



# THE ORATORY

## Safeguarding (Child Protection) Policy

September 2025

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Regulatory Body:	DfE
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Education Safeguarding Advisory Team (ESAT)	Jo Lloyd Becky Langstone Sophie Kendall	01865 810603 <a href="mailto:ESAT.safeguardingchildren@oxfordshire.gov.uk">ESAT.safeguardingchildren@oxfordshire.gov.uk</a>
Locality Community Support Service (LCSS) worker		0345 2412608 <a href="mailto:LCSS.South@oxfordshire.gov.uk">LCSS.South@oxfordshire.gov.uk</a> Link for OS – Patsy Denton
Multi Agency Safeguarding Hub (MASH)		0345 050 7666
Emergency Duty Team (EDT)		0800 833408
Police		101 or in emergencies 999
Disclosure & Barring Service (DBS)		0300 0200 190 customerservices@db.s.gsi.gov.uk
<b>Prevent Team</b> – Support and Advice about Extremism		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>
Kingfisher Team (Child Sexual Exploitation)		01865 335276 <a href="mailto:KingfisherTeam@Oxfordshire.gov.uk">KingfisherTeam@Oxfordshire.gov.uk</a>
Children's Commissioner for England		Dame Rachel de Souza Tel: 020 7783 8330 <a href="http://www.childrenscommissioner.gov.uk">www.childrenscommissioner.gov.uk</a>

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Independent Listener for Boarders  Mrs Janet Harper		<a href="mailto:janharper27@gmail.com">janharper27@gmail.com</a>
NSPCC Whistleblowing Advice Line		Weston House, 42 Curtain Road, London, EC2A 3NH  0800 028 0285  Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
National College for Teaching and Leadership		0207 593 5393  <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
Ofsted Safeguarding Children		0300 123 4666 (Monday to Friday from 8am to 6pm)  <a href="mailto:whistleblowing@ofsted.gov.uk">whistleblowing@ofsted.gov.uk</a>

Our school recognises its responsibility for Safeguarding and Child Protection.

## 1. INTRODUCTION

- 1.1. It is essential that everybody working in a school or college understands their safeguarding responsibilities. Everyone who comes into contact with children and families has a role to play in ensuring children and young people are safe from abuse, neglect, exploitation, and harm. The Oratory School is committed to Safeguarding children and aims to create a culture of vigilance. All staff ensure that any decisions made are in the best interests of the child.
- 1.2. Our pupils' welfare is our paramount concern. The Governing body ensures that The Oratory School will Safeguard and promote the welfare of pupils and work together with agencies to ensure that our school has adequate arrangements to identify, assess and support those children who are likely to suffer or are suffering abuse, harm or neglect. <https://www.oscp.org.uk/concerned-about-a-child/>
- 1.3. This policy provides the basis for good practice within the school for Safeguarding work. It should be read in conjunction with the Oxfordshire Safeguarding Children's Safeguarding procedures, plus the Safeguarding appendix document. These are in keeping with relevant national procedures and reflect what the partnership considers to be safe and professional practice in this context.
- 1.4. This policy applies to all members of staff in our school, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers.

## 2. THE LEGAL FRAMEWORK

- 2.1. This policy and the accompanying procedure have been developed in accordance with the following statutory guidance and local safeguarding procedures:
  - Working Together to Safeguard Children 2026: A guide to multi-agency working to help, protect and promote the welfare of children, March 2026: [Working together to safeguard children 2026: statutory guidance](#)
  - Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2025: [www.gov.uk/government/publications/keeping-children-safe-in-education--2](http://www.gov.uk/government/publications/keeping-children-safe-in-education--2)

## 3. ROLES AND RESPONSIBILITIES

- 3.1. The school's Designated Safeguarding Lead (DSL) is Stephen Burrows, who has overall designated responsibility for Safeguarding and ensures there is always appropriate cover for this role.

The responsibilities of all Designated Safeguarding Leads are described in detail in Appendix A.

- 3.2. The **Governing body** are collectively responsible for ensuring that Safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.

- 3.3. **All staff members, governors, volunteers and external providers** know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child.
- 3.4. The Oratory School acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents.
- 3.5. The Oratory School and Governing body takes all reasonable action to limit children's exposure to the risks from the school's IT system and ensures the school has appropriate filters and monitoring systems in place and regularly review their effectiveness.

#### 4. SUPPORTING CHILDREN

4.1. Our school will support all pupils by:

- ensuring the content of the curriculum includes social and emotional aspects of learning through PSHE, RSHE and other curriculum contexts and ensuring that pupils are taught about Safeguarding so that they 'recognise when they are at risk and how to get help when they need it'.
- ensuring a comprehensive curriculum response to online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly.
- encouraging pupils to talk about feelings and ensuring they are listened to by a range of appropriate adults.
- supporting children to feel safe, develop confidence and independence and increase the development of self-esteem and self-assertiveness and responding to concerns of aggression or bullying.
- liaising and working together with other support services and those agencies involved in safeguarding children, including Family Help and preventative services as required in Working Together to Safeguarding Children 2026.
- considering intra familial harms and any necessary support for siblings.
- Our behaviour policy is aimed at supporting vulnerable pupils in the school. The behaviour policy outlines measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.
- having clear procedures in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence, and sexual harassment (which could take place on or offline).
- acknowledging the importance of 'contextual Safeguarding': <https://contextualsafeguarding.org.uk/> which considers wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare.
- alerting the Local Authority if it is aware of any child being looked after under a Private Fostering arrangement. On admission to school, and at other times, the school will be vigilant in identifying any private fostering arrangement.
- acknowledging that a child that is looked after (CWCF), in kinship care or has been previously looked after by the Local Authority potentially remains vulnerable and ensuring that all staff have the skills, knowledge and understanding to support these children.
- taking positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils with certain protected characteristics in order to meet their specific need. For example, taking positive action to support girls if there was evidence that they were being subjected to sexual violence or sexual harassment. This

includes making reasonable adjustments for disabled children and young people and those identified as having special educational needs.

- acknowledging that a child or young person being lesbian, gay or bisexual can sometimes be targeted by other children.
- offering support to children that are gender questioning with consideration to their individual needs, in partnership with their parents and any clinical advice
- Being aware that where a school places a pupil with an alternative provision provider, it continues to be responsible for the Safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. The school will follow DfE guidance on Alternative Educational Provision:
- <https://www.gov.uk/government/publications/alternative-provision>

## 5. PROCEDURES FOR DEALING WITH A CONCERN AND RECORD KEEPING

5.1. If a member of staff has a concern about a child or if a child tells them they are being, or at risk of being, abused, exploited or neglected, staff will appropriately respond by listening and offering reassurance. Staff should:

1. Make an accurate factual record as soon as possible including details of:
  - Dates and times of their observations/incident
  - Dates and times of any discussions in which they were involved
  - Any injuries
  - Explanations given by the child/adult
  - What action was taken
  - Any actual words or phrases used by the child

**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.

2. Listen to the wishes and feelings of the child, do not to make any promises but keep the child informed (age appropriate) of the action that will be taken.
3. Report it to the DSL. Staff do this through recording on MyConcern, which is automatically then sent to the DSL.
4. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
5. In the absence of the DSL or DDSL, staff will refer directly to MASH or the child's Social Worker (if applicable) and the police (if appropriate) if there is a significant concern.

5.2. The DSL will ensure any decisions and justifications for those decisions will be recorded in writing with clear outcomes documented following any action taken.

5.3. The Oratory School will discuss any concerns we have with the child's parents. There may be occasions when this is not appropriate, and if so, school staff would consult with other agencies prior to involving parents. We will record any decision not to discuss with parents and why.

5.4. Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance '[For Organisations](#)' which includes information about your obligations and how to comply, including protecting personal information and providing access to official information.

5.5. All Safeguarding records will be transferred in accordance with GDPR/KCSiE to the child's receiving school/setting within 5 school days.

5.6. The Head Master will be kept informed of any significant concerns by the DSL, and all other staff are informed on a need-to-know basis. This is primarily achieved through entries on MyConcern to specific teams around specific children. The DSL and Head Master meet formally once each week and both the Head Master and Second Master have access to all MyConcerns.

## **6. CONCERNS AND ALLEGATIONS ABOUT STAFF – For further details please refer to Appendix D and E**

6.1. All staff understand the processes and procedures to manage any safeguarding concern or allegation (no matter how small) about staff members (including supply staff, volunteers and contractors).

6.2. If staff have a Safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, volunteers and contractors), then this should be referred to the Head Master.

6.3. If staff have a Safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school or college low-level concerns policy.

## **7. INFORMATION SHARING**

7.1. We recognise that all matters relating to Safeguarding are confidential.

- 7.2. All staff members have a professional responsibility to share information with other agencies to Safeguard children.
- 7.3. All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing to Safeguard and promote children's welfare.
- 7.4. We ensure that staff members are confident about what they can and should do according to the law, including how to obtain consent to share information and when information can be shared without consent.
- 7.5. Staff should not assume a colleague or another professional will act to share information that might be critical in keeping children safe.

## **8. MULTI AGENCY WORKING**

- 8.1. We will develop and promote effective working relationships with other agencies, including agencies providing Family Help services to children, the Police and Children's Social Care.
- 8.2. We will ensure that relevant staff members participate in multi-agency meetings and forums, including Child Protection Conferences and core groups, to consider individual children.
- 8.3. We will participate in Child Safeguarding Practice Reviews (CSPRs), other reviews and file audits as and when required to do so by the Oxfordshire Safeguarding Children's Partnership. We will ensure that we have a clear process for gathering the evidence required for reviews and audits and embed recommendations into practice and complete required actions within agreed timescales.

## **9. SAFER RECRUITMENT – Please read in conjunction with the Safer recruitment policy**

- 9.1. Our school is committed to ensuring the development of a safe culture and:
  - that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
- 9.2. The Governing Body and Leadership Team are responsible for ensuring that the school follows safer recruitment processes outlined within guidance.

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- 9.3. The school maintains an accurate Single Central Record (SCR) in line with statutory guidance. This will be monitored and reviewed to ensure compliance by the Governing Body and the school's Leadership Team.
- 9.4. The Governing Body ensures that at least one person on every recruitment panel has completed safer recruitment training.
- 9.5. The school are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2018.
- 9.6. The Oratory School ensures that contractors and providers are aware of the school's Safeguarding policy and procedures and that this will be referred to and followed if an allegation is made regarding a member of their agency. The school will require that employees and volunteers provided by these organisations use the school's procedures to report concerns.
- 9.7. We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of Safeguarding checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, 2025*. If assurance is not obtained, permission to work with our children or use our school premises may be refused.
- 9.8. When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.
- 9.9. We advise all staff to disclose any reason that may affect their suitability to work with children that could be a transferable risk to their role.

## **10. TRAINING**

- 10.1. All staff in our school receive appropriate Safeguarding training at induction, which is updated at least annually, and all staff are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately.

- 10.2. Our DSL undergoes training to provide them with the knowledge and skills required to carry out their role. Our DSL and any members of our DSL team refresh their DSL training every two years.
- 10.3. Safeguarding training is provided to all new staff on appointment as part of their induction process including online safety which, amongst other things, includes an understanding of the expectations and applicable roles and responsibilities in relation to filtering and monitoring. This information will be regularly updated.
- 10.4. The Governing body will ensure that **all** Governors and trustees receive appropriate Safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in are effective and support the delivery of a robust whole school approach to Safeguarding. The training should be regularly updated.
- 10.5. We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate Safeguarding training commensurate with their roles before starting work.
- 10.6. The Designated Safeguarding Lead will update school staff and volunteers on any changes to Safeguarding legislation and procedures and relevant learning from Child Safeguarding Practice Reviews (CSPRs) in line with Working Together 2026. These updates will occur annually or more frequently when necessary and will include Safeguarding and Child Protection updates such as online safety (for example, via emails, e-bulletins and staff meetings), to provide them with the skills and knowledge to continue to safeguard children effectively.
- 10.7. The school will maintain accurate and up to date records of staff induction and training.

## **11. WHISTLEBLOWING IN A SAFEGUARDING CONTEXT**

- 11.1. While the school has a separate whistleblowing policy, this is a summary that outlines the process when there is a concern about poor or unsafe practice and potential

failures in the school's safeguarding provision. This does not replace the whistleblowing policy and should be read in conjunction with the school policy.

Whistleblowing is a term that is used where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed. All staff and volunteers should feel able to raise concerns and know they will be taken seriously by the Senior Leadership Team.

If the concern is about the Head Master, they should be raised with the Chair of Governors.

If you would prefer to raise your concerns outside of the school, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **12. SITE SECURITY**

- 12.1. All staff members have a responsibility to ensure our buildings and grounds are safe; this includes ensuring the safety of any visitors to the school.
  
- 12.2. The school will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.
  
- 12.3. 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.
  
- 12.4. 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 Head Master 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 pupils 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.

## **13. QUALITY ASSURANCE**

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OS072 The Oratory School Safeguarding (Child Protection) Policy

Updated: August 2025

To be reviewed: August 2026

- 13.1. The Oratory School ensures that systems are in place to monitor the implementation of, and compliance with, this policy and accompanying procedures.
- 13.2. The Oratory School's Senior Leadership Team and the Governing body will ensure that action is taken to remedy any deficiencies and weaknesses identified in Child Protection arrangements without delay.

#### **14. POLICY REVIEW**

- 14.1. This policy will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle.
- 14.2. The Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures.
- 14.3. Additional updates to the safeguarding policy and appendix will take place when needed.

## **APPENDIX A:**

### **The role of the Designated Safeguarding Lead**

#### **Managing referrals:**

- Refer cases to MASH and the Police, where appropriate, in a timely manner avoiding any delay that could place the child at increased risk
- Refer to the Oxfordshire Threshold of needs to assist with decision making - <https://www.oscp.org.uk/wp-content/uploads/2024/04/Threshold-of-needs.pdf>
- Act as a source of support, advice and expertise to staff members on matters of Child Protection and Safeguarding, including contextual Safeguarding.
- Have responsibility to ensure there is at least one key adult for 'Operation Encompass'. Guiding principles of the scheme are here: [Home: Operation Encompass](#). An annual information letter will be sent to parents.
- To ensure that the Local Authority are notified if children are persistently absent or missing education. [Children missing education - GOV.UK](#)

#### **Record keeping:**

- Keep detailed, accurate, secure records of all Safeguarding and welfare concerns, discussions and decisions made, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as children's social care or the Prevent program etc.
- Maintain a chronology of significant incidents for each child with Safeguarding concerns, including a record of decisions made and the reasons for those decisions.
- Ensure such records are kept confidentially and securely and separate from the child's educational record.
- The Oratory School has at least two emergency contacts for every child.
- When a child leaves our school, we will contact the Designated Safeguarding Lead at the new school or college and will ensure that the Safeguarding file is forwarded to the receiving setting within 5 school days and retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving setting and/or evidence of recorded delivery.

#### **Multi-agency working and information sharing:**

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

### **Raising awareness:**

The Designated Safeguarding Lead:

- Ensures each member of staff has access to, and understands, the school's Child Protection policy and procedures, and that training is regularly updated and at least annually.
- Ensures the School's Child Protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with Governors regarding this.
- Ensure the Child Protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Link with the Safeguarding Partnership arrangements to make sure staff are aware of any training opportunities and the latest local policies on local Safeguarding arrangements.
- Help promote educational outcomes by sharing information about welfare, Safeguarding and Child Protection issues that children who have or have had a Social Worker are experiencing with teachers and school and college leadership staff.
- Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them.

### **Training Knowledge and skills:**

The Designated Safeguarding Lead (and DDSLs) undergo training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The Designated Safeguarding Lead (and DDSLs) also undertake Prevent awareness training.

### **Quality assurance:**

- Monitor the implementation of and compliance with policy and procedures, including periodic audits of Safeguarding files (at a minimum once a year).
- Complete the 175/157 annual safeguarding report and submit to the Local Authority.
- Provide regular reports to the governing body detailing changes and reviews to policy, training undertaken by staff members and relevant data about vulnerable children.

### **Support for staff:**

- The school has a framework for providing an opportunity for staff who are working directly with vulnerable children to talk through and reflect on their involvement with the child's case.

## APPENDIX B:

### Safeguarding Definitions

- **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.
- **Children** are any people who have not yet reached their 18<sup>th</sup> birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSiE applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021.
- **Family Help** is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing Family Help is more effective in promoting the welfare of children rather than reacting later. It is particularly important that the designated safeguarding lead (and their deputies) know what the local Family Help process is and how and where to access support.
- **Safeguarding and promoting the welfare of children** is defined 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 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.
  - Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the child.
  - Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.
- **Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 47 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development; his health or development shall be compared with that which could reasonably be expected of a similar child.'
- **Vulnerable children:** Any child may benefit from Family Help, but all school and college staff should be particularly alert to the potential need for Family Help for a child who:
  - is disabled or has certain health conditions and has specific additional needs

- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently absent from education, missing/goes missing from home, or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

<https://www.oscp.org.uk/practitioners/locality-and-community-support-service-early-help/>

#### **CATEGORIES OF ABUSE:**

- **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development and conveying that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include:
  - not giving the child opportunities to express their views
  - deliberately silencing them or 'making fun' of what they say or how they communicate

It may feature:

- age or developmentally inappropriate expectations being imposed on children
- interactions that are beyond a child's developmental capability
- overprotection and limitation of exploration and learning
- preventing the child from participating in normal social interaction
- seeing or hearing the ill-treatment of another
- serious bullying (including cyberbullying)
- causing children frequently to feel frightened or in danger or the exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- **Neglect** is the persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, it may involve a parent 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
  - ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/neglect/>

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, 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.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific Safeguarding issue in education (KCSiE 2025).

## **APPENDIX C:**

Appendix C contains important additional information about specific forms of abuse and safeguarding issues for our staff awareness and is in line with Keeping children Safe in Education.

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

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers.

### **Child Sexual Exploitation & Child Criminal Exploitation**

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

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

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). CCE indicators can also be indicators of CSE, as can children who have older boyfriends or girlfriends and children who suffer from sexually transmitted infections or become pregnant.

The department provide: [Child sexual exploitation: guide for practitioners](#)

A full list of indicators can be found here: [Child Sexual Exploitation - Oxfordshire Safeguarding Children Partnership](#)

## **County Lines**

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

## **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 - year olds](#).

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [Child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

## **Children Who Are Absent from Education**

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

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

### **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Online Safety, Remote Learning, Cybercrime and Filtering & Monitoring**

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

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

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

The school has an Online Safety policy, which covers the use of mobile phones, cameras and other digital recording devices e.g. I-Pads. For online safety, within the policy there is support

about children accessing the internet whilst they're at school using data on their phones. This considers that many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G networks. This access means some children, whilst at school, sexually harass, bully and control others via their mobile and smart technology, share indecent images consensually and non-consensually and view and share pornography and other harmful content. This has been carefully considered within schools ICT Policy, including the management of devices, filtering and monitoring and access to smart technology. The policy also reinforces the importance of online safety, including making parents aware of what the school asks children to do online (e.g. sites they need to visit or who they'll be interacting with online).

The policy for remote learning demonstrates an understanding of how to follow Safeguarding procedures when planning remote education strategies and teaching remotely.

Guidance to support schools and colleges understand how to help keep pupils and staff safe whilst learning remotely can be found at <https://www.gov.uk/guidance/safeguarding-and-remote-education> and <https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools>

## **Cybercrime**

The school is aware that children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the Designated Safeguarding Lead (or a deputy), should consider referring into the Cyber Choices programme.

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

## **Filtering and monitoring**

Our Governing body is doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, they ensure that the school has appropriate filters and monitoring systems in place and that there is regular review of their effectiveness.

Whilst considering their responsibility to Safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the Governing body also consider the age range of their pupils, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus Safeguarding risks.

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

To support schools and colleges to meet this duty, the Department for Education's [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK](#) set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs
- schools can use the department's [Plan technology for your school - GOV.UK](#) to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

Governing bodies and proprietors should review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard. Additional guidance on “appropriate” filtering and monitoring can be found at:

- UK Safer Internet Centre: <https://saferinternet.org.uk/guide-and-resource/teachers-and-school-staff/appropriate-filtering-and-monitoring>. The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be assessed at <https://saferinternet.org.uk/blog/filtering-and-monitoring-webinars-available>.
- Southwest Grid for Learning ( <https://swgfl.org.uk/> ) has created a [tool](#) to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).
- The Department has published [Generative AI: product safety expectations](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

## **Domestic Abuse**

The statutory definition of Domestic Abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of Domestic Abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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. Experiencing domestic abuse 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.

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.

We are mindful of the prevalence of Domestic Abuse and that this may be impacting any of pupils. Victims and witnesses can be too fearful to report. Further support is available via the Oxfordshire Domestic Abuse Service.

[Domestic abuse support services | A2Dominion](#)

## **Operation Encompass**

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990. The Oratory School is an Operation Encompass school.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Lead (and DDSs) are aware of contact details and referral routes into 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 local authority children's social care where a child has been harmed or is at risk of harm.

## **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 and neglect, or other potentially traumatic adverse childhood experiences, it 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 designated safeguarding lead or a deputy.

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

The department has published advice and guidance [Preventing bullying - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/preventing-bullying) and [Mental Health and Behaviour in Schools](https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools) (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience amongst young people including its guidance [Promoting children and young people's emotional health and wellbeing](https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing). Its resources include social media, forming positive relationships, smoking and alcohol. See [Every Mind Matters](https://www.gov.uk/government/publications/every-mind-matters) for links to all materials and lesson plans.

## **Modern slavery and the National Referral Mechanism**

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

## **Preventing radicalisation**

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a school's or college's safeguarding approach.

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

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

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

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes:

- risk assessment
- working in partnership
- staff training
- IT policies

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

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

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

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

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

## **Channel**

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

The Designated Safeguarding Lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#) and [Channel training from the Home Office](#)

## **Sexual Harassment, Violence, Harmful Sexual Behaviours**

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence is rape, assault by penetration, sexual assault, causing someone to engage in sexual activity without consent (when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003).

Sexual Harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school or college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Harmful Sexual Behaviours exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. Schools and colleges should be aware of the importance of

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- recognising, acknowledging and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

Our school will follow Part 5 of Keeping Children Safe in Education 2025 when responding to all signs, reports and concerns of child-on-child sexual violence and sexual harassment.

### **So-called 'honour'– based abuse (including female genital mutilation and forced marriage)**

So-called 'honour'-based abuse (HBA) 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. 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. All forms of HBA are abuse (regardless of the 162 motivation) and should be handled and escalated as such. 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

## **Female Genital Mutilation**

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Female genital mutilation: resource pack - GOV.UK ([www.gov.uk](http://www.gov.uk))

**Mandatory Reporting Duty for teachers** - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve the Integrated Front Door as appropriate.

## **Forced Marriages**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

## **APPENDIX D:**

### **Concerns and Allegations about Staff including Supply staff, Volunteers and Contractors**

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

This includes all cases that meet the harm threshold where a person is alleged to have:

- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offence against, or related to, a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children and is known as transferable risk.

There are two levels of allegation/concern:

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

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

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

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

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

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

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

### **Pre-Appointment Checks and Safer Recruitment**

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

When appointing new staff, schools and colleges must:

- verify a candidate's identity. Identification checking guidelines can be found on the [GOV.UK](https://www.gov.uk) website
- obtain (via the applicant) an enhanced DBS certificate (including barred list information for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, follow advice on the [GOV.UK](https://www.gov.uk) website
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate and verify professional qualifications, as appropriate
- verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.
- carry out an online search on shortlisted candidates to help identify any issues that are publicly available online. Shortlisted candidates will be informed before online searches are carried out. Ensure that evidence of these checks has been retained

In addition:

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

### **Single Central Record**

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

- all staff, including teacher trainees on salaried routes, agency and third-party supply staff, even if they work for one day
- for independent schools, all members of the proprietor body.

The minimum information that must be recorded in respect of staff members (including teacher trainees on salaried routes) is set out below. For agency and third-party supply staff, schools and colleges must include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff.

The single central record must indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained:

- an identity check, (identification checking guidelines can be found on the GOV.UK website)
- a standalone children's barred list check 90
- an enhanced DBS check (with children's barred list check) requested/certificate provided
- a prohibition from teaching check
- further checks on people who have lived or worked outside the UK
- a check of professional qualifications, where required,
- a check to establish the person's right to work in the United Kingdom.

In addition:

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OS072 The Oratory School Safeguarding (Child Protection) Policy

Updated: August 2025

To be reviewed: August 2026

- colleges must record whether the person's position involves 'relevant activity', i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18
- independent schools (including academies and free schools) must record details of the section 128 checks undertaken for those in management positions.

The details of an individual should be removed from the single central record once they no longer work at the school or college.

Our school follows Part 3 of Keeping Children Safe in Education 2025 and this should be read on conjunction with the Safer Recruitment

## **APPENDIX E: dealing with allegations against staff and volunteers**

### **1. Introduction**

1.1 Despite all efforts to recruit safely there will be occasions when allegations of abuse by staff or volunteers against children are raised.

1.2 It is essential that any allegation of abuse made against a teacher or other member of staff (including supply staff, volunteers or a governor of the school) is dealt with fairly, quickly and consistently, in a way that provides effective protection for the child, and at the same time supports the person who is the subject of the allegation.

1.3 This procedure is drawn up taking account of the following prevailing guidance:

- Working Together to Safeguard Children
- The Children Act
- Education Act
- Keeping Children Safe in Education (KCSiE)

### **2. Thresholds for allegations**

2.1 These procedures should be applied when there is an allegation that any person who works in regulated activities with children, in connection with their employment or voluntary activity, with the children's workforce has:

- **Behaved in a way that has harmed a child or may have harmed a child.**
- **Possibly committed a criminal offence against or related to a child.**
- **Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.**
- **Behaved or may have behaved in a way that indicates they may not be suitable to work with children.**

2.2 Allegations can be made in relation to restrictive physical interventions and restraint but can also relate to inappropriate relationships between members of staff and children or young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual (see s16-19 Sexual Offences Act 2003).
- 'Grooming' i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 Sexual Offences Act 2003).
- Other 'grooming' behaviour giving rise to concerns of a broader child protection nature e.g. inappropriate text/e-mail messages or images, gifts, socialising etc.
- Possession of indecent images/pseudo-photographs of children.

2.3 In addition, these procedures should be applied when there is an allegation that any person who works with children:

- Has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include arrest for possession of a weapon or indecent images of children. As a parent or carer, their own child becomes subject to child protection procedures and/or they and their family become involved with social services for safeguarding reasons.
- Is closely associated with someone in their personal lives (e.g. partner, member of the immediate family or other household member) who may present a risk of harm to child/ren for whom the member of staff is responsible in their employment/volunteering.

2.4 This policy should be followed where a person's employment is covered by the Childcare Act 2006 (See definition in the statutory guidance) and:

2.5 Is living in the same household where another person who is disqualified lives or is employed - a person is disqualified if they are 'found to have committed' an offence which is included in the 2009 Regulations updated July 2018 (a 'relevant offence').

2.6 It is also important to note that, whilst not specifically covered by statutory guidance, the risks associated with the wider family and close associates of the member of staff may also need to be considered.

2.7 This policy should be followed where allegations are made against a 16 and 17-year-old who has been put in a position of trust by an organisation in relation to anyone under the age of 18. For example, where they might be involved in coaching a sport or in other school or out of school activities or undertaking training and work placements.

2.8 The policy for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above or may do so without warranting consideration of either a police investigation or Section 47 Child Protection enquiries by Local Authority children's social care services. In these cases, our school would follow their Safeguarding and other relevant policies to resolve cases without delay.

### **The difference between an allegation and a low-level concern**

2.9 It might not be clear whether an incident constitutes an 'allegation'. It is important to remember that in order to be an allegation the alleged incident has to be sufficiently serious as to suggest that harm has or may have been caused harm to a child/ren or that the alleged behaviour indicates the individual may pose a risk of harm to children. Issues that do not meet this threshold may constitute conduct, performance or disciplinary issues and should be addressed by our school using the appropriate organisations policies. If in doubt, our school will consult with the LADO.

2.10 If it is difficult to determine the level of risk associated with an incident our school will consider:

- Was the incident a disproportionate or inappropriate response in the context of a challenging situation?
- Where the incident involved an inappropriate response to challenging behaviour, had the member of staff had training in managing this?
- Does the member of staff understand that their behaviour was inappropriate and express a wish to behave differently in the future? For example, are they willing to undergo training?

- Does the child or family want to report the incident to the police, or would they prefer the matter to be dealt with by the employer?
- Have similar allegations previously been made against the employee – is there a pattern developing?

2.11 Incidents which fall short of the threshold could include an accusation that is made second or third hand (by someone who did not witness the alleged incident) and the facts are not clear,

or the member of staff alleged to have done this was not there at the time, or there is confusion about the account.

2.12 Whether an incident constitutes an allegation and hence needs to be dealt with through these policies, may need to be discussed between the LADO and our school. If it falls short of this threshold there may still be a role for the LADO to provide advice and support to our school. Where the matter constitutes a conduct or performance issue, our school should follow the appropriate disciplinary procedures and let the LADO know of the outcome.

2.13 Oxfordshire LADO have a consultation referral document that supports LADO in triaging whether the referral meets the allegation threshold or is a low-level concern. Our school will use the LADO consultation form to support our decision making.

### **3. Roles and Responsibilities**

3.1 Allegations about staff should be reported to the Head Master. If the Head Master wishes to delegate the allegation to another member of staff to investigate, this would need to be a staff member of the Senior Leadership Team. Our school will:

- Seek advice from the LADO regarding incidents where it is unclear whether it is an allegation or a low-level concern.
- Report all allegations of harm to the LADO within 24 working hours of when the incident occurs and or when the disclosure is made.

#### **Organisations or individuals using school premises**

If our school receives an allegation relating to an incident that happened within an external club or activity within the school premises, we will follow our safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO).

#### **Whistleblowing**

3.2 All staff at our school should be made aware of the organisation's whistleblowing policy and feel confident to voice concerns about the attitude or actions of colleagues

#### **Roles and responsibilities for Local Authorities**

3.3 Oxfordshire have a team of LADOs to:

- Assesses and reviews the referrals and decides if an Allegation Against Staff and Volunteer's threshold is met.
  - Manage and have oversight of individual cases.
  - Provide advice and guidance to employers and voluntary organisations.
  - Liaise with the police and other agencies.
  - Monitor the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.
- 
- Provide advice and guidance to employers in relation to making referrals to the Disclosure and Barring Service (DBS), Teaching Regulation Agency (TRA) and regulatory bodies such as Ofsted, the General Medical Council (GMC), Health and Care Professions Council (HCPC) and Nursing and Midwifery Council (NMC) etc.

3.4 It is important to be aware that LADOs do not carry out investigations into allegations and need to remain impartial. The responsibility for the investigation remains with the employer (or whoever is commissioned by the employer to investigate the process) and/or the police. The LADO can provide advice and, where necessary, co-ordinate the process.

#### **Supply teachers and contracted staff**

3.5 In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures, for example, supply teachers or contracted staff provided by an employment agency or business.

3.6 Whilst our school is not the employer of supply teachers, we will ensure allegations are dealt with properly. **In no circumstances** would our school decide to cease to use a supply teacher due to Safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. This is in line with the guidance within KCSIE.

#### **Roles and responsibilities for the Police**

3.7 An investigation into the allegation is normally carried out by the authority in which it sits e.g. criminal allegations will be investigated by the Police and non-criminal allegations will be investigated in the first instance by the School. This will be agreed at the initial evaluation stage. Where the School is not conducting the investigation, it will cooperate with investigative agencies. The investigation will be overseen by the Local Authority Designated Officer (LADO) who will record and be reported to by all other relevant agencies involved. Internal investigations must be second to any Safeguarding investigation and may need to be delayed until the external investigation is complete.

#### **Police bail**

3.8 Police will make an informed decision on making an arrest based on the information known at the time. If an arrest is justified, and following the custody process, the officer in the case will consider if the threshold for bail conditions has been met and either release the suspect on bail with conditions or release under investigation (RUI) without conditions. The decision to arrest is not always an accurate reflection of the risk posed, and any decisions around management of the suspect and arrest/interview should be shared with the LADO for ongoing risk management.

#### **4. Responding to an allegation or concern – the role of the employer**

4.1 An allegation or concern raised about a member of staff may arise from a number of sources, for example, a report from a child, a concern raised by another adult in the organisation or a complaint by a parent. It may also arise in the context of the member of staff and their life outside work or at home.

##### **Initial action by person receiving or identifying an allegation or concern**

4.2 The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind. They should not:

- Investigate or ask leading questions.
- Make assumptions or offer alternative explanations.
- Promise confidentiality.

They should follow our school procedures, which should include the following:

- Making a written record of the information (where possible in the child's/adult's own words), including the time, date and place of incident/s, persons present and what was said.
- Signing and dating the written record.
- Immediately reporting the matter to the Head Master or their delegated deputy in their absence or where the Head Master is the subject of the allegation report to the Chair of Governors.
- A "case manager" will lead any investigation. The case manager will be appointed by the Head Master or Chair of Governors.
- Our school will undertake an immediate risk assessment which involves ensuring immediate safety of the child and/or children and seeking medical attention if required.

##### **Initial action by the Head Master/employer**

4.3 When informed of a concern or allegation at our school, the Head Master/Case Manager will not investigate the matter but will gather initial information and liaise with the LADO.

As part of the process the Head Master/Case Manager will:

- Obtain written details of the concern/allegation, signed and dated by the person receiving it (not the child / adult making the allegation or the alleged person).
- Record any information about times, dates and location of incident/s and names of any potential witnesses.
- Record discussions about the child and/or member of staff, any decisions made, and the reasons for those decisions.

##### **Notifying the LADO within one working day of an allegation**

4.4 The Head Master/Case Manager at our school will inform the LADO within one working day after an allegation is made and prior to any further investigation taking place. A failure to report an allegation in accordance with procedures is a potential disciplinary matter as this could place a child at further risk of harm.

- If it is outside of normal working hours and there is an immediate risk to a child/ren our school will call the Local Authority Children's Social Care Emergency Duty Team and the Police, if necessary.
- Our school will carry out a risk assessment. This will include ensuring safety, identifying a safety plan and any potential organizational risk.

### **Suspension – when it should be considered**

4.5 Our school will not suspend a member of staff without serious consideration and will not do it automatically when an allegation has been made. Depending on the nature of the case, it may be possible that alternative arrangements are made so that the individual can continue working. Our school is responsible for the decision to suspend an employee but will listen to the views of the police, other agencies and/or LADO regarding suspension. In the case of suspension, the employee will receive written confirmation within one working day and will be informed of the reason for the suspension. Our school will also liaise with their HR provider.

## **5. The Role of the LADO**

### **Initial consideration of an allegation by the LADO**

5.1 The LADO's role is statutory, whose responsibilities are set out in Working Together to Safeguard Children. The investigation will be overseen by the LADO who will record and be reported to by all other agencies. <https://national-lado-network.co.uk/the-role-of-the-lado-local-authority-designated-officer/>

### **Position of Trust Meeting (POT)**

5.2 This is a multi-agency meeting that seeks to agree a course of action following an allegation against a staff member. The POT meeting seeks to discuss and explore if there is enough information to suggest a child may have been harmed or a criminal offence may have been committed. This is decided on a case-by-case basis.

5.3 The purpose of the meeting is to scope, gather and share information, and plan and direct the investigation which could also end up as an internal management investigation.

5.4 The POT meeting will be chaired by the LADO and all appropriate professionals would be invited. The subject of the allegation does not attend the POT meeting.

### **Timescales for completing investigations of allegations**

5.5 It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. Our school will investigate allegations as a priority to avoid any delay. The time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation.

### **Monitoring progress**

5.6 The LADO will monitor and record the progress of each case, depending on its complexity. This could be by way of review meetings/discussions or direct liaison with the police, LA children's social care, our school as appropriate.

## **Records of LADO Allegations Management**

5.7 Information of all allegations that meets LADO Threshold will be kept on a restricted and confidential LADO database.

### **6. Outcomes Following an Investigation**

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

#### **Substantiated allegations**

There is sufficient evidence to prove the allegation that a child has been harmed or there is a risk of harm.

#### **Malicious**

There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive. The police should be asked to consider what action may be appropriate in these circumstances.

#### **False allegations**

There is sufficient evidence to disprove the allegation, however, there is no evidence to suggest that there was a deliberate intention to deceive.

#### **Unsubstantiated allegations**

There is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

#### **Unfounded**

The additional definition of 'unfounded' can be used to reflect cases where there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

### **Outcome Letter**

6.2 Our school will put the outcome and recommendations in writing to the alleged person and send a copy of the letter to the LADO who will keep this on the LADO data base.

### **References**

6.3 It is noted in Keeping Children Safe in Education 2025 that cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious will not be included in our school references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious will also not be included in any reference.

6.4 Substantiated allegations will be included in references, provided that the information is factual and does not include opinions.

### **Record keeping in relation to the outcome of an investigation**

6.5 Details of allegations, following an investigation, that are found to have been malicious or false should be removed from personnel records unless the individual gives their consent for

retention of the information. However, for all other allegations, it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- notes of any action taken, and decisions reached, and the outcome i.e substantiated, unsubstantiated etc
- a copy provided to the person concerned, where agreed by children's social care or the police and
- a declaration on whether the information will be referred to in any future reference.

6.6 Where records contain information about allegations of sexual abuse, these will be preserved for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the

inquiry. Our school will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### **Substantiated Outcomes**

6.7 If the allegation is substantiated and the individual is dismissed or our school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, our school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

6.8 If the individual concerned is a member of teaching staff, our school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Notifying Ofsted**

6.9 Ofsted should be informed of any allegation or concern made against a member of staff in any day care establishment for children under 8 or against a registered child minder. They should also be invited to take part in any subsequent meeting/discussion.

6.10 Ofsted should also be informed if there is an allegation against a teacher or worker in a reception class or an early year setting. Our school has a duty to inform Ofsted and the LADO.

## **7. Disciplinary or Suitability Process and Investigation**

7.1 The Designated Officer and the Head Master/Case Manager should discuss whether disciplinary action is appropriate in all cases where:

- It is clear at the outset or decided in the POT meeting that a police investigation or local authority children's social care services enquiry is not necessary or
- Our school is informed by the police or the Crown Prosecution Service that a criminal investigation and any subsequent trial is complete, or that an investigation is to be closed without charge, or a prosecution discontinued

7.2 The discussion should consider any potential misconduct or gross misconduct on the part of the member of staff, and take into account:

- Information provided by the police and/or local authority children's social care services
- The result of any investigation or trial
- The different standard of proof in disciplinary and criminal proceedings.

7.3 The investigation and any subsequent disciplinary hearing should be held in accordance with our school's disciplinary policy and procedure. Our school will liaise with HR.

7.4 For supply staff, the process described above will be the responsibility of the supply agency and not the school.

### **Resignations and settlement agreements**

7.5 Every effort should be made to reach a conclusion in all cases even if the individual refuses to co-operate, having been given a full opportunity to answer the allegation and make representations.

7.6 Settlement agreements, by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, will **not** be used where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children.

7.7 Such an agreement will not prevent a thorough police and/or school or employer investigation where that is appropriate.

7.8 Our school will not cease our investigations if the person leaves, resigns or ceases to provide their services. We will ensure that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.

### **Returning to work**

7.9 Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Head Master/HR will consider how best to facilitate that. Most people

will benefit from some help and support to return to work after a stressful experience. The Head Master/HR will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school or college.

## **8. General responsibilities when investigating an outcome**

### **Support to the child and family involved**

8.1 Our school, together with LA children's social care and/or police, where they are involved, will consider the impact on the child concerned and provide support as appropriate. Liaison between the agencies should take place in order to ensure that the child's needs are addressed.

### **Keeping parents/carers and children informed**

- Our school will inform the parents of the child/ren involved of the allegation and the process that is being followed unless this will impede the disciplinary or investigative processes.
- The parent/s and the child, if sufficiently mature, should be helped to understand the processes involved and be kept informed about the progress of the case and of the outcome where there is no criminal prosecution. This will include the outcome of any disciplinary process, but not the deliberations of, or the information used in, a hearing.

### **Responsibilities to employees/volunteers alleged to have caused harm**

#### **Support to the accused member of staff**

8.2 As soon as possible after an allegation has been received, the accused member of staff should be advised to contact their union or professional association. HR should be consulted at the earliest opportunity in order that appropriate support can be provided via the organisation's occupational health or employee welfare arrangements.

#### **Keeping the accused member of staff informed**

8.3 Subject to restrictions on the information that can be shared, our school should, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome (e.g. disciplinary action and dismissal or referral to the DBS or regulatory body). If the matter is subject to police involvement, the police should always be consulted prior to any discussion with the accused so criminal investigations are not compromised.

8.4 The accused member of staff should:

- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved
- Be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process
- If suspended, be kept up to date about events in the workplace.

### **Confidentiality**

8.5 Every effort should be made to maintain confidentiality while an allegation is being investigated or considered. This includes staff involved and parents/carers. Apart from keeping the child, parents and accused person (where this would not place the child at further risk) up to date with progress of the case, information should be restricted to those who have a need to know, in order to protect children, facilitate enquiries and manage related disciplinary or suitability processes.

## **9. Non-Recent Allegations (historic)**

9.1 Where an adult makes an allegation of a non-recent nature to our school that they were abused as a child, our school will advise the individual to report the allegation to the police, and we will report the allegation to the LADO.

## **10. Low Level Concerns**

10.1 This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the LADO threshold.

### **Definition of low-level concerns**

10.2 The term 'low-level' concern is any concern, no matter how small, that an adult working in or on behalf of our school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

- Being overly friendly with children
- Having favourites
  
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language
- Sharing personal mobile numbers with children
- Social media use

### **Sharing low-level concerns**

10.3 Our school recognises the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

10.4 All staff are required to report low level concerns to the Head Master.

### **Responding to low-level concerns**

10.5 The Head Master will collect all available evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

10.6 The information collected will then be used to categorise the type of behaviour and determine any further action, in line with the staff Code of Conduct.

10.7 If the concern is of a safeguarding nature, liaison with the LADO will be carried out, in line with the expectations from Oxfordshire LADO team. The LADO can be re-contacted at any time if the evidence that is gathered raises further concerns or meets the allegation thresholds.

### **Record keeping**

10.8 All low-level concerns at our school will be recorded. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

10.9 Our school records will be:

- Kept confidentially.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold.
- Retained at least until the individual leaves employment at the school

10.10 Where a low-level concern relates to a supply teacher or contractor, our school will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## 11. Oxfordshire LADO Managing Allegations Flowchart

This flowchart describes the process for reporting concerns and allegations about someone in a position of trust

