

The Oratory Schools Association

Safeguarding (Child Protection) Policy

September 2018

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1. Introduction

This policy is available on the website and applies to all members of staff including volunteers and governors. It has regard to [Keeping Children Safe in Education \(2018\)](#) (KCSIE), and also [Working together to safeguard children \(2018\)](#) (WT) as well as a number of other documents outlined in appendix 6 of this policy.

Safeguarding is defined by KCSIE as: ***protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.***

A 'Child' is taken to be someone under 18 although of course the school will continue to fully support the welfare of all students when they become 18.

1b) Key safeguarding contact details for this policy

| Internal Contact Details | |
|--|---|
| Matthew Fogg: Deputy Head Pastoral (Designated Safeguarding Lead OS) | 01491 683504 (Office Number –office hours) 07786 396136 School Mobile 01491 683606 (School Number – out of office hours) |
| Gill Smith: Deputy Head Pastoral (Designated Safeguarding Lead OPS) | 01189 766903 (Office Number –office hours) 07872 562667 Mobile Number 01189 844511 School Number and out of office hours) |
| Amanda Gemmill: Deputy DSL - OS | 01491 683584 (Office Number – office hours) |
| Fr David Elliott Deputy DSL - OS | 01481 683581 (Office Number – office hours) 07973 241424 Mobile Number 01491 683504 (School number – out of office hours) |
| Chris Sexon: Assistant Head (Pastoral) Deputy DSL - OPS | 01189 844511 School Number and out of office hours) |
| Trish Williamson Deputy DSL for EYFS - OPS | 01189 844511 (School Number and out of office hours) p.williamson@oratoryprep.co.uk |
| Kerry Hulbert Counsellor for both OS and OPS | |
| Mr Matthew Stilwell, Mrs Margaret Edwards or Mr Nick Tanner Designated Governors for Safeguarding | 01491 683600 (Office Number – office hours) email: clerk@oratory.co.uk NOTE: Request governor to contact re. safeguarding disclosure |
| External Agencies | |
| Oxfordshire Safeguarding Children Board Multi-Agency Safeguarding Hub (MASH) Safeguarding Children Service (South Oxfordshire): Emergency Duty Team: Oxfordshire Family Information Service: (Social Services Department.) | 01865 815843 email: oscb@oxfordshire.gov.uk 0345 0507666 01865 323041 0800 833408 08452 262636 01865 792422 |
| Local Authority Designated Officer for allegations (LADO/Designated Officer): Assistant Designated Officer | Alison Beasley email: alison.beasley@oxfordshire.gov.uk Phone number: 01865 815956 or 01865 323457 Mobile: 07833436649 Email: lado.safeguardingchildren@oxfordshire.gov.uk Web page: http://schools.oxfordshire.gov.uk/cms/content/safeguarding Donna Crozier email: Donna.Crozier@Oxfordshire.gov.uk Phone number: 018650816382 Mobile: 0791331799 |

| | |
|---|--|
| Thames Valley Police: | 101 / 999 / 01865 841148 |
| MASH Team – Multi Agency Safeguarding Hub <i>(for any immediate concerns about a child)</i> | 0345 0507666 0800 833 408 (outside office hours) mash-childrens@oxfordshire.gcsx.gov.uk |
| Disclosure & Barring Service (DBS): PO Box 181, Darlington, DL1 9FA | 0300 0200 190 customerservices@db.s.gsi.gov.uk |
| Prevent Team – Support and Advice about Extremism Reading – PO Debbie Smith Oxfordshire – PEO Mohamed Azad | 0845 050 7666 Prevent – Home Office Website: www.gov.uk/government/organisations/home-office |
| Kingfisher Team (Child Sexual Exploitation) | 01865 309196 KingfisherTeam@Oxfordshire.gov.uk |
| DfE (non-emergency prevent advice) | 020 7340 7264 Counter-extremism@education.gsi.gov.uk |
| Children’s Commissioner for England Office of the Children’s Commissioner Sanctuary Buildings, 20 Great Smith Street, London. SW1P 3BT Advice Team for Children | Anne Longfield Tel: 020 7783 8330 Website: www.childrenscommissioner.gov.uk Email: info.request@childrenscommissioner.gsi.gov.uk Tel: 0800 528 0731 Email: advice.team@childrenscommissioner.gsi.gov.uk |
| Independent Listener for Boarders Mrs Emma Holmes | 07903 522 963 |
| NSPCC Whistleblowing Advice Line for anyone with child protection concerns in the workplace. It provides support and advice to those who feel unable to get a child protection issue addressed by their employer. | Weston House, 42 Curtain Road, London, EC2A 3NH 0800 028 0285 Email: help@nspcc.org.uk |
| National College for Teaching and Leadership | 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH 0207 593 5393 Email: misconduct.teacher@education.gov.uk |
| Ofsted Safeguarding Children | 0300 123 4666 (Monday to Friday from 8am to 6pm) Email: whistleblowing@ofsted.gov.uk |
| Locality & Community Support Services South | 0345 2412608 LCSS.South@oxfordshire.gov.uk Link for OS and OPS – Patsy Denton |

2. Staff responsibility for safeguarding

Part 1 of KCSIE (including Annex A) must be read and followed by the governing body and all staff (including volunteers) in the school. All staff are given a copy of this during their induction as well as the school’s child protection policy, staff code of conduct (part of the Employment Manual), and the schools behaviour and attendance (including children missing education) policies. Safeguarding training (including *Prevent* awareness and online safety) is also part of all staff induction. There is also annual training in safeguarding in place for all staff so that they can understand and discharge their safeguarding responsibilities as well as more regular updates (training/email/bulletins) through the year. All staff and Governors undergo external training from Oxfordshire Safeguarding Board every three years. Both of the Designated Safeguarding Leads as well as all of the Deputy Safeguarding Leads receive level three training and this is renewed every two years. Temporary, voluntary and new staff who work in school are given separate training if they have not attended the annual training at the start of the year. The DSLs keep a central record of all safeguarding training undertaken by members of staff and others.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. Staff in schools are in a particularly important position as they can identify concerns early on, provide help and prevent concerns from escalating. All members of staff at The Oratory School and the Oratory Preparatory School have a responsibility to provide a safe environment in which children can learn and in their actions they must always consider what is in the best interests of each student, working with a child-centred approach. The wishes of the child will be taken into account when determining action to be taken and services to provide. Children are actively encouraged to raise concerns, and are taught about safeguarding by covering relevant issues throughout their time at the Oratory Schools both in our PSHE course, tutor time and, where appropriate, in academic lessons.

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

All school staff should be prepared to identify children who might benefit from pastoral support and with potential safeguarding concerns. Any staff member with concerns about a child's welfare should pass on their concerns to a DSL, although they can make a referral themselves. Our staff are important in providing early help to students with safeguarding issues so that as soon as a problem emerges at any point then support will be provided as quickly as possible. Staff training ensures that they are aware of the process for making referrals to children's social care and for statutory assessments under the Children's Act 1989 - especially section 17 (children in need) and section 27 (a children suffering harm). They are also trained to be aware of the different types of abuse and neglect so that they can identify case of children who might be in need of help.

3. Types of abuse and neglect

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

- Is disabled or/and has SEN (whether or not they have an Education Health and Care Plan);
- Is a young carer;
- Is frequently missing from home/not attending school;
- Is known to be misusing drugs or alcohol or involved in sexting;
- Has challenging family circumstances such as adult mental health problems or domestic abuse or has returned home to their family from care.

If staff members are unsure they should always speak to one of the DSLs. All staff should be aware that abuse, neglect and any safeguarding issues are rarely standalone events that can be covered by one definition and in most cases many issues overlap with each other. In addition staff should be vigilant for the fact that

there could be domestic abuse occurring which can have particularly serious long lasting emotional and psychological impact. Advice on this can be found at [NSPCC- Domestic Abuse](#).

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. Staff training ensures that staff are also aware that children are capable of abusing their peers. Ensuring children are aware of forms of online abuse e.g. sexting is part of the PSHE programme of study.

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

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

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

Possible signs of Physical Abuse include:

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

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

Possible signs of Emotional Abuse include:

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

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

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

Possible sign of sexual abuse include:

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

Neglect: Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may affect a foetus during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); Protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use

of inadequate care-givers) or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible signs of neglect include:

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

4. What to do if a member of staff has a safeguarding concern about a child

If a member of staff has any safeguarding concern they should act upon it straight away. 'Where a child suffering, or is likely to suffer from harm it is important that a referral to children's social care (and if appropriate the police) is made immediately' (KCSIE 2018). Guidance for this can be found in [What to do if you are worried a child is being abused – Advice for Practitioners \(March 2015.\)](#)

The Oratory School and The Oratory Prep School refer all matters of concern as a matter of course to Oxfordshire's Locality and Community Support Services (South) the single point of contact for all safeguarding concerns in this area on 0345 241 2608 (or to the MASH team if there is an immediate safeguarding concern; or the LADO where it relates to concern about a member of staff) as a matter of course or the equivalent Children's Social Care service for a child who lives in a different Local Authority.

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

- Listen carefully to the child and keep an open mind. Staff must not take a decision as to whether or not abuse has taken place. Staff should understand that they are not making a diagnosis when receiving concerns, just taking them down to be passed on. It could be that signs of abuse noted might not prove that there is abuse and they do not constitute proof in themselves.
- Not ask leading questions, that is a question which suggests its own answer for instance, 'was it your father?' or 'Did this take place on Tuesday when you were away?'
- Reassure the child that they are being taken seriously but that they cannot give a guarantee of confidentiality. The member of staff should explain that (while maintaining an appropriate level of confidentiality) they need to pass the information on to the DSL or, where appropriate, children's social care.
- Keep a written record of the conversation. This should include the date time and place of the conversation, the essence of what was said and done, by whom and in whose presence. It is also useful to describe observable behaviour such as crying, shaking etc although this should not be interpreted. Wherever possible the actual words spoken by the child should be recorded. This should be signed by the person making it and should use names not initials. The record must be kept securely and handed to the DSL. If possible notes should be taken in the meeting itself, or if not then as soon as possible after it. **MyConcern is our preferred way of entering and retaining records as these are secure and can only be accessed by relevant staff.**

- Preserve any evidence that they are given for instance scribbled notes, mobile phones with messages on them, clothing or computers. **One important point to emphasise is that in cases where illegal images of a child have been taken and/or circulated the teacher should be careful not to view or forward these images but to retain the device the pictures are on for external agencies.**

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

- Look at the child's pastoral/safeguarding record on MyConcern;
- Make a referral if not already made by a member of staff, and if a referral by phone has been made to complete a written referral form for either the Multi Agency Safeguarding Hub (MASH) (Downloaded from: <https://www2.oxfordshire.gov.uk/cms/content/referring-child-childrens-social-care>) or the LADO if relating to an allegation against a member of staff (Downloaded from: <http://www.oscb.org.uk/reporting-concerns/>) or the relevant children's social care service if the child lives in a different Local Authority.
- Inform the parent/carer unless it is felt that this would put the child at risk. Although parental consent is not needed it is almost always beneficial to have cooperation. This issue, and what should be said to parents, will be discussed with children's social care.

5. Categories of referral to external agencies

In all cases where referrals are made to Childrens Social Care or any other external agency any member of staff may make a referral but in the majority of cases the referral will be made by a DSL. If a referral is made by another member of staff they will receive support from the DSL in making the referral and working with external agencies after this. The contact details for making referrals in Oxfordshire can be found at the start of the policy (if a child lives in a different authority the referral will be made to that different authority.)

When safeguarding concerns emerge the member of staff concerned/DSL should refer to the Oxfordshire Thresholds of Need Guide summarised as:

Level 1

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

Level 2

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

Level 3

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

Level 4

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

Full information about the differing levels of need and responses can be found at http://www.oscb.org.uk/wp-content/uploads/Oxfordshire-Threshold-of-Needs_Final.pdf

Oxfordshire's 7 step referral process:

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

6. After a referral has been made

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

- The child requires immediate protection and urgent action is required
- The child is in need and should be assessed under section 17
- There is reasonable cause to suspect the child is suffering, or likely to suffer from significant harm and whether enquiries must be made and the child assessed under section 47
- Any services are required by the child and family
- Further specialist assessments are required to help the local authority to decide on the best course of action

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

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

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

7. Record Keeping

All concerns, discussions and decisions made in relation to safeguarding concerns and the reasons for those decisions should be recorded in writing. These records should be put onto MyConcern, the school's safeguarding database, as these records can only be accessed by the relevant teachers – for example: senior pastoral leaders, the Housemaster, the Housemother, Health Centre staff and the Tutor. If in doubt about recording information staff should always discuss with a DSL.

Information about children's welfare may be shared with others outside the school to help keep children safe from harm. We always aim to discuss this with parents or carers before we do so, but this may not always be possible. If this is the case, the law allows us to share this information without asking first. The

Data Protection Act it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Please refer to our Data Protection Policy for further information.

Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children. The DSL will document information-sharing decisions and actions taken. Advice for staff about information sharing with regard to safeguarding will be part of staff training on Safeguarding. More details can be found in [Information sharing: Advice for practitioners \(2018\)](#).

8. Allegations Against Staff Members Volunteers or Governors

If staff members have concerns about another staff member or volunteer or governor who might pose a risk of harm to a child/children, or may have harmed a child/children they should refer these to the headmaster. Where there are concerns about the headmaster this should be referred to the chairman of governors. It will be ensured that any reporting of any allegations against the Headmaster to the Chair of Governors is made without informing the Head. Staff may look to discuss any of these concerns with the DSL and make any referral through them.

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

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

Dealing with allegations

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

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

Substantiated: there is sufficient evidence to prove the allegation;

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

False: there is sufficient evidence to disprove the allegation;

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

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

In the first instance the DSL, the headmaster or (where the headmaster is the subject of an allegation) the chair of governors should discuss the allegation immediately with the LADO and a case manager will be

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

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

The case manager should inform the accused person about the allegation as soon as possible after consulting the designated officer(s). It is extremely important that the case manager provides them with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager should not do that until those agencies have been consulted, and have agreed what information can be disclosed to the accused. Employers must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or college or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step. If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance in *Working together to safeguard children*. If the allegation is about physical contact the strategy discussion or initial evaluation with the police should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

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

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

Support for those involved

The Oratory Schools have a duty of care to employees and so staff will be informed of concerns or allegations as soon as possible and have the likely course of action explained to them unless the police or children's social care services object. They should be advised to contact their trade union representative or colleagues

for support and should also be given access to counselling. A named representative will keep the member of staff informed of the progress of the case and consider what support is appropriate. If suspended the member of staff should also be kept informed of other work-related issues. Social contact with colleagues should be allowed unless this would be prejudicial to the enquiry. The allegation will be dealt with as quickly as possible in a fair and consistent way that provides effective protection for the child but also supports the member of staff who is the subject of the allegation.

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

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

Making decisions on allegations

The school will give due weight to the views of the LADO and to this policy when making a decision about suspension. Advice about whether an allegation against a teacher is sufficiently serious to refer to the Teaching Regulation Agency can be found in [Teacher misconduct: the prohibition of teachers \(April 2018\)](#).

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

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

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

It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Compromise agreements' cannot be used to prevent a referral being made to the DBS when it is legally required nor can an individual's refusal to cooperate with an investigation. The Governors have a legal duty to respond to requests from the DBS for information they hold

already, but they do not have to find it from other sources. The School will confirm to inspectors all instances of action in relation to safeguarding concerns.

Ceasing to use a member of staff's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

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

9. Peer on Peer Abuse

The School recognises that children are capable of abusing their peers, known as peer on peer abuse. This can either be between two children of any sex or through a group of children abusing a child or another group of children. Any incidents of alleged or suspected abuse by children or young people will be taken seriously and reported to the safeguarding leads immediately. Peer abuse might take various forms; for example (and the following list is not exhaustive):

- Bullying
- Racial, homophobic, gender or culture-related bullying or abuse. All allegations of verbal abuse should will be investigated and dealt with appropriately and must not be tolerated or passed off as 'banter' or 'part of growing up';
- Physical abuse such as hitting, kicking, biting;
- Sexual harassment and sexual violence;
- Via the use of ICT e.g. sexting, 'revenge pornography' - staff should be particularly mindful of the potential for the misuse of information technology for bullying and abusive purposes;
- Grooming by peers as part of child sexual exploitation;
- Abuse linked to gang-related activity or initiation-type violence/rituals.

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

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

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

manage risk posed by a child who is alleged to have abused another must also address their needs and responses should be considered accordingly.

As a school we recognise that it is not enough 'just' to respond to incidents should they arise. Therefore, we **minimise the possibility of peer abuse** by:

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

Responding to Allegations of Peer Abuse

The school recognises the need for sensitivity and proportionality when dealing with these difficult issues. The following general rules will apply to their management:

- The safeguarding leads will seek appropriate and timely advice wherever necessary and contact MASH or LCSS as appropriate where there are concerns, or the equivalent if the child lives in a different Local Authority. The safety and best interests of victim(s) will be the paramount consideration at all times. The safeguarding leads will also consider the possibility and take account of any wider and / or ongoing risk(s) to others;
- The needs of the victim and the needs of the alleged perpetrator will be considered separately;
- In addition to safeguarding the identified victim, the school will consider (i) whether the alleged perpetrator seems to pose a risk to any other children; and (ii) how best to manage that risk;
- Children and young people who abuse others are responsible for their abusive behaviour, and safeguarding action must include addressing their behaviour and its causes;
- The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children;
- Where necessary, the school will participate fully in a co-ordinated approach by child welfare/ protection, youth offending, education and health agencies.

10. Sexual violence and sexual harassment between children

The Oratory Schools will always carefully consider any report of sexual violence and/or sexual harassment. As with any peer on peer abuse sexual violence and harassment can occur between any two children or

groups of children. Sexual violence refers to sexual offences as described under the Sexual Offences Act 2003 including, rape and sexual assault. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online or offline and is likely to violate a child's dignity and/or makes them feel intimidated, degraded or humiliated and/or creates a hostile, offensive or sexualised environment. Sexual harassment and violence exist in a continuum and may overlap. In whatever form it takes it is never acceptable, will never be tolerated, and is not an inevitable part of growing up or as 'banter' or 'boys being boys'. All victims are taken seriously and offered support. As with any safeguarding staff must always take the line that 'it could happen here', particularly (but not exclusively) in the case of boys against girls with 64% of girls aged 13-21 saying they had experienced sexual violence or harassment in the past year (Girlguiding's Girls' Attitudes Survey 2017).

The Oratory Schools challenge behaviour such as grabbing parts of another pupil's body and such actions are sanctioned severely under our discipline policy as dismissing or tolerating such behaviour risks normalising it. As in other areas of Safeguarding it is important to be aware that SEND students can be especially vulnerable. This issue is addressed as a whole school issue as part of our wider safeguarding policy. It forms part of staff training and is dealt with in the school PSHE course for all the students.

Action following a report

Reports of sexual violence and sexual harassment are often particularly complex and difficult and so the DSL will always look to talk through any cases such as this with Oxfordshire social services. In cases where a crime has been committed the DSL will also contact the police.

Within the school a disclosure of sexual violence or harassment will be treated like any other safeguarding disclosure and in addition in this case it is also essential to emphasise to the victim and reassure them that they are being taken seriously, they are being supported and will be kept safe. **One important point to emphasise is that in cases where illegal images of a child have been taken and/or circulated the teacher should be careful not to view or forward these images but to retain the device the pictures are on for external agencies.** A victim should never be given the impression that they are creating a problem by reporting sexual violence or harassment and they should certainly not be made to feel ashamed by making a report. The school will also offer counselling to the victim with the school counsellor. If an allegation does go through the criminal justice system there will be anonymity offered in the legal system, and The Oratory will do all it can to reasonably protect the anonymity of any children involved in a report of sexual violence or harassment. As ever with safeguarding only appropriate and relevant staff will be informed about the report.

The DSL will normally be the person to decide on the college's response to a report of sexual violence or harassment. In all cases the initial report will be carefully evaluated. The school's approach will consider:

- The wishes of the victim on how to proceed where possible. Victims should be given as much control as reasonable possibly over how the investigation will proceed and what support is offered to them;
- The nature of the alleged incident;
- The ages and developmental stages of the children involved. In particular if there are any power imbalances for instance if an older child is the perpetrator;
- If this is a one off incident or part of a pattern;
- Any ongoing risks to the children involved including the wider protection of all the children in The Oratory;

- Wider environmental factors where incidents or behaviour is associated with issues outside school and environmental factors are present that are a threat to the one or more of the childrens' health or welfare. This contextual understanding can be very important if a safeguarding referral is made.

Given the distress caused by potential close proximity of a victim and an alleged perpetrator at school the alleged perpetrator will be removed immediately from any classes they share with the victim. Risk assessments should be updated as appropriate. Separation is done to support both children and is not a judgement on the guilt of the alleged perpetrator. More widely the DSL will look to see how the children involved can be kept a reasonable distance apart outside while the facts of the case are established either by school or social services or the police.

If a criminal investigation leads to a conviction or caution, The Oratory Schools will then take disciplinary action according to the school discipline policy. In most situations like this the incident would be a serious breach of discipline and lead to the view that allowing the perpetrator to remain at The Oratory Schools would seriously harm the education and welfare of the victim. Above and beyond this behaviour of this sort would lead to a consideration of permanent exclusion. The DSL will record decisions made on MyConcern both to record the events and explain decision making.

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

- As above the needs and wishes of the victim should be paramount within the context of protecting the child. Wherever possible the victim should be able to continue with their normal routine so that The Oratory remains a safe place for them.
- Also as above consider the age and developmental stage of the victim, especially as there will often be a power/age imbalance between the victim and alleged perpetrator.
- Support should be on a case-by-case basis so that there is a proportionality to the school response as well as effective support for the victim.

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

- While needing to safeguarding the victim and wider student body the alleged perpetrator will also need support and they should be provided with education, ongoing safeguarding support and information about any disciplinary sanctions.
- Consideration of the developmental stage and age of the alleged perpetrator.

Schools should be aware of their obligations under the Human Rights Act [HRA 1998] and the Equality Act 2010.

11. Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status by either an individual or group. It takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity either in exchange for something the child wants/needs or for the advantage of the perpetrator or facilitator.

It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Children can be groomed by peers and/or exploited as part of gang-related activity. It can

be perpetrated by individuals or groups, males or females, children or adults. It does not always involve physical contact and can happen online. It can include both contact (either penetrative and non-penetrative acts) and non-contact sexual activity. It can even occur without the child's knowledge through copying videos or images they have posted online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation under acronym SAFEGUARD:

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

The government guidance on child sexual exploitation is [safeguarding children and young people from sexual exploitation: supplementary guidance to Working together to safeguard children \(PDF\)](#) (DCSF, 2009) referenced in Appendix C Working together to safeguard children. Further information can also be found on the NSPCC website and GOV.UK: [What to do if you suspect a child is being sexually exploited](#). Any concerns relating to CSE will be reported to the DSL who will follow safeguarding referral procedures.

Child sexual exploitation is widely unreported because it relies on the vulnerabilities of children in a way that makes them feel unable to share their experience with others. If staff find evidence that a child is being sexually exploited it is important they refer this either to either the police or MASH or the equivalent if the child lives in a different Local Authority, depending on the urgency of the situation themselves or through the DSL.

CSE happens to children of all ages and both boys and girls and from all walks of life. Research estimates that around a third of victims are boys. Looked after children might be especially vulnerable to CSE, as might those with learning disabilities. Further guidance from Oxfordshire is contained in the following advice from the Kingfisher team (<http://www.oscb.org.uk/professionals/providers-the-kingfisher-team-and-horizon-support-services/>)

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

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

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

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

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

12. Whistleblowing

All staff should feel able to raise concerns about poor practice or potential failures in the school's safeguarding, and are required to report to the Headmaster any concern or allegations about school practices or the behaviour of colleagues. This is in accordance with the Whistleblowing Policy found in the staff employment manual.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

13. Children with Special Educational needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers when recognising abuse and neglect in this group of children. It can sometimes be assumed that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration. In addition these children can also be disproportionately impacted by things like abuse, neglect or bullying without outwardly showing any warning signs, often due to communication barriers, isolation, dependency on others etc. A number of serious case reviews have also highlighted the dangers inherent in focusing on adult rather than a child's needs and on a primary focus on support as 'opposed' to potential risk [of abuse]. The Oratory ensures that students on our SEND register receive additional pastoral support, with key workers to help support them in addition to the usual pastoral structure of the school.

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

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

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

Do I / we understand how any condition, disability, impairment or other factor e.g. culture impacts?

How well can I / we understand and communicate with this child?

National guidance makes it clear that for some children it is not yet possible to prescribe techniques for communicating about possible abusive experiences in ways which are reliable and evidentially safe. Spontaneous disclosures are rare from disabled children, especially those who use alternative or augmentative communication systems and abuse is more likely to be identified via physical signs, behavioural responses and /or emotional presentation / changes. It is therefore imperative that staff are sensitive to what might be very subtle indicators, especially where children have multiple disabilities, and that regular consultation occurs between the SENCO and DSL in school, especially in circumstances where issues and / or concerns arise.

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

14. Early Years Foundation Stage (EYFS)

As with all staff EYFS staff and volunteers are given safeguarding training. They will have training specific to their setting, including identifying signs of possible abuse and neglect for EYFS children at the earliest opportunity. These may include:

- Significant changes in children's behaviour;
- Deterioration in children's general well-being;
- Unexplained bruising, marks or signs of possible abuse or neglect;
- Children's comments which give cause for concern;
- Any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or:
- Inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example: inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

The School's policy on the use of mobile phones and cameras in the EYFS setting is set out as per the EYFS Statutory Framework and can also be found in the ICT Acceptable Use Policy for Employees, in the Staff Code of Conduct and includes the following:

- Any personal digital recording device including personal mobile phones, cameras and video recorders cannot be used when in the presence of children either on school premises or when on outings.
- All mobile phones must be stored securely within the setting during contact time with children. (This includes staff, visitors, parents, volunteers and students – including the school's sixth form mentors).
- No parent is permitted to use their mobile phone or use its camera facility whilst inside the EYFS setting. School policy regarding this matter should be explained clearly to Parents by the Head of EYFS.
- Mobile phones must not be used in any teaching area within the setting or within the bathroom area.
- In the case of a personal emergency staff should use the school telephone. It is the responsibility of all staff to make families aware of the school telephone numbers.
- Personal calls may be made in non-contact time but not within the teaching areas.
- Personal mobiles, cameras or video recorders should not be used to record classroom activities. ONLY school equipment should be used.

- Photographs and recordings can only be transferred to and stored on a school computer before printing.
- All telephone contact with Parents/Carers must be made on the school telephone and should be recorded.
- During group outings nominated staff will have access to the school mobile which can be used in an emergency or for contact purposes.
- In the case of school productions, Parents/carers are permitted to take photographs of their own child in accordance with school protocols which strongly advise against the publication of any such photographs on Social networking sites.

The school will notify the relevant child protection agency of any serious accident or injury to, or the death of, any child while in their care, and will act on any advice from this agency.

15. Honour Based Violence

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

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found in KCSIE and [Multi-agency guidelines: Handling case of forced marriage](#).

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

16. Identifying cases of Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is prohibited by law in England, Scotland and Wales, whether it is committed against a United Kingdom national or permanent United Kingdom resident in the UK or abroad. FGM is an abuse of the human rights of girls and women and therefore a child protection issue.

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

17. Radicalisation /Extremism

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

‘Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas’.

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

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

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

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

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

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

- Have the knowledge and confidence to identify children who are at risk;
- Be able to challenge extremist ideas used to legitimise terrorism;
- Know where and how to refer children and young people for further help (including the local police or by dialling 101);

- Ensure that our children remain safe online with a priority on robust ICT protocols and procedures as well as having appropriate levels of filtering on the Internet;
- Manage its prayer and faith facilities with a clear policy on cover arrangements and any issues that arise, including how access is managed after hours.

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

18. Looked after children, previously looked after children and care leavers

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

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

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

If there is a child at The Oratory Schools who has been in care the DSL will get the details of the local authority Personal Advisor who has been appointed to support them and will liaise with them if there are any concerns.

19. Safeguarding children away from the school site

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

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

Following KCSIE 2018 where a child is placed with an alternative provider, The Oratory continues to be responsible for safeguarding and has to be satisfied that the provider meets the needs of the pupil. The most obvious example of this is the timetabled service activity done by pupils in the 5th form and above with different organisations in the local area. The Oratory will obtain written confirmation that the appropriate safeguarding checks have been carried out on individuals working at the establishment as would happen at school.

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

20. Private fostering

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

21. Children missing education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2018) the school has:

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

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Appendix 1: The Role of Designated Safeguarding Leads

The Oratory School has a number of Designated Safeguarding Leads (DSLs) and Deputy Safeguarding Leads to support staff in carrying out their safeguarding duties and liaising with external services. The DSLs are both members of their respective leadership team with the necessary status and authority to be responsible for matters relating to child protection and welfare throughout all areas of the school. The Oratory School ensures that the safeguarding leads have sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively and they regularly attend safeguarding seminars as well as taking the statutory training required every two years. Their responsibilities are included in their job description. During term time a safeguarding lead will always be available (during school hours) for staff and pupils in the school to discuss any safeguarding concerns.

The Designated Safeguarding Lead for the Senior School is **Mr Matthew Fogg**, the Deputy Head Pastoral. He has ultimate lead responsibility for safeguarding and child protection in the senior school. The Designated Safeguarding Lead for the Preparatory School is **Mrs Gill Smith**, the Deputy Head Pastoral. At the senior school there are two Deputy Safeguarding Leads (**Dr Amanda Gemmill** and **Fr David Elliott**). At the prep school there are also two Deputy Safeguarding Leads (**Mr Chris Sexon** and **Mrs Patricia Williamson**). The DSLs meet regularly to discuss safeguarding issues across the whole campus.

If the DSL is unavailable or is him/herself the subject of a complaint, his/her duties will be carried out by one of the Assistant DSLs. All are trained to Level Three.

The main areas of responsibility of the DSLs are:

- To advise and act upon all suspicion, belief and evidence of abuse reported to them.
- To be the first point of contact for parents, pupils, staff and external agencies in all matters of child protection and safeguarding.
- To understand the risks associated with online safety and also the additional risks faced by SEND students online for example from online bullying, grooming or radicalisation. Also to have the up to date capability to keep children safe online at school.
- To keep the Headmaster informed of all actions. (unless the Headmaster is the subject of a complaint.) In this situation, the DSL should consult with the Chair of Governors or in his absence, the Governor with responsibility for Safeguarding.
- To liaise with other agencies and liaise with the LADO on behalf of the school, co-ordinate child protection procedures and to have a working knowledge of the Local Authority's safeguarding procedures and the school's Child Protection and Safeguarding Policy and procedures.
- To ensure that appropriate action is taken in the School and that procedures are followed in all actual or suspected cases of child abuse. If at any time there is a risk of immediate serious harm to a child, a referral should be made immediately to Oxfordshire's MASH service.
- To contact MASH or the LADO within twenty-four hours to seek advice on safeguarding concerns brought by staff or pupils such as allegations of abuse against members of staff. Also to also check

whether or not the pupil or pupil's family involved is known to social services and to continue to liaise with external agencies that are involved in supporting the welfare of a child and where appropriate work with Family Information Service (FIS) to complete an EHAP.

- To be aware of the differentiation between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies (see Flowchart 1) and the Oxfordshire Thresholds of Need Guide (see section 5).
- To deal with issues arising from, or relating to, historical allegations.
- To ensure that all staff have training in child protection so that they fully understand part one and annex A of KCSIE as well as regular reviews of their own practice and opportunities to discuss any concerns they may have about safeguarding matters. It is good practice for other members of staff to contribute to this training where appropriate. This will include training in how to refer cases of suspected abuse to the local authority children's social care as required (or the police if a crime has been committed) and also in the Prevent duty. All staff, volunteers and governors will be trained in the Prevent duty and how to refer cases to the Channel programme where there is a radicalisation concern as required.
- To monitor the keeping, confidentiality and storage of records in relation to child protection. Also to promote the use of MyConcern as the central online database for safeguarding records and train staff in its use. This ensures that Pupil Welfare and safeguarding issues are managed centrally while allowing all relevant staff to contribute efficiently and effectively.
- Where appropriate, to take part in the child protection conferences or reviews. If the DSL cannot attend they will ensure that another of those responsible for Pupil Welfare and Safeguarding will attend.
- Together with the Headmaster and School Leadership, annually to review the School's Policy on Child Protection and Safeguarding and in each term look at how the duties have been discharged, and to report on this to the Governing Body. A report will be given termly to the Governors Safeguarding Committee and the reports will be viewed by the all Governors annually as part of the Safeguarding training for Governors. Any deficiencies or weaknesses in regard to child protection arrangements will be remedied without delay.
- Where children leave the school the Designated Safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.

Appendix 2: Safer Recruitment

The Oratory School has a culture of safe recruitment, and makes its decisions about the suitability of employees based on the checks and evidence as set out in part three of KCSIE 2018 and ISI Regulatory Requirements. The same checks also apply to volunteers (including governors) working for the school as well as those in paid employment. This evidence includes:

- Enhanced DBS check
- Barred list check for staff involved in a regulated activity as defined in KCSIE –in summary: staff regularly teaching or caring for children when unsupervised or with other opportunities for regular contact with children.
- Prohibition from teaching check and prohibition from management check for those in management roles. For staff who work in childcare provision a check that they are not disqualified under the Childcare (Disqualification) Regulations 2009.

- References, identity checks and interview information
- Also a self-declaration of 'Disqualification by Association' (see 11b below - for staff who work in early years provision and those who work in later years provision for children who have not attained the age of 8 and employees who are directly concerned in the management of such provision)

Records of these checks will be kept with HR in a single central record for all staff who work at the school including volunteers, governors and supply/agency staff if applicable of pre-appointment checks as set out in paragraphs 128-131 of KCSIE. The date on which each check was completed will be kept for the identity check, barred list check, enhanced DBS check, prohibition from teaching check, further checks on people who have lived or worked outside the UK, check of professional qualifications, check to establish the person's right to work in the UK.

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

When using staff from an agency or third party organisation The Oratory School obtains written notification that they have carried out their own safeguarding checks including written notification that an enhanced DBS certificate and barred list check has been obtained. The Oratory School then checks that the person coming for work is the same person on whom the checks have been made. Trainee teachers paid directly by The Oratory School are checked as with any other employee. Where trainee teachers are fee-funded the checks are carried out by the teacher training provider as with agency workers.

If a member of staff has not obtained their DBS certificate before they start work they will be supervised appropriately (the DSL and HR department will carry out a risk assessment), and all other checks including a separate barred list check will have been carried out.

Appendix 2b: Disqualification from teaching in EYFS

Disqualification by Association - new Government legislation, July 2018 reads: **Disqualification by association** 21. Under the 2018 Regulations, schools are no longer required to establish whether a member of staff providing, or employed to work in, childcare is disqualified by association. Regulation 9 does not apply to staff in a relevant school setting; disqualification by association is only relevant where childcare is provided in domestic settings (e.g. where childminding is provided in the home) or under registration on domestic premises. Accordingly, schools should not ask their staff questions about cautions or convictions of someone living or working in their household. Schools should review their staffing policies and safer recruitment procedures, and make changes accordingly.

Appendix 3: Online Safety

Children and young people can be exploited and suffer bullying through their use of modern technology such as mobile phones and social networking sites. Technology can also provide the platform to facilitate harm such as child sexual exploitation, radicalisation, sexual predation or peer on peer abuse and sexting advice for which can be found in government advice: [Sexting in Schools and Colleges](#). The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material.
- **Contact:** being subjected to harmful online interaction with other users.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

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

As part of our limiting of any potentially inappropriate material being accessed in school students are not allowed to use their phones during the school day with the exception of sixth formers who can use their phones in the sixth form centre.

We will ensure that staff are aware of how not to compromise their position of trust in or outside the setting and are aware of the dangers associated with social networking sites.

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

Information and support

<https://www.thinkuknow.co.uk/>

<https://www.disrespectnobody.co.uk/>

<http://www.saferinternet.org.uk/>

<https://www.internetmatters.org/>

<https://www.pshe-association.org.uk/>

<http://educateagainsthate.com/>

<https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>

Appendix 4: Attendance and the admissions register

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. Effective information sharing between the school and parents is critical to ensuring that all children are safe and receiving suitable education.

A child going missing from education either during term time or at a point of transfer to another school or college is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, sexual or criminal exploitation or radicalisation. It can also indicate mental health problems, substance abuse or other issues.

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

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

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

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

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

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

Appendix 5: Visitors on the school site

Any visitor to the school site will have their identity checked at school reception and they will be required to wear an identity badge and to be supervised while on-site. This applies to visiting parents, contractors, visiting speakers and any other visitors.

The Oratory School has visiting speakers frequently, and as part of our responsibility under Prevent we ensure that all talks are aligned to the ethos and values of the school and British values. We do this by ensuring that the Deputy Head Pastoral and the HR department have background information about the speaker as well

as a clear understanding of the purpose of the talk. The school will have an organising liaison with the speaker to organise this and supervise the speaker while they are on site. In the unlikely event of a speech not aligning with the values and ethos of the school and British values immediate action will be taken by a member of staff to balance the information given. Each visiting speaker will be evaluated by the organiser and should they not meet the needs of our students then this will be clearly communicated to the visiting speaker/ institution by the Deputy Head Pastoral.

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

Appendix 6: Key Documents

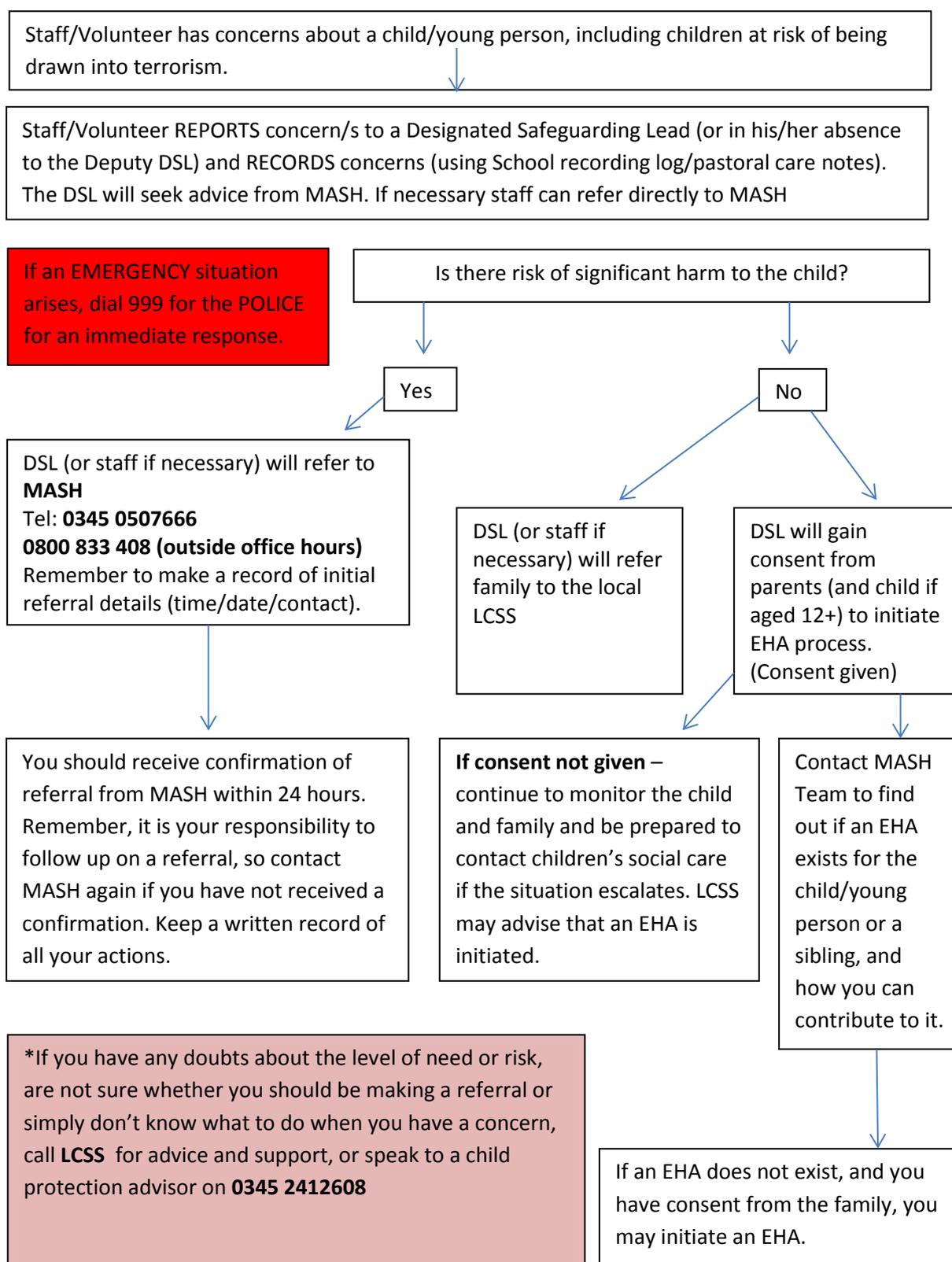
The DfE guidance that The Oratory has regard to in this policy is:

- [Keeping Children Safe in Education](#) (September 2018) (KCSIE)
- KCSIE incorporates the additional statutory guidance: [Disqualification under the Childcare Act](#) (2006 updated September 2018)
- KCSIE also refers to the non-statutory advice for practitioners: [What to do if you're worried a child is being abused](#) (March 2015)
- [Working Together to Safeguard Children](#) (September 2018) (WT)
- WT refers to the non-statutory but important advice: [Information sharing: advice for safeguarding practitioners](#) (2018)
- [Prevent Duty Guidance: for England and Wales](#) (July 2015) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:
- [The use of social media for on-line radicalisation](#) (July 2015)

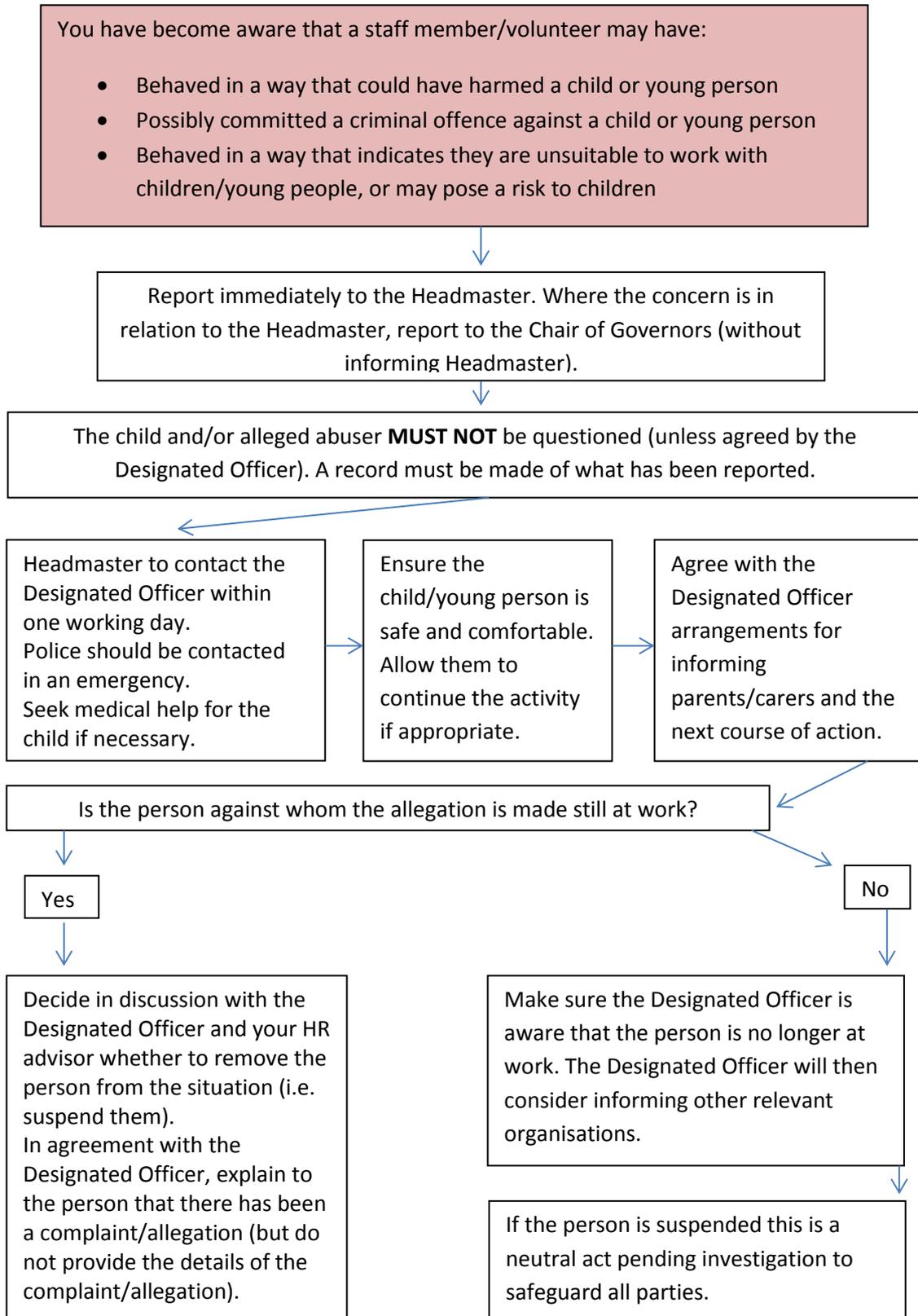
Flowchart 1: Dealing with Concerns about a Child/Young Adult

Note that full information on referrals is found at:

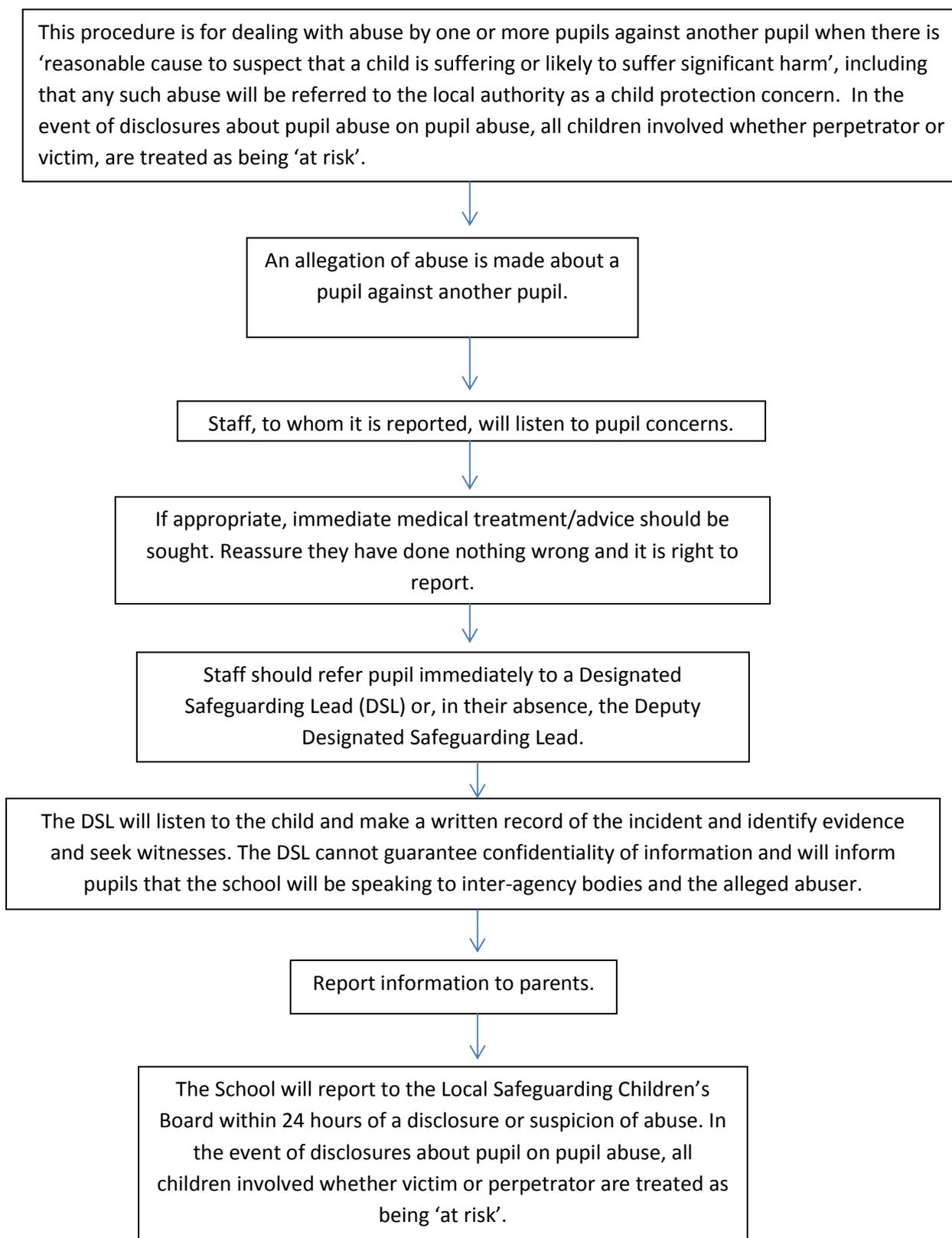
http://oxfordshirescb.proceduresonline.com/p_referrals.html



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



Flowchart 3: Procedures for Dealing with Abuse by One or More Pupils Against Another Pupil



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

