreement before referring — but only where doing so will not place the child at increased risk or impede a police investigation. Where there is doubt, the DSL will clarify with children's social care or the police whether the parents should be told, and if so when and by whom. The child's views must also be taken into account.
8. Where there are grounds to suspect a child is suffering, or is likely to suffer, significant harm, contact children's social care through MASH on 0345 050 7666, sharing the known facts, any suspicions or allegations, and whether there has been any contact with the child's family. Referrals must be made within 24 hours and are followed up in writing.
9. Where a child is in immediate danger and urgent protective action is required, call the police on 999, then notify children's social care of what has happened and what action has been taken.
10. Where a pupil needs urgent medical attention and there is a suspicion that parental abuse has caused the medical need, seek immediate advice from MASH about informing the parents — remembering that parents should normally be informed if a child requires urgent hospital attention, but that where this could place the child at greater risk, action must be taken in the child's best interests.
11. Where the threshold for significant harm is not met, either actively monitor the situation, consider the early help or Family Help process, or contact the LCSS for a named consultation.
12. Follow up if the situation does not improve. If the DSL is not satisfied with the response of another agency, or a child's circumstances do not improve, the DSL must escalate, using the Oxfordshire Safeguarding Children Partnership's escalation and resolution procedure.

The School expects a local authority social worker to acknowledge receipt of a referral within one working day. If this does not happen, the DSL will follow up. The School will contribute to assessments and investigations as required, but is not the investigating agency.

10. Early help and Family Help

We want families to get the right help at the earliest point, before difficulties escalate. Providing early help is more effective than reacting later, and any member of staff may be the first to notice that a family would benefit from support.

Working Together to Safeguard Children 2026 distinguishes between **universal services and community-based early help**, and the **targeted early help level of Family Help** — a multi-disciplinary offer for families with more significant or complex needs, delivered by a lead practitioner. The DSL is responsible for understanding the local Family Help arrangements and referral routes, and for supporting staff to identify children who would benefit.

Staff should be particularly alert to the need for early help or Family Help for a child who:

- is disabled, has certain health conditions or has special educational needs (whether or not they have an education, health and care plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing, or goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges, such as substance misuse, adult mental health problems or domestic abuse;
- is misusing alcohol or other drugs themselves;
- has returned home to their family from care;
- is at risk of so-called honour-based abuse, including female genital mutilation or forced marriage;
- is a privately fostered child;
- is persistently absent from education, including persistent absence for part of the school day;
- **is pregnant or is a parent themselves;**
- **has shown early signs of abusive, violent or harmful behaviours towards others;**
- **has been repeatedly removed from the classroom, or is on a part-time timetable.**

Removal from the classroom is recorded on Involve and is monitored by Heads of Year and the Deputy Head – Pastoral and Wellbeing to identify patterns. Where patterns are identified, they will work with the DSL to gather evidence and decided whether it is appropriate to make a referral.

Where a child is on a part-time timetable, the Deputy Head – Pastoral and Wellbeing will work with the DSL to ensure the child is supported appropriately in School and gather evidence and decided whether it is appropriate to make a referral.

Where early help is appropriate, the DSL will normally lead on liaising with other agencies and setting up an inter-agency assessment. The case will be kept under constant review, and if the child's situation does not appear to be improving, the DSL will consider a referral to children's social care.

11. Record keeping

Good records protect children. A concern that is not recorded cannot be joined up with what others have seen.

- All safeguarding concerns, discussions, decisions and the reasons for those decisions **must** be recorded in writing, and signed and dated by the author.
- Initial records are made the same day; a full factual record is made within 24 hours.
- Records are made on **CPOMS**, or a Record of Concern Form where a written note is made in the first instance. Original handwritten notes **must** be retained on file.
- Records must be factual and observable, distinguishing fact from opinion, hearsay and assumption. Where a child uses their own words — including sexual "pet" words — the actual words used must be recorded rather than translated.
- **Paper records** are kept securely, separately from the main pupil file, in a locked cabinet accessible only to the DSL and Deputy DSLs, with the pupil's main file marked to indicate that a safeguarding file exists.
- Electronic records are held securely with access restricted to the DSL and Deputy DSLs.
- Records are retained in accordance with the School's Guidelines on the Storage and Retention of Records. Records relating to an allegation against an adult are retained until the person reaches normal pension age, or for **10 years from the date of the allegation, whichever is the longer**.

Transfer of child protection files

When a pupil leaves the School, the DSL will transfer the child protection file to the receiving school or college **within five school days** for an in-year transfer, or within the first five days of the start of a new term, and will obtain a receipt. The file is transferred separately from the main pupil file, and securely.

In line with KCSIE 2026, the DSL will:

- distinguish clearly between **current concerns and historic information**, so that the receiving DSL can prioritise;
- speak DSL to DSL where the information is complex, sensitive or urgent, and transfer information **before** the pupil arrives where that is in the child's interests;
- where the file is received from another school and appears incomplete or unclear, **review it and go back to the previous DSL for clarification**;
- where information suggests that an incoming pupil may present a risk to others, carry out a risk assessment and put a **safety and support plan** in place before the pupil starts.

12. Confidentiality and information sharing

Maintaining confidentiality is an important part of the trust placed in members of staff. Staff are expected to protect confidential information and to share it only where there is a proper professional, safeguarding or legal reason to do so.

At the same time, **no member of staff should assume that someone else will pass on information**, and fears about sharing information **must not** stand in the way of the need to safeguard and promote the welfare of children. The Data Protection Act 2018, the UK GDPR and the **Data (Use and Access) Act 2025** do not prevent the sharing of information for the purposes of keeping children safe. Where there is a risk of serious harm, information can and should be shared without consent.

Staff **must not** promise a child confidentiality. A member of staff receiving a disclosure should explain, in a way appropriate to the child's age and understanding, that they may need to pass information on in order to keep the child or others safe.

The School will have regard to the DfE guidance *\Information sharing: advice for practitioners providing safeguarding services* (current version, May 2024) and to the Information Commissioner's Office guidance on data sharing.

Information is shared on a need-to-know basis. Staff who need to know that a child is subject to a child protection plan, or is otherwise vulnerable, will be told what they need to know to keep the child safe and support them, and no more.

13. Child-on-child abuse (including harassment and violence)

We are committed to a School community in which every child feels safe, respected and valued. We expect everyone to treat others with kindness, respect and integrity, and we respond promptly wherever abuse between children is suspected or reported.

All staff **must** understand that child-on-child abuse is a safeguarding issue **for both the child who is harmed and the child who has caused harm**, and that it is preventable. Staff should be alert to behaviours and indicators of risk at an early stage, so that evidence-based support can be provided before harm escalates.

We do not tolerate abusive behaviour between children being passed off as "banter", "having a laugh", "just growing up" or a normal part of teenage relationships. Downplaying such behaviour creates an unsafe environment and can normalise abuse. Equally, the fact that no reports have been made does not mean that child-on-child abuse is not happening; it may mean that children do not feel able to report it.

Forms of child-on-child abuse

- abuse in intimate personal relationships between children;
- physical abuse, including hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, and initiation or hazing rituals;

- **sexual harassment**, including sexual comments, remarks and jokes, online sexual harassment and upskirting — which may be a standalone incident or part of a wider pattern of abuse;
- **sexual violence**, including rape, assault by penetration and sexual assault;
- causing someone to engage in sexual activity without consent;
- **making or sharing nudes and semi-nudes**, including images that are digitally altered or generated using artificial intelligence (see section 14);
- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- **misogyny and misandry**, sexist attitudes and harmful gender stereotyping;
- child sexual exploitation and child criminal exploitation between children;
- abuse relating to a child's race, religion, disability, sexual orientation or gender identity.

KCSIE 2026 emphasises the **continuum** running from harmful sexual behaviour through to sexual violence, and the escalatory nature of misogyny. We recognise that extreme misogynistic content is increasingly prevalent online and can contribute to the normalisation of sexual harassment and sexual violence. Early identification and challenge reduce the risk of harmful sexual behaviour, and we take a zero-tolerance approach.

Our response

All concerns of child-on-child abuse **must** be reported to the DSL. The DSL will consider, in every case:

- the wishes and feelings of the child who has been harmed, and what they want to happen;
- the nature of the alleged incident, including whether a crime may have been committed;
- the ages, developmental stages and relative power of the children involved;
- whether there is a significant age, size, cognitive or power imbalance;
- whether the behaviour is a one-off or part of a pattern;
- any ongoing risk to the child, to other children or to School staff;
- contextual safeguarding — the wider environment, including online and outside School, in which the behaviour occurred.

Options range from managing the matter internally, through early help, to referral to children's social care and, where a crime may have been committed, to the police. The School will use the Oxfordshire Threshold of Needs and, where helpful, tools such as the **Stop It Now** traffic-light framework and Oxfordshire County Council's child-on-child guidance, to inform decisions.

Support is offered to **all** children involved, including the child alleged to have caused harm, who may also be a victim. Support routes include the DSL and Deputy DSLs, the child's tutor, the Head of Year, the Housemaster or Housemistress, the School Counsellor, the Deputy Head and the Head. Risk and support plans are put in place and reviewed. Detailed guidance on managing allegations of child-on-child abuse is at **Appendix 4**.

Where a report of sexual violence or sexual harassment is made, the School will follow the process at Appendix 4 and Part five of KCSIE 2026, will consider the need for immediate protective arrangements — including separate arrangements for travel, the timetable and break

times — and will take advice from children's social care and the police where appropriate. The School **must not** carry out its own investigation where a criminal investigation may be required, and will take advice from the police.

14. Making or sharing nudes and semi-nudes

Children sometimes share nude or semi-nude images of themselves or others. This can happen consensually or as a result of pressure, coercion or blackmail, and the consequences for the child depicted can be severe and long-lasting.

KCSIE 2026 uses the term "**making or sharing nudes and semi-nudes**" in place of "sexting" or "youth-produced sexual imagery". Importantly, the definition now expressly includes images that have been **digitally altered or wholly generated using artificial intelligence**, sometimes described as "deepfakes" or "deep nudes". Creating, possessing or distributing an indecent image of a person under 18 is a criminal offence, and this applies to AI-generated and altered images.

All incidents of sharing nudes and semi-nudes, whether consensual or non-consensual, are a safeguarding concern and require a safeguarding response. That response will be proportionate to the circumstances, including the ages of those involved, any element of coercion, and the vulnerability of the children concerned.

Where an incident is reported, staff **must**:

- report it to the DSL immediately;
- **not** view, copy, print, share, store or save the imagery, and not ask a child to share or delete it;
- **not** delete the imagery or ask the child to delete it before the DSL has assessed the situation;
- not ask the child questions about the incident beyond what is necessary, leaving this to the DSL;
- explain to the child that the DSL will be informed, and reassure them that they will be supported.

The DSL will follow the UK Council for Internet Safety guidance *Sharing nudes and semi-nudes: advice for education settings working with children and young people*\ (March 2024). The DSL **must** refer immediately to the police and children's social care where:

- the incident involves an adult;
- there is reason to believe a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example where they have special educational needs);
- what is known involves sexual acts, any child under 13, or an act of concerning sexual behaviour;

- a child is at immediate risk of harm owing to the sharing of the imagery — for example, they are presenting as suicidal or self-harming;
- the imagery depicts sexual acts and any child in the imagery is under 13.

Parents will normally be informed unless doing so would place the child at risk. The DSL will record the incident, the decision and the rationale in full, and will consider what curriculum and pastoral response is needed for the wider School community.

15. Online safety

Technology is central to how our pupils learn, socialise and grow up. We want them to enjoy its benefits confidently and safely, and we take a whole-School approach in which online safety is embedded in safeguarding, in the curriculum, in staff training and in our work with parents.

The breadth of online risk is categorised as the **four C's**:

- **Content** — being exposed to illegal, inappropriate or harmful material, including pornography, self-harm and suicide content, extremist material, and **disinformation, misinformation and conspiracy theories**;
- **Contact** — being subjected to harmful online interaction with other users, including adults posing as children or young adults, and **harmful interactions with generative AI**;
- **Conduct** — online behaviour that increases the likelihood of, or causes, harm, including making or sharing nudes and semi-nudes and online bullying;
- **Commerce** — risks such as online gambling, inappropriate advertising, phishing, financial scams and fraud.

Filtering and monitoring

The School uses **Smoothwall** filtering and monitoring. The Head of IT Services monitors the system and reports violations to the DSL, who determines the safeguarding response.

In line with KCSIE 2026 and the DfE filtering and monitoring standards, the School **must**:

- identify and assign roles and responsibilities for managing filtering and monitoring systems — the responsible member of the Senior Leadership Team (the DSL) is, supported by the Head of Digital Learning and the Head of IT Services;
- **review the effectiveness of the filtering and monitoring provision at least once every academic year, and keep a written record of the review**;
- check that filtering and monitoring works on **all internet-connected devices in all relevant locations**, including boarding accommodation and personal devices where the School's systems are used;
- block harmful and inappropriate content without unreasonably impacting teaching and learning;
- have effective monitoring strategies that meet the School's safeguarding needs, and apply filtering and monitoring rules to AI tools.

The Governing Body receives assurance on filtering and monitoring effectiveness at least annually.

Working with parents

We recognise that most of a child's online life happens away from School. We provide information and guidance to parents on online safety, including the risks associated with generative AI, and we encourage parents to talk to their children about the sites, apps and tools they use.

16. Artificial intelligence

Artificial intelligence brings real opportunities for learning, and real safeguarding risks. We want our pupils and staff to use AI confidently, critically and safely, and we treat AI-related harm as a safeguarding matter.

Staff and pupils **must** be aware that:

- images and videos may be **digitally altered or wholly generated using AI**. Creating, possessing or sharing AI-generated indecent images of a person under 18 — including "deepfakes" of real classmates — **is a criminal offence** and will be treated as a safeguarding matter;
- **generative AI chatbots and companions** can produce inaccurate, biased, age-inappropriate or harmful content, including content relating to self-harm, suicide, eating disorders and extremism, and can form a relationship of apparent trust with a child that displaces adult support;
- AI tools can be used by those seeking to **groom or exploit children**, including to generate convincing personas and to produce child sexual abuse material;
- over-reliance on AI can lead to **cognitive offloading** — a reduction in a child's own critical thinking, resilience and problem-solving — and pupils should be taught to interrogate rather than accept AI output;
- information entered into a generative AI tool may leave the School's control. Personal data and safeguarding information **must not** be entered into any AI tool that has not been approved by the School.

The School will:

- have regard to the DfE guidance *\Generative artificial intelligence (AI) in education* and *\Generative AI: product safety expectations*, and to the DfE's support materials on using AI in education settings;
- apply filtering and monitoring rules to AI tools;
- include AI risks in staff safeguarding training, drawing on Module 3 of the DfE materials, and in the pupil curriculum;
- ensure the DSL receives **additional training on AI-related safeguarding risks, reviewed at least annually**;

- report AI-related safeguarding concerns through the same route as any other concern.

This Policy should be read in conjunction with the School's AI Policy.

17. Mobile phones

We want the School day to be a time when pupils are present with each other and with their learning. Statutory guidance now provides that schools **should be mobile phone-free environments by default**, with any departure from that approach treated as an exception.

The School's arrangements for pupil mobile phones are set out in the Mobile Phone Policy, which must be read alongside this policy and which is being reviewed to reflect the statutory guidance *\Mobile phones in schools*. Although the School is a mobile-free environment by default, there will be some rare exemptions, for example for pupils with a medical need or a specific safeguarding reason. Permission for this must be sought from the DSL who will set out the terms of use.

Staff use of mobile phones and personal devices, including the taking of images, is governed by the Staff Behaviour Policy and the Taking, Using and Storing Images of Children Policy. In the Early Years Foundation Stage, additional restrictions apply (see section 32).

18. Cyber security as a safeguarding issue

The School recognises that cyber security is a safeguarding and operational resilience issue. A cyber incident may compromise children's personal, pastoral, medical or safeguarding information, and may disrupt the systems through which concerns are reported, recorded and acted upon.

The School therefore has regard to the DfE Cyber security standards for schools and colleges and the wider Digital and technology standards in schools and colleges. Responsibility for cyber security, digital resilience, filtering and monitoring, and incident response is assigned to named senior leaders and technical staff, with appropriate oversight by the Senior Leadership Team and Governing Body.

The School maintains records of key information assets, hardware, software and systems; applies proportionate access controls including multi-factor authentication; keeps systems patched and supported; maintains tested backup and disaster recovery arrangements; trains staff in cyber awareness; and ensures that procedures are in place for responding to cyber incidents, including arrangements for safeguarding continuity if key digital systems are unavailable.

If CPOMS is unavailable, staff must not delay reporting a safeguarding concern. The concern must be reported immediately to the DSL or a Deputy DSL in person, by telephone or through the safeguarding mailbox, depending on what systems remain available. A written record must be made as soon as possible, signed and dated, and passed securely to the DSL.

Where the School's Record of Concern Form is not available, the written record must include: the child's full name; the date, time and location of the concern, disclosure or incident; the name and role of the person making the record; the names of any other people present; a factual account of what was seen, heard or disclosed; the child's own words where relevant; any questions asked by the adult; any visible injuries or presentation concerns; immediate action taken; who the concern was reported to and when; any advice received or next steps agreed; and the signature/name and date of the person making the record.

The DSL will maintain a temporary secure safeguarding log during the period of unavailability, ensure that urgent action is taken where required, and arrange for all records and actions to be uploaded to CPOMS once the system is restored. Records will be uploaded to CPOMS by the DSL, a deputy or other member of staff with Safeguarding Children Level 3 training. The Record of Concern Forms and safeguarding log will be stored securely in the DSL's office. Original handwritten or temporary records must be retained securely in accordance with the School's record keeping arrangements.

19. Mental health and emotional wellbeing

We know that mental health difficulties can be both a consequence of harm and a warning sign of it. We take a whole-School approach to mental health and emotional wellbeing, and we want every child to know where to turn when they are struggling.

All staff **must** be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. **Self-harm, suicidal ideation and risk of suicide are safeguarding concerns in their own right.**

Staff are **not** expected to diagnose mental health conditions, and **must not** wait for a formal diagnosis before acting. Where staff have a mental health concern about a child that is also a safeguarding concern, they **must** report it to the DSL immediately.

Possible warning signs that a child may be experiencing a serious mental health problem include: changes in behaviour or mood; sleep difficulties; withdrawal from social situations; loss of interest in activities they usually enjoy; changes in eating; declining academic engagement; and physical signs of harm or neglect.

Where a child is in **immediate danger**, staff **must call 999**. Where urgent but non-emergency mental health support is required, the DSL will contact **NHS 111**, which provides access to urgent mental health support.

The School's Mental Health Lead is Amy Prior, Deputy Head – Pastoral and Wellbeing. Support available includes the School Counsellor, the pastoral team, and referral to external services through the DSL. Mental health and wellbeing are taught through the LIF-Ed programme.

20. Children who are lesbian, gay or bisexual, and children who are questioning their gender

We are committed to a School in which every child is safe, respected and valued for who they are. Children who are lesbian, gay or bisexual, and children who are questioning their gender, can be targeted by other children and may be at greater risk of bullying, isolation and harm. Staff **must** challenge homophobic, biphobic and transphobic language and behaviour, and provide a trusted adult with whom a child can be open.

KCSIE 2026 incorporates statutory content on children who are questioning their gender, separating this from provision relating to children who are lesbian, gay or bisexual. The guidance addresses requests relating to social transition — which are expected to be raised by a parent and/or the child, with parental involvement expected in most cases — and sets requirements in relation to toilets, changing facilities, overnight accommodation and sport, including that:

- children are prevented from using toilets designated for the opposite biological sex;
- children aged 11 or over are prevented from undressing in front of a child of the opposite biological sex, or using changing rooms designated for the opposite sex;
- children are prevented from sharing overnight accommodation with a child of the opposite biological sex.

The School will consider suitable alternative arrangements — for example single-occupancy facilities — while continuing to promote the welfare of all children, including those who are questioning their gender and their peers. Requests, decisions and the reasons for them will be recorded, communicated and reviewed, and responses will remain child-centred and risk-based.

21. Preventing radicalisation

Protecting children from radicalisation is part of our wider safeguarding duty. Under section 26 of the Counter-Terrorism and Security Act 2015, the School has a duty to have "due regard to the need to prevent people from being drawn into terrorism" — the **Prevent duty**.

We meet this duty by:

- building pupils' resilience through the curriculum, including the LIF-Ed programme, and by promoting open discussion and critical thinking;
- assessing the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology;
- training staff to recognise and respond to the signs of radicalisation;
- using appropriate filtering and monitoring to reduce access to terrorist and extremist material;
- working in partnership with the Oxfordshire Safeguarding Children Partnership and the local Prevent team;
- applying the Visiting Speakers requirements at section 34.

The **Designated Safeguarding Lead is the School's Prevent lead**. Any concern that a child may be being drawn into terrorism **must** be reported to the DSL, who will consider a referral to the **Channel** programme, or to the police where there is an immediate risk. Where there is an immediate risk of harm, call **999**.

The School has regard to the *\Prevent duty guidance for England and Wales* (December 2023) and the *\Channel duty guidance* (2023). Staff should complete the Home Office Prevent awareness e-learning.

22. Domestic abuse and Operation Encompass

Children who live with domestic abuse are victims in their own right under the **Domestic Abuse Act 2021**, whether or not they see, hear or are directly harmed by an incident. The effects can be profound and long-lasting.

Operation Encompass operates on a statutory footing under **section 49A of the Domestic Abuse Act 2021**, inserted by **section 20 of the Victims and Prisoners Act 2024**. Where the police attend a domestic abuse incident and a child connected to the household may be affected, they **must** notify the School **before the start of the next school day**. This applies to all children connected to the household, whether or not they were present at the incident.

The School's **Key Adult** for Operation Encompass is the Designated Safeguarding Lead. On receiving a notification, the DSL will:

- record the notification securely and confidentially;
- consider what support the child may need that day, and quietly brief the small number of staff who need to know;
- monitor the child's presentation and wellbeing;
- consider whether an early help, Family Help or children's social care referral is required;
- take care not to inadvertently disclose the notification to the child or family in a way that could increase risk.

23. Children living in temporary accommodation

Children placed in temporary accommodation face disruption to their education, health and friendships, and may be at increased risk. Under the **Children's Wellbeing and Schools Act 2026**, a local housing authority is required to notify the School where a child on roll has been placed in temporary accommodation.

On receiving such a notification, the DSL will assess the child's welfare and educational needs, consider what practical and pastoral support the School can offer, liaise with the local authority and other agencies, and make a referral for early help, Family Help or to children's social care where appropriate. The notification and the School's response will be recorded on the child's CPOMS file.

24. Looked-after and previously looked-after children

The most common reason for a child becoming looked after is that they have suffered abuse or neglect. Looked-after and previously looked-after children may therefore have particular safeguarding and emotional needs, and are at greater risk of poorer educational outcomes.

The School has a designated teacher for looked-after and previously looked-after children: Sarah Orton, Head of Prep School, who works with the DSL and the Virtual School Head to promote the educational achievement of these children. The designated teacher will have appropriate training.

The DSL will hold details of a looked-after child's legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the level of authority delegated to the carer, and will ensure that the child's social worker and the Virtual School Head have the School's contact details. The DSL also holds information about children who have or have had a social worker, so that this is taken into account in decisions about support and safeguarding.

The School recognises the role of the Virtual School Head in relation to children in **kinship care** and will engage with the Virtual School Head where appropriate.

25. Children with special educational needs and disabilities, and children with medical conditions

Children with special educational needs and disabilities, and children with physical health or medical conditions, can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- assumptions that indicators of possible abuse — such as behaviour, mood or injury — relate to the child's condition without further exploration;
- children being more prone to peer-group isolation, bullying or exploitation than other children;
- the potential for children to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

Staff **must** apply professional curiosity and **must not** attribute a change in presentation to a child's condition without considering whether a safeguarding concern exists. Extra pastoral support and attention is provided for these children, alongside careful consideration of any intimate care needs. Staff will also question the cause of knocks and bumps in children with limited mobility, including visitors to the site as well as pupils.

The School's arrangements for supporting children with medical conditions, including the administration of medication, are set out in the relevant School policies and are read alongside this policy.

26. Young carers

Some of our pupils provide care for a family member who is disabled, unwell, has a mental health condition or misuses substances. Young carers can carry significant responsibility at home, which may affect their attendance, punctuality, homework, friendships, health and wellbeing, and may make them less likely to ask for help.

Staff should be alert to the possibility that a child is a young carer, and should report concerns to the DSL, who will consider an early help or Family Help referral and what support the School can offer. Young carers are a group to whom the early help alert list at section 10 expressly applies.

27. Sport and physical activity

Sport is a significant part of School life and a positive force in children's development. It also carries specific safeguarding considerations: close coaching relationships, physical contact, changing and showering facilities, travel and overnight stays, one-to-one coaching, and the involvement of external clubs, coaches and volunteers.

The School will ensure that:

- all coaches, instructors and volunteers working with our pupils, whether employed by the School or engaged externally, are subject to the appropriate safeguarding checks set out at section 28;
- staff and coaches understand and follow the Staff Behaviour Policy, including in relation to physical contact, one-to-one coaching, changing facilities, transport and communication with pupils;
- arrangements for changing, showering and overnight accommodation on tours and fixtures are appropriate to the ages and needs of the pupils, and reflect the requirements set out at section 20;
- where pupils are placed with external sports providers or attend external clubs, the School seeks assurance about the provider's safeguarding arrangements;
- pupils know how to raise a concern about a coach, a teammate or an opponent, and that concerns arising in a sporting context are reported to the DSL in the same way as any other concern.

28. Safer recruitment

Keeping unsuitable people out of our School is one of the most effective things we can do to keep children safe. We are committed to a safe culture and to recruitment, selection and induction practices that make our commitment to safeguarding explicit at every stage.

The Governing Body and the Senior Leadership Team are responsible for ensuring that the School follows safe recruitment processes in line with Part three of Keeping Children Safe in

Education 2026. At least one member of every recruitment panel **must** have completed safer recruitment training.

Our arrangements include:

- safeguarding statements in all recruitment materials and job descriptions;
- scrutiny of application forms, exploration of gaps in employment history and of any concerns at interview;
- **online searches on shortlisted candidates**, carried out proportionately, with any matters arising raised at interview;
- verification of identity, right to work, qualifications and professional status;
- at least two references, sought on **all** shortlisted candidates before interview where possible, and taken up directly with the referee;
- an **enhanced DBS check, with children's barred list information where the person will engage in regulated activity**;
- a prohibition from teaching check, and where relevant a prohibition from management (section 128) check and an overseas check;
- application of the statutory guidance on the Childcare (Disqualification) Regulations 2018 and related obligations under the Childcare Act 2006.
- an accurate **Single Central Record**, maintained, monitored and reviewed for compliance by the Senior Leadership Team and the Governing Body;
- safeguarding induction for all new staff, volunteers and trainee teachers before they begin work with children.

Regulated activity and volunteers — important change from 1 September 2026

The **Crime and Policing Act 2026** removes the "supervision exemption" from regulated activity. Previously, a volunteer who was supervised by a person engaged in regulated activity might not themselves be in regulated activity. That exemption no longer applies.

From 1 September 2026, a person who teaches, trains, instructs, cares for or supervises children **on more than three days in a month, or overnight**, is engaged in **regulated activity even where they are supervised**. Volunteers engaged in regulated activity **must** have an enhanced DBS check with children's barred list information before they begin, and the School **must** ensure that no individual engaged in regulated activity is barred from working with children.

Ongoing duty to disclose

All staff, volunteers and trainee teachers **must** disclose to the Head any matter that may affect their suitability to work with children — including any caution, charge, conviction, or any circumstance in their personal or family life that could present a transferable risk. This duty is ongoing throughout employment and is communicated at recruitment and reiterated at regular intervals.

Contractors and third-party providers

Contractors and third-party providers **must** follow the School's safeguarding policy. The School will seek assurance that their staff have undergone the appropriate safeguarding checks and will risk-assess the level of contact each will have with children. Where satisfactory assurance is not obtained, permission to work with children or on site will be refused. Contractors who have not been appropriately checked are supervised at all times. Where a contractor or provider does not have the opportunity for regular contact with children, the School will decide whether a basic DBS check is appropriate. Where an individual working at the School is self-employed, the School will either obtain the DBS check directly or request to see the certificate, to ensure it is at the level required.

29. Allegations that may meet the harm threshold — concerns about adults working with children

Every member of our community should feel able to raise a concern about the conduct of an adult, and to know that it will be taken seriously and handled fairly. Handling allegations properly protects children; it also protects staff from unfounded suspicion.

This procedure applies where it is alleged that a member of staff, supply staff, volunteer, trainee teacher, contractor or any other adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against, or related to, a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children. This includes behaviour outside School — known as **transferable risk**. Where appropriate, an assessment of transferable risk should be undertaken; if in doubt, seek advice from the LADO.

It also applies to allegations relating to individuals or organisations **using the School premises** to run activities for children, such as community groups, sports associations or extra-curricular providers. Where an allegation concerns a person who is not directly employed by the School — including supply staff and trainee teachers placed with the School by an agency or another body — the School **shares** safeguarding responsibility for the allegation with that employment agency or business, and the case manager will liaise with them throughout.

What to do

Any concern **must** be reported **immediately** to the Head. Concerns about the Head **must** be reported to the Chair of Governors. Where the concern relates both to the Head and to the Chair of Governors, it should be reported to the Vice-Chair of Governors or directly to the LADO. Staff **must not** investigate the matter themselves, and **must not** discuss it with the person concerned or with colleagues.

The case manager

The **case manager** is the Head (or, where the allegation is against the Head, the Chair of Governors). The case manager is responsible for managing the allegation, liaising with the LADO, and ensuring that the child and the adult concerned are appropriately supported.

Referral to the LADO

Where an allegation meets any of the criteria above, the case manager **must** refer it to the **Local Authority Designated Officer (LADO) within one working day**, and in any event within 24 hours, and **must not** carry out any investigation, or inform the person concerned, before taking LADO advice — because doing so may prejudice a police investigation.

Where a child is at immediate risk, or a criminal offence may have been committed, the police **must** be contacted immediately. The DSL will also consider whether a referral to children's social care is required.

Suspension and alternatives to suspension

Suspension must not be an automatic response. The case manager **must** consider whether alternatives to suspension are appropriate and sufficient to manage the risk, in consultation with the LADO. Alternatives include:

- redeployment to another role in which there is no direct contact with the child concerned or with children generally;
- providing an assistant to be present when the individual has contact with children;
- redeploying the individual to alternative duties;
- moving the child or children concerned to classes where they will not come into contact with the individual;
- temporarily reducing or restricting the individual's contact with children pending the outcome.

Where suspension is nevertheless considered necessary, the **rationale and justification must be recorded**, the alternatives considered must be recorded, and the decision **must be confirmed to the individual in writing within one working day**, together with the reasons.

Support for those involved

The School will support the child or children concerned, and will keep the individual against whom the allegation has been made informed of progress and offered support, including access to welfare counselling or occupational health where appropriate. A named contact will be appointed to keep the individual informed. Parents of the child will be kept informed of progress, subject to the advice of the LADO, the police and children's social care.

Reviews and timescales

The case manager will keep the case under review and will work with the LADO to progress it as quickly as a fair and thorough process allows. The **first review must take place no later than**

four weeks after the initial assessment, and thereafter at **fortnightly or monthly intervals**, depending on the complexity of the case.

Outcomes

On conclusion, one of the following outcomes will be recorded:

- **Substantiated** — there is sufficient evidence to prove the allegation;
- **Unsubstantiated** — there is insufficient evidence either to prove or disprove the allegation; this does not imply guilt or innocence;
- **False** — there is sufficient evidence to disprove the allegation;
- **Malicious** — there is sufficient evidence to disprove the allegation **and** there has been a deliberate act to deceive;
- **Unfounded** — there is no evidence or proper basis which supports the allegation being made.

Where an allegation is found to be **malicious or false**, the record **must be removed from the individual's personnel file**. Where a child or other person has made a deliberately malicious or false allegation, the School will consider what support or sanction is appropriate for them, and whether a referral to children's social care is needed.

Referrals to the DBS and the Teaching Regulation Agency

Where an individual is dismissed, or would have been dismissed had they not resigned, because they have harmed a child or pose a risk of harm to children, the School **must** make a referral to the **Disclosure and Barring Service**. Where a teacher's conduct may warrant a prohibition order, the School **must** consider a referral to the **Teaching Regulation Agency**. **A settlement or non-disclosure agreement must never be used to prevent a referral or to avoid these duties.**

"Compromise agreements" must not be used. In considering any referral to the Teaching Regulation Agency, the School has regard to its duties under the **Public Sector Equality Duty**.

Where an individual resigns or ceases to provide their services, this **must not** prevent the allegation being followed up and concluded in accordance with this procedure.

Records and references

A clear and comprehensive summary of the allegation, how it was followed up and resolved, decisions reached and the action taken is kept on the individual's confidential personnel file, and a copy is provided to the individual. Records are **retained until the individual reaches normal pension age, or for 10 years from the date of the allegation, whichever is the longer**.

Allegations found to be **false, unsubstantiated, unfounded or malicious must not be referred to in employer references**. Only substantiated allegations are included.

Non-recent allegations

Allegations of historic abuse are handled in the same way as contemporary concerns and **must** be reported to the police and to the LADO. Where the allegation concerns a person who now works with children, the procedure above applies.

30. Low-level concerns about adults

Most concerns about adult conduct do not meet the harm threshold. Sharing them early is not about catching people out; it is about creating an open and transparent culture in which minor concerns can be addressed before they escalate, and in which staff are confident about the boundaries set by the Staff Behaviour Policy.

A **low-level concern** is any concern — no matter how small, and even if no more than a nagging doubt — that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the Staff Behaviour Policy, including outside of work, and does not meet the harm threshold.

Examples might include being over-friendly with children, having favourites, taking photographs of children on a personal device, engaging in inappropriate humour, or using inappropriate language.

All low-level concerns **must** be shared with the DSL, or directly with the Head. Staff are also **encouraged to self-refer** where they have found themselves in a situation that could be misinterpreted, or where they have behaved in a way that on reflection falls below the standard expected.

The **Head is the ultimate decision-maker** in respect of low-level concerns, although depending on the nature of the low-level concerns, the Head may wish to consult with the DSL and take a more collaborative decision-making approach. The Head or the DSL will collect as much evidence as possible by speaking directly to the person who raised the concern (unless it was raised anonymously), to the individual concerned and to any witnesses. The Head will then decide whether the concern in fact meets the harm threshold — in which case section 29 applies and the LADO must be consulted — or whether it should be handled as a low-level concern.

Records of low-level concerns are kept confidentially, in a central record, and are reviewed so that any **patterns of behaviour** can be identified and addressed. Records are kept at least until the individual leaves the School. Records of low-level concerns may be kept for a longer period, in line with records of allegations (i.e. until the individual reaches normal pension age, or for 10 years from the date of the concern if that is longer), where they form part of a wider pattern of concern.

Low-level concerns **must not** be included in employer references unless they relate to issues that would normally be included in a reference, for example where a pattern of behaviour has met the threshold for formal capability or disciplinary action.

Where a low-level concern relates to a member of supply staff, a contractor or an agency worker, the School will report it to their employer or agency so that any potential patterns can be identified.

31. Whistleblowing

Speaking up about poor safeguarding practice takes courage, and we want every member of our community to know that they can do so without fear. Staff should feel able to raise concerns about poor or unsafe practice, and such concerns will be taken seriously by the Senior Leadership Team and the Governing Body.

Concerns about safeguarding practice should be raised with the DSL, the Head or the Chair of Governors, in accordance with the School's Whistleblowing Policy. Where a member of staff feels unable to raise a concern internally, or feels that their genuine concerns are not being addressed, they may contact:

- the **NSPCC Whistleblowing Advice Line** on **0800 028 0285** or help@nspcc.org.uk;
- the **LADO** on **01865 810603**;
- **Ofsted**, in relation to Early Years Foundation Stage provision, on **0300 123 1231**;
- the Department for Education's dedicated helpline in relation to safeguarding concerns or extremism, on **020 7340 7264** or counter.extremism@education.gov.uk.

General guidance on whistleblowing is available at www.gov.uk/whistleblowing.

32. Early Years Foundation Stage

Our youngest children depend on us completely. The Early Years Foundation Stage Statutory Framework sets additional safeguarding and welfare requirements which apply to our EYFS provision, and which are **strengthened from 1 September 2026**.

The EYFS Policy and the EYFS Intimate Care Policy must be read alongside this policy. In the EYFS, the School **must**:

- ensure that all EYFS staff receive **safeguarding training that meets the criteria set out at Annex C of the EYFS Statutory Framework, renewed at least every two years**, with knowledge refreshed at regular intervals and at least annually;
- ensure that a **designated safeguarding lead for the EYFS** is identified, appropriately trained and available;
- obtain an **enhanced DBS check, including children's barred list information, for all staff and volunteers** working in the EYFS, and ensure that **no individual begins work or volunteering until the results have been received and are satisfactory**;
- apply the Childcare (Disqualification) Regulations 2018 and ensure that no disqualified person works in the setting or is otherwise directly concerned in its management;
- require staff and prospective staff to disclose, on an **ongoing basis**, any conviction, caution, court order, reprimand or warning, or any other information that may affect their suitability to work with children — a duty communicated at recruitment and reiterated at regular intervals;
- **notify Ofsted within 14 days** of any allegation of **harm or abuse** by a person living, working or looking after children at the premises, of any significant event that is likely to affect the

suitability of any person who cares for or is in regular contact with children, and of the action taken in response. **Note that the threshold has been lowered from "serious harm" to "harm".**

- maintain the required staff-to-child ratios at all times, and ensure that at least one person with a current **paediatric first aid** certificate is on the premises and available at all times when children are present, and accompanies children on outings;
- apply safer sleeping practices for children who sleep during the day, with regular checks and appropriate recording;
- apply **safer eating** practices, including managing the risk of choking and allergies, and ensuring appropriate supervision at mealtimes;
- ensure that children's **privacy and dignity** are respected during toileting and nappy changing, and that intimate care is provided in accordance with the EYFS Intimate Care Policy;
- have regard to guidance on **screen use** in the early years, ensuring that any use of screens is purposeful, age-appropriate and limited;
- apply restrictions on the use of personal mobile phones and cameras in the setting, in accordance with the EYFS Policy.

33. Use of School premises by third parties, and after-school activities

Where our premises are used by others to run activities for children, those children are entitled to the same standard of safeguarding as our own pupils.

Before agreeing to any hire, lease or letting of School premises for activities involving children, the School will:

- seek assurance that the provider has appropriate safeguarding policies and procedures, including a designated safeguarding lead, safer recruitment arrangements and a process for handling allegations;
- ensure that safeguarding requirements — including compliance with this policy, the requirement to report allegations to the School and to the LADO, and the School's right to terminate the arrangement where safeguarding requirements are not met — are written into the hire or lease agreement **as a condition of use**;
- ensure that a **DSL or Deputy DSL is available at all times the premises are in use by children**, or that clear alternative arrangements are agreed and recorded;
- have regard to the DfE guidance *\After school clubs, community activities, and tuition: safeguarding guidance for providers* (February 2026).

Where an allegation is made in relation to an individual or organisation using the School premises, the School will follow section 29 of this policy, including informing the LADO.

34. Visiting speakers

Visitors enrich the education we offer, and we want pupils to hear a wide range of voices. At the same time, the School has a responsibility to ensure that visiting speakers do not present a risk to pupils or promote extremist views.

A nominated member of the academic staff coordinates safeguarding checks for all external speakers, to ensure that they are suitable and that the visit falls within the scope of the Prevent duty and the promotion of fundamental British values. A log is kept of all visits. This process is overseen by the DSL

All visiting speakers **must** be approved in advance by the Designated Safeguarding Lead. The member of staff hosting the visit is responsible for:

- carrying out appropriate checks on the speaker and the organisation they represent, including online checks;
- obtaining and reviewing the content of the proposed presentation in advance where practicable;
- ensuring that a member of staff is present throughout, and that visiting speakers are **never left unsupervised with pupils** unless they have been subject to the appropriate safeguarding checks;
- ensuring visitors sign in, wear identification and are aware of the School's safeguarding arrangements and how to report a concern;
- intervening and, if necessary, stopping the session where the content is or becomes inappropriate, and reporting the matter to the DSL.

Any concern about a visiting speaker **must** be reported to the DSL, who will consider whether a Prevent or other safeguarding referral is required.

35. Physical intervention and positive handling

Our approach to behaviour is built on positive relationships, clear expectations and respect. There are, however, rare occasions when physical intervention is necessary to prevent a child from harming themselves or others, damaging property, or committing an offence.

Staff **may** use reasonable force in such circumstances, in accordance with the law and with the School's Restrictive Interventions policy and Behaviour policy. Any use of force **must** be reasonable, proportionate and necessary in the circumstances — in line with KCSIE, using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances — and **must** be recorded and reported to the DSL and the child's parents.

Full details of the School's approach to planning, using, recording and reporting restrictive interventions are set out in the School's Restrictive Intervention Policy.

Staff should be aware that a child with special educational needs or disabilities, or a medical condition, may require a planned approach set out in an individual plan. The School has regard to the current DfE guidance on the use of reasonable force and restrictive intervention.

36. Children missing from education and children missing from School

A child going missing from education, or being persistently absent, can be a warning sign of a range of safeguarding concerns, including neglect, sexual or criminal exploitation, radicalisation, forced marriage, so-called honour-based abuse and travelling to conflict zones.

The School:

- monitors attendance and absence closely and follows up unexplained absence on the first day;
- holds **at least two emergency contacts** for every child, so that there is an additional point of contact where a child cannot be located or is at risk;
- informs the local authority of any pupil who is going to be added to or deleted from the admission register at a non-standard transition point, in accordance with the statutory requirements, providing the required information;
- refers to the local authority in accordance with the statutory guidance *\Children missing education* (September 2025) and to Oxfordshire County Council Admissions on **01865 815175**;
- follows the Missing Child Policy where a child goes missing from the School site or from a School activity;
- has regard to the statutory guidance *\Working together to improve school attendance*, and reads this policy alongside the Attendance Policy.

37. Teaching children to keep themselves safe

Children are safer when they understand risk, know what a healthy relationship looks like, and know how to ask for help. We provide opportunities to teach safeguarding throughout the curriculum and through the wider life of the School.

Safeguarding education is delivered principally through the **LIF-Ed programme**, alongside Relationships and Sex Education and Health Education, assemblies, tutor time and the pastoral system. It includes:

- healthy and respectful relationships, consent, and recognising and challenging abusive behaviour;
- online safety, including the four C's, AI-generated content and the risks associated with sharing images;

- challenging misogyny, sexism, harmful gender stereotypes and all forms of discriminatory attitude;
- recognising and reporting abuse, including child-on-child abuse, and knowing which trusted adults to tell;
- mental health and emotional wellbeing, and where to seek help;
- personal safety, including road, water, fire and drug and alcohol awareness;
- understanding the risks of radicalisation and extremism, and building resilience to them.

The curriculum is planned so that it is age-appropriate, is informed by the safeguarding concerns arising in School, and is reviewed with the DSL.

38. Training and induction

Safeguarding training is what turns this policy into practice. It is not a compliance exercise; it is how our staff gain the confidence to notice, to ask and to act.

What everyone must read and complete

- All staff, volunteers, trainee teachers and governors **must read Part one of Keeping Children Safe in Education 2026 in full** and confirm in writing that they have read and understood it. **The condensed version formerly at Annex A has been withdrawn: there is no longer a shortened version for staff who do not work directly with children.** Office, catering, site, grounds, administrative and support staff read the same Part one as teaching staff.
- Staff who work directly with children should also read **Annex B** (the role of the designated safeguarding lead) of KCSIE 2026. Note that the annexes have been renumbered: the former Annex B (Further information) is now Annex A; the former Annex C (Role of the DSL) is now Annex B; and the former Annex E (Regulated activity) is now Annex C.
- All staff **must** read and confirm they have understood this policy, the **Staff Behaviour Policy** (code of conduct), the School's behaviour policy, and the safeguarding response to children who are absent from education.

Induction

All new staff, volunteers, trainee teachers and, where relevant, contractors, receive safeguarding induction **before** they begin work with children. Induction covers this policy, the Staff Behaviour Policy, how to raise a concern, the identity of the DSL and Deputy DSLs, the child protection recording systems, online safety and filtering and monitoring, and the low-level concerns procedure.

Ongoing training

Group	Requirement	Frequency
All staff	Whole-staff safeguarding and child protection training	At least every 3 years

All staff	Safeguarding and child protection updates, including online safety, AI risks and local and national developments	At least annually, delivered each September, and through regular updates during the year
DSL and Deputy DSLs	Formal DSL training, provided through the Oxfordshire Safeguarding Children Partnership	At least every 2 years
DSL and Deputy DSLs	Knowledge and skills updates, including additional training on AI-related safeguarding risks	At regular intervals, and at least annually
EYFS staff	Safeguarding training meeting the criteria at Annex C of the EYFS Statutory Framework	Renewed at least every 2 years
Recruitment panels	Safer recruitment training	In accordance with statutory requirements, with at least one trained member on every panel
Governors	Safeguarding and safer recruitment training; Part one and Annex B of KCSIE 2026	On appointment and refreshed regularly

The DSL maintains a record of all safeguarding training undertaken, which is reported to the Governing Body. Staff who join the School outside the normal training cycle receive the relevant training as part of induction.

39. Monitoring, oversight and review

This policy is reviewed **at least annually** by the DSL and the Governing Body, and immediately following any material change to statutory guidance, or where a safeguarding incident or a review of practice indicates a need for change. The approved policy is **published on the School website** and is available in hard copy on request.

Oversight arrangements include:

- safeguarding as a **standing item** on the agenda of Governing Body meetings;
- a termly report from the Safeguarding Governor and an annual safeguarding report from the DSL to the Governing Body;
- an annual review of the effectiveness of safeguarding arrangements, including how the duties have been discharged;
- the annual recorded review of filtering and monitoring effectiveness;
- participation in Child Safeguarding Practice Reviews, audits and multi-agency reviews required by the Oxfordshire Safeguarding Children Partnership, with a clear process for gathering the evidence required and for embedding recommendations into practice within agreed timescales;
- completion of the annual statutory safeguarding return under section 175/157 of the Education Act 2002.

Where a deficiency or weakness in safeguarding arrangements is identified, the Senior Leadership Team and the Governing Body **must** ensure that it is remedied **without delay**.

40. Related School policies and procedures

This policy should be read in conjunction with the following School policies and procedures:

- Access, Security and Visitors
- Admissions
- Attendance
- CCTV
- Complaints Procedure
- Data Protection Policy for Staff
- Digital Technology
- Early Years Foundation Stage (EYFS)
- EYFS Intimate Care
- Employee Handbook
- Equal Opportunities for Pupils
- Fire Safety Management Plan
- First Aid
- Guidelines on the Storage and Retention of Records
- Health and Safety
- LIF-Ed
- Microsoft Surface Device
- Missing Child
- Mobile Phone
- Prevention of Bullying
- Privacy Notice
- Promoting Good Behaviour
- Safer Recruitment
- Relationships and Sex and Health Education (RSE)
- Restrictive Intervention
- Risk Assessment
- Social Media
- Spiritual, Moral and Social
- Staff Behaviour
- Staff Privacy Notice
- Substance Misuse
- Substance Misuse Guidance for Pupils
- Taking, Using and Storing Images of Children
- Whistleblowing

41. Legislation, regulation and guidance

This policy has regard to the following legislation and statutory guidance. References are to the current version of each document unless a specific version is materially important.

Legislation

- Children Act 1989 and Children Act 2004
- Education Act 2002, in particular section 157 (independent schools)
- Education (Independent School Standards) Regulations 2014 (as amended)
- Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006
- Childcare Act 2006 and the Childcare (Disqualification) Regulations 2018
- Counter-Terrorism and Security Act 2015, in particular section 26 (the Prevent duty)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003, as amended (mandatory reporting duty)
- Domestic Abuse Act 2021, in particular section 49A (Operation Encompass), as inserted by section 20 of the Victims and Prisoners Act 2024
- Modern Slavery Act 2015
- Data Protection Act 2018, UK GDPR and the **Data (Use and Access) Act 2025**
- Police and Criminal Evidence Act 1984 (appropriate adults)
- Public Interest Disclosure Act 1998
- **Crime and Policing Act 2026** (removal of the supervision exemption from regulated activity)
- **Children's Wellbeing and Schools Act 2026** (including temporary accommodation notification)

Statutory and other guidance

- *\Keeping children safe in education* — www.gov.uk/government/publications/keeping-children-safe-in-education--2 (the 2026 edition comes into force on 1 September 2026)
- *\Working together to safeguard children* — www.gov.uk/government/publications/working-together-to-safeguard-children--2 (2026 edition, 18 March 2026)
- *\Early years foundation stage statutory framework* — www.gov.uk/government/publications/early-years-foundation-stage-framework--2 (July 2026 framework, effective 1 September 2026)
- *\What to do if you're worried a child is being abused* — www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2
- *\Information sharing: advice for practitioners providing safeguarding services* — www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

- \Sharing nudes and semi-nudes: advice for education settings\ — www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
- \Children missing education\ — www.gov.uk/government/publications/children-missing-education
- \Working together to improve school attendance\ — www.gov.uk/government/publications/working-together-to-improve-school-attendance
- \Filtering and monitoring standards for schools and colleges\ — www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges
- \NPCC When to Call the Police\ — www.npcc.police.uk/publications/All-publications
- \Cyber security standards for schools and colleges\ — www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges
- \Prevent duty guidance for England and Wales\ (December 2023) and \Channel duty guidance\
- \Multi-agency statutory guidance on female genital mutilation\ (July 2020)
- \Oxfordshire Safeguarding Children Partnership procedures and the Oxfordshire Threshold of Needs\ — www.oscp.org.uk
- \Searching, screening and confiscation\ — www.gov.uk/government/publications/searching-screening-and-confiscation
- \Preventing and Tackling Bullying\ — www.gov.uk/government/publications/preventing-and-tackling-bullying-and-harassment-of-school-staff/preventing-and-tackling-the-bullying-and-harassment-of-school-staff
- \Sharing nudes and semi-nudes\ — advice for education settings — www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
- \Mobile phones in schools\ — www.gov.uk/government/publications/mobile-phones-in-schools/mobile-phones-in-schools
- \Digital and technology standards in schools and colleges\ — www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges
- \After school clubs, community activities, and tuition: safeguarding guidance for providers\ — www.gov.uk/government/publications/guidance-for-parents-and-carers-on-safeguarding-children-in-out-of-school-settings/using-after-school-clubs-tuition-and-community-activities
- \Generative artificial intelligence (AI) in education\ — www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education
- \Generative AI: product safety expectations\ — www.gov.uk/government/publications/generative-ai-product-safety-standards/generative-ai-product-safety-standards

- \Relationships Education, Relationships and Sex Education (RSE) and Health Education\ – www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education
- \Behaviour in schools\ – www.gov.uk/government/publications/behaviour-in-schools--2
- \Safeguarding and protecting people for charities and trustees\ – www.gov.uk/guidance/safeguarding-and-protecting-people-for-charities-and-trustees

Version history

Version / date	Summary of change	Author
February 2026	Previous approved version.	Joe Hughes, Director of Safeguarding
August 2026 (draft)	Full redraft to Keeping Children Safe in Education 2026, Working Together 2026 and the EYFS framework of July 2026; the previous three-Part, eight-Annex, five-Appendix structure rebuilt as a single sequence of numbered sections with five appendices.	Policy Review
August 2026 (V4)	Reformatted to the School policy template (V4): document control moved to the front, policy summary and scoped contents field added, heading hierarchy normalised, version history added. No change of substance. DRAFT — not yet approved.	Policy Review
August 2026 (V5)	Updated links. Changes in SLT positions and restructuring. Changes to bring the policy in line with other relevant policies.	Joe Hughes, Director of Safeguarding
September 2026 (V6)	Minor updates following the publishing of KCSIE 2026 on September 1	Joe Hughes, Director of Safeguarding

Appendix 1 — Abuse and neglect: definitions and indicators

Knowing what to look for is vital to the early identification of abuse and neglect. **All** staff should be aware of the indicators of abuse and neglect so that they are able to identify children who may be in need of help or protection. If staff are unsure, they should **always** speak to the Designated Safeguarding Lead or a Deputy.

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

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

Physical abuse

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

Indicators of physical abuse and factors that should increase concern

- Multiple bruising, or bruises and scratches, especially on the head and face
- Clusters of bruises, for example fingertip bruising caused by being grasped
- Bruises around the neck and behind the ears — the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument, for example linear bruising (a stick), parallel bruising (a belt) or the marks of a buckle
- Bite marks
- Deliberate burning, which may be indicated by the pattern of an instrument or object such as an electric fire, cooker or cigarette
- Scalds with upward splash marks or tide marks
- Untreated injuries
- Recurrent injuries or burns
- Bald patches

In the social context of the School, it is normal to ask about a noticeable injury, and the response is generally light-hearted and detailed. Concern should therefore be increased when:

- the explanation given does not match the injury;
- the explanation uses words or phrases that do not match the vocabulary of the child (adult words);
- no explanation is forthcoming;
- the child, parent or carer is secretive or evasive;
- the injury is accompanied by allegations of abuse or assault.

You should be concerned if the child or young person:

- is reluctant to have parents or carers contacted;
- runs away or shows fear of going home;
- is aggressive towards themselves or others;
- flinches when approached or touched;
- is reluctant to undress to change clothing for sport;
- wears long sleeves during hot weather;
- is unnaturally compliant in the presence of parents or carers;
- has a fear of medical help or attention;
- admits to a punishment that appears excessive.

Oxfordshire Safeguarding Children Partnership guidance on physical abuse:
www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/physical-abuse/

Emotional abuse

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

Indicators of emotional abuse — developmental

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes

Indicators of emotional abuse — behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation ("I'm stupid", "ugly", "worthless")
- Neurotic behaviour such as rocking, hair-twisting or thumb-sucking
- Self-mutilation
- Suicide attempts
- Drug or solvent abuse
- Running away
- Compulsive stealing or scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour, for example wetting
- Eating disorders
- Destructive tendencies
- Arriving early at School and leaving late

Indicators of emotional abuse — social

- Withdrawal from physical contact

- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Indicators of emotional abuse — emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Most harm is produced in *\low warmth, high criticism* homes, not from single incidents.

Emotional abuse is difficult to define, to identify and to prove. It is chronic and cumulative, and has a long-term impact. It is sometimes possible to spot emotionally abusive behaviour by the way adults speak to or behave towards children; an appropriate challenge or intervention at an early stage can affect positive change and prevent more intensive work being needed later.

OSCP guidance on emotional abuse: www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/emotional-abuse/

OSCP guidance on domestic abuse: www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/domestic-abuse/

Sexual abuse

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

Substantive change: KCSIE 2026 removes the phrase "rape or oral sex" from this definition, because it risked creating confusion about the legal definition of rape, and replaces it with an example of penetration with an object, which is legally recognised as a distinct form of sexual assault. The previous Cokethorpe policy reproduced the older wording.

Characteristics of child sexual abuse

- It is often planned and systematic — people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- **Grooming the child** — those who abuse children take care to choose a vulnerable child and often spend time making them dependent
- **Grooming the child's environment** — abusers try to ensure that potential adult protectors, especially parents and other carers, are not suspicious of their motives

Indicators of sexual abuse — physical observations

- Damage to genitalia, anus or mouth
- Sexually transmitted infections
- Unexpected pregnancy, especially in very young girls
- Soreness in the genital area, anus or mouth, and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections, discharges or abdominal pain

Indicators of sexual abuse — behavioural observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour or promiscuity
- Hinting at sexual activity; inexplicable decline in school performance
- Depression or other sudden apparent changes in personality, such as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Being socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour
- Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at School, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders, sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns, such as thumb-sucking or bringing out discarded cuddly toys
- Becoming worried about clothing being removed

OSCP resources on child sexual abuse: www.oscp.org.uk/centre-of-expertise-on-child-sexual-abuse-research-resources-and-guidance/

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example as a result of maternal substance misuse. 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); to protect a child from physical and emotional harm or danger; to ensure adequate supervision (including the use of inadequate care-givers); or to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

NSPCC research has highlighted the following examples of the neglect of children under 12: frequently going hungry; frequently having to go to school in dirty clothes; regularly having to look after themselves because parents are away or have problems such as drug or alcohol misuse; being abandoned or deserted; living at home in dangerous physical conditions; not being taken to the doctor when ill; and not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group. Neglect is often noticed at a stage when it does not yet pose a risk to the child, and an appropriate intervention or conversation at that early stage can prevent the child continuing to suffer.

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene — unkempt, dirty or smelly
- Underweight
- Dress unsuitable for the weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from School or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food

OSCP neglect guidance and toolkit: www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/neglect-2/ The OSCP childcare and development checklist provides a more detailed list of indicators of neglect and is available to all staff.

Neglect is often linked to other forms of abuse, so any concern should at least be discussed with the DSL.

Indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community, and a proper assessment carried out by appropriate people. What matters is this: if you feel unsure or concerned, do something about it. Do not keep it to yourself.

Modern slavery

Modern slavery encompasses human trafficking, slavery, servitude and forced or compulsory labour. Children may be trafficked into or within the UK for sexual exploitation, criminal exploitation (including county lines and cannabis cultivation), domestic servitude, forced labour or benefit fraud. Indicators may include a child who: appears to be under the control of others; has money, clothing or possessions they cannot account for; goes missing for periods; travels unusual routes or distances; shows signs of physical or emotional abuse; has restricted freedom of movement; or has no identification documents.

Where a child is identified as a potential victim of modern slavery, the DSL **must** make a referral through the **National Referral Mechanism**, in addition to referrals to children's social care and the police.

Child-to-parent or caregiver abuse

Children may cause harm to a parent, carer or sibling. **Child-to-parent or caregiver abuse** can involve physical violence, threats, damage to property, financial abuse and coercive or controlling behaviour. It is often hidden, and families may feel shame or fear the consequences of disclosing. Staff should be alert to indicators and report concerns to the DSL, who will consider an early help or Family Help referral and, where appropriate, a referral to children's social care.

Appendix 2 — Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol misuse, deliberately missing education and the making or sharing of nudes and semi-nudes can put children in danger. Further information is available in **Annex A of Keeping Children Safe in Education 2026** and on the Oxfordshire Safeguarding Children Partnership website.

Serious violence

Serious violence can include assault, and the carrying, threatened use or actual use of weapons. All staff should be aware of the indicators that a child may be at risk of, or involved in, serious violent crime. These may include increased absence from School; a change in friendship group or relationships with older individuals or groups; a significant decline in performance; signs of self-harm or a significant change in wellbeing; signs of assault or unexplained injuries; unexplained gifts or new possessions; **disrupted education**; and **a history of offending**.

Risk factors that increase the likelihood of involvement include being male, having been frequently absent or permanently excluded, having experienced child maltreatment, and having been involved in offending such as theft or robbery. Children committing violence may themselves be victims. Early support for those at risk is vital. Staff should report concerns to the DSL, who will consider a referral for early help, Family Help or to children's social care and the police.

Violence against women and girls, misogyny and misandry

KCSIE 2026 gives greater prominence to violence against women and girls, recognising that harmful attitudes and behaviours can begin in childhood. Extreme misogynistic content is increasingly prevalent online and is linked to harmful sexual behaviour among young people, contributing to the normalisation of sexual harassment and sexual violence.

We take a zero-tolerance approach to sexual harassment and harmful sexual behaviour, and we recognise the **escalatory nature of misogyny** — early identification and challenge minimises the risk of harmful sexual behaviour developing. Misandry is also addressed. Rather than treating incidents in isolation, we work to build a culture that prevents abuse before it occurs, through the curriculum, through pastoral work and through the consistent challenge of sexist and discriminatory language and behaviour by staff and pupils alike.

Upskirting

"Upskirting" is taking a photograph under a person's clothing without their permission, with the intention of viewing their genitals or buttocks, with or without underwear, to obtain sexual gratification or to cause the victim humiliation, distress or alarm. It is a criminal offence under the Voyeurism (Offences) Act 2019 and can affect anyone of any sex. It must be reported to the DSL.

So-called "honour-based" abuse, including female genital mutilation and forced marriage

So-called "honour-based" abuse encompasses incidents or crimes committed to protect or defend the honour of a family or community, including female genital mutilation, forced marriage and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of so-called "honour-based" abuse are abuse, and **must** be handled and escalated as such. Staff who have a concern **must** speak to the DSL, who will consider a referral to children's social care and the police. Where there is a risk to life, limb or long-term health, contact the police immediately on 999.

Female genital mutilation — mandatory reporting duty

Female genital mutilation is a criminal offence. **Teachers have a statutory duty under section 5B of the Female Genital Mutilation Act 2003 to report personally to the police where, in the**

course of their professional duties, they either are informed by a girl under 18 that an act of FGM has been carried out on her, or they observe physical signs that appear to show an act of FGM has been carried out. This duty applies to the individual teacher and **must not** be delegated, although the teacher should also inform the DSL. The duty does not apply in relation to suspected cases — these are dealt with through the usual safeguarding route.

The School has regard to the *\Multi-agency statutory guidance on female genital mutilation* (July 2020).

Contextual safeguarding

Safeguarding incidents can occur outside the School and can be associated with contexts outside the home, including peer groups, schools, neighbourhoods and online. Children may be vulnerable to abuse and exploitation from within their peer group and from outside it, and from wider environmental factors. Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety or welfare, and the School will provide as much information as possible as part of the referral process.

Children who are absent from education

Children being absent from education, particularly repeatedly or for prolonged periods, and children missing education, can act as a vital warning sign of a range of safeguarding possibilities, including neglect, sexual abuse, child sexual and criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation and risk of forced marriage.

The School follows the arrangements at section 36 of this policy and its Attendance Policy, and has regard to the statutory guidance *\Children missing education* (September 2025) and *\Working together to improve school attendance*.

Child sexual exploitation and child criminal exploitation

Child sexual exploitation (CSE) and child criminal exploitation (CCE) are forms of abuse in which an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been exploited even if the activity appears consensual. Exploitation can be a one-off occurrence or a series of incidents, and can be perpetrated by males or females, and by children or adults.

KCSIE 2026 clarifies that both CCE and CSE **may be committed or facilitated by an organised network or gang, and the victim may appear to be part of that group.** Both may constitute **modern slavery**, and where a victim is identified an appropriate **modern slavery / National Referral Mechanism referral** should be completed.

Indicators of child criminal exploitation

- Appearing with unexplained gifts, money or new possessions

- Associating with other children involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing School or education, or not taking part in education
- Having older friends or relationships with controlling adults
- Carrying weapons, or having unexplained injuries

Additional indicators of child sexual exploitation

- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections, displaying sexual behaviours beyond expected sexual development, or becoming pregnant
- Being taken to locations away from home, sometimes overnight
- Receiving unexplained phone credit, mobile phones or accounts
- Secretive use of the internet or social media, or multiple accounts and devices
- Withdrawal from family and previous friendship groups

County lines

County lines is a form of criminal exploitation in which gangs and organised criminal networks use children to move and store drugs and money, often across county boundaries, and use coercion, intimidation, violence (including sexual violence) and weapons. Children can be targeted and recruited both in person and online. A child involved in county lines may be trafficked and may be a victim of modern slavery. Concerns **must** be reported to the DSL, who will consider referrals to children's social care, the police and the National Referral Mechanism.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours, including physical, emotional, sexual, financial and psychological abuse, and coercive or controlling behaviour. It can occur between people of any age, sex or sexual orientation, including between children in intimate relationships. **Children who see, hear or experience the effects of domestic abuse are victims in their own right under the Domestic Abuse Act 2021.** Exposure to domestic abuse can have a serious, long-lasting emotional and psychological impact.

See also section 22 of this policy, on Operation Encompass.

Cybercrime

Cybercrime is criminal activity committed using computers or the internet. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime, such as unauthorised access to computers, denial of service attacks, or making, supplying or obtaining malware. Early intervention can divert children from harm. Where the DSL has a concern, they may consider referral to the **National Crime Agency's Cyber Choices** programme.

Homelessness and children living in temporary accommodation

Being homeless, or at risk of becoming homeless, presents a real risk to a child's welfare. Indicators include household debt, rent arrears, domestic abuse and anti-social behaviour, and a family being asked to leave a property. The DSL is aware of contact details and referral routes into the local housing authority so that concerns can be raised at the earliest opportunity. Where a child has been placed in temporary accommodation, see section 23 of this policy.

Children and the court system

Children may be involved with the court system, for example as a witness in criminal proceedings, or where their parents are separating and a child arrangements order is being sought. Resources are available to support children through these processes, and the DSL will consider what pastoral support the child requires.

Children with family members in prison

Children who have a family member in prison are at risk of poor outcomes, including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders provides support. Staff should report concerns to the DSL, who will consider what support the School can provide, including an early help or Family Help referral.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for them. Community safety incidents in the vicinity of the School can raise concerns among children and parents. The School teaches children how to keep themselves safe, in an age-appropriate way, and works with the police where a community safety incident occurs.

Substance misuse

Drug and alcohol misuse can be both an indicator of, and a risk factor for, other safeguarding issues, including exploitation and mental ill health. The School's Substance Misuse Policy and Substance Misuse Guidance for Pupils are read alongside this policy. Concerns should be reported to the DSL.

Bullying, including cyberbullying

Bullying causes real and lasting harm and can be a safeguarding concern in its own right. Our approach is set out in the Prevention of Bullying Policy. Where bullying is severe, persistent, prejudice-based or discriminatory, or where it causes or is likely to cause significant harm, it **must** be reported to the DSL and dealt with under this policy.

Private fostering

A private fostering arrangement occurs when a child under 16 (or under 18 if disabled) is cared for and provided with accommodation for 28 days or more by someone who is not a parent, person with parental responsibility, or close relative. **The School has a mandatory duty to notify**

the local authority of any private fostering arrangement of which it becomes aware. Concerns must be reported to the DSL.

Child in need and child protection thresholds

Section 17 of the Children Act 1989 provides that a child is in need if they are unlikely to achieve or maintain, or have the opportunity to achieve or maintain, a reasonable standard of health or development without the provision of services by a local authority; if their health or development is likely to be significantly impaired, or further impaired, without the provision of such services; or if they are disabled.

Section 47 of the Children Act 1989 provides that where a local authority has reasonable cause to suspect that a child in their area is suffering, or is likely to suffer, significant harm, it has a duty to make such enquiries as it considers necessary to decide whether to take action to safeguard or promote the child's welfare.

The DSL will use the **Oxfordshire Threshold of Needs** to inform decisions about which level of response is appropriate.

Appendix 3 — Receiving a disclosure: the seven R's

All staff should ensure that:

- A member of staff who is approached by a child listens positively and tries to reassure them. They **cannot promise complete confidentiality** and should explain that they may need to pass information to other professionals, to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- Additional consideration is given to children with communication difficulties and to those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.
- All staff know who the DSL is and who to approach if the DSL is unavailable. Ultimately, **all staff have the responsibility to make a referral to the police or children's social care directly** and should do so if, for whatever reason, there are difficulties following the agreed protocol — for example, they are the only adult on the School premises at the time and have concerns about sending a child home.
- All staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and may not recognise their experiences as harmful. Children may feel embarrassed or humiliated, or may be being threatened. This may relate to their vulnerability, disability, sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns. It is also important that staff build trusted relationships with children that facilitate communication.
- Where a disclosure relates to harmful sexual behaviour, **two members of staff should be present wherever possible.**

Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

Reassure

- Reassure the pupil, but only so far as is honest and reliable
- Do not make promises you may not be able to keep, such as "I'll stay with you", "everything will be alright now" or "I'll keep this confidential"
- Do reassure — for example: "I believe you", "I am glad you came to me", "I am sorry this has happened", "We are going to do something together to get help"

Respond

- Respond to the pupil only as far as is necessary to establish whether you need to refer the matter; do not interrogate for full details
- Do not ask leading questions such as "did he touch your private parts?" or "did she hurt you?" Such questions may invalidate your evidence, and the child's, in any later prosecution
- Do not ask the child why something has happened
- Do not criticise the alleged perpetrator; the pupil may care about them, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to, and reassure the pupil that it will be a senior member of staff

Report

- Share concerns with the DSL as soon as possible
- If you are not able to contact the DSL or a Deputy DSL and the child is at risk of immediate harm, contact MASH or the police immediately

Record

- If possible, make brief notes at the time and record them as soon as possible using CPOMS, or a Record of Concern Form
- Keep your original notes on file
- Record the date, time, place, persons present, noticeable non-verbal behaviour, and the words used by the child. If the child uses sexual "pet" words, record the actual words used rather than translating them into "proper" words
- Complete a **body map** to indicate the position of any noticeable bruising
- Record facts and observable things rather than your interpretations or assumptions

Remember

- Support the child: listen, reassure and be available

- Confidentiality is essential — share your knowledge only with appropriate professional colleagues
- Try to get some support for yourself if you need it

Review (led by the DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

The role of an appropriate adult

The Police and Criminal Evidence Act 1984 provides that "the role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons". The appropriate adult is expected to observe that the police are acting properly and fairly in relation to a vulnerable detained person's rights and entitlements, and to help the detained person understand those rights. Where a pupil requires an appropriate adult, the School will liaise with parents and the police, and the DSL will advise on the arrangements.

Appendix 4 — Managing allegations of child-on-child abuse

Prevention

We reduce the likelihood of child-on-child abuse by building a culture in which it is not tolerated and in which children feel able to speak up. Our preventative work includes:

- a clear and consistently applied behaviour policy, and a School culture built on respect and integrity;
- a planned curriculum, delivered through LIF-Ed, RSE and Health Education, covering healthy relationships, consent, boundaries, online behaviour, and challenging misogyny, sexism and discrimination;
- staff training so that everyone understands what child-on-child abuse looks like, including its online forms, and that it is never "banter";
- accessible routes for children to report concerns, including to their tutor, Head of Year, Housemaster or Housemistress, the School Counsellor, the DSL, the Deputy Head or the Head;
- appropriate supervision, and risk assessment of areas and activities where children are less closely supervised;
- analysis of recorded concerns by the DSL to identify patterns, hotspots and emerging issues, informing curriculum and pastoral planning.

Procedure when an allegation is made

13. The member of staff receiving the report follows the seven R's at Appendix 3, reassures the child, and makes an initial record the same day.
14. The concern is reported to the DSL immediately and recorded on CPOMS.
15. The DSL takes immediate steps to ensure the safety of the child who has been harmed and of other children, including, where necessary, separation of the children involved, changes to seating, timetabling, travel arrangements and break-time supervision.
16. The DSL considers whether the child needs medical attention and, if so, arranges it without delay, preserving evidence where a crime may have been committed.
17. The DSL assesses the incident against the factors at section 13 — the wishes and feelings of the child harmed, the nature of the incident, ages and developmental stages, any power imbalance, whether it is one-off or a pattern, ongoing risk, and the wider context.
18. The DSL decides on the response: managing the matter internally; early help or Family Help; referral to children's social care; and/or referral to the police. Where a crime may have been committed, the police must be contacted and the School must not carry out its own investigation without police advice.
19. The DSL informs the parents of the children involved, unless doing so would place a child at risk, and takes advice from children's social care or the police where there is doubt.
20. A risk and support plan is put in place for the child who has been harmed and for the child alleged to have caused harm, recording what support is being provided, by whom, and when it will be reviewed.
21. The DSL records all decisions, the rationale for them, and the actions taken.
22. The matter is kept under review, and the plans are revisited at agreed intervals until the DSL is satisfied the risk has been managed.

Supporting the child who has been harmed

The child's wishes and feelings are central. Support may include a designated trusted adult, access to the School Counsellor, changes to timetabling or supervision, support for reintegration, and referral to specialist services. The child should be kept informed, in an age-appropriate way, of what is happening and why. Support **must not** be conditional on the child pursuing a formal complaint or police report.

Supporting the child alleged to have caused harm

A child who has caused harm may also be a victim, and may have unmet needs of their own. The School will consider whether they require support, an assessment of their needs, a referral for early help, Family Help or to children's social care, and what educational or therapeutic intervention would reduce the risk of repetition. Any disciplinary response is considered alongside, and does not replace, the safeguarding response, and is applied in accordance with the School's behaviour policy and with regard to any special educational need or disability.

Sexual violence and sexual harassment — definitions

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 they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent, and A does not reasonably believe that B consents.

Sexual assault: a person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent, and A does not reasonably believe that B consents.

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. 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 they agree by choice to that penetration and have the freedom and capacity to make that choice.

Sexual harassment means unwanted conduct of a sexual nature that can occur online or offline, and both inside and outside of School. It is likely to violate a child's dignity, make them feel intimidated, degraded or humiliated, and/or create a hostile, offensive or sexualised environment. It includes: sexual comments, remarks, jokes and taunting — **which may be standalone comments or part of a wider pattern of abuse**; sexual "jokes" or taunting; physical behaviour such as deliberately brushing against someone, interfering with clothes, or displaying pictures, photos or drawings of a sexual nature; online sexual harassment, including non-consensual sharing of images, sexualised online bullying, unwanted sexual comments and messages on social media, sexual exploitation, coercion and threats; and **upskirting**.

The School uses the Stop It Now traffic-light framework and Oxfordshire County Council child-on-child guidance to help distinguish developmentally expected behaviour from problematic and harmful sexual behaviour.

Police action and responsibility

Where a report may involve a criminal offence, the DSL will contact the police and follow their advice. The School will:

- not conduct its own investigation in a way that may prejudice a police investigation;
- preserve any evidence, and not view, copy or share any imagery;
- continue to safeguard all children involved while any police or children's social care process is ongoing, including through risk assessment and safety planning;
- consider the School's own disciplinary process only once the police have confirmed that it will not prejudice their investigation;
- keep parents informed, subject to police and children's social care advice;
- have regard to the National Police Chiefs' Council guidance *\When to call the police*.

Appendix 5 — Contacts and useful links

Local contacts

Organisation	Telephone	Contact
Multi-Agency Safeguarding Hub (MASH) — children's social care	0345 050 7666 / 01865 519 800	www.oscb.org.uk/concerned-about-a-child/
Out of Hours Emergency Duty Team	0800 833 408	—
LCSS North	0345 2412703	LCSS.North@oxfordshire.gov.uk
LCSS Central	0345 2412705	LCSS.Central@oxfordshire.gov.uk
LCSS South	0345 2412608	LCSS.South@oxfordshire.gov.uk
Local Authority Designated Officer (LADO)	01865 810603	Lado.safeguardingchildren@oxfordshire.gov.uk
Oxfordshire County Council Admissions (children missing education)	01865 815175	—
Oxfordshire Safeguarding Children Partnership	—	oscb@oxfordshire.gov.uk / www.oscb.org.uk
Police — emergency	999	—
Police — non-emergency, including FGM reporting	101	—
Local Prevent team (report via Oxfordshire MASH)	0345 050 7666 / 01865 519 800	www.oxfordshire.gov.uk/sites/default/files/file/adult-social-and-health-care/PreventNationalReferralForm.pdf

National contacts

Organisation	Telephone	Contact
NSPCC Helpline	0808 800 5000	help@nspcc.org.uk / www.nspcc.org.uk
NSPCC Whistleblowing Advice Line	0800 028 0285	help@nspcc.org.uk
Childline	0800 1111	www.childline.org.uk
DfE counter-extremism / Prevent helpline	020 7340 7264	counter.extremism@education.gov.uk
Ofsted (EYFS notifications)	0300 123 1231	—
Anti-Terrorist Hotline	0800 789 321	—
Ofsted whistleblowing (EYFS)	0300 123 3155	whistleblowing@ofsted.gov.uk

Useful links

- Information sharing advice for practitioners — www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice
- What to do if you are worried a child is being abused — www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2
- Keeping children safe in education — www.gov.uk/government/publications/keeping-children-safe-in-education--2
- Working together to safeguard children — www.gov.uk/government/publications/working-together-to-safeguard-children--2
- Early years foundation stage statutory framework — www.gov.uk/government/publications/early-years-foundation-stage-framework--2
- Children missing education — www.gov.uk/government/publications/children-missing-education
- Filtering and monitoring standards — www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges
- Cyber security standards for schools and colleges — www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges
- Whistleblowing guidance — www.gov.uk/whistleblowing
- NSPCC — www.nspcc.org.uk
- Oxfordshire Safeguarding Children Partnership — www.oscb.org.uk
- Prevent e-learning — www.elearning.prevent.homeoffice.gov.uk/channelawareness
- OSCP Prevent guidance — www.oscb.org.uk/safeguarding-themes/prevent/

This document is a draft. It is not approved, is not final, and review by the Policy Review and Modernisation process does not constitute confirmation that the policy is legally or regulatorily compliant. It is submitted for human review, professional judgement and approval.

— End of draft —