



# THE ORATORY

## THE ORATORY SCHOOL (OS)

### Safeguarding (Child Protection) Policy

September 2024

Policy Owner:	Assistant Head Safeguarding
Type of Policy:	Regulatory
Regulatory Body:	DfE
Relevant Legislation:	KCSIE 2024 Prevent duty 2015 Teaching online safety in schools 2019 Children's act 1989 The use of social media for on-line radicalisation 2015 Safeguarding and Protecting People for Charities and Trustees 2017 Working Together to Safeguard Children 2023
Last reviewed by/date:	Assistant Head Safeguarding, August 2024
Last approved by/date:	Newman Committee October 2023
Next review due:	August 2025
This version published:	1 <sup>st</sup> September 2024
Circulation:	All Staff & Governors Inspection Portal School Website Parent Portal
Linked policies	Contained within this policy

<b>Contents</b>	<b>Page</b>
1. Policy Statement and Principles	3
2. The Role of the Designated Safeguarding Lead (DSL)	4
3. Staff Training	6
4. Children who may be particularly vulnerable	7
5. Child Protection Procedures	8
6. Categories of referral to external agencies	9
7. Confidentiality and Sharing Information	10
8. Allegations made against/concerns raised in relation to Staff, Volunteers, Supply Staff or Governors and low level concerns	11
9. Child on Child Abuse	20
10. Sharing of nudes and semi-nudes	22
11. Child on Child Sexual Violence and Sexual Harassment	22
12. Child Criminal Exploitation (CCE), Serious Violent Crime, County Lines and Gangs	27
13. Child Sexual Exploitation (CSE)	28
14. Whistleblowing if you have concerns about a colleague	29
15. Children with Special Educational needs and Disabilities	30
16. Honour Based Abuse (HBA)	30
17. Female Genital Mutilation (FGM)	31
18. Upskirting	31
19. Radicalisation/Extremism	32
20. Looked after children	33
21. Child abduction and community safety incidents	34
22. Homelessness	34
23. Safeguarding children away from the school site	34
24. Non-school activities on school premises	35
25. Private fostering	35
26. Children Absent from Education	36
27. Mental Health	36
28. Diversity and inclusion	36
29. Children who have a social worker	37
<b>Appendices and Flowcharts</b>	
Appendix 1 – Key Safeguarding Contact details for this policy	38
Appendix 2 – Types of Abuse and Neglect	40
Appendix 3 – Safer Recruitment	43
Appendix 4 – Online Safety and Cybercrime	46
Appendix 5 – Attendance and admissions register	48
Appendix 6 – Visitors on the school’s site	50
Appendix 7 – Key documents	51
Flowchart 1: Dealing with Concerns about a Child/Young Adult	52
Flowchart 2: Dealing with an Allegation of Child Abuse against an Employee, Volunteer or Any Other Person Working at a School	53
Flowchart 3: Procedures for Dealing with Abuse by One or More Students Against Another Student	54
Flowchart 4: Online Safety Incident Raised by a Child/Young Person or Member of Staff	55

## 1. Policy Statement and Principles

This policy is one of a series in the school's integrated Safeguarding portfolio; it is available on the website and applies to all members of staff, including supply staff, volunteers and governors. It has regard to *Keeping Children Safe in Education* (September 2024) (KCSIE), *Working together to safeguard children* (2023) (WT) and *The Prevent Duty* (2015), *Safeguarding and Protecting People for Charities and Trustees*, as well as a number of other documents outlined in appendix 7 of this policy. Part 1 of KCSIE has been read by all staff. Part 1 and Annex A has been read by school leaders and those who work directly with children. KCSIE 2024 has been read and will be followed by our Governors and Leadership Team.

Safeguarding is defined by KCSIE as:

- Providing help and support to meet the needs of children as soon as problems emerge;
- Protecting children from maltreatment, whether that is within 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;
- Taking action to enable all children to have the best outcomes.

'Children' includes everyone under the age of 18 although of course the school will continue to support fully the welfare of all students when they become 18.

KCSIE 2024 makes the point that when defining 'victim' 'it is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim.' In addition, it notes that in using the term 'perpetrator' 'schools should think very carefully about terminology, especially in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.

**Our core Safeguarding principles are:**

- To create a culture of vigilance.
- At The Oratory School we are committed to Safeguarding children and young people and we expect everyone who works in our school to share this commitment.
- Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.
- Safeguarding is everyone's responsibility.
- The Oratory School's responsibility to Safeguard and promote the welfare of children is of paramount importance.
- Safer children make more successful learners.
- Policies will be reviewed annually unless an incident or new legislation or guidance suggests the need for an interim review.

### **Child Protection Statement**

The Oratory School recognises our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection and justice.

### **Policy Principles**

- The welfare of the child is paramount;
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection;
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;

- Students and staff involved in Child Protection issues will receive appropriate support.

### Policy Aims

- To provide staff with the necessary information to enable them to meet their Child Protection responsibilities;
- To ensure consistent good practice;
- To demonstrate the school's commitment with regard to Child Protection to students, parents and other partners.

### Whole school approach to Safeguarding

We are committed to a whole school approach to Safeguarding, led and facilitated by our Governors. They have strategic leadership responsibility for Safeguarding arrangements at the school to facilitate a whole school approach to Safeguarding that involves everyone in the school so that it is at the forefront, underpinning all relevant aspects of process and policy development with the child's wishes and feelings always taken into account. All Governors have Safeguarding training to equip them with the strategic understanding to work with the Head and Designated Safeguarding Lead, including an understanding of local arrangements with OSCP. This means they can assure themselves that there are clear Safeguarding systems in place (including online safety and regularly reviewing effectiveness of filtering and monitoring systems), as set out in this policy that are well promoted, easily understood and easily accessible for children confidently to report abuse knowing their concerns will be treated seriously and that they can safely express their views and give feedback. This policy recognises that while all children should be protected some groups of children are potentially at greater risk of harm.

KCSIE 2024 makes explicit the obligations of Governors under the [Human Rights Act](#) (1998), [Equality Act](#) (2010) and [Public Sector Equality Duty](#) (2012). This reinforces their safeguarding duties, for instance noting that 'governing bodies... should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race [Equality Act 2010: advice for schools](#). In particular it notes that schools can 'take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting students with a particular protected characteristic in order to meet their specific need.' For the Public Sector Equality Duty 'whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these... This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.' See [Technical Guidance on the Public Sector Equality Duty](#). This means ensuring Safeguarding and Child Protection are at the forefront and underpin all relevant aspects of process and policy development. Our systems, processes and policies operate with the best interests of the child at their heart. Where there is a Safeguarding concern, we ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Our systems are well promoted, easily understood and easily accessible for children to report abuse confidently, knowing that their concerns will be treated seriously and that they can safely express their views and give feedback.

## 2. The Role of Designated Safeguarding Lead (DSL):

The DSL is a member of the Leadership Team with the necessary status and authority to be responsible for matters relating to Child Protection and welfare throughout all areas of the school. The Oratory School ensures that the Safeguarding Lead and Deputy Safeguarding Leads have sufficient time, funding, supervision and support to fulfil their child welfare and Safeguarding responsibilities effectively and they regularly attend Safeguarding seminars as well as taking the statutory training required every two years. During term time a Safeguarding lead will always be available for staff and students in the school to discuss any Safeguarding concerns.

The Designated Safeguarding Lead for The Oratory School is **Mr Stephen Burrows**. There are five Deputy Safeguarding Leads: **Dr Victoria Fogg, Mr Thomas Gibbon, Mr Graham Muckalt, Mr Peregrine Nunes-Carvalho** and **Mr Charles Watson**. In addition, both the Head and Senior Deputy Head are trained to DSL Level 3.

In the absence of the DSL, the deputy DSL carries out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL, the deputies will assume all of the functions below.

The primary responsibilities of the DSL are:

- To work with external agencies and professionals on matters of safety and Safeguarding.
- To undertake regular and appropriate training.
- To raise awareness of Safeguarding and Child Protection amongst the staff, students and parents.
- To be able to keep detailed, accurate and secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as Local Authority children's social care or the Prevent programme.
- To be aware of students who have a social worker and to ensure that the school is maintaining a culture of high aspirations for this cohort and that the school is supporting the cohort to reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- To help promote educational outcomes by sharing information about welfare, Safeguarding and Child Protection issues with teachers and school leadership staff.
- To advise and act upon all suspicions, beliefs and evidence of abuse reported to them.
- To manage referrals from school staff or any others from outside the school.
- To be the first point of contact for parents, students, staff and external agencies in all matters of Child Protection and Safeguarding.
- To understand the risks associated with online safety and also the additional risks faced by SEND students online, for example from online bullying, grooming or radicalisation. Also to have the up to date capability to keep children safe online at school.
- To keep the Head informed of all actions, unless the Head is the subject of a complaint; in this situation, the DSL should consult with the Chair of Governors or, in their absence, one of the Governors with responsibility for Safeguarding.
- To liaise with external agencies and with the LADO on behalf of the school, co-ordinate Child Protection procedures and to have a working knowledge of the Local Authority's Safeguarding procedures and the school's Child Protection and Safeguarding Policy and procedures.
- To liaise with other agencies such as the Police (for advice see [When to Call the Police: advice for School and Colleges](#)) including ensuring that students have an Appropriate Adult where they want it if speaking to the police or arrested.
- To understand who to contact in the event of an incident of sexual violence or harassment as per KCSIE 2024 as these concerns go to the Local Authority and/or the Police if appropriate.
- To ensure that appropriate action is taken in the School and that procedures are followed in all actual or suspected cases of child abuse. If at any time there is a risk of immediate serious harm to a child, a referral should be made immediately to the appropriate MASH team.
- To contact MASH or the LADO within twenty-four hours to seek advice on Safeguarding concerns brought by staff or students, such as allegations of abuse against members of staff. Also to check whether or not the student or student's family is known to social services and to continue to liaise with external agencies that are involved in supporting the welfare of a child and, where appropriate work with Family Information Service (FIS).
- To be aware of the differentiation between Safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies (see Flowchart 1) and Oxfordshire's Threshold of Needs Guide (see section 6).
- To deal with issues arising from, or relating to, historical allegations.
- To ensure that all staff have training in Child Protection so that have read and fully understand Part One and Annex A of KCSIE as well as regular reviews of their own practice and opportunities to discuss any concerns they may have about Safeguarding matters. It is good practice for other members of staff to contribute to this training where appropriate. This will include training in how

to refer cases of suspected abuse to the Local Authority and children's social care as required (or the Police if a crime has been committed) and also in the Prevent duty. All staff, including supply staff, volunteers and governors will be trained in the Prevent duty and how to refer cases to the Channel programme where there is a radicalisation concern.

- To monitor the keeping, confidentiality and storage of records in relation to Child Protection. Also to promote the use of MyConcern as the central online database for Safeguarding records and train staff in its use. This ensures that student welfare and Safeguarding issues are managed centrally while allowing all relevant staff to contribute efficiently and effectively. Use of the MyConcern system ensures that our handling of Safeguarding and Child Protection data is GDPR compliant. The members of staff who receive all concern updates (DSL, HM and SDH) each have TFA enabled on their account.
- Where appropriate, to take part in Child Protection conferences or reviews. If the DSL cannot attend, they will ensure that another of those responsible for Student Welfare and Safeguarding will attend.
- Together with the Head and School Leadership, annually to review the School's Policy on Child Protection and Safeguarding and in each term look at how the duties have been discharged and to report on this to the Governing Body. A report will be given termly to the Governors and the reports will be viewed by all Governors annually as part of their Safeguarding training. The Governors are provided with reports of training, referrals to external agencies, any significant issues from the preceding term, handover of Safeguarding files to other schools and planning for the coming term. Any deficiencies or weaknesses in regard to Child Protection arrangements will be remedied without delay.
- Where children leave the school the Designated Safeguarding Lead will ensure their Child Protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt will be obtained.
- The Designated Safeguarding Lead, working alongside the IT Department, has oversight of online safety, including filtering and monitoring, at the school.

## **Key Safeguarding contact details for this policy – Appendix 1**

### **3. Staff Training**

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff and governors will receive a briefing during their induction, which includes the school's Safeguarding and Child Protection policy, the policy and procedures to deal with child on child abuse, student behaviour policy, reporting of low level concerns, procedures for children absent from education, staff code of conduct (which includes the whistle blowing policy as well as guidance on relationships and use of social media), reporting and recording arrangements, and the identities and contact details of the DSL and deputies. New leaders (including governors) receive a copy of part 1 of KCSIE. In addition, all staff receive the following training during induction:

- Part 1 of KCSIE
- Prevent awareness
- Online safety

All staff, including the DSL, Head and Governors will receive training that is regularly updated; this includes regular updates on filtering and monitoring to ensure that all staff understand their role and responsibility. The DSL and deputies subscribe to a range of Safeguarding e-bulletins and the DSL is a member of Safeguarding Pro (a website for DSLs which provides a weekly email as well as access to a range of resources). All staff will also receive Safeguarding and Child Protection updates via email, e-bulletins, website access and staff meetings throughout the year.

School prefects receive Safeguarding training before taking up their roles.

All members of staff at The Oratory School have a responsibility to provide a safe environment in which children can learn and in their actions they must always consider what is in the best interests of each student, working with a child-centred approach. Staff understand that children can be at risk of harm in school and out of school, at home or online. All staff are aware of the importance of reassuring the children in our care that they are being taken seriously and that they will be supported and kept safe. Students are never given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

The wishes of the child will be taken into account when determining the action to be taken and what services to provide. Children are actively encouraged to raise concerns, and are taught about Safeguarding by covering relevant issues throughout their time at The Oratory School both in our PSHE course (which proactively discusses relationships, sex and relationships and health education), tutor time and, where appropriate, in academic lessons.

KCSIE 2024 emphasises that 'staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected' as they 'may feel embarrassed, humiliated or being threatened' or 'they may not recognise their experience as harmful.' Most importantly it states 'This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.' Staff training at The Oratory places great emphasis on developing this 'professional curiosity' and building relationships with children.

All staff must maintain an attitude of '**it could happen here**' when it comes to potential Safeguarding concerns. It is important that all members of staff play a part in identifying concerns, sharing information and taking prompt action so that all children receive the right help at the right time to address risks and prevent issues escalating. Data protection concerns should not be a barrier to sharing information where failure to do so would result in a child being placed at risk of harm. Child Safeguarding Practice Reviews show the dangers of failing to take effective action, including failing to act on and refer early signs of abuse, neglect and exploitation; poor record keeping; failing to listen to the views of the child; failing to reassess concerns when situations do not improve; sharing information too slowly; not challenging those who appear not to be taking action.

**All** school staff should be prepared to identify children who might benefit from pastoral support and with whom there are potential Safeguarding concerns and pass on their concerns to the DSL, although they can make a referral themselves. Our staff are vital in providing early help to students with Safeguarding issues as we recognise that support for children of all ages improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Staff training ensures that they are aware of the process for making referrals to children's social care and for statutory assessments under the Children's Act 1989 - especially section 17 (child in need) and section 47 (a child suffering harm). They are also trained to be aware of the different types of abuse, neglect and exploitation so that they can identify cases of children who might be in need of help. Please see [Working Together](#) for a full definition of Early Help.

It is recognised that effective education is tailored to specific needs so children with particular vulnerabilities such as SEND or victims of abuse will be considered appropriately in how they are taught to give them a more personalised and contextualised approach, for instance with 1:1 support in some topics and being allowed to work separately when there are topics which might be difficult for them to participate in with the rest of their class. The PSHE curriculum is a key part of preventative education that ensures that The Oratory has a culture of zero tolerance for 'sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment'. The behaviour policy and practice also gives a clear set of values.

#### **4. Children who may be particularly vulnerable**

Knowing what to look for is vital in the early identification of abuse, neglect and exploitation. Further information can be found in [What to do if you are worried a child is being abused – Advice for practitioners](#). Staff should be particularly alert to potential need for support for a student who:

- Is disabled and/or has SEND (whether or not they have an Education Health and Care Plan);
- Is a young carer; living in chaotic and unsupportive home situations;
- Is frequently missing from education, home and care;
- Is known to be misusing drugs or alcohol or is involved in the sharing of nudes and semi-nudes;
- May be affected by parental substance misuse, domestic violence or parental mental health needs;
- Does not have English as a first language;
- Is vulnerable to being bullied, or is engaging in bullying;
- Is vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, gender or sexuality;
- May be at risk of sexual exploitation, female genital mutilation, forced marriage, being forced into marriage before their 18<sup>th</sup> birthday or being drawn into gangs or extremism.

If staff members are unsure, they should always speak to one of the DSL team. All staff are aware that abuse, neglect and any Safeguarding issues are rarely standalone events that can be covered by one definition and in most cases many issues overlap with each other. In addition, staff should be vigilant to the fact that there could be domestic abuse occurring which can have particularly serious long lasting emotional and psychological impact.

The definition of Domestic Abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are 'personally connected' and the behaviour is abusive. Abuse can be direct or indirect (e.g., through a child). Children can be victims if they are related and see, hear or experience the abuse.

We are an Operation Encompass school, a police and school early intervention Safeguarding information sharing partnership which supports children experiencing domestic violence and abuse. This is one method by which we promote early reporting in order to support our students.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Advice on this can be found at [NSPCC – Domestic Abuse](#)

## **Types of abuse and neglect – see Appendix 2**

### **5. Child Protection Procedures**

if staff have any concerns about a child's welfare, they should act on them immediately. They should follow the School's Child Protection policy and speak to the DSL (or deputy). Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Guidance for this can be found in [What to do if you are worried a child is being abused – Advice for Practitioners \(March 2015.\)](#)

The Oratory School refers all matters of concern as a matter of course to Oxfordshire's Locality and Community Support Services (South), the single point of contact for all Safeguarding concerns in this area on 0345 2412608 (or to the MASH team if there is an immediate Safeguarding concern; or the LADO where it relates to concern about a member of staff) or the equivalent Children's Social Care service for a child who lives in a different Local Authority.



When a member of staff suspects or hears a complaint of abuse they must:

- Listen carefully to the child and keep an open mind. Staff must not take a decision as to whether or not abuse has taken place. Staff should understand that they are not making a diagnosis when receiving concerns, just taking them down to be passed on. It could be that signs of abuse noted might not prove that there is abuse and they do not constitute proof in themselves.
- Not ask leading questions, that is a question which suggests its own answer, for instance, 'was it your father?' or 'did this take place on Tuesday when you were away?'
- Reassure the child that they are being taken seriously but that they cannot be given a guarantee of confidentiality. The member of staff should explain that, while maintaining an appropriate level of confidentiality, they need to pass the information on to the DSL or, where appropriate, children's social care.
- Keep a written record of the conversation. This should include the date, time and place of the conversation, the details of what was said and done, by whom and in whose presence. It is also useful to describe observable behaviour such as crying, shaking etc although the reasons for this should not be conjectured. Wherever possible the actual words spoken by the child should be recorded. This should be signed by the person making it and should use names, not initials or staff codes. The record must be kept securely and handed to the DSL. If possible, notes should be taken in the meeting itself, or if not then as soon as possible after it. **MyConcern is our method of entering and retaining records as these are secure and can only be accessed by relevant staff.** All concerns are logged on MyConcern and include a summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, decisions reached and the outcome.
- Preserve any evidence that they are given, for instance scribbled notes, mobile phones with messages on them, clothing or computers. **One important point to emphasise is that in cases where illegal images of a child have been taken and/or circulated the teacher should be careful not to view or forward these images but to retain the device the pictures are on for external agencies.**

Early information sharing is vital and staff should not assume that another colleague will take action or share information to help keep that child safe. Advice can be found [here](#). No single professional can have a full picture of a child's needs and everyone who comes into contact with them has a role to play in identifying concerns. All suspicions or complaints of abuse must be reported to one of the DSLs (or the Head if the complaints involves the DSL). If a DSL is not available this should not delay appropriate action being taken by any member of staff and **anyone can make a referral**. However, if this happens, the DSL should be informed of actions that have been taken as soon as possible. The DSL will:

- Look at the child's pastoral/Safeguarding record on MyConcern.
- Make a referral if not already made by a member of staff, and if a referral by phone has been made to complete a written referral form for either the Multi Agency Safeguarding Hub (MASH) or the LADO if relating to an allegation against a member of staff or the relevant children's social care service if the child lives in a different Local Authority.
- Inform the parent/carer unless it is felt that this would put the child at risk. Although parental consent is not needed, it is almost always beneficial to have cooperation. This issue, and what should be said to parents, will be discussed with children's social care. On no account will parents be spoken to unless advice has been sought from children's social care. Parental consent is not required to make a referral to statutory agencies.
- We are also aware that children are being harmed in contexts outside the home, and our pastoral support system allows us to provide as much context as possible when making a referral. Additional information is available here: [Contextual Safeguarding](#). The [online tool Report Child Abuse to Your Local Council](#) directs to the relevant local children's social care contact number.

## 6. Categories of referral to external agencies

In all cases where referrals are needed to Children's Social Care or any other external agency any member of staff may make a referral, but in the majority of cases the referral will be made by the DSL. If a referral is made by another member of staff they will receive support from the DSL in making the referral and working with external agencies subsequently.

When Safeguarding concerns emerge the member of staff concerned/DSL should refer to the Oxfordshire Thresholds of Needs Guide, summarised as:

### **Level 1**

(Universal): Children and young people, including disabled/seriously ill children and young people, who reach their full potential, make good overall progress through the care of their families, communities and the support of a range of universally provided services e.g. schools, primary health care, leisure services, and some specialist disability services such as health care/education.

### **Level 2**

(Additional Needs): Children and young people, including disabled/seriously ill children and young people, who may become vulnerable and who will require additional support due to their own development, family circumstances or environmental factors. They are at risk of not reaching their full potential and life chances may be impaired without additional services. This can be a single or multi-agency response and won't always necessitate a response from the Local Authority.

### **Level 3**

(Complex Needs): Children and young people, including disabled/seriously ill children and young people, whose needs are complex and who require support from more than one agency. They are at risk of social or educational exclusion; their health, welfare, social or educational development is being impaired; and life chances will be impaired without the provision of additional services.

### **Level 4**

(Critical Needs): Children and young people, including disabled/seriously ill children and young people, who have critical and enduring needs. They are at risk of significant harm or removal from home

Full information about the differing levels of need and responses can be found at:

[Threshold of needs \(TON\) 2022 | Oxfordshire County Council](#)

### **Oxfordshire's seven step referral process:**

- Identify Safeguarding concerns
- Discuss the concern with the child and seek advice from the DSL
- Consult Threshold of Needs document to make decision about next course of action
- Discuss concerns with child's family or carer as appropriate
- Contact LCSS for advice or MASH for immediate action
- Complete EHA/TAF or MASH referral
- Appropriate actions taken

### **After a referral has been made:**

The local authority should make a decision within one working day of a referral being made about what course of action it is taking and should let the referrer know the outcome, determining whether:

- The child requires immediate protection and urgent action is required
- The child is in need and should be assessed under section 17
- There is reasonable cause to suspect the child is suffering, or likely to suffer from significant harm and whether enquiries must be made and the child assessed under section 47
- Any services are required by the child and family

- Further specialist assessments are required to help the local authority to decide on the best course of action

Staff (generally the DSL) will follow up on a referral should information not be forthcoming within three days at least, but in practice within 24 hours. If social workers decide to carry out a statutory assessment, the DSL or other member of staff with DSL support will do everything they can to support that assessment.

If Early Help or other support is appropriate the case will be kept under review and consideration given to a new referral to social care. In particular, if after referral the child's situation does not appear to be improving, the DSL or person who made the referral will press for reconsideration to ensure that the student's situation improves.

Whatever the outcome of a referral the DSL will coordinate appropriate ongoing support for the child in school in conjunction with social services.

## 7. Confidentiality and Sharing Information

All staff understand that Child Protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL, Head or Chair of Governors (depending on who is the subject of concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

All concerns, discussions and decisions made in relation to Safeguarding concerns and the reasons for those decisions should be put on to MyConcern, the school's password protected Safeguarding database and only made available to relevant individuals. If in doubt about recording information, staff should always discuss with the DSL.

Information about children's welfare may be shared with others outside the school to help keep children safe from harm. We always aim to discuss this with parents or carers before we do so, but this may not always be possible. If this is the case, the law allows us to share this information without asking first. The Data Protection Act it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Please refer to our data protection policy for further information.

If any member of staff receives a request from a student or parent to see the Child Protection records, they will refer the request to the data protection officer.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.

Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children. The DSL will document information-sharing decisions and actions taken. Advice for staff about information sharing with regard to Safeguarding will be part of staff training on Safeguarding. More details can be found in the [Data Protection in Schools toolkit](#) and in [Information sharing: Advice for practitioners \(2024\)](#).

## 8. Allegations made against/concerns raised in relation to Staff, Volunteers, Supply Staff or Governors and low level concerns

There the two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold (Low Level Concerns).

If staff members have concerns about another staff member or volunteer or governor who might pose a risk of harm to a child/children, or may have harmed a child/children they should refer these to the DSL

or Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. It will be ensured that the reporting of any allegations against the Head to the Chair of Governors is made without informing the Head. The Chair would then contact the LADO for guidance. Staff may look to discuss any of these concerns with the DSL and make any referral through them.

Allegations made against a teacher who is no longer teaching or historical allegations of abuse should be referred to the police.

The procedures for dealing with allegations needs to be applied with common sense. Many cases will not meet the criteria of a member of staff having harmed or risking harm to a child, or may do so without warranting either police investigation or enquires by local authority social services. The Head (through the DSL if appropriate) will always discuss the issue with the LADO before taking a decision on this. In cases where external agencies are not required, The Oratory School will act to resolve the case as speedily as possible. On rare occasions when allegations are so serious they require immediate intervention from outside school the Head or DSL should be informed so that they can consult with external agencies.

### **Dealing with allegations**

The School will not undertake its own investigations of allegations without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. Where appropriate the LADO or another officer appointed by the local authority will deal with the management and oversight of an allegation against a member of staff (see Flowchart 2).

The following definitions should be used when determining the outcome of allegation investigations:

**Substantiated:** there is sufficient evidence to prove the allegation;

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;

**False:** there is sufficient evidence to disprove the allegation;

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

In the first instance the DSL, the Head or (where the Head is the subject of an allegation) the Chair of Governors should discuss the allegation immediately with the LADO and a case manager will be designated. This is to consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the designated officer(s) in order to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it should be recorded by both the case manager and the designated officer(s), and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the designated officer(s) what action should follow both in respect of the individual and those who made the initial allegation.

The case manager should inform the accused person about the allegation as soon as possible after consulting the designated officer(s). It is extremely important that the case manager provides them with as much information as possible at that time. However, where a strategy discussion is needed, or police

or children's social care services need to be involved, the case manager should not do that until those agencies have been consulted, and have agreed what information can be disclosed to the accused. Employers must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step.

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance in [Working together to safeguard children](#). If the allegation is about physical contact the strategy discussion or initial evaluation with the police should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where it is clear that an investigation by external agencies is unnecessary the LADO should discuss the next steps with the case manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so the LADO should discuss with the case manager how, and by whom, the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school staff. However, in other circumstances, because of the nature or complexity of the allegation, the allegation will require an independent investigator.

## **Support for those involved**

The Oratory School has a duty of care to employees and so staff will be informed of concerns or allegations as soon as possible and have the likely course of action explained to them unless the police or children's social care services object. They should be advised to contact their trade union representative or colleagues for support and should also be given access to counselling. A named representative will keep the member of staff informed of the progress of the case and consider what support is appropriate. If suspended the member of staff should also be kept informed of other work-related issues. Social contact with colleagues should be allowed unless this would be prejudicial to the enquiry. The allegation will be dealt with as quickly as possible in a fair and consistent way that provides effective protection for the child but also supports the member of staff who is the subject of the allegation.

Parents/carers of the child or children involved should be told of the allegation as soon as possible. However, where a strategy discussion is required or external agencies need to be involved the case manager should not do so until they have consulted and agreed what information can be disclosed. Parents/carers should be kept informed of the progress of the case and told the outcome where there is not a criminal prosecution. They should be told any disciplinary outcome in confidence, and parents/carers should be made aware of the requirement to maintain confidentiality about any allegations made against teachers while investigations are ongoing.

When an allegation is made the school should maintain confidentiality while it is being investigated. Reporting restrictions apply until either the accused is charged with an offence or the Secretary of State or the DfE/TRA (Teaching Regulation Agency) publishes information about an investigation or decision on a disciplinary case. The case manager will take advice from the DSL/police/social services about who needs to know and what information can be shared in the case; how to manage leaks/gossip; what information can be given to reduce speculation; how to manage the press.

## **Making decisions on allegations**

The school will give due weight to the views of the LADO and to this policy when making a decision about suspension. Advice about whether an allegation against a teacher is sufficiently serious to refer to the Teaching Regulation Agency can be found in [Teacher misconduct: the prohibition of teachers \(Feb 2022\)](#).

The Oratory School has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the harm test is satisfied in respect of that individual;
- Where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence;
- If that individual has been removed from working (paid or unpaid) in regulated activity (even if deployed to another area of work not regulated or if suspended), or would have been removed had they not left.

A compromise agreement will not be used and there will be a prompt and detailed report to the DBS and Teaching Regulation Agency. In each case The Oratory School will consider whether to refer the case to the Secretary of State who may investigate the case. Any such incidents will be followed by a review of the Safeguarding procedures within the School done together with the LADO, with a report being presented to the Governors without delay.

It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Compromise agreements' cannot be used to prevent a referral being made to the DBS when it is legally required, nor can an individual's refusal to cooperate with an investigation. The Governors have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources. The School will confirm to inspectors all instances of action in relation to Safeguarding concerns.

Ceasing to use a member of staff's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. We will consider whether to make a referral to the Secretary of State (via the Teaching Regulation Agency) where the school ceases to use the services of a teacher because of serious misconduct, or when we have dismissed them or ceased to use their services had they not left first. This applies equally to agencies (for example, supplying supply teachers).

If an allegation against a member of staff is found to have been malicious it will be removed from personnel records. If an allegation is not substantiated, is unfounded or malicious, it will not be referred to in any employment reference. For all other allegations, a clear comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, will be kept on a person's confidential personnel file, and a copy provided to the person concerned.

Whatever the outcome of a case and how serious it has been the case manager will consider the case and determine whether any lessons can be learned or improvements made in the light of this.

### **Low-Level Concerns**

A Low-Level Concern is defined as any concern about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below) or is otherwise not serious enough to consider a referral at the time of its reporting. Low-Level Concerns refer to behaviour on the part of a staff member towards students that is considered inappropriate in line with statutory Safeguarding advice, the Staff Code of Conduct, and the Appropriate and inappropriate behaviour subsection of this policy.

Low-Level Concerns are differentiated from concerns that can cause harm. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult 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 in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While Low-Level Concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious Safeguarding concerns, e.g. child sexual abuse, often begin with Low-Level Concerns, e.g. being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

## **Roles and responsibilities**

*The Governors are responsible for:*

- Ensuring that the school complies with its duties under Child Protection and Safeguarding legislation;
- Ensuring that policies, procedures and training opportunities with regard to reporting Safeguarding concerns are compliant and effective;
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations;
- Ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate;
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration;
- Ensuring that there are appropriate procedures in place to handle allegations and Low-Level Concerns reported against members of staff.

*The Head is responsible for:*

- Being a point of contact for all staff when they have Safeguarding concerns, whether serious or low-level;
- Assessing whether Safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are Low-Level Concerns;
- Implementing this policy, and all related policies, throughout the school, and ensuring that staff adhere to it at all times;
- Safeguarding students' wellbeing and maintaining public trust in the teaching profession;
- Ensuring that all staff have undertaken Safeguarding training;
- Ensuring that all staff have an ongoing awareness of Low-Level Concerns and reporting procedures.
- Keeping detailed, accurate and secure records of all Low-Level Concerns and any actions taken. This is done through using **Confide**, the platform run by **The Safeguarding Company** specifically designed for the reporting and management of Low-Level Concerns.

*The DSL is responsible for:*

- Being a point of contact for all staff when they have Safeguarding concerns, whether serious or low-level.
- Assessing whether Safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are Low-Level Concerns.
- Following all procedures outlined here for acting upon Low-Level Concerns.

- Liaising with the Head, staff members, the Governors and all relevant agencies to act upon concerns, where necessary.

*Staff are responsible for:*

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times.
- Interacting with students in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between students and staff members.
- Understanding the importance of reporting low-level Safeguarding concerns.
- Reporting any and all Safeguarding concerns they may have about students immediately.
- Reporting any and all Safeguarding concerns they may have about the behaviour of a member of staff immediately.

## **Prevention amongst staff**

*Appropriate and inappropriate behaviour*

The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards students. Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority and influence in relation to students;
- There is a significant power imbalance in the student-staff dynamic;
- There are more stringent expectations on their behaviour with regard to students due to their position as a public professional.

Staff will remain aware of the fact that all students under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a student and do not engage with students as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the Head or DSL immediately.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the Head or DSL include:

- Being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with students, e.g. conversations that are about a staff member's personal life or are of a sexual nature.
- Having favourites – this could include, but is not limited to, calling students by pet names or terms of endearment or buying students gifts.
- Taking photographs of children on their personal mobile phones or devices.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate, sexualised, intimidating or offensive language.

Staff will be aware that some of the above Low-Level Concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in Low-Level inappropriate behaviour in relation to students inadvertently will be made aware and



supported in correcting this behaviour in line with the Staff Code of Conduct. The Head will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where Low-Level concerning behaviour is seen more widely.

## **School culture**

The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards students for staff members. All staff will read, understand and adhere to the Staff Code of Conduct.

Staff will address any questions they have regarding Safeguarding to the DSL. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. students are not treated as friends and an appropriate professional distance is maintained by staff.

The school will ensure that all staff are sufficiently trained surrounding the reporting of Safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The school will ensure that all staff understand how to recognise and report Safeguarding concerns. Staff will be trained to identify concerning or problematic behaviour towards students that may indicate a Safeguarding concern, and how to identify signs of abuse or harm in students.

## **Evaluating school culture following concerns**

The school will ensure that appropriate consideration is given to the school's culture and whether or not it has enabled the inappropriate behaviour to occur. The Head will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the school's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

## **Reporting concerns**

The school will promote a culture in which Safeguarding students is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Staff members will report their concerns to the Head or DSL verbally. When submitting concerns, staff will take care to ensure that they observe the Confidentiality Policy and the Allegations of Abuse Against Staff Policy contained within our Safeguarding Policy, and protect the identity of all individuals to which the concern pertains as far as possible. All concerns will then be recorded on **Confide** by either the Head or DSL.

Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a Low-Level Concern relates to the Head, it should be reported to the Chair of Governors.

Where a Low-Level Concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the Head, who will, in turn, inform the employer of the subject of the concern.

## **Self-reporting**

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted;
- Could appear compromising to others;
- They realise, upon reflection, falls below the standards set out in the Staff Code of Conduct.

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Head and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

### **Evaluating concerns**

Where the Head or DSL is notified of a Safeguarding concern, they will use their professional judgement to determine if the concern is Low-Level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the Head will discuss the concern with the DSL, and will seek advice from external agencies where there is any doubt about how seriously to take the concern. When seeking external advice, the Head will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy, at all times.

To evaluate a concern, the Head/DSL will:

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information;
- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law;
- Determine whether the concern, when considered alongside any other Low-Level Concerns previously made about the same individual, should be reclassified as an allegation;
- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow;
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it;
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

### **Acting on concerns**

#### *Where the concern is unfounded*

If it is discovered upon evaluation that the Low-Level Concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct, and the law, the Head will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Head will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Head will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The Head will discuss the concern with the DSL to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL and Head will work together to resolve this with input from other staff members, as necessary.

### *Where the concern is Low-Level*

Where the Head determines that a concern is Low-Level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed.

The Head or DSL holds a meeting with the individual about whom the concern was reported, during which they will:

- Talk to the individual in a non-accusatory and sympathetic manner;
- Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible);
- Clearly state what about their behaviour was inappropriate and problematic;
- Discuss the reasons for the behaviour with the individual;
- Inform the individual clearly what about their behaviour needs to change;
- Discuss any support that the individual may require in order to achieve the proper standards of behaviour;
- Allow the individual the opportunity to respond to the concern in their own words;
- The Head/DSL asks the individual to re-read the Staff Code of Conduct depending on the nature of the concern;
- The DSL and Head will consider whether the individual should receive guidance, supervision or any further training;
- Where considered appropriate in the circumstances, the Head/DSL will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
- Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis;
- Where any student or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

The Head/DSL will ensure that all details of the Low-Level Concern, including any resultant actions taken, are recorded and securely stored on **Confide**. The Head will ensure that these records are kept organised and up-to-date, and that it is easy to refer back to them if any other concerns are reported about the same individual.

The specific approach to handling Low-Level Concerns will be adapted on a case-by-case basis. It is unlikely that a Low-Level Concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated.

### *Where the concern is serious*

The Head/DSL may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation.

## **Record keeping**

The school will retain all records of Low-Level Concerns, including those that were found to be unfounded. The Head/DSL will ensure that all records include the most accurate and up to date information and will store them on **Confide**.

Records will include:

- Details of how the concern was followed up and resolved;
- A note of any action taken, decisions reached, and the outcome;

- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the Head to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable.

Records of Low-Level Concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple Low-Level Concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple Low-Level Concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of Low-Level Concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

The Head and DSL will ensure that all records are kept in a manner that is consistent with the Data Protection Policy. Records will be confidential, kept password-protected, and securely destroyed after the staff member to whom the concerns pertain has left the school.

The school will only refer to concerns about a staff member in employment references where they have amounted to a substantiated Safeguarding allegation, i.e. it has met the harms threshold and has been found to have basis through investigation, or where it is not exclusively a Safeguarding issue and forms part of an issue that would normally be included in a reference, e.g. misconduct or poor performance. Low-level Safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met the harms threshold.

## 9. Child on Child abuse

All staff are aware that children can abuse other children and that it can happen both inside and outside of school and online. All staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. All staff understand, that even if there are no reports in the school, it does not mean it is not happening, it may be the case that it is just not being reported. Our staff know to report any concerns regarding child on child abuse to the DSL. All staff are aware that we take a whole school approach to dealing with child on child abuse and of our zero tolerance approach to abuse.

As a boarding school, we are alert to signs of abuse that can occur more readily in such settings, for example, inappropriate student relationships and the potential for child on child abuse. We are aware of our obligations in relation to the [National Minimum Standards for Boarding Schools](#).

Staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

We know that child on child abuse might manifest differently for boys and girls, e.g. girls being touched inappropriately or coerced into sexual activity, boys being initiated into gangs etc. Such abuse may also be indicative of a previous or ongoing abusive experience for a perpetrator and/or victim.

Research indicates that children with SEN, additional or complex needs are particularly vulnerable. All staff should be mindful of the added vulnerability of children and young people who have been the victims of violent crime, including the risk that they may respond to this by abusing younger or weaker children.

The alleged perpetrator is likely to have considerable unmet needs, as well as posing a significant risk of harm to other children. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse, may have problems in their educational development and may have committed other offences. They may, therefore, be suffering, or at risk of suffering, significant harm and be in need of protection. Consequently, any plan to reduce and/or manage risk posed by a child who is alleged to have abused another must also address their needs and responses should be considered accordingly.

As a school, we recognise that it is not enough 'just' to respond to incidents should they arise. We understand, that even if there are no reports in our school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child on child abuse they should speak to their DSL (or deputy). In addition we try and **minimise the possibility of child on child abuse** by:

- Creating and maintaining an environment which is safe, caring, respectful and stimulating, and which seeks to promote the social, physical and moral development of our students;
- Recognising the potential gendered nature of child on child abuse;
- Actively discouraging and challenging all unacceptable behaviour, including all forms of bullying and abuse. We will also challenge the attitudes and behaviours which underpin it;
- Strike an appropriate balance between student's right to privacy and the need for proportionate supervision to keep them safe in and around school;
- Have in place clear strategies for promoting positive behaviour, including a system of rewards and sanctions that is clear to staff, students and parents;
- Maximise opportunities within the curriculum, via PSHE, assemblies and focused weeks to deliver key keeping safe and associated behavioural, spiritual, moral, social and cultural messages - including the use of external resources and the expertise of external speakers and groups;
- Ensuring that all adults associated with our school understand their role and responsibilities as role models;
- Ensuring that staff and any volunteers are trained to look for and respond appropriately to any potential indicators of peer abuse;
- Seeking appropriate and timely advice where uncertainty exists and/or concerns arise;
- Ensuring that children, and parents, know how to raise any worries or concerns with adults/staff in school and by signposting them to appropriate sources of advice and support outside school.

## Responding to Allegations of Child on child Abuse

The school recognises the need for sensitivity and proportionality when dealing with these difficult issues and we know that how we respond to an initial disclosure can have an impact on future disclosures. All allegations of child on child abuse should be passed onto the DSL immediately. They will then be investigated and dealt with as follows:

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was an intent to cause harm. In addition to Safeguarding the identified victim, the school will consider (i) whether the alleged perpetrator seems to pose a risk to any other children; and (ii) how best to manage that risk;
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children’s social care (MASH or LCSS). The DSL will then work with children’s social care to decide on next steps, which may include contacting the police;
- **Inform parents** – as with other concerns of abuse, the school will normally seek to discuss concerns about a student with parents. Our focus is the safety and wellbeing of the student and so if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought from children’s social care (LCSS) and/or the police before parents are contacted. Where necessary, the school will participate fully in a coordinated approach by child welfare/ protection, youth offending, education and health agencies.

### Supporting those involved

The support required for the student who has been harmed will depend on their circumstances and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the student that harmed. We will seek to understand why the student acted in the way they did and consider what support may be required to help the student and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

## 10. Sharing nudes and semi-nudes

In cases of the sharing nudes and semi-nudes we follow guidance given to schools and colleges by the UK Council for Internet Safety’s Education Working Group in partnership with the NPCC: [‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’](#).

Sharing nudes and semi-nudes is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages.

### What the law says:

Sharing nudes and semi-nudes can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they:

- take an explicit photo or video of themselves or a friend;
- share an explicit image or video of a child, even if it’s shared between children of the same age;
- possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

As of January 2016 in England and Wales, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest.

Crimes recorded this way are unlikely to appear on future records or checks, unless the young person has been involved in other similar activities which may indicate that they are at risk.

## 11. Child on Child Sexual violence and sexual harassment

This section of the policy follows Part 5 of KCSIE 2024 and also Annex B which has many links to online support and advice. It is also informed by Ofsted's [Review of sexual abuse in schools and colleges \(June 2021\)](#).

Harmful sexual behaviour (HSB) is a useful umbrella term for the different forms of inappropriate, problematic, abusive and violent sexual behaviour. In considering HSB where there is a big age difference (more than two years) can be considered harmful although it also depends on e.g. physical size, or if for instance the older child has a disability. Understanding HSB is an important part of safeguarding training at The Oratory and also the PSHE programme.

Sexual harassment is 'unwanted conduct of a sexual nature' and can include sexual comments such as sexualized names, comments or stories, sexualized jokes, physical behaviour such as brushing against someone or interfering with their clothes, displaying pictures of a sexual nature, online sexual harassment such as consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. It can violate a child's dignity, make them feel intimidated or degraded and create a hostile, offensive or sexualized environment.

Sexual violence refers to sexual offences as described under the Sexual Offences Act 2003 including, rape and sexual assault. Specific definitions of types of sexual violence can be found in part 5 of KCSIE 2024. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online or offline (or both) and violates a child's dignity and/or makes them feel intimidated, degraded or humiliated and/or creates a hostile, offensive or sexualised environment. Sexual harassment and violence exist in a continuum and may overlap.

The Oratory works to educate all its students about consent, and that it is the freedom and capacity to choose. Specifically in sexual relations consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Very importantly:

- **A child under the age of 13 can NEVER consent to any sexual activity;**
- **The age of consent in the UK is 16;**
- **Sexual intercourse without consent is rape.**

The Oratory has a zero tolerance approach to sexual violence and/or sexual harassment and will always respond appropriately to all reports, including incidents taking place outside school or online. Even if an incident does not seem that serious in the first instance addressing any poor behaviour will help to prevent further, and potentially worse, behaviour in the future. All staff understand that, in whatever form it takes sexual violence and/or sexual harassment is never acceptable, will never be tolerated, and is not an inevitable part of growing up or as 'banter', 'just having a laugh' or 'boys being boys'. The Oratory challenges inappropriate behaviours, in particular potentially criminal behaviour such as grabbing bottoms or breasts and genitalia, flicking bras, lifting up skirts and such actions are sanctioned severely under our sanctions policy. Downplaying these behaviours can lead to a culture of poor behaviour and an unsafe environment in the school and in worst cases normalises abuse leading to children accepting it as normal and not coming forward to report it.

As with any safeguarding, staff must always take the line that 'it could happen here', particularly (but not exclusively) in the case of boys against girls with 64% of girls aged 13-21 saying they had experienced sexual violence or harassment in the past year (Girlguiding's Girls' Attitudes Survey 2017). However, as with any child on child abuse, sexual violence and harassment can occur between any two children, or groups of children regardless of age or sex. There is regular staff training on being vigilant for, and responding to, incidents of sexual violence and harassment.

Also, as in other areas of Safeguarding, it is important to be aware that SEND students can be especially vulnerable. This issue is addressed as a whole school issue as part of our wider safeguarding policy. It forms part of staff training and is dealt with in the school PSHE course for all students.

Children who are victims of sexual violence and/or harassment will find this stressful and distressing, particularly if the alleged perpetrator(s) attend the same school. Even more than with other forms of child on child abuse we understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important that if staff have **any** concerns regarding child on child abuse they should speak to the DSL.

All victims are taken seriously, supported to be kept safe, and are offered support both pastorally and also bearing in mind the potential impact on their educational attainment. Staff will look to emphasise to the victim and reassure them that they are being taken seriously, they are being supported and will be kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or harassment and they should certainly not be made to feel ashamed by making a report. It will also be explained that the law is there to protect children and not criminalise to help avoiding alarm or distress.

### **Making/receiving a report**

Students are encouraged to report abuse or any other safeguarding concerns to a member of staff that they trust, and this is regularly reinforced in PSHE lessons and in tutor time. Students have the opportunity to raise concerns with their tutor and Housemaster/Housemistress.

It is often not easy for children to tell staff about abuse directly. Often concerns will arise from changing behaviour or appearance and staff might also hear about abuse indirectly from another student or possibly from overhearing conversations about possible concerns. Staff should always look to act if they have any concerns that come to them indirectly like this. In particular, they should bear in mind that some children may face additional barriers to reporting because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

We will aim where possible to have two members of staff present in the case of a student making a disclosure. As ever with safeguarding they will not promise confidentiality although the report will also only be shared with the necessary people. Also, as with other safeguarding disclosures staff should look to listen carefully, reflect the child's language in what they say, be non-judgemental and not ask leading questions although **staff can ask children if they have been harmed and what the nature of that harm was**. An objective written record should be made either during the meeting or straight after (the preferred option so that the child can be given full attention). Next steps will be explained to the victim including who the report will be passed to.

It is extremely important that all staff respond properly to a report from a child because this response will either encourage or undermine the confidence of that child or other students to potentially come forward to report sexual violence and/or harassment in future. A disclosure of sexual violence or harassment will be treated like any other safeguarding disclosure, including abuse that occurs online or outside school.

Staff should bear in mind that this might be only the first reported incident rather than just a single incident. Trauma can affect memory so children might not be able to recall some details.



**One important point to emphasise is that in cases where illegal images of a child have been taken and/or circulated the teacher should be careful not to view or forward these images but to retain the device the pictures are on for external agencies.**

## **Responding to a report**

The school will offer support such as counselling to the victim. If an allegation does go through the criminal justice system, there will be anonymity offered in the legal system, and The Oratory will do all it can to reasonably protect the anonymity of any children involved in a report of sexual violence or harassment. It is understood that social media may make this more difficult and the school will be watchful as far as it can be to this possibility. As ever with safeguarding, only appropriate and relevant staff will be informed about the report.

When there has been a report of sexual violence the DSL will make an immediate risk and needs assessment (and in cases of harassment if it is felt necessary) considering the victim's needs, whether there have been other victims, the alleged perpetrator and other children in their peer group (and possibly staff). Risk assessments will be recorded and kept under review considering the risks and putting measures in place to protect all concerned and keep them safe.

Reports of sexual violence and sexual harassment are often particularly complex and difficult and so the DSL will always look to talk through any cases such as this with OSCP unless it is clearly of a very low level for instance a one-off incidence of name calling. In cases where a crime has been committed the DSL will also contact the police, and more widely will contribute to any multi-agency requirements as necessary.

The DSL will normally be the person to decide on the School's response to a report of sexual violence or harassment. In all cases, the initial report will be carefully evaluated on a case-by-case basis. The School's approach will consider:

- The wishes of the victim on how to proceed where possible. Victims should be given as much control as reasonably possible over how the investigation will proceed and what support is offered to them although this will be balanced with our responsibilities to protect other children;
- The nature of the alleged incident;
- The ages and developmental stages of the children involved. In particular, if there are any power imbalances for instance if an older child is the perpetrator;
- If this is a one off incident or part of a pattern (including the possibility of other forms of abuse);
- That sexual violence and harassment can take place within intimate personal relationships between children;
- Any ongoing risks to the children involved including the wider protection of all the children at The Oratory;
- Wider environmental factors where incidents or behaviour is associated with issues outside school and environmental factors are present that are a threat to the one or more of the children's health or welfare. This contextual understanding can be very important if a safeguarding referral is made.

## **Acting on a report**

Given the distress caused by potential close proximity of a victim and an alleged perpetrator at school, the alleged perpetrator in a very serious case such as rape or assault will be removed immediately from any classes they share with the victim. Risk assessments should be updated as appropriate. Separation is done to support both children and is not a judgement on the guilt of the alleged perpetrator. More widely outside the classroom, the DSL will look to see how the children involved can be kept a reasonable distance apart outside while the facts of the case are established either by school or social services or the police. In other cases of sexual violence and/or harassment again the DSL will make a judgement on whether, and how much, separation is needed.

The DSL should carefully consider when to inform the alleged perpetrator(s) of the report. Where social services and/or the police are informed this would only happen after discussion with these other agencies.

The victim may ask school staff not to tell anyone about an incident but as with other safeguarding incidents if a child has been harmed, is at risk of harm or is in immediate danger a referral must be made, and if a crime has been perpetrated this must be referred to the police. Parents/carers will normally be informed unless this would put the victim at risk. The DSL will balance the victim's wishes against the duty to protect them and other children and will generally look to take advice with external agencies.

Consideration will be given to supporting other students who have witnessed or been affected by an incident. This includes working to ensure students are not taking 'sides' and bullying or harassing any of those involved either physically or online. This includes consideration of how students get to and from school.

There are four likely scenarios to consider when managing reports of sexual violence and/or sexual harassment

- 1) **Manage Internally.** This might be the case with, for instance, a one-off low-level incident. It should still be made clear though that there is zero tolerance of this sort of behaviour and all the discussions and decisions made around the case should be recorded as usual.
- 2) **Early help.** While it might be that no referral is needed in a case like this it might be decided that support is needed to address concerns and to prevent an escalation of unacceptable behaviour either from within school or with the services offered through OSCP. Again all the details of the case will be recorded and zero tolerance will be stressed.
- 3) **Referral to social care.** Where a child has been harmed, is at risk of harm or is in immediate danger a referral will be made to OSCP. This referral will be made with the same principles as any safeguarding referral, with particular significance given to the need to make sure that the victim, and any other affected children including the alleged perpetrator are protected immediately without waiting for an investigation to start. Social services may feel that intervention is not appropriate, but a new referral should be made if it is felt that the child remains in danger or at risk of harm. Again, all the details of the case will be recorded and zero tolerance will be stressed.
- 4) **Report to the police.** These reports will always in parallel with an OSCP referral, and police reports will always follow from reports of rape, assault by penetration or sexual assault. Next steps will be made in consultation with the police including whether the police will take further action and when to inform parents, and the DSL will make sure that actions taken by the school do not jeopardise the police investigation. If a student is given bail or is released under investigation The Oratory will carry out a risk assessment for that student in liaison with the police. Again, all the details of the case will be recorded and zero tolerance will be stressed.

In the case of a criminal investigation The Oratory will work closely with the police and other agencies to ensure the school's actions do not jeopardise the police investigation while it is ongoing. KCSIE 2024 specifies that 'Disciplinary action can be taken while other investigations by the police and/or local authority children's social care are ongoing' but this will always be considered on a case-by-case basis. If a criminal investigation leads to a conviction or caution, The Oratory will then take disciplinary action according to the school sanctions policy. In most situations like this, the incident would be a serious breach of discipline and lead to the view that allowing the perpetrator to remain at The Oratory could seriously harm the education and welfare of the victim. Whether the perpetrator remains in school or not a risk assessment will be made for all the children involved in consultation with the children, families and external agencies with particularly emphasis on avoiding bullying and harassment from other students who may well know about the case.

If there is no further action on the case school will provide support and also follow its own disciplinary procedures as the burden of proof for a criminal case and a school disciplinary proceeding is very

different. If a report is found to have been unfounded or false or malicious the DSL (in consultation with other senior staff) will consider what further steps need to be taken both in supporting the students and also potentially as a disciplinary concern. The DSL will record decisions made on MyConcern both to record the events and explain decision making.

Decisions regarding safeguarding support for the victim should be based on the following principles:

- As above, the needs and wishes of the victim should be paramount within the context of protecting the child. Wherever possible the victim should be able to continue with their normal routine so that The Oratory remains a safe place for them. A victim will never be made to feel they are the problem for making the report;
- Also as above, consider the age and developmental stage of the victim, especially as there will often be a power/age imbalance between the victim and alleged perpetrator;
- Support should be on a case-by-case basis so that there is a proportionality to the school response as well as effective support for the victim. It is possible that this support could be very long-term depending on the nature of the incident and The Oratory will in particular seek to ensure that the victim is not isolated from their peer group or bullied or harassed;
- Needs can be on a range including mental, physical and sexual health or unwanted pregnancy and external support can be found with the NHS Sexual Assault Referral Centre (SARC).

Decisions regarding safeguarding support for the perpetrator should be based on the following principles:

- While needing to safeguard the victim and wider student body, the alleged perpetrator will also need support and they should be provided with education, ongoing safeguarding support and information about any disciplinary sanctions. Support and disciplinary proceedings are not mutually exclusive and may need to happen at the same time;
- Consideration of the developmental stage and age of the alleged perpetrator and the proportionality of the response to be decided on a case-by-case basis.

All decisions and actions are regularly reviewed and 'lessons learnt' are discussed. If patterns of behaviour across the school are identified then the pastoral team will look to take appropriate action to remedy this. Consideration will always be given as to whether extra teaching time and/or staff training should be put in place to make sure that the wider culture of the school is such that possibilities of inappropriate behaviour like this are minimized.

## **12. Child Criminal Exploitation (CCE), Serious Violent Crime County Lines and Gangs**

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

(a) in exchange for something the victim needs or wants and/or

(b) for the financial or other advantage of the perpetrator or facilitator and/or

(c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact and can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines *see below*), forced to shoplift or pickpocket, or to threaten other young people.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. All the factors involved in creating vulnerability to CSE can also be found in CCE. Signs of involvement in any of these activities may include increased absence from school whether by exclusion or not, having experienced child maltreatment, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries and involvement in offending.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. If any of these warning signs are noticed by a member of staff, they should enter them onto MyConcern and talk to one of the DSLs. As always in child protection and care, early intervention is the most effective way of helping potentially vulnerable children.

The Oratory looks to prevent violence within school or student involvement outside school through a number of methods:

- Our PSHE curriculum and regular discussions with tutors include information about how to be safe, how to deal with dangerous incidents and avoid exploitation by potentially dangerous groups.
- Aggressive behaviour is challenged rigorously by our behaviour policy.
- Using MyConcern; we are able to identify and support students who might potentially be vulnerable to violence or being drawn into violent behaviour of gangs outside school.
- The Oratory always ensures to pass on any safeguarding information to other institutions when students leave us, and to get information from other institutions concerning students who join us.
- We work closely with the local council services and the police with regards to dealing with anti-social behaviour or crime in the area.

### **County Lines and modern slavery**

Often related to serious violent crime, and a growing national risk for vulnerable children across the country is 'county lines' activity. 'County lines' is a term used to describe gangs and organized criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone line or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Children can be targeted and recruited in school as well as other places. They are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging' where drugs are concealed internally to avoid detection. Children can become trapped into this exploitation by gangs creating drug debts and can threaten serious violence or kidnapping towards victims or their families if they attempt to leave the county lines network.

Potential involvement in county lines can be identified by episodes of missing home, school or care when the victim may have been trafficked and a referral to the National Referral Mechanism should be considered in these cases. Other possible indicators are being the victim or perpetrator of violent crime, being involved in drugs, are found in accommodation where they have no connection (called a 'trap house' or 'cuckooing' owe a 'debt bond' to their exploiters or have a bank account to facilitate drug dealing.

Involvement in these forms of crime is extremely risky for any child, not just because of the potential for a criminal record but also because of the even more serious risk of physical and/or sexual abuse of children by gangs with which they might become involved. The advice for schools on these issues can be found in [Advice to Schools and colleges on gangs and youth violence](#), and [Criminal exploitation of children and vulnerable adults: county lines](#).

Potentially linked with this is the issue of modern slavery. This encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in [Modern Slavery Statutory Guidance](#).

### **13. Child Sexual Exploitation (CSE)**

Child Sexual Exploitation (CSE) is a form of child sexual abuse that can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Children can be groomed by peers and/or exploited as part of gang-related activity. It can be perpetrated by individuals or groups, males or females, children or adults. It does not always involve physical contact and can happen online. It can include both contact (either penetrative and non-penetrative acts) and non-contact sexual activity. It can even occur without the child's knowledge through copying videos or images they have posted online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation under acronym SAFEGUARD:

- **S**exual Health and Behaviour: Sexually transmitted infections; pregnancy; terminations; inappropriate sexualised behaviour.
- **A**bsence from school or repeatedly running away or going missing, often resulting in a significant decline in performance.
- **F**amilial Abuse and/or problems at home: Forced marriage or honour-based abuse; domestic abuse; substance misuse; parental mental ill-health; homelessness; privately fostered/looked after.
- **E**motional and Physical Condition: Suicidal Ideation; self-harm; low self-esteem; confusion re sexual orientation; SEND; poor mental health; signs of assault or unexplained injuries or changes in appearance.
- **G**angs, older age groups, involved in Criminality: Direct involvement with gang members; involvement in criminal activity; involvement with older individuals or lack of same-age friends or a change in friendship group; contact with victims of CSE.
- **U**se of technology, sexual bullying: Evidence of sharing nudes or semi-nudes or other sexualised communication online; multiple phones; problematic use of internet/social networking.
- **A**lcohol or Drug Misuse.
- **R**eceipt of unexplained gifts or money including mobile phone credit, clothes, jewellery money.
- **D**istrust of authority figures either in or out of school.

Further information can also be found on the NSPCC website and GOV.UK: [What to do if you suspect a child is being sexually exploited](#). Any concerns relating to CSE will be reported to the DSL who will follow Safeguarding referral procedures.

CSE happens to children of all ages and both boys and girls and from all walks of life. Research estimates that around a third of victims are boys. Looked after children might be especially vulnerable to CSE, as might those with learning disabilities. Further guidance from Oxfordshire is contained in the following advice from the [Kingfisher team](#).

There are a number of things that we can do to prevent CSE and/or help other agencies to disrupt the activities of those engaging or intent on engaging in it. Via the curriculum (PSHE) and through engagement with parents and carers, we will raise awareness around healthy relationships and, where appropriate, CSE and grooming processes, including how this can happen online.

Information sharing is vital in identifying and tackling all forms of abuse and *especially* child sexual exploitation. We will be vigilant, seek advice, monitor attendance, keep robust registers, share information and contribute effectively to multi-agency processes designed to prevent, disrupt and/or prosecute perpetrators of CSE. We are also mindful of our contribution to processes designed to protect children who have been victims of CSE:

**Physically** - Making it as hard as possible for perpetrators to gain access to young people; face-to-face but also via phones, online etc.

**Relationally** - By ensuring that young people experience safe, stable relationships which counteract the abuse and, for Looked After Children, provide stability in terms of education and placements;

**Psychologically** - Helping young people to find a source of [positive] identity outside of abusive relationships.

#### 14. Whistleblowing if you have concerns about a colleague

All staff should feel able to raise concerns about poor practice or potential failures in the school's Safeguarding, and are required to report to the Head any concern or allegations about school practices or the behaviour of colleagues. Complaints about the Head should be reported to the Chair of Governors. The School's Whistleblowing Policy is found in the staff employment manual.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding Child Protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00AM to 8:00PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). They can also report their concerns direct to children's social care or the police if they believe direct reporting is necessary to secure action.

#### 15. Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional Safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. It can sometimes be assumed that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration. In addition, these children can also be disproportionately impacted by things like abuse, neglect or bullying without outwardly showing any warning signs, often due to communication barriers, isolation, dependency on others etc. The Oratory School ensures that students on our SEND register receive additional pastoral support, with key workers to help support them in addition to the usual pastoral structure of the school.

These children can also suffer abuse in ways other than via overt physical or sexual assaults which means that staff need to be mindful of a wide range of issues when working with these young people. For example, privacy, dignity and respect, food, mobility/ restraint, intimate care, finances, medication, the use of aids and adaptations.

In order to safeguard children with more complex needs, staff in school will work especially hard to develop the skills they need to give them a 'voice'. In practice, three essential questions always need to be asked:

- What is expected of this child? - developmentally, behaviourally etc.

- Do I/we understand how any condition, disability, impairment or other factor e.g. cultural impacts?
- How well can I/we understand and communicate with this child?

It is imperative that staff are sensitive to what might be very subtle indicators, especially where children have multiple disabilities, and that regular consultation occurs between the SENCO and DSL in school, especially in circumstances where issues and/or concerns arise.

When applying disciplinary measures to SEND students the risks will be considered so that it does not add to the vulnerability of the child, for instance, if isolating the child from class or having to restrain them in examples of dangerous behaviour physically. The SEND Department works with the pastoral team and all staff to ensure that there is a clear set of guidelines of how best to work with each of the children on the SEND register, in particular by planning positive and proactive behaviour to avoid problems in advance.

## 16. Honour Based Abuse (HBA)

So-called 'honour-based' abuse (HBA) (including Female Genital Mutilation and Forced Marriage) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. There are a range of potential indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found in KCSIE and [Multi-agency guidelines: Handling cases of forced marriage](#).

If staff have a concern regarding a child that might be at risk of HBA they should follow procedures for other Safeguarding concerns as seen in Flowchart 1.

## 17. Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is prohibited by law in England, Scotland and Wales, whether it is committed against a United Kingdom national or permanent United Kingdom resident in the UK or abroad. (FGM Act 2003 and as amended by the Serious Crime Act 2015). FGM is an abuse of the human rights of girls and women and therefore a Child Protection issue.

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin

- talk about a 'special' procedure to become a woman

## Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

Teachers **must** personally report to the police (by ringing 101) cases where they discover that an act of FGM appears to have been carried out. They should also still consider and discuss any such case with the DSL and involve children's social care as appropriate. Contact must be made with MASH or the equivalent if the child lives in another Local Authority. The duty to contact the police does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over although cases like this will be discussed by contacting MASH. Further guidance can be found here: [Multi-agency statutory guidance on female genital mutilation](#).

## 18. Upskirting

Upskirting is a crime in the UK under the Voyeurism (Offences) Act 2019. The Crown Prosecution Service (CPS) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

The behaviour policy makes it clear that upskirting will not be tolerated. Staff and all students are all briefed on upskirting and its implications.

## 19. Radicalisation/Extremism

Any concern regarding Radicalisation or Extremism will be directed to MASH (or the equivalent if the child lives in a different Local Authority) who will contact the Prevent Team. The Oratory uses the Governmental accepted definition of extremism to be:

*Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:*

1. Negate or destroy the fundamental rights and freedoms of others; or
2. Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or



### 3. Intentionally create a permissive environment for others to achieve the results in 1 or 2.

There is no place for extremist views of any kind in our school, whether from internal sources – students, staff or governors, or external sources - school community, external agencies or individuals. Our students see our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens.

Extremism and exposure to extremist materials and influences can lead to poor outcomes for children. As part of wider Safeguarding responsibilities school staff will be alert to:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups, especially where students have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images
- Students accessing extremist material online, including through social networking sites.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- Partner schools, local authority services, and police reports of issues affecting students in other schools or settings.
- Students voicing opinions drawn from extremist ideologies and narratives. Also use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Anti-Western or Anti-British views.

#### **Recognising Extremism:**

Early indicators of radicalisation or extremism may include:

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

In line with the Counter-Terrorism and Security Act (2015) the Head and Governors, often delegated to a DSL, assess the risk of children in the school who are susceptible to being drawn into terrorism, including how likely they are to be exposed to extremist ideas that are part of a terrorist ideology.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated Safeguarding lead (or deputy) making a Prevent referral.

We are committed to ensuring that our students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

When the school hosts visiting speakers, there are clear, set clear protocols for ensuring that these are suitable and appropriately supervised (see Appendix 5). Our School will work in partnership with other agencies: co-operate productively, in particular, with local *Prevent* co-ordinators, the police and closely follow any procedure as set out by Oxfordshire Safeguarding Children Partnership's agreed processes and criteria for Safeguarding individuals vulnerable to extremism and radicalisation.

The School's ICT policies contain robust procedures and practice to ensure children are safe from extremist material when accessing the internet in school, including by ensuring suitable filtering is in place. All staff have had Prevent training to:

- Have the knowledge and confidence to identify children who are at risk;
- Be able to challenge extremist ideas used to legitimise terrorism;
- Know where and how to refer children and young people for further help (including the local police or by dialling 101);
- Ensure that our children remain safe online with a priority on robust ICT protocols and procedures as well as having appropriate levels of filtering on the Internet;
- Manage its prayer and faith facilities with a clear policy on cover arrangements and any issues that arise, including how access is managed after hours.

The Oratory School will normally discuss any concerns in relation to possible radicalisation with a child's parents as they are in a key position to spot signs of radicalisation. This will not happen if there is a specific reason to believe that to do so would put the child at risk. Families who raise concerns themselves will be supported.

## **20. Looked after children**

A child who is looked after by a local authority (referred to as a looked-after-child) as defined in section 22 of the Children Act (1989), means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by a local authority. Should the school have on roll a child who is looked after by the Local Authority the Oratory School will ensure that our staff have the skills, knowledge and understanding necessary to keep them safe. In particular, the DSL will ensure that all agencies work together and prompt action is taken on concerns to safeguard these particularly vulnerable children.

Appropriate staff will have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A child who has been looked after in the past remains vulnerable and so The Oratory will continue to have extra pastoral support in place for them. If there is a child at The Oratory School who has been in

care the DSL will get the details of the local authority Personal Advisor who has been appointed to support them and will liaise with them if there are any concerns.

## **21. Child abduction and community safety incidents**

Child abduction, the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child, can be committed by anyone and is just one example highlighted by KCSIE 2024 of safeguarding concerns that can arise for students outside school.

Other 'community safety incidents' in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. The Oratory educates its students in the PSHE program about how to keep themselves safe and adapts these lessons to the different age and independence of students, for example, as they start walking to school on their own. Lessons look to build children's confidence, abilities and resilience rather than simply warning them about all strangers.

## **22. Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding lead (and any deputies) should be aware of contact details and referral routes to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the Designated Safeguarding Lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

## **23. Safeguarding children away from the school site**

When on school trips it is important that staff continue to apply all elements of the Safeguarding policy and continue to be vigilant for potential Safeguarding issues. The DSL and Senior Deputy Head can be contacted on their school phone or by email if there are any urgent Safeguarding issues that need discussion.

Students sometimes stay with a host family when on a trip, often a foreign language exchange. The Oratory School has responsibility for students who come and stay with our families and school would arrange for a DBS enhanced certificate for anyone aged 16 or over in the household where the child will be staying. It is not possible to obtain DBS checks for adults who provide homestays for our students abroad. The Oratory will liaise with partner schools to understand the arrangements in place and ensure that they are appropriate and sufficient to safeguard every child on the exchange.

Following KCSIE 2024 where a child is placed with an Alternative Provider, The Oratory continues to be responsible for Safeguarding and has to be satisfied that the provider meets the needs of the student. The most obvious example of this is the timetabled service activity done by students in the 5<sup>th</sup> form and

above with different organisations in the local area. The Oratory will obtain written confirmation that the appropriate Safeguarding checks have been carried out on individuals working at the establishment as would happen at school.

The Oratory does not ordinarily organise work experience, but if this does happen the school will ensure that the placement provider has Safeguarding policies in place. The specific circumstances of the work experience and the supervision in place will determine what different checks might be needed for the supervisors of the work experience. In addition, it may be necessary for the organiser of the work experience to request a DBS enhanced check for the child doing work experience if they are 16 or over and working with children.

#### **24. Non-school activities on school premises**

The school site is made use of by a small number of external organisations during term time. When these are under the direct supervision or management of school staff, our arrangements for Child Protection will apply. Where these activities are provided separately by another body, this is not necessarily the case. We seek the necessary assurance that the body concerned has appropriate Safeguarding and Child Protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. We also ensure Safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; failure to comply with this would lead to termination of the agreement. In cases of an allegation that happened when an individual or organisation was using school premises, we will follow our Safeguarding procedures, including informing the LADO if required.

#### **25. Private fostering**

If a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility or relative in their own home this is Private Fostering. It is not considered private fostering if it happens for fewer than 28 days. Where the school becomes aware of a private fostering arrangement this should be raised with the DSL. The school must then notify the local authority so that they can check that this arrangement is suitable and safe for the child. Once notified a social worker from the local authority will arrange to visit the child's parents, the private foster carers and the child themselves. They will keep in touch with these people at regular intervals to ensure that everything is going well and will offer support to foster carers and parents.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse, neglect and exploitation, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

#### **26. Children Absent from Education**

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse, neglect and exploitation and may also raise concerns about other Safeguarding issues, including the criminal exploitation of children. We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when students are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2024) the school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for students who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take students off-roll when they:
  - leave school to be home educated
  - move away from the school's location
  - remain medically unfit beyond compulsory school age
  - are in custody for four months or more (and will not return to school afterwards); or
  - are permanently excluded

We will ensure that students who are expected to attend the school, but fail to take up the place will be referred to the local authority. When a student leaves the school, we will record the name of the student's new school and their expected start date.

## **27. Mental Health**

All staff should also 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well-placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a Safeguarding concern, immediate action should be taken, following their Child Protection policy and speaking to the DSL or a deputy.

More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Every Mind Matters](#) for links to all materials and lesson plans.

## **28. Diversity and inclusion**

It is understood that a student who is lesbian, gay, bisexual or gender questioning (LGBT), or perceived to be LGBT by other students, may be targeted by other children. Because of this risk The Oratory includes lessons on understanding LGBT in its PSHE curriculum. In addition, all members of staff have undertaken LGBT awareness training.

The Oratory also works actively to educate against discrimination, and promote inclusion in the other key areas including race, gender and neurodiversity. These topics are also covered in the PSHE curriculum, and there is ongoing staff training in Diversity and Inclusion to encourage understanding of these issues and encouraging dialogue and student voice.

It is acknowledged that those children questioning their gender may be subject to wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

### **Support for gender questioning children**

When families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When families are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

When supporting a gender questioning child, The Oratory School will take a cautious approach and will consider the broad range of their individual needs, in partnership with the child's parents, including any clinical advice that is available and how to address wider vulnerabilities, such as the risk of bullying.

### **29. Children who have a social worker**

At The Oratory School, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most students. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support students who have a social worker.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered a matter of routine. There are clear powers to share this information under existing duties to safeguard and promote the welfare of children. Where children need a social worker, this should inform decisions about Safeguarding (for example, responding to unauthorised absence or absence from education where there are known Safeguarding risks) and about promoting welfare, for example by considering carefully the provision of pastoral and/or academic support, alongside action by statutory services). Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, 'Help, protection, education' sets out action Government is taking to support this.

## Appendix 1 - Key Safeguarding contact details for this policy

<b>Internal Contact Details</b>	
<b>Stephen Burrows:</b> DSL	01491 683529 (Office Number – office hours) 07786 396137 (School Mobile) <a href="mailto:s.burrows@oratory.co.uk">s.burrows@oratory.co.uk</a>
<b>Victoria Fogg:</b> Deputy DSL	07584 286529 (School Mobile) <a href="mailto:v.fogg@oratory.co.uk">v.fogg@oratory.co.uk</a>
<b>Thomas Gibbon:</b> Deputy DSL	07501 990501 (School Mobile) <a href="mailto:t.gibbon@oratory.co.uk">t.gibbon@oratory.co.uk</a>
<b>Graham Muckalt:</b> Deputy DSL	07584 563922 (School Mobile) <a href="mailto:g.muckalt@oratory.co.uk">g.muckalt@oratory.co.uk</a>
<b>Peregrine Nunes-Carvalho:</b> Deputy DSL	07584 250166 (School Mobile) <a href="mailto:p.nunes-carvalho@oratory.co.uk">p.nunes-carvalho@oratory.co.uk</a>
<b>Charles Watson:</b> Deputy DSL	07584 562069 <a href="mailto:c.watson@oratory.co.uk">c.watson@oratory.co.uk</a>
<b>Matthew Fogg:</b> Senior Deputy Head	01491 683504 (Office Number – office hours) 07786 396136 (School Mobile) 01491 683606 (School Number – out of office hours) <a href="mailto:m.fogg@oratory.co.uk">m.fogg@oratory.co.uk</a>
<b>Kerry Hulbert</b> Counsellor for OS	01491 683606 (School Number)
<b>Mrs Kate Carberry-Long</b> Designated Governor for Safeguarding	01491 683600 (Office Number – office hours) email: <a href="mailto:clerk@oratory.co.uk">clerk@oratory.co.uk</a> Kate Carberry-Long: <a href="mailto:k.carberry-long@oratory.co.uk">k.carberry-long@oratory.co.uk</a>
<b>External Agencies</b>	
<b>Oxfordshire Safeguarding Children Partnership</b> (Our local LSC Partnership) Safeguarding Children Service (South Oxfordshire): Emergency Duty Team:	01865 815843 email: <a href="mailto:oscp@oxfordshire.gov.uk">oscp@oxfordshire.gov.uk</a>  01865 810603 0800 833408
<b>Local Authority Designated Officer for allegations</b> (LADO/Designated Officer):  Assistant Designated Officer	Jo Lloyd email: <a href="mailto:jo.lloyd@oxfordshire.gov.uk">jo.lloyd@oxfordshire.gov.uk</a> Phone number: 01865 815956 Email: <a href="mailto:lado.safeguardingchildren@oxfordshire.gov.uk">lado.safeguardingchildren@oxfordshire.gov.uk</a> Web page: <a href="http://Local Authority Designated Officer (LADO) - Oxfordshire Safeguarding Children Partnership">Local Authority Designated Officer (LADO) - Oxfordshire Safeguarding Children Partnership</a> Donna Crozier email: <a href="mailto:Donna.Crozier@Oxfordshire.gov.uk">Donna.Crozier@Oxfordshire.gov.uk</a> Phone number: 018650816382 Mobile: 0791331799
<b>Thames Valley Police:</b>	101 / 999 / 01865 841148
<b>MASH Team</b> – Multi Agency Safeguarding Hub (for any immediate concerns about a child)	0345 0507666 0800 833 408 (outside office hours) <a href="mailto:mash-childrens@oxfordshire.gcsx.gov.uk">mash-childrens@oxfordshire.gcsx.gov.uk</a>
<b>Disclosure &amp; Barring Service (DBS):</b> PO Box 181, Darlington, DL1 9FA	0300 0200 190 <a href="mailto:customerservices@dbs.gsi.gov.uk">customerservices@dbs.gsi.gov.uk</a>
<b>Prevent Team</b> – Support and Advice about Extremism Reading – PO Debbie Smith Oxfordshire – PEO Mohamed Azad	0845 050 7666 Prevent – Home Office Website: <a href="http://www.gov.uk/government/organisations/home-office">www.gov.uk/government/organisations/home-office</a>
<b>Kingfisher Team</b> (Child Sexual Exploitation)	01865 335276 <a href="mailto:KingfisherTeam@Oxfordshire.gov.uk">KingfisherTeam@Oxfordshire.gov.uk</a>
<b>DfE</b> (non-emergency prevent advice)	020 7340 7264 <a href="mailto:Counter-extremism@education.gsi.gov.uk">Counter-extremism@education.gsi.gov.uk</a>

<p><b>Children’s Commissioner for England</b> Office of the Children’s Commissioner Sanctuary Buildings, 20 Great Smith Street, London. SW1P 3BT</p> <p>Advice Team for Children</p>	<p><b>Dame Rachel de Souza</b> <b>Tel: 020 7783 8330</b> <b>Website:</b> <a href="http://www.childrenscommissioner.gov.uk">www.childrenscommissioner.gov.uk</a> <b>Email:</b> <a href="mailto:info.request@childrenscommissioner.gsi.gov.uk">info.request@childrenscommissioner.gsi.gov.uk</a></p> <p><b>Tel: 0800 528 0731</b> Email: <a href="mailto:advice.team@childrenscommissioner.gsi.gov.uk">advice.team@childrenscommissioner.gsi.gov.uk</a></p>
<p><b>Independent Listener for Boarders</b> <b>Mrs Angela Stanton</b></p>	<p><a href="mailto:angelastantoncounselling@gmail.com">angelastantoncounselling@gmail.com</a> 07727 609436</p>
<p><b>NSPCC Whistleblowing Advice Line</b> for anyone with Child Protection concerns in the workplace. It provides support and advice to those who feel unable to get a Child Protection issue addressed by their employer.</p>	<p>Weston House, 42 Curtain Road, London, EC2A 3NH 0800 028 0285 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<p><b>National College for Teaching and Leadership</b></p>	<p>53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH 0207 593 5393 Email: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a></p>
<p><b>Ofsted Safeguarding Children</b></p>	<p>0300 123 4666 (Monday to Friday from 8am to 6pm) Email: <a href="mailto:whistleblowing@ofsted.gov.uk">whistleblowing@ofsted.gov.uk</a></p>
<p><b>Locality &amp; Community Support Services South</b></p>	<p>0345 2412608 <a href="mailto:LCSS.South@oxfordshire.gov.uk">LCSS.South@oxfordshire.gov.uk</a> Link for OS – Patsy Denton</p>



## Appendix 2: Types of Abuse and Neglect

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. It can also include the impact of witnessing ill treatment of others, particularly in cases of domestic abuse. Staff training ensures that staff are also aware that children are capable of abusing their peers. Ensuring children are aware of forms of online abuse e.g. the sharing of nudes and semi-nudes is part of the PSHE programme of study.

Possible signs of abuse include (but are not limited to):

- The student says s/he has been abused or asks a question which gives rise to that inference;
- There is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
- The student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour;
- The student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- The student's development is delayed or they lose or gain weight;
- The student appears neglected, e.g. dirty, hungry, inadequately clothed;
- The student is reluctant to go home, or has been openly rejected by his / her parents or carers.
- The student is reluctant to go to school.

**Physical Abuse:** This 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.

Possible signs of Physical Abuse include:

- Children may seek to conceal such injuries by keeping their arms and legs covered or being reluctant to change for sport;
- Injuries which do not match the explanation given for them;
- Bruises in places where you would not normally expect to find them, in soft tissue, for example, rather than on the bony prominence;
- Bruises which have a distinctive shape or pattern, like hand prints, grasp or finger marks or belt marks;
- Burns or scalds with clear outlines;
- Bite marks and bruises like love-bites;
- Bruising in or around the mouth.

**Emotional Abuse:** This is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It is more than just occasional criticism. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunity to express their views by deliberate silencing or making fun of what is said. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing, hearing or experiencing 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, though it may occur alone.

Possible signs of Emotional Abuse include:

- The child might become withdrawn, nervous, and unhappy or lacking in confidence. It may result in a child being unable to make friends, perhaps because they behave aggressively or inappropriately towards other children;
- The child is continually depressed and withdrawn.
- Runs away or is frightened to go home or is reluctant to attend school.
- Is persistently blamed for things that go wrong.
- Is made to carry out tasks inappropriate to their age.
- Is not allowed to do normal childhood activities.
- Displays excessive fear of their parents or carers.
- Is excessively clingy and tearful.

**Sexual Abuse:** The key elements in any definition of sexual abuse are the betrayal of trust and responsibility and the abuse of power for the purpose of the sexual gratification of the abuser. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children (see part 10 of this policy).

The abuser may use different ways to persuade the child to cooperate such as bribery, threats or physical force. Sexual abuse can take different forms, from touching to intercourse, and often does not cause any outward signs of physical injury. It can happen to boys as well as girls and to children of any age, from birth to 18 years old. Sexual abuse can have long lasting effects. Some children who have been abused go on to abuse other children. Some find as they grow up that they are unable to have close relationships with other people. Others deliberately injure themselves because they feel so awful about themselves.

Possible sign of sexual abuse include:

- The child exhibits sexually explicit behaviour;
- Has inappropriate sexual knowledge for his or her age;
- Attempts suicide or self-inflicts injuries;
- Repeatedly runs away from home.

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

Possible signs of neglect include:

- The child is constantly hungry, greedy or stealing food;
- Has lingering illnesses which have not been treated;
- Is continually smelly, scruffy and dirty;
- Is often dressed in inadequate or unsuitable clothing for the weather conditions;
- Suffers repeated accidents, suggesting a lack of proper supervision;
- Is constantly tired;
- Does not respond when given attention or, on the other hand, one who craves attention and affection from any adult.

**Domestic Abuse:** This is not directly the abuse of children but its significance for the wellbeing of young people means that it is emphasised in KCSIE 204. In addition, the Domestic Abuse Act 2021 recognises the impact of domestic abuse on children as victims in their own right if they see, hear, or experience the effects of this abuse. It is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass psychological, physical, sexual, financial and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children including their ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

## Appendix 3: Safer Recruitment

The Oratory has a culture of safe recruitment, and makes its decisions about the suitability of employees based on the checks and evidence as set out in part three of KCSIE 2024 which provides a clear chronology of requirements and best practice with regard to staff recruitment, and also ISI Regulatory Requirements.

### 1) Recruitment and selection

The Governors create a strong safeguarding culture at The Oratory with a robust recruitment procedure to deter and prevent unsuitable people from applying to, or being employed by, The Oratory School. All recruitment panels will include at least one person who has received safer recruitment training.

Adverts for positions at The Oratory include the safeguarding requirements of the role as well as the school's commitment to safeguarding, and whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. As suggested in paragraph 220 of KCSIE 2024 an online search on shortlisted candidates will be carried out as part of due diligence. Candidates will be made aware that these checks will be made.

Application forms for roles in **regulated activity** (that is staff regularly teaching or caring for children when unsupervised or with other opportunities for regular contact with children such as personal care or healthcare or any overnight activity see [Factual note on regulated activity in relation to children](#) and further explanation in Annex E of KCSIE 2024) include a statement that it is an offense to apply for the role if the applicant is barred from engaging in regulated activity relevant to children. Application forms also refer to a link to the child protection policy on the school website. A CV should not be accepted in place an application form, and applicants must provide:

- Personal details, current and former names, current address and national insurance number.
- Employment details including reasons for leaving and a full employment history since leaving school including reasons for any gaps in employment. Verification should be obtained of an individual's most recent relevant period of employment where the applicant is not currently employed.
- Details of referees. Open references should not be accepted. The applicants should not obtain the reference. References should be from the candidate's current employer and be from a senior person – in the case of a school referee the head should confirm the reference is accurate in respect to disciplinary investigations. A reference should come from the relevant employer from the last time the applicant worked with children if not currently working with children or from their current employer if they have never worked with children. Electronic references should always be checked to ensure they originate from a legitimate source.
- A statement of how they meet the person specification
- A declaration confirming that the information they have provided is true

At least two people carry out shortlisting and they should explore all potential concerns, for instance inconsistencies or gaps in employment. Information should be compared between the application form and references. Referees should be contacted to clarify where information is vague or insufficient. Shortlisted candidates will be asked to complete a self-declaration of criminal record or other information that would make them unsuitable to work with children.

Interviews should ask the candidate's motivation for working with children, ask about their experience and skills of working with children and probe any gaps in employment. Areas that might be of concern from a candidate would be indicators of negative safeguarding behaviours, any implication that adults and children are equal, a lack of recognition of the vulnerability of children, inappropriate idealisation of children and inadequate understanding of appropriate boundaries between adults and children.

Students should be involved in the recruitment process in a meaningful way. Any information about past disciplinary action or allegations should be considered and all information considered in decision making should be clearly recorded along with decisions made.

## **2) Pre-appointment checks**

Governors ensure that the following checks apply to all individuals appointed to engage in regulated activity with children and appointments must be conditional on completion of these checks. The same checks also apply to volunteers (including governors) working for the school as well as those in paid employment. These checks are:

- References, identity checks and interview information, including the candidate's mental and physical ability to carry out their responsibilities which should be checked at interview.
- The person's right to work in the UK. If the person has lived or worked outside the UK The Oratory makes checks to ensure that any relevant events that occurred outside the UK can be considered (for details of this see paragraphs 279-284 of KCSIE 2024).
- Professional qualifications. The Teacher Regulation Agency's (TRA) Employer Access Service should be used to verify Qualified Teacher Status.
- Enhanced DBS check. More details on types of DBS checks including for contractors and the DBS update service can be found in paragraphs 237-248 of KCSIE 2024). Volunteers do not need to be re-checked if they have already had a DBS check but if there are any concerns a new DBS check will be obtained at the appropriate level.
- Barred list check for staff involved in a regulated activity. A separate children's barred list check should be obtained if an individual will start in regulated activity before the DBS is available.
- Prohibition from teaching check issued by the Secretary of State or any sanctions or restrictions imposed by the GTCE (for further details see paragraphs 253-255 of KCSIE 2024). For staff who work in childcare provision a check that they are not disqualified under the Childcare (Disqualification) Regulations 2009.
- A self-declaration of 'Disqualification by Association'.
- A section 128 check (checking names of individuals barred from management of an independent school) for school governors and staff in a management position (for further details see paragraphs 256-260 of KCSIE 2024).

Records of these checks will be kept with HR in a single central record for all staff who work at the school including volunteers, governors and supply/agency staff if applicable of pre-appointment checks as set out in KCSIE 2024. The date on which each check was completed will be kept for the identity check, barred list check, enhanced DBS check, prohibition from teaching check, further checks on people who have lived or worked outside the UK, check of professional qualifications, check to establish the person's right to work in the UK.

Every recruitment panel includes at least one member of staff who has undergone safer recruitment training under the scheme currently operated by The Department for Education with refresher training as required by Oxfordshire Safeguarding Children Partnership.

When using staff from an agency or third party organisation, The Oratory obtains written notification that they have carried out their own safeguarding checks including written notification that an enhanced DBS certificate and barred list check has been obtained. Where such an enhanced DBS certificate has disclosed any information The Oratory must get a copy of the certificate from the agency. The Oratory then checks that the person coming for work is the same person on whom the checks have been made.

Where using contractors The Oratory will set out safeguarding requirements in the contract between the organisation and The Oratory to ensure that any contractor working in the school has been subject to an appropriate level of DBS check. No contractor for whom no checks have been obtained will be allowed to work unsupervised in the school. In the case of self-employed staff working for The Oratory, the school will obtain a DBS check for them.

If a member of staff has not obtained their DBS certificate before they start work, they will be supervised appropriately, and all other checks including a separate barred list check will have been carried out.

In KCSIE 2024, there is specific guidance that if anyone working in school, including supply teachers or volunteers, has 'behaved or may have behaved in a way that indicates they may not be suitable to work with children' this should be taken into account for their suitability for employment. This might include incidents outside school not involving a child, for instance, domestic violence at home. It should be considered what triggered these actions and whether these actions could be triggered in a school context and be a potential risk.

### **3) Recording Information**

The Oratory follows regulations in maintaining a single central register (SCR) of pre-appointment checks. This covers all staff even if they work only for one day and members of the governing body. This register contains:

- An identity check.
- A barred list check.
- An enhanced DBS check request/certificate provided.
- A prohibition from teaching check.
- Checks on people who have lived or worked outside the UK.
- A check on professional qualifications.
- A check on the person's right to work in the UK.
- If the person's position involves 'relevant activity' i.e. regular sole charge of persons aged under 18.
- Section 128 check if relevant.
- Whether written confirmation for agency and third party supply staff has been received that the business supplying these staff has carried out the relevant checks and has the appropriate certificates, the date this confirmation was received and whether details of an enhanced DBS certificate have been provided.

The details of an individual are removed from the SCR once they no longer work at this school. Copies of DBS certificates and records of criminal information disclosed and documents used to verify identity, right to work and required qualifications are kept in each member of staff's personnel file.

### **4) Existing staff**

In some circumstances The Oratory needs to carry out new checks on existing staff if an individual moves from a post that was not regulated activity to one that is, where there has been a break in service of 12 weeks or more, or if there are concerns about an individual's suitability to work with children.

## Appendix 4: Online Safety and Cybercrime

This policy has been written in light of the government's document: Teaching Online Safety in Schools (2019) and KCSIE 2024:

Children and young people can be exploited and suffer bullying through their use of modern technology such as mobile phones and social networking sites. Technology can also provide the platform to facilitate harm such as child sexual exploitation, radicalisation, sexual predation or child on child abuse and sharing of nudes and semi-nudes. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material.
- **Contact:** being subjected to harmful online interaction with other users.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- **Commerce:** risks such as online gambling, inappropriate advertising, financial scams etc.

In order to minimize the risks to our children and young people we have in place a firewall that prevents searching for inappropriate material online. In addition, the school can monitor what is being entered by students and the Safeguarding leads are alerted automatically if inappropriate or concerning content is entered for them to follow up with the students. The school is always careful that "overblocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and Safeguarding and the blocking of specific sites is always under review.

Staff are aware that abuse can take place wholly online or technology may be used to facilitate offline abuse.

As part of our limiting of any potentially inappropriate material being accessed via 3G/4G/5G technology in school, younger students are not allowed to use their phones during the school day (Year 7 to Year 10 students). Year 7 to Year 11 boarders also hand in electronic devices at bedtime. Further details of this are found in the Mobile Phone policy.

### Filtering and monitoring

The DSL has overall responsibility for filtering and monitoring in school. This is done with the help of our IT Department and is also supported by regular LT discussion. We ensure that all staff receive regular training and updates on this area. All staff are aware that they need to report to the DSL if they see or suspect that inappropriate content is being accessed. Our filtering and monitoring processes are reviewed every term against the filtering and monitoring standards. Our web filter sends alerts to the DSL and Senior Deputy Head in instances of students' inappropriate behaviour online.

**Staff/student online relationships** - We will ensure that staff are aware of how not to compromise their position of trust in or outside the setting and are aware of the strict rules regarding online contact and electronic communication with students. Staff found to breach of these rules may be subject to disciplinary action or Child Protection investigation. For further guidance see the staff employment manual and staff acceptable use policy.

Item 56 in the School's employment manual states the following: ***Personal mobile telephones and electronic devices:***

- It is understood that staff may need to check text messages and/or personal emails in the case of an emergency or during break times.
- Personal use must not interfere with your work commitments (or those of others). It is a privilege and not a right.
- Staff shall set an example and shall **never** use their own mobile telephones or other electronic devices whilst they are on duty (whether in a classroom or otherwise) and any such mobile

devices should be switched off except in the case of an emergency and be kept out of sight of parents or students.

We have a whole school approach to online safety. This includes annual update training for staff regarding online safety. All children are taught about Safeguarding, including online, through teaching and learning opportunities, as part of our broad and balanced curriculum. There is particular focus on this in our PSHE curriculum. The school also organises Parents' Forums and information brochures as an awareness session for parents with regard to online safety. We expect all students to adhere to the safe use of the internet as detailed in our Online Safety and Anti-Bullying Policies. Information and support can be found in the Online Safety policy.

Further information can be accessed here: [Online Safety Guidance and A Business Guide for Protecting Children On Your Online Platform](#).

## Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet and is another possible safeguarding issue as children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. It is categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). They include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources;
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme, a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general online safety.

Additional advice can be found at: [Cyber Choices](#), and [National Cyber Security Centre - NCSC.GOV.UK](#)

## Online learning

Our guidelines for online learning are as follows:

- **All Safeguarding or wellbeing concerns should be reported as normal through MyConcern or directly with the DSL.**
- 1:1 lessons need separate guidance and this can be found below
- Staff and students must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas (not in bedrooms); and where possible be against a neutral background.
- **The live class should be recorded and backed up elsewhere, so that if any issues were to arise, the video can be reviewed. This is done through Teams so long as you remember to start the recording**
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day. For us this means that lessons ought to follow the normal school timetable pattern.



- Language must be professional and appropriate, including any family members in the background
- Schools should risk assess the use of live learning using webcams. We have done this.

### **1:1 lessons**

If 1:1 lessons are required then the student must be sat where they can be observed by another adult (parent, guardian etc...). It would be fine for them to be sat in the kitchen with a parent working away on something else in the background.

## Appendix 5: Attendance and the admissions register

For school policy regarding attendance and children missing school, please refer to the school attendance policy and government guidance [Working together to improve school attendance](#). The Oratory follows this guidance which states that: *Good attendance is a learned behaviour, and the most effective schools recognise the importance of developing good patterns of attendance from the outset. Schools that have good attendance recognise that it is not a discrete piece of work but rather it is an integral part of the school's ethos and culture. In building a culture of good school attendance.'*

All children, regardless of their circumstances, are entitled to a fulltime education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Effective information sharing between the school and parents is critical to ensuring that all children are safe and receiving suitable education.

A child going missing from education either during term time or at a point of transfer to another school or college is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, sexual or criminal exploitation or radicalisation. It can also indicate mental health problems; substance abuse or other issues. Attendance is therefore discussed as a standing item in termly safeguarding meetings, and is part of the DSL's responsibility including evaluation of attendance and plans for improvement where needed.

As found in the school's Missing student policy there is a rigorous procedure to check and deal with unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions. The school has an admission register and an attendance register that is monitored daily and if attendance continues to be irregular without good cause then school will inform the local authority (for more details see the school' Missing student policy)

New students are put on the admission register at the beginning of the first day on which the school has agreed that the student will attend the school. If a student fails to attend on the agreed or notified date, the school will notify the relevant local authority at the earliest opportunity to prevent the child from going missing from education. The school will regularly request parents to inform them of any changes whenever they occur. This can assist the school in dealing with Student Welfare issues and any Safeguarding issues if they arise. The admission register will include:

- The full name of the student;
- The full name and address of any parent with whom the student lives;
- At least two emergency contact numbers;
- The full name and address of the parent with whom the student is going to live, and the date the student is expected to start living there, if applicable;
- The name of student's destination school and the student's expected start date there, if applicable; and the grounds under which the student's name is to be deleted from the admission register.

When a parent notifies school of a change of address school will record the full name of the parent with whom the student will live, the new address and the date when they move that new address. If a parent notifies school that their son/daughter will be attending another school then the admissions register will note the name of the new school and that date on which they are due to start attending the school. When a new student arrives The Oratory School will notify the relevant local authority within five days of them being added to the admission register except for those starting at the beginning of the school's youngest year.

The School must inform the local authority where the child is resident if a student's name is going to be deleted from the admission register on certain grounds (and provide the authority with the information from the admissions register as above along with the ground) on which the student's name is to be deleted:

- When the child has been taken out of school to be home educated,
- When the family has apparently moved away,
- When the child has been certified as medically unfit to attend,
- When the child is in custody for more than four months,
- When the child has been permanently excluded.

### **Elective Home Education**

Schools must inform their Local Authority of all deletions from their admission register when a child is taken off role. Where a parent/carer has expressed their intention a child from The Oratory with a view to educating at home we will work together with other key professionals and the parents/carers to meet and discuss the final decision to ensure that this is in the best interests of the child. This is particularly important where a child has SEND, is vulnerable and/or has a social worker.

## **Appendix 6: Visitors on the school site**

Any visitor to the school site will have their identity checked at school reception and they will be required to wear an identity badge and to be supervised while on-site. This applies to visiting parents, contractors, visiting speakers and any other visitors. Visitors to school in a professional capacity will be asked if they have the appropriate DBS check but will not be asked to present it.

The Oratory School has visiting speakers frequently, and as part of our responsibility under Prevent we ensure that all talks are aligned to the ethos and values of the school and British values. We do this by ensuring that the Senior Deputy Head and the HR department have background information about the speaker as well as a clear understanding of the purpose of the talk. The school will have an organising liaison with the speaker to organise this and supervise the speaker while they are on site. In the unlikely event of a speech not aligning with the values and ethos of the school and British values immediate action will be taken by a member of staff to balance the information given. Each visiting speaker will be evaluated by the organiser and should they not meet the needs of our students then this will be clearly communicated to the visiting speaker/institution by the Senior Deputy Head. References may be taken and internet searches completed in order to ensure suitability of visiting speakers to the school. These records will be retained by HR.

It is good practice for staff contractors working regularly in school with opportunity for contact with students to have basic Safeguarding training at a level appropriate to their role and, for instance, to know the identity of the DSL and the duty to pass on concerns.

## Appendix 7: Key Documents

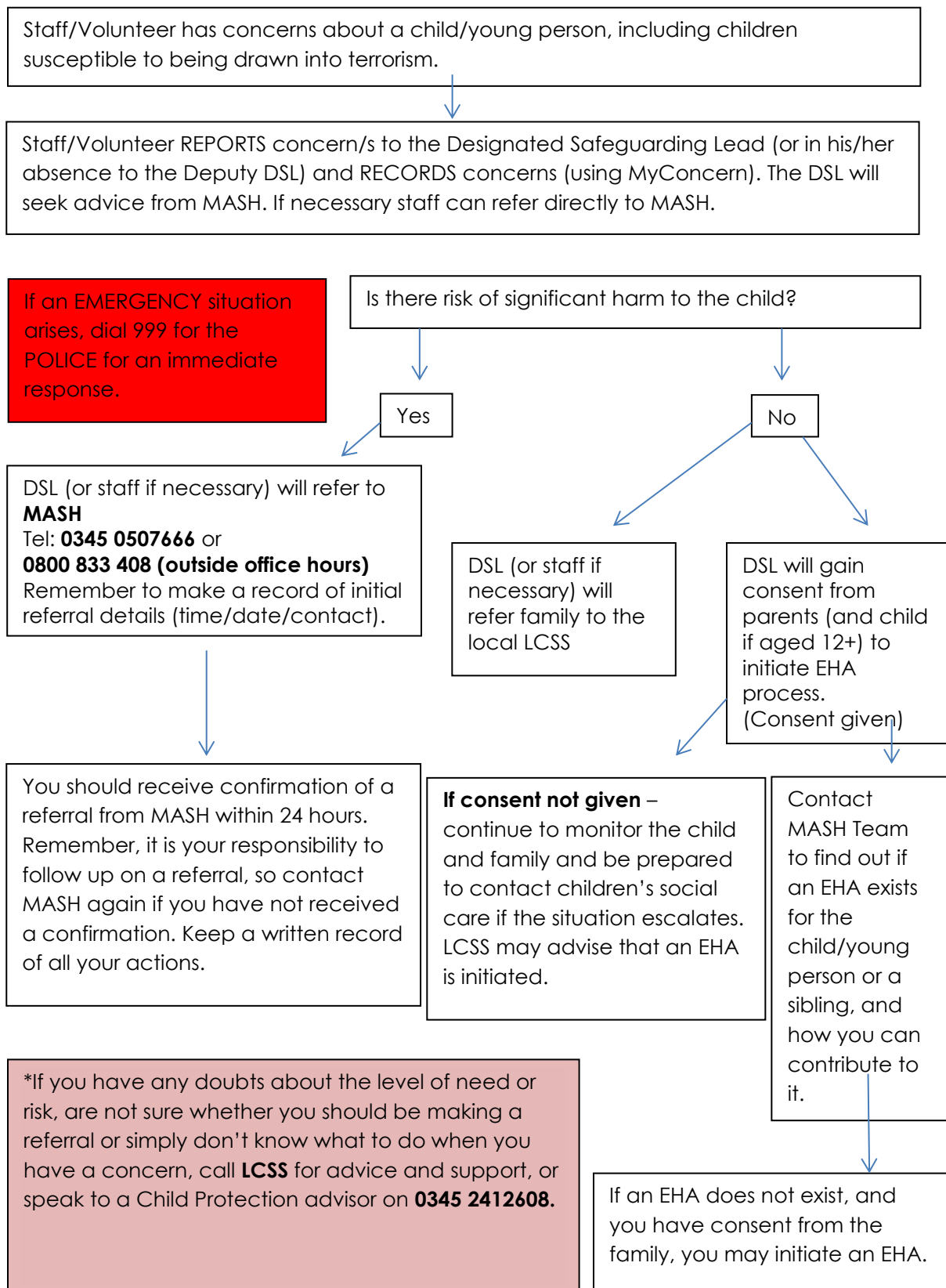
The DfE guidance that The Oratory has regard to in this policy is:

- [Keeping Children Safe in Education 2023](#) (September 2024) (KCSIE)
- KCSIE incorporates the additional statutory guidance: [Disqualification under the Childcare Act](#) (2006 updated September 2018)
- KCSIE also refers to the non-statutory advice for practitioners: [What to do if you're worried a child is being abused](#) (March 2015)
- [Working Together to Safeguard Children](#) (September 2023) (WT). WT refers to the non-statutory but important advice: [Information sharing: advice for Safeguarding practitioners](#) (2018)
- [Prevent Duty Guidance: for England and Wales](#) (July 2015) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:
- [The use of social media for on-line radicalisation](#) (July 2015)
- [Children who run away or go missing from home or care](#) (January 2024)
- [Safeguarding children who may have been trafficked](#) (October 2011)
- [Care of unaccompanied and trafficked children and child victims of modern slavery](#) (November 2017)
- [From harm to hope: A 10-year drugs plan to cut crime and save lives](#) (April 2022)
- [Honest information about drugs](#)
- Lucy Faithful Foundation self help site for [teenagers worried about sexual behaviour](#)

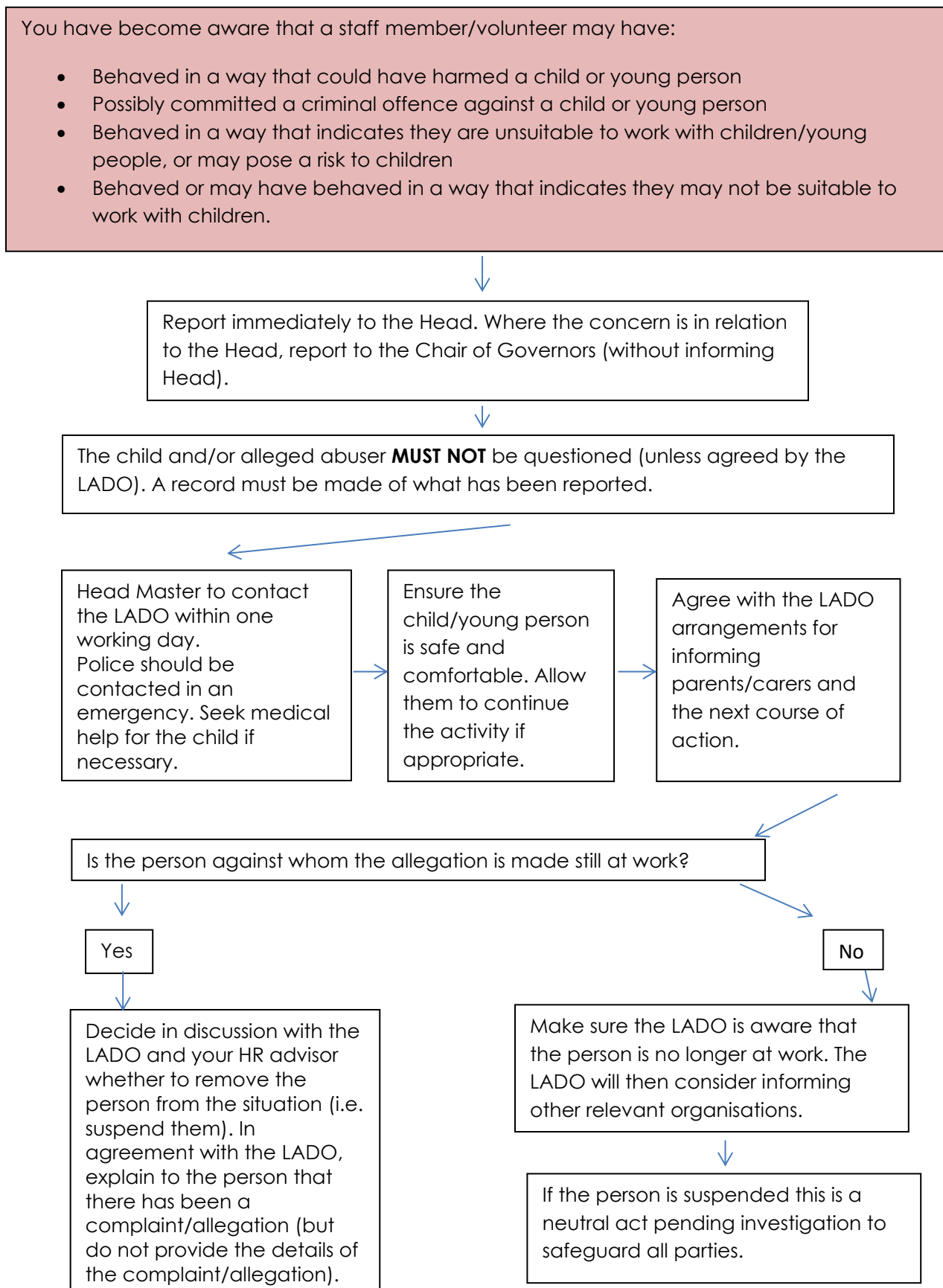
## Flowchart 1: Dealing with Concerns about a Child/Young Adult

Note that full information on referrals is found at:

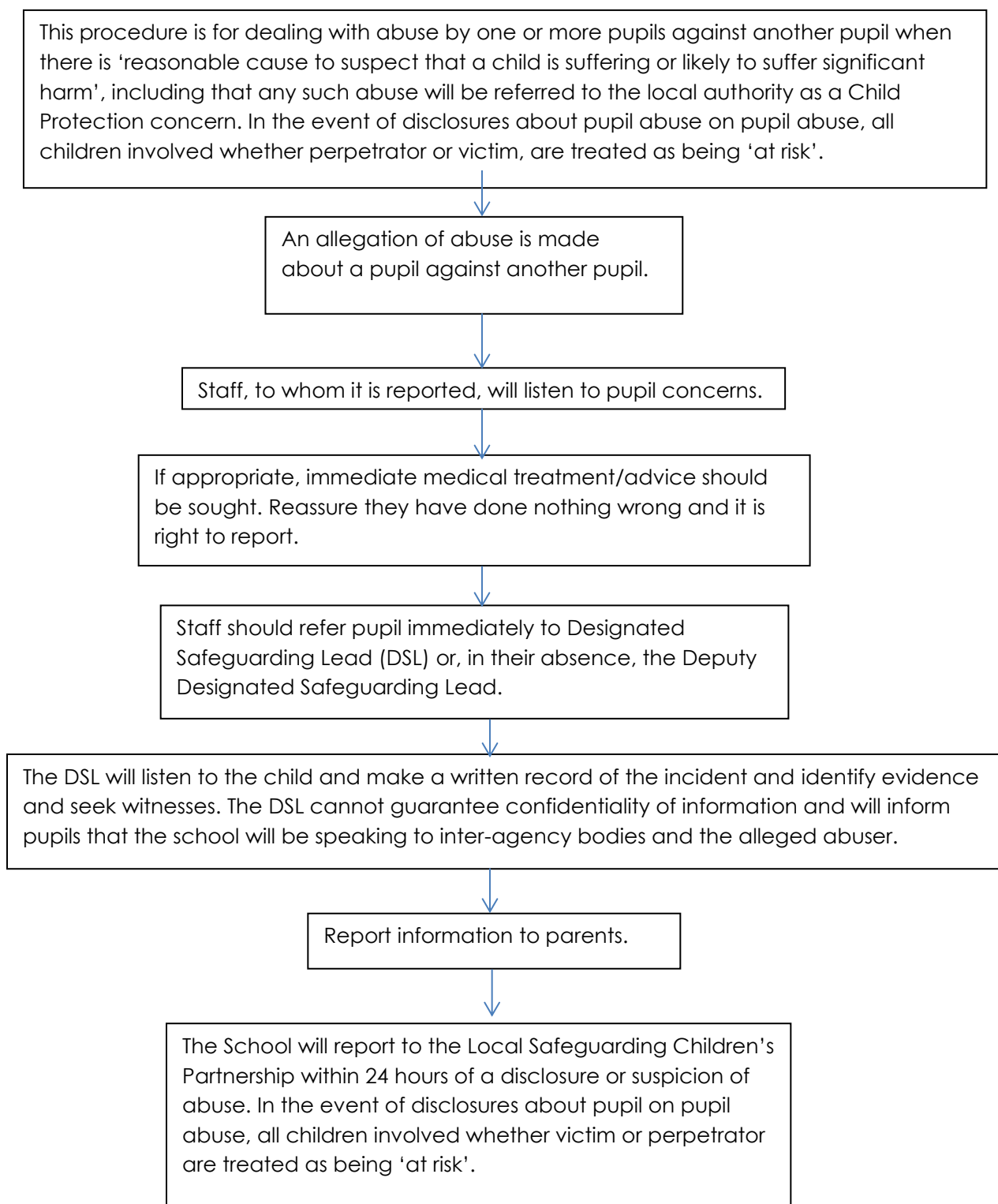
[http://oxfordshirescb.proceduresonline.com/p\\_referrals.html](http://oxfordshirescb.proceduresonline.com/p_referrals.html)



## Flowchart 2: Dealing with an Allegation of Child Abuse against an Employee, Volunteer or Any Other Person Working at a School



### Flowchart 3: Procedures for Dealing with Abuse by One or More Students Against Another Student





## Flowchart 4: Online Safety Incident Raised by a Child/Young Person or Member of Staff

