

**2026/27 Child Protection and
Safeguarding Policy for
The Oratory School**

Consistent with Keeping Children Safe in Education 2026



Date agreed and ratified by Governing Body: September 2026

Review date: August 2027

In this policy:

- Staff includes reference to volunteers and Governors

The policy will be reviewed and updated at least annually and will also be updated promptly in response to changes in national or local guidance, emerging Safeguarding risks, learning from Child Safeguarding Practice Reviews and internal quality assurance activity.

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Nominated Safeguarding Governors	Kate Carberry-Long and Pascale Lo	01491 683500 k.carberry-long@oratory.co.uk 01491 683500 p.lo@oratory.co.uk
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Local Authority Designated Officer (LADO)	Jo Lloyd Sandra Barratt Amie Pilcher	01865 810603 Lado.Safeguardingchildren@oxfordshire.gov.uk
Education Safeguarding Advisory Team (ESAT)	ESAT team	01865 810603 ESAT.Safeguardingchildren@oxfordshire.gov.uk
Locality Community Support Service (LCSS) worker	Edith Williams	07788 302193 lcss@oxfordshire.gov.uk

Multi Agency Safeguarding Hub (MASH)		0345 050 7666
Emergency Duty Team (EDT)		0800 833408
Police		101 or in emergencies 999

The Oratory School recognises its responsibility for Safeguarding and Child Protection; this policy must be read, understood and adhered to in conjunction with the requirements for individual roles as stipulated in Keeping Children Safe in Education 2026.

1. Introduction

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 should ensure that any decisions made are in the best interests of the child.

The Oratory School recognises that Safeguarding and promoting the welfare of children is everybody's responsibility. The Oratory School adopts a child-centred approach and seeks to ensure that every decision made reflects the best interests of the child. Staff are expected to maintain professional curiosity, recognising that abuse, neglect, exploitation and harm rarely occur in isolation and that multiple vulnerabilities may present simultaneously.

Our pupils' welfare is our paramount concern. The Governing Body will ensure that The Oratory School will Safeguard and promote the welfare of pupils and work together with agencies to ensure that The Oratory School has adequate arrangements to identify, assess and support those children who are likely to suffer or are suffering abuse, harm or neglect.

Our Safeguarding policy is in keeping with relevant national procedures and local Safeguarding arrangements. More details can be found via the [Oxfordshire Safeguarding Children's Partnership](#). [What to do if you think a child is at risk of abuse or neglect - Oxfordshire Safeguarding Children Partnership](#)

The Oratory School recognises the importance of providing help and support as soon as concerns emerge and will work collaboratively with children, families, Family Help services, Children's Social Care and other agencies to ensure children receive the right help at the right time.

This policy applies to all members of staff in The Oratory School, including all permanent, temporary and support staff, Governors, volunteers, contractors and external service or activity providers.

In line with Working Together to Safeguard Children 2026, The Oratory School places the child at the centre of all Safeguarding practice. Safeguarding decisions are informed by a clear understanding of the child's lived experience, their wishes and feelings, and the impact of harm on their day-to-day life. All staff are expected to exercise professional curiosity and judgement and to act promptly where concerns are identified.

2. Legislation and Statutory Guidance

This policy is informed by, and has due regard to, the following statutory guidance and legislation:

- Keeping Children Safe in Education DfE, 2026
- Working Together to Safeguard Children DfE, 2026
- Children Act 1989 and Children Act 2004
- Education and Inspections Act 2006
- Education Act 2011

- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- Children and Social Work Act 2017
- Restrictive interventions, including use of reasonable force, in schools, 2026

This policy also reflects Oxfordshire Safeguarding Children Partnership (OSCP) local procedures and thresholds.

3. Roles and Responsibilities

The Oratory School's Designated Safeguarding Lead (DSL) has overall responsibility for Safeguarding and ensures there is always appropriate cover.

The DSL provides leadership for Safeguarding within The Oratory School, including ensuring robust challenge, reflective discussion and professional oversight of Safeguarding decisions, particularly where concerns are emerging, cumulative or complex.

The Oratory School will ensure there are robust arrangements in place to provide Safeguarding leadership when the DSL is unavailable. Deputy Designated Safeguarding Leads have appropriate access to Safeguarding records and systems to enable them to carry out their role effectively. The Oratory School ensures that secure arrangements are in place to facilitate the sharing of Safeguarding information between members of the Safeguarding team where necessary to protect children. The Oratory School uses MyConcern and teams are assigned appropriately to each case.

The Governing Body is collectively responsible for ensuring that Safeguarding arrangements are fully embedded within The Oratory School's ethos and reflected in The Oratory School's day-to-day practice.

As a boarding school, The Oratory School recognises that Safeguarding responsibilities extend beyond the academic day. Safeguarding arrangements apply equally to day pupils and boarders. Boarding provision operates in accordance with the National Minimum Standards for Boarding Schools and is supported by boarding-specific Safeguarding procedures, staff training, supervision arrangements and reporting systems.

All staff understand the importance of professional curiosity and challenge in Safeguarding practice and are expected to act promptly where there are concerns about a child's safety or welfare.

The Oratory School and Governing Body ensure that appropriate filtering and monitoring systems are in place and are effective in reducing children's exposure to harmful online content and activity. These arrangements are proportionate, age-appropriate, risk based and regularly reviewed. The Governing Body maintains strategic oversight of filtering and monitoring arrangements and receives appropriate assurance regarding their effectiveness, at least once per academic year. Filtering and monitoring arrangements form part of The Oratory School's wider Safeguarding framework and are considered alongside staff training, curriculum provision, online safety education and risk assessment processes.

The Governing Body will ensure that Safeguarding arrangements reflect emerging Safeguarding risks including extra-familial harm, attendance related vulnerability, online harms, technology-enabled abuse, exploitation and serious violence.

All staff, Governors, volunteers and external providers are expected to identify children who may benefit from additional support, including Family Help, and to raise concerns promptly with the Designated Safeguarding Lead.

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.

4. Supporting Children

The Oratory School understands that Safeguarding and promoting the welfare of children is defined by Working Together to Safeguard Children 2026 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.

Categories of abuse are defined in Keeping Children Safe in Education 2026, and understood by The Oratory School as:

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), 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.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, 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 and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

Our staff are aware that Safeguarding issues often overlap and can put children at risk of harm, including but not limited to, the categories of above. The following are understood as being potential indicators of risk:

- Drug taking and/or alcohol misuse
- Unexplainable and/or persistent absences from education
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation
- Consensual and non-consensual making or sharing of nudes or semi nudes.

Further information on these Safeguarding issues can be found within Keeping Children Safe in Education 2026.

The Oratory School will support all pupils by:

- Ensuring the curriculum contributes to Safeguarding and promotes children's welfare through age-appropriate and developmentally appropriate teaching, including through PSHE, RSHE, Health Education, Computing and other relevant curriculum areas. This will include learning about healthy respectful relationships, consent, online safety, digital resilience, Safeguarding, exploitation, discrimination, equality, diversity, misogyny, prejudice, mental health and wellbeing, harmful sexual behaviour, serious violence, radicalisation, the safe use of technology, including generative artificial intelligence, and how to seek help when concerned about themselves or others.
- Ensuring that Safeguarding education is responsive to emerging local and national Safeguarding risks and reflects the lived experiences of children.
- Ensuring The Oratory School implements and applies mobile phone arrangements in accordance with Department for Education guidance and The Oratory School's own mobile phone, behaviour and online safety policies.
- Encouraging pupils to talk about feelings and ensuring they are listened to by a range of appropriate adults.
- Recognising that mental health concerns, self-harm, suicidal ideation, eating difficulties and significant emotional distress may be indicators that a child has experienced or may be at risk of abuse, neglect, exploitation or other Safeguarding concerns.
- Ensuring that children know where and how to access support for their mental health and wellbeing within school and through external services where appropriate.

- Recognising that young carers may experience additional Safeguarding vulnerabilities including emotional wellbeing concerns, reduced attendance, caring responsibilities and social isolation. Staff will be alert to these needs and will ensure that appropriate support is provided in partnership with families and other agencies.
- Ensuring that children's voices, wishes and lived experiences are central to decision-making and that their views are sought, recorded and taken seriously, in line with Working Together to Safeguard Children.
- Raising 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 Safeguard Children 2026.
- Recognising that Family Help is a shared responsibility across agencies and that schools play a key role in identifying emerging need, cumulative harm and vulnerability at an early stage.
- Considering the role of family networks, kinship care and protective factors, alongside risks, when assessing need and planning support.
- Recognising that regular attendance is a protective factor and that persistent absence, severe absence, repeated lateness, missing education and disengagement from learning may indicate Safeguarding concerns, vulnerability or unmet need.
- Considering intra familial harms and any necessary support for siblings.
- Having a behaviour policy that focuses on early support, prevention and de-escalation, particularly for vulnerable pupils. The policy should make clear that restrictive physical interventions are a last resort and are only used where necessary and proportionate. It also sets out The Oratory School's statutory duties to record and report all significant incidents involving the use of force, including timely recording, notifying parents, and reviewing incidents to reduce future risk, alongside clear 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 off-line).
- Recognising that children may experience harm beyond their family environment, including child criminal exploitation, child sexual exploitation, serious violence, county lines activity, harmful sexual behaviour, peer abuse and online abuse.
- Recognising that serious violence, weapon carrying, threats of violence, peer conflict and criminal exploitation may present significant Safeguarding risks and ensuring concerns are identified and responded to appropriately.
- Alerting the Local Authority if The Oratory School is aware of any child being looked after under a Private Fostering arrangement. On admission to school, and at other times, The Oratory 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 or students with certain protected characteristics 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.

- Recognising that children who are lesbian, gay, bisexual, or gender-questioning may experience bullying, discrimination or vulnerability. The Oratory School will consider each child's individual circumstances, listen to their views, work in partnership with parents wherever appropriate, take account of relevant professional advice and ensure Safeguarding decisions are made in the child's best interests.
- Challenging sexist, misogynistic, discriminatory and abusive behaviours and promoting a culture of respect, equality and safety.
- Recognising the importance of preventing Violence Against Women and Girls (VAWG). The school will actively challenge misogyny, harmful gender stereotypes, sexual harassment, gender-based abuse and other behaviours that may contribute to violence or harm. Through safeguarding practice, behaviour systems, pastoral support and the curriculum, the school promotes respectful relationships, equality, consent and a culture of safety for all.
- Recognising that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.
- Recognising that children with medical needs or complex health needs may require additional Safeguarding consideration. Staff will remain alert to indicators of abuse, neglect or exploitation and ensure that Safeguarding and medical needs are considered together when assessing risk.
- 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 Oratory School will follow DfE guidance on Alternative Educational Provision: [Alternative provision - GOV.UK](https://www.gov.uk/government/publications/alternative-educational-provision)

5. Procedures for dealing with a concern and Record Keeping

The Oratory School recognises any child may benefit from support via universal services, community based Early Help/targeted Family Help prior to statutory services.

Our staff are alert to the potential need for additional support 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 pregnant and/or is a parent themselves.
- Has exhibited early signs of abusive, violent and/or harmful behaviours.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from education, home or care.
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- Is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.
- Is at risk of being radicalised into terrorism.
- 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 honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child.

All staff are aware of the processes for supporting children and families including criteria, referral route and associated legislation including:

- Community-based Family Help assessments.
- Family Help support/Targeted early help (Section 10 and 11 of the Children Act 2004).
- Children in Need including how this applies for disabled children (Section 17 of the Children Act 1989).
- Child Protection- when there is reasonable cause to suspect a child is suffering or likely to suffer significant harm (Section 47 of the Children Act 1989).
- Care and supervision orders (Section 31 of the Children Act 1989).
- Duty to accommodate a child (Section 20 of the Children Act 1989).

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 respond appropriately by listening and offering reassurance. Staff will take account of the wishes and feelings of the child, will not make any promises and will keep the child informed (age appropriate) of the action that will be taken.

Staff will make an accurate and factual record of any concern as soon as possible and will add it to MyConcern, detailing:

- A clear and comprehensive summary of the concern including the child's voice.
- Record of actions taken including consideration of any urgent medical attention.

Staff will ensure that records distinguish between fact, observation, the child's wishes and feelings, information received from others and professional opinion. Where professional judgment has informed decision-making, the rationale for that judgment will be clearly recorded.

Staff should promptly report concerns to the DSL in accordance with level of need identified. 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.

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 the DSL and other agencies prior to involving parents. We will record any decision not to discuss with parents and why.

Following receipt of a Safeguarding concern for a child, the DSL will:

- Consider if there is a requirement for any immediate action including MASH referral, Police report, medical intervention.
- Ensure that decisions taken, the rationale for those decisions, actions agreed and outcomes achieved are clearly recorded in writing. This includes situations where concerns are monitored, stepped down, or closed, and where referrals are not made.
- Records will demonstrate timely action, professional curiosity, reflective decision-making and how the child's wishes, feelings and lived experience have informed Safeguarding assessment, decision making and planning.

- Records will provide a clear chronology of concerns and demonstrate how individual incidents have been considered within the context of any cumulative harm or emerging patterns of risk.

Records of concern are kept on MyConcern.

Safeguarding records are maintained securely on MyConcern. All staff have access to record concerns. Access to safeguarding information is restricted according to role and the need-to-know principle, with appropriate teams being built around each specific case.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in The Oratory School. Safeguarding records are kept in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and in line with Data protection in schools - [Record keeping and management - Guidance - GOV.UK](#)

Safeguarding records will be sufficiently detailed to support effective multi-agency working and enable professionals to understand the child's lived experience, identified risks, protective factors, actions taken, outcomes achieved and the rationale for Safeguarding decisions.

All Safeguarding records will be transferred securely and without unnecessary delay, in accordance with UK GDPR, data protection legislation, and Keeping Children Safe in Education, to the child's receiving school or setting within five school days. Where Safeguarding concerns are significant or complex, the DSL will ensure a direct discussion takes place with the receiving DSL to support continuity of Safeguarding arrangements. A record of the transfer will be retained.

The Head Master will be kept informed of Safeguarding concerns by the DSL and all other staff are informed on a need-to-know basis.

6. Managing Child-on-Child Abuse, Sexual Harassment, Violence including Harmful Sexual Behaviours (HSB)

All staff understand that child-on-child abuse includes a wide range of behaviours including sexual harassment, sexual violence, harmful sexual behaviour, misogynistic language, weapon-related threats and online abuse.

Such behaviour is never acceptable and should not be tolerated or dismissed as banter, part of growing up or normal behaviour.

Child-on-child abuse can occur between children of any age and sex and can take place both inside and outside of school, online and offline. It may be a one-off incident or a pattern of behaviour and should never be tolerated or dismissed.

The Oratory School recognises the national focus on preventing Violence Against Women and Girls (VAWG) and understands that misogyny, gender-based abuse, harmful sexual behaviour and other harmful attitudes may underpin some incidents of child-on-child abuse. The school is committed to identifying and challenging such behaviours at the earliest opportunity through Safeguarding practice, behaviour management, pastoral support and education.

The Oratory School understands that sexual violence and sexual harassment is not acceptable, and we are committed to creating a culture where children feel confident to report concerns, knowing they will be taken seriously.

Harmful sexual behaviours exist on a continuum and range from developmentally appropriate behaviour to problematic, abusive or violent behaviour. Responses are proportionate, child-centred

and take account of the needs of both the victim and the alleged perpetrator, recognising that children displaying harmful behaviour may also be vulnerable.

When responding to concerns, The Oratory School will:

- Take all reports seriously, even where there is no physical evidence.
- Avoid victim-blaming and ensure children are supported appropriately.
- Consider the impact on the wider school environment.
- Involve external agencies where required.
- Record decisions, actions taken and rationale clearly.

All staff understand that even if there are no reports this does not mean abuse, harassment or violence is not happening, it is possible that abuse is unreported. Our staff challenge inappropriate behaviours between children that are abusive in nature.

The Oratory School follows Part 5 of Keeping Children Safe in Education when responding to all concerns related to child-on-child sexual violence, sexual harassment and harmful sexual behaviours and recognises the need for clear reporting routes, consistent responses and ongoing support for all children involved, including alleged perpetrators, in line with a trauma-informed approach.

7. Supporting Children who are Questioning their Gender

The Oratory School recognises that children may question their gender identity. In line with statutory guidance, The Oratory School will take a cautious, considered approach, act in the best interests of the child and work in partnership with parents/carers.

The Oratory School will not initiate a social transition. Any requests will be handled on a case-by-case basis, with advice sought as appropriate. Policies will not reinforce harmful gender stereotypes.

8. Online Safety and Filtering & Monitoring

The Oratory School recognises the need to ensure children are safeguarded from potentially harmful and inappropriate online material. The Oratory School's approach to online safety is to protect and educate children and staff in their use of technology and we have mechanisms to identify, intervene and escalate any concerns.

The Oratory School recognises the increasing Safeguarding considerations associated with generative artificial intelligence (AI) and ensures that filtering & monitoring, staff training and pupil education reflects associated risks in line with Department for Education expectations.

The Oratory School understands that 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 or generative AI applications that simulate 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, including consensual and non-consensual sharing of self-

generated intimate images and/or videos, including those generated using AI, e.g. deepfakes, sharing other explicit images and online bullying.

- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If we feel pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group [APWG](#)

Filtering and Monitoring

The Oratory School recognises that filtering and monitoring systems are an important Safeguarding measure but cannot prevent all online harm. Our children are supported through education, staff vigilance, Safeguarding procedures and a whole-school approach to online safety.

Staff are aware of emerging online harms including AI-generated content, manipulated imagery, deepfakes, online coercion, online exploitation, harmful online communities, misogynistic content, extremist content and technology enabled abuse.

Our Governing Body is responsible for ensuring The Oratory School has appropriate filtering and monitoring systems in place and that there is review of their effectiveness at least once every academic year, with records maintained of those reviews.

Whilst considering our 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.

The appropriateness of any filtering and monitoring systems is informed by our Prevent risk assessment.

Additional guidance on filtering and monitoring is accessible through [Meeting digital and technology standards in schools and colleges - Filtering and monitoring: core standard - Guidance - GOV.UK](#)

9. Concerns and Allegations about staff, including supply staff, trainee teachers, volunteers and contractors

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

If anyone has a concern or an allegation is made about a member of staff (including supply staff, trainee teachers, volunteers and contractors), this is referred to the Head Master. If the concern relates to the Head Master, this is referred to the Chair of Governors.

If there is a concern or an allegation about a member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold; this should be reported in accordance with the low-level concerns policy, in Annex E of this policy.

The harm threshold as defined in Working Together to Safeguard Children 2026 details the requirement to refer any concern or allegation about anyone working with children (whether paid or voluntary) who may have:

- 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 he or she 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.

Any concern or allegation that may meet the harm threshold must be referred to the Local Authority Designated Officer (LADO).

10. Information Sharing

The Oratory School recognises that all matters relating to Safeguarding are confidential.

All staff members have a professional responsibility to share information with other agencies to Safeguard children.

All staff will be given appropriate training to understand the purpose of information sharing to safeguard and promote children's welfare.

Information sharing decisions will be timely, necessary and proportionate, taking account of the nature and level of risk to the child. Staff will not allow concerns about confidentiality or data protection to impact Safeguarding action where a child may be at risk of abuse, neglect, exploitation or harm.

Our staff will not assume that another professional will share information or take action to Safeguard a child. Where staff remain concerned that appropriate action has not been taken, they will continue to escalate concerns through the DSL and, where necessary, in accordance with the OSCP Escalation and Resolving Professional Concerns and Disagreement Policy.

11. Multi-Agency Working

The Oratory School recognises Safeguarding as a shared, multi-agency responsibility and contributes actively, respectfully and constructively to joint decision-making, information sharing and coordinated plans to support children and families.

The Oratory School will ensure that relevant staff members participate in multi-agency meetings and forums, including Child Protection Conferences and core groups, to consider individual children.

The DSL 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. The DSL will consult with relevant staff and ensure clear processes for gathering the evidence required for reviews and audits and will embed recommendations into practice and complete required actions within agreed timescales.

Where disagreements arise between professionals or agencies, these will be managed respectfully and escalated in line with local Safeguarding partnership procedures. The Oratory School recognises the importance of constructive challenge to ensure that children receive the right help at the right time.

12. Safer Recruitment - to be read in conjunction with the Safer Recruitment and Selection policy.

The Oratory School recognises that Safeguarding responsibilities do not end once recruitment checks have been completed. Safeguarding vigilance, professional conduct, supervision, training, low-level concern reporting, allegation management and ongoing suitability assessments form part of The Oratory School's safer culture.

All staff understand the requirement to disclose to the Head Master any concern that may affect their suitability to work with children.

The Governing Body will seek assurance that Safeguarding considerations are embedded throughout the employee lifecycle, including recruitment, induction, supervision, development and departure from employment.

The Oratory 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 children and staff.

The Oratory 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 Oratory School's Leadership Team.

The Governing Body will ensure that at least one person on every recruitment panel has completed safer recruitment training.

The Oratory School will ensure that contractors and providers are aware of The Oratory 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 Oratory School will require that employees and volunteers provided by these organisations use The Oratory School's procedures to report concerns.

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 2026. If assurance is not obtained, permission to work with our children or use The Oratory School premises may be refused.

The school will ensure that decisions regarding regulated activity are made in accordance with current statutory guidance. Particular consideration will be given to volunteers, work experience placements, visiting professionals and individuals who regularly teach, train, instruct, care for or supervise children.

When we commission services from other organisations, we will ensure that compliance with our policies and procedures is a contractual requirement.

13. Training

All staff, including those who do not work directly with children, will read and understand Part One of KCSIE 2026.

All staff in The Oratory School receive appropriate Safeguarding training at induction, which is updated at least annually. All staff are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately. Safeguarding training promotes a culture of vigilance, professional curiosity and confidence to act. Staff are supported to understand how Safeguarding concerns may present cumulatively and across different areas of a child's life.

Our Designated Safeguarding Lead (DSL) undergoes training to provide them with the knowledge and skills required to carry out their role; this training is refreshed every 2 years.

Deputy Designated Safeguarding Leads (DDSL) are trained to the same standard as the DSL and this training is refreshed every 2 years.

Safeguarding training is provided to all new staff on appointment as part of their induction process including The Oratory School's code of conduct, 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.

The Oratory School will maintain accurate and up to date records of staff induction and training.

The Governing Body will ensure that all Governors receive appropriate Safeguarding and Child Protection (including online) training at induction. This training equips them with the knowledge to provide strategic challenge to assure themselves that the Safeguarding arrangements are effective and support a whole school approach to Safeguarding. The training should be regularly updated.

The Oratory School ensures 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.

The DSL updates 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 include learning from local and national CSPRs, with a focus on what this means for The Oratory School's Safeguarding practice.

The DSL will use a variety of mechanisms to provide Safeguarding updates to the school community including online safety.

14. Whistleblowing in a Safeguarding Context - to be read in conjunction with the Whistleblowing policy

Whistleblowing is a term that is used when 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 that they will be taken seriously by the Senior Leadership Team.

If our staff identify a concern about poor or unsafe practice and potential failures in The Oratory School's Safeguarding provision this should be reported to the Head Master. If the concern is about the Head Master, this should be reported to the Chair of Governors.

If staff are concerned with the action or inaction through internal reporting procedures, then staff should refer to the Whistleblowing policy and may contact the NSPCC whistleblowing line on 0800 028 0285 or email help@nspcc.org.uk

15. Site Security

All staff members have a responsibility to ensure our buildings and grounds are safe; this includes ensuring the safety of any visitors to The Oratory School.

The Oratory 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 Oratory School site.

The Oratory School recognises the risk of camera-enabled wearable devices including glasses and is alert to the privacy, Safeguarding and data protection implications for The Oratory School community with procedural guidance detailed in acceptable use of IT, visitor arrangements and codes of conduct.

16. Quality Assurance

The Oratory School will ensure that systems are in place to monitor the effectiveness of Safeguarding arrangements, including the quality of decision-making, record keeping, multi-agency working and the impact of actions taken to safeguard children.

The Oratory School's senior leaders and the Governing Body will ensure that action is taken to remedy any deficiencies and weaknesses identified in Child Protection arrangements without delay.

17. Policy Review

This policy will be reviewed every academic year or in accordance with statutory guidance updates. All other linked policies will be reviewed in line with their policy review cycle.

The DSL will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures.

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.

- Ensures 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.
- Links 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.

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 annual safeguarding report and submit to the Local Authority.
- The DSL will provide termly Safeguarding reports to Governors, which includes Safeguarding activity, training, attendance vulnerability, allegations, low-level concerns, Filtering and Monitoring, and emerging safeguarding risks, and an annual safeguarding report evaluating Safeguarding effectiveness.

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

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 18th 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.

APPENDIX C: Further Information

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 DDSLs) 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.

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 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 \(www.gov.uk\)](#)

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) Check a Teacher's Record 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:

- 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.

Appendix E: dealing with allegations against staff and volunteers

1. Introduction

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

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.

Our school is committed to maintaining a strong culture where all concerns about adults working with children are recognised, responded to promptly and managed fairly. Throughout any allegation process, the welfare of the child remains paramount, while ensuring staff are treated fairly, consistently and in accordance with statutory guidance.

This procedure has been developed in accordance with:

- Working Together to Safeguard Children
- The Children Act
- Education Act
- Keeping Children Safe in Education (KCSiE)
- Guidance for Safer Working Practice

2. Thresholds for allegations

Our school creates and maintains a culture where concerns about adults working with children can be shared, openly, promptly and without fear of reprisals.

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.**

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 Sexual Offences Act 2003).
- 'Grooming' i.e. meeting a child under 16 with intent to commit a relevant offence (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.

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. Where the individual is a parent or carer, their own child becomes subject to child protection procedures, and/or they and their family become involved with social care 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 children.

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

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').

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.

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 another school, out of school activity or undertaking training and work placements.

The policy for dealing with allegations needs 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

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 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.

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?

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.

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.

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

Roles and responsibilities for all organisations

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 on 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 one working day of when the incident occurs/when the disclosure is made.

Our school recognises that effective management of allegations requires timely information sharing and effective multi agency working between the school, the LADO, children's social care, the police and any other relevant agencies, in accordance with Working Together to Safeguard Children.

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

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

Oxfordshire has a team of LADOs to:

- Assess and review referrals and decide if an allegation meets the Harm threshold.
- 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.

Our school understands that the LADO does not carry out investigations into allegations and will 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

In some circumstances, we will have to consider an allegation against an individual not directly employed by them; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business. Where this applies, our school will share Safeguarding responsibilities with the employing agency or business. Our school will remain responsible for gathering the facts and managing the safeguarding process, while working closely with the employing agency or business, who will usually lead on any disciplinary action.

Whilst our school is not the employer of supply teachers, we are still responsible for ensuring that allegations are dealt with properly. Our school will liaise with the LADO to determine a suitable outcome, and we will discuss with the supply agency, including where the supply teacher works across more than one school or college, whether suspension or temporary redeployment is appropriate while the investigation is undertaken.

Agencies should be fully involved and co-operate with any enquiries from the LADO, Police and/or Local Authority children's social care. Our school will usually take the lead on handling allegations to ensure that all appropriate action is taken. This is because agencies do not have direct access to children or other school or college staff and are therefore unable to gather the facts when an allegation is made or hold all the relevant information required by the LADO as part of the referral process.

The supply teacher should be advised to contact their trade union representative, where they have one, or a colleague for support. Any allegations management meeting arranged by the LADO should consider information sharing between the school and agency, including whether the agency is aware of any previous concerns or allegations which should be considered as part of the investigation.

When using a supply agency, our school will ensure the agency is informed of the school's process for managing allegations and will take account of the agency's own relevant policies and its duty, as a personnel supplier, to make referrals to the Disclosure and Barring Service (DBS) where appropriate. The agency's Human Resources Manager, or equivalent, should be invited to relevant meetings and kept appropriately informed throughout the process.

Where a concern or allegation relates to a trainee teacher placed within our school, these arrangements will also apply. The relevant teacher training provider will be expected to follow the same procedures as supply agencies.

Roles and responsibilities for the Police

An investigation into the allegation is normally carried out by the local authority area in which the allegation occurred in 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). Internal investigations may need to be delayed until the external investigation is completed, the LADO will support with liaison between the Police and School for this to be agreed.

Police bail

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

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

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 Headteacher or the Deputy Headteacher in their absence or where the Headteacher 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 Headteacher 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

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

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 organisational risk.

Contact numbers:

LADO - LADO.safeguardingchildren@oxfordshire.gov.uk / 01865 810603 EDT – 0800 833 408

Suspension – when it should be considered

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 of the reason for the suspension. Our school will complete the LADO Suspension Risk assessment to help inform decision making.

5. Outcomes Following an Investigation

The following definitions should be used by the investigator 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**

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

Our school will put the outcome and recommendations in writing to the alleged person and share with the LADO.

References

It is noted in Keeping Children Safe in Education that cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious will not be included in our school references.

Substantiated allegations will be included in references, provided that the information is factual and does not include opinions. A timeframe for this may be agreed on a case-by-case basis.

Record keeping in relation to the outcome of an investigation

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.

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

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. There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

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.

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.

Ofsted will also be informed if there is an allegation against a teacher or worker in a reception class or an early year setting.

6. Disciplinary or Suitability Process and Investigation

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.

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.

The investigation and any subsequent disciplinary hearing should be held in accordance with our school's disciplinary policy and procedure with the support of Human Resources (HR).

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

Resignations and settlement agreements

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.

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.

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

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 and welfare of children, including any in which the person concerned refuses to cooperate.

Returning to work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Headteacher /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 Headteacher /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.

7. General responsibilities when investigating an outcome

Support to the child and family involved

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 to ensure that the child's needs are addressed. The wishes, feelings and lived experience of the child will be considered throughout the process ensuring safeguarding decisions remain child centred.

Keeping parents/carers and children informed

Parents or carers of the child or children involved should be:

- formally told about the allegation as soon as possible. The case manager should consult the LADO and where involved, Local Authority children's social care and/or the Police on what information can be disclosed.
- kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member.
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.

The parent 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, as appropriate, where there is no criminal prosecution.

Responsibilities to employees/volunteers alleged to have caused harm

Support to the accused member of staff

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

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, 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.

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

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.

Information sharing will be proportionate, lawful and in accordance with safeguarding responsibilities, balancing confidentiality with the need to protect children from harm.

8. Non-Recent Allegations (historic)

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.

9. Low-level Concerns

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 concern

Low-level concerns may include behaviour that is inconsistent with the Staff Code of Conduct or the Guidance for Safer Working Practice, including, maintaining professional boundaries, appropriate physical contact, one-to-one working, online conduct and use of personal devices.

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

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.

All staff are required to report low-level concerns to the Head Master,

Responding to low-level concerns

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

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.

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 and may meet the Harm threshold.

Record keeping

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.

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 harm threshold.
- Retained at least until the individual leaves employment at the school

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.

Patterns of low-level concerns relating to the same individual will be reviewed collectively to identify whether the behaviour may indicate an escalating concern requiring management under the allegations procedures.

10. Oxfordshire LADO Managing Allegations Flowchart

Managing concerns about people that work or volunteer with children

(This flowchart describes the process for reporting concerns and allegations)

Concern identified or allegation made about professional/volunteer

Any immediate action to safeguard child/ren is taken if required

Agency completes LADO referral and consultation form and sends to Duty LADO

Email - lado.safeguardingchildren@oxfordshire.gov.uk

The Duty LADO reviews the referral and consultation form (within one working day) – this decision making may require the LADO to have further conversation with the referrer

Harm Threshold is **met**



LADO allocated to have oversight of case

Concern that the person poses a risk of harm -

LADO will consider the need for a **Position of Trust** meeting (this may involve Police, Social Care, Employer and HR) to gather and share information, plan and direct the investigation

Or LADO will advise an **internal management investigation** is required and this will be quality assured by the allocated LADO (ideally concluded within four

Harm Threshold is **not met**



Duty LADO offers advice, signposting, supports risk assessment

Outcome of consultation detailed on LADO consultation and referral form and shared with the referrer

LADO records consultation on secure recording system