



The Manor

Preparatory School

SAFEGUARDING POLICY

Including:

- Child Protection Policy
- Staff Behaviour Policy
- Whistle-blowing Policy
- Visitors and Visiting Speakers Policy

WHOLE SCHOOL POLICY (INCLUDING EYFS)

Date Policy Reviewed:

31 March 2021

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1 September 2021

Person(s) Responsible for Review:

Deputy Head Pastoral and Head, followed by Governors

SAFEGUARDING POLICY

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Key Personnel	Name/s	Contact Details
Designated Safeguarding Lead (DSL)	Mr Varun Footring	01235 858480 07929 857030 vfootring@manorprep.org
Deputy DSLs	Mrs Pippa McConnell Mrs Victoria Evans Mr Neil Jackson	01235 858485 07552 848843 pmcconnell@manorprep.org 01235 858496 07423 682590 vevans@manorprep.org 01235 858456 07435 987404 njackson@manorprep.org
School's Named 'Prevent' Lead	Mr Varun Footring	01235 858480 07929 857030 vfootring@manorprep.org
Nominated Safeguarding Governor	Mrs Jan Rimmer	07884 280893 dandridge.house@btinternet.com
Head	Mr Alastair Thomas	01235 858460 07826 398855 head@manorprep.org
Chair of Governors	Mr Shaun Forrestal	07428 616799 shaun@theforrestals.net
Education Safeguarding Advisory Team / Local Authority Designated Officers (LADOs)	Alison Beasley Donna Crozier Sandra Barratt Becky Langstone (ESAT)	01865 810603 lado.safeguardingchildren@oxfordshire.gov.uk
Education Prevent Leads	Alison Beasley Karen Crossan	01865 810603 lado.safeguardingchildren@oxfordshire.gov.uk
Locality Community Support Service (LCSS) worker	Emma Walker	0345 2412608 Emma.Walker@Oxfordshire.gov.uk
Multi Agency Safeguarding hub (MASH)	Katrina Johnson	0345 050 7666
Out of hours Emergency Duty Team (EDT)		08450 507666
Police		101 or in emergencies 999

SECTION ONE: CHILD PROTECTION POLICY: PROCEDURE – WHAT DO YOU DO?

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all staff should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. If in any doubt about sharing information, staff should speak to the Designated Safeguarding Lead (DSL) or a Deputy DSL. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

CHILD PROTECTION PROCEDURE – What YOU should do

1. If a member of staff has a concern about a child's welfare, they should speak to the DSL in person immediately or certainly within 24 hours (the member of staff should not go to a colleague for advice first).
2. Allegations involving a member of staff or a volunteer should be directed to the Head who will decide whether to involve the LADO (Local Authority Designated Officer). Please refer to the flow diagram on page 12 below and to the Whistleblowing Policy.
3. If it is not possible to see the DSL or a DDSL in person, contact should be made by phone from a private location.
4. The member of staff should then log their concern as soon as possible by logging into CPOMS (Child Protection Online Monitoring System) which can be accessed here: themanorprepschool.cpoms.net. Staff should click 'Add Incident' and then type their account which will be automatically sent to the DSL and Deputy DSLs. If a member of staff is unable to access CPOMS, a paper 'Record of Concern Form' is available in the Deputy Head Office.
5. This form should be completed by the individual raising the concern (not a third party) and should be based on notes taken by the member of staff at the time or immediately after. The record should be factual and objective, using the voice of the child where possible. All evidence must be safeguarded and kept. Notes should include:
 - Dates and times of their observations
 - Dates and times of any discussions in which they were involved
 - Any injuries
 - Explanations given by the child / adult
 - What action was taken
 - Any actual words or phrases used by the child
 - Any questions the staff member asked (remembering not to ask any leading questions)

Following a report of concerns, the DSL must:

1. Decide whether there are sufficient grounds for suspecting significant harm, in which case a referral must be made to Children's Social Care and the police if it is appropriate. The rationale for this decision should be recorded by the DSL. The DSL may choose to seek advice on a 'no names' basis by calling the LCSS (Local Community Support Service).
2. Normally the school should try to discuss any concerns about a child's welfare with the family and where possible, seek their agreement before making a referral to Children's Social Care. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be taken into account.
3. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm the DSL (or Deputy) must contact Children's Social Care via MASH, sharing:
 - the known facts
 - any suspicions or allegations
 - whether or not there has been any contact with the child's family

The MASH can be contacted by phone on **0345 050 7666**.

4. If a child is in immediate danger and urgent protective action is required, the police must be called. The DSL must then notify Children's Social Care of the occurrence and what action has been taken.
5. When a pupil needs *urgent* medical attention and there is suspicion of parental abuse causing the medical need, the DSL or their Deputy should seek immediate advice from the MASH about informing the parents, remembering that parents should normally be informed if a child requires urgent hospital attention. However, as in all cases, if it is felt this could put the child more at risk then all action should be taken in the best interests of the child.
6. If there is not considered to be a risk of significant harm, the DSL will either actively monitor the situation, consider the Early Help process or contact the LCSS for a no names consultation.
7. If the child lives in a different area (i.e. outside Oxfordshire), Oxfordshire staff will then liaise with the local authority where the child lives.

Please also remember that ANYONE can make a referral if necessary. Under these circumstances, the referral must be followed up with an online report. More information is available at: <http://www.oscb.org.uk/concerned-about-a-child/>

The Designated Safeguarding Lead (DSL) or a Deputy DSL should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the Senior Leadership Team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.

Anyone who has a concern about a child's welfare should ensure a referral is made to children's social care.

Contact the DSL:

Varun Footring – 01235 858480 / 07929 857030 / vfootring@manorprep.org

OR Deputy DSL:

Pippa McConnell 01235 858485 / 07552 848843 / pmcconnell@manorprep.org

Victoria Evans 01235 858496 / 07423 682590 / vevans@manorprep.org

Neil Jackson 01235 858456 / 07435 987404 / njackson@manorprep.org

The name of the practitioner designated to take lead responsibility for safeguarding children in the EYFS setting is Mrs Pippa McConnell (contact details above).

If the above are unavailable, then any member of staff has the responsibility to contact the **Oxfordshire MASH:**

mash-children@oxfordshire.gov.uk / 0345 050 7666

OR the LADO:

lado.safeguardingchildren@oxfordshire.gov.uk / 01865 815956 / 01865 810603

The DSL (or Deputy DSL) should be informed at the first opportunity.

It is not appropriate for staff to conduct any kind of investigation or to ask leading questions of a pupil. It is not possible to promise confidentiality to a pupil giving evidence as one is obliged to pass on information if a pupil may be at risk. However, child protection issues should never be discussed with anyone other than the DSL, or in their absence the Deputy DSLs or later on the official investigation team. Fuller guidance is available in the DfE document '[Code of Conduct – Guidance for Staff to Promote Safer Working Practice for All Adults Who Work With Children and Young People](#)' (August 2020). All evidence must be safeguarded and kept.

- The Designated Safeguarding Lead does an initial review of the evidence. If he considers that there is a possibility of abuse he communicates as soon as possible or within 24 hours at the latest with the Oxfordshire MASH (new cases - serious) or the Local Community Support Service (LCSS) South (new cases – advice/'no names' consultation) or the Children's Social Care Team, South (open cases). If the allegation is against a member of staff/volunteer the Head will contact the LADO and the Chair of Governors.
- Advice is sought from the Oxfordshire MASH, LCSS (South), the Children's Social Care Team (South) by the DSL.
- If the allegation involves a member of staff or a volunteer, please refer to the flow diagram on page 12 below; 'Allegations Against Adults/School Staff/Volunteers'.

- In all proper circumstances, a complaint involving a serious criminal offence will be referred to the Oxfordshire MASH (new cases) or Oxfordshire Children's Social Care Team, South (open cases). In the case of serious harm, the police will be informed from the outset.
- Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with the parent and pupil, their consent is not required for a referral where there are reasonable grounds for believing that a child is at risk of significant harm.

The DSL must communicate within 24 hours with the Oxfordshire MASH whenever a new allegation or disclosure of abuse causing significant/serious harm has been made ([Working Together to Safeguard Children](#) and [What to do if you're worried a child is being abused](#)). If the allegation is against a member of staff/volunteer the Head will contact the LADO and the Chair of Governors. If the child lives in a different area (i.e. outside Oxfordshire), the DSL will contact Oxfordshire within 24 hours; Oxfordshire staff will then liaise with the local authority where the child lives.

When deciding whether to make a referral, it is not for the School to make its own decision over what appears to be a borderline case. Any doubts or concerns should be discussed with:

- the Local Authority Designated Officer (LADO) if the allegation of abuse is against a member of staff or volunteer;
- the MASH or LCSS if there is an allegation of abuse by anyone else (eg abuse by a parent or peer on peer). If this needs to be done tentatively and without giving names in the first instance, Oxfordshire LCSS provide a 'No Names' consultation service (please see Appendix 8, 'Safeguarding and Prevent Contact Details'). What appears minor at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus the school will not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse.

Once cases are 'open', they are dealt with by the Children's Social Care Team, South.

The Manor realises the importance of the following points, which help guide the school's actions:

- Children receiving the right help at the right time to address risks and prevent issues escalating. The principle of **early help** for children is fully recognised.
- Acting on and referring the early signs of abuse and neglect
- Keeping clear records
- Reassessing concerns when situations do not improve
- Listening to the views of the child
- Sharing information quickly
- Challenging inaction
- Care is taken not to impose high thresholds for referrals, either in policy or practice

Any member of staff who has knowledge or suspicion that a pupil is suffering significant harm or is at risk of significant harm should refer their concerns immediately to the DSL

or in his absence one of his two Deputy DSLs. 'Harm' is defined in the Children Act 1989 section 31(9) as:

- Ill-treatment (including sexual abuse and physical abuse)
- Impairment of health (physical or mental) or development (physical, intellectual, emotional, social or behavioural) as compared to a similar child

'Harm' includes the impairment of a child's health or development as a result of witnessing the ill-treatment of another person (Adoption and Children Act 2002).

Children who have suffered or are likely to suffer significant harm are reported without delay to the Oxfordshire MASH (new cases) or the Children's Social Care Team, South (open cases).

CHILDREN IN NEED - Section 17

A **child in need** is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

CHILDREN AT RISK - Section 47

Children suffering, or likely to suffer, significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, **significant harm**. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based abuse, and extra-familial threats like radicalisation and sexual exploitation.

Children in need of additional support from one or more agencies

These children should be involved in inter-agency assessment using local processes, including use of the 'Early Help Assessment' (EHA) and 'Team around the Family' (TAF) approaches.

Role of all Staff in being able to make a referral to outside agencies

Any member of staff can make a referral to external agencies. In regular training sessions, it is emphasised to staff that they must feel able to raise concerns and feel supported in their safeguarding role (stressed by [Working Together to Safeguard Children](#)) and, as KCSIE (Sept 2020) emphasises, staff are made aware that all staff can make a referral to external agencies. Where a member of staff makes a referral directly, he/she needs to inform the DSL as soon as possible thereafter.

However, staff are aware that, in line with KCSIE (Sept 2020), they are advised that if they have concerns about a child, they should first speak to the DSL rather than taking their concerns direct to children's social care, except in exceptional circumstances.

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

Manor Staff are aware that the former should be reported to children's social care (MASH) immediately; the latter should lead to inter-agency assessment using local processes via the LCSS, including use of the 'Early Help Assessment' (EHA) and 'Team around the Family' (TAF).

Staff are aware of the clear delineation between children who would benefit from early help and those whose needs may meet the threshold for statutory intervention under the Children's Act 1989 which includes those considered to be 'in need' for the purposes of the Act, those who may be suffering, or likely to suffer, significant harm, and/or those who may be in immediate danger and in need of immediate protection (where referrals to the police and/or children's care should be made immediately).

CONFIDENTIALITY

It is not possible to promise confidentiality to pupils on child protection matters.

SHARING INFORMATION

GDPR (General Data Protection Rules) and the UK Data Protection Act 2018 outline data protection principles which contain guidance about sharing information. 'Special category personal data' may be shared to safeguard children at risk. Information may be shared with relevant authorities, without consent of the individual, if there is a risk of harm to a child. For further information on this topic, please see 'Information sharing advice for safeguarding practitioners' (<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>).

Staff should understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place the child at risk.

Schools do not need to provide pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, schools must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt, The Manor will seek independent legal advice.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. 'Working Together to Safeguard Children' (2018) states that 'you **do not** need consent to share personal information. (...) It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal information required. The legal bases that may be appropriate for sharing data in these circumstances could be 'legal obligation' or 'public task' which includes the

performance of a task in the public interest of the exercise of official authority.’ Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. It continues to be good practice to ensure transparency and to inform parents/carers that you are sharing information for these purposes and seek to work cooperatively with them.

Further details on information sharing can be found:

- in Chapter one of Working Together to Safeguard Children (2018), which includes a myth-busting guide to information sharing
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
- at [The Information Commissioner’s Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance from the department
- in [Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR](#).

OUT OF SCHOOL CARE/HOLIDAY ACTIVITIES

The arrangements in this policy also apply to all aspects of The Manor’s out of school care and holiday activities.

WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED OR NEGLECTED

SAFEGUARDING IS EVERYONE'S RESPONSIBILITY

Member of staff has concerns about a child's welfare or a disclosure is made

(including children in need and children at risk)

Be alert to signs of abuse and question unusual behaviours

STAFF MUST TAKE IMMEDIATE ACTION



DISCUSS concerns with the DSL or, in his absence, a Deputy DSL ***immediately*** (within 24 hours)

LOG their concern ***as soon as possible*** on CPOMS (themanorprepschool.cpoms.net) by clicking 'Add Incident'

The DSL will consider if it is necessary to contact the Oxfordshire LCSS, MASH or the Children's Social Care Team; this is best done in the presence of the member of staff who reported the matter.

- LCSS (Local Community Support Service): new cases, 'no names' advice
- MASH (Multi-Agency Safeguarding Hub): new cases, serious/immediate
- Children's Social Care Team: open cases

Allegations involving a member of staff or a volunteer should be directed to the Head who will decide whether to involve the LADO (Local Authority Designated Officer). Please refer to Whistleblowing Policy for more information.



DSL STILL HAS SAFEGUARDING CONCERNS

Child in Need / Child at Risk

DSL NO LONGER HAS SAFEGUARDING CONCERNS

This still may be a **child in need of Early Help**



DSL will contact LCSS for advice OR progress immediately to:

MASH Emergency Duty Team – 0345 0507666
Children's Social Care Emergency Duty Team - 0800 833408

If the child is at immediate risk dial 999

CHILD HAS ADDITIONAL OR UNMET NEEDS DSL WILL:

- Seek 'no names' advice from the LCSS
- Consult with the family
- Arrange additional pastoral support for the child



CHILDREN'S SERVICE ACTIONS

1. Acknowledge receipt of referral
2. Decide on next course of action (within one working day)
3. Feedback decision to referrer e.g:
 - Further Assessment including
 - Child protection enquiries/Strategy Discussion
 - No further action required for Children's Services **and Early Help Assessment recommended**
 - Referred to other agency for service provision



MONITORING AND IF REQUIRED:

Early Help Assessment (EHA)
Team around the Family (TAF) proceedings.

**WHERE A YOUNG PERSON DISCLOSES ABUSE OR NEGLECT, THE FOLLOWING
SEQUENCE OF EVENTS SHOULD BE ADHERED TO**

Create a safe environment

Create a safe environment by offering the child a private and safe place if possible. Stay calm and reassure the child and stress that he/she is not to blame. Tell the child that you know how difficult it must have been to confide in you.



Listen

Listen to what the child has to say and take them seriously; reassure the child but advise that you cannot promise to keep a secret. Do not make promises you cannot keep. If there is a requirement for immediate medical intervention, assistance should be called for. Tell the child what you are going to do next after the disclosure.



Talking to the child

When talking to the child, do not interview the child and keep questions to a minimum. Do not display shock or disbelief. Encourage the child to use his/her own words and do not ask leading questions (eg. TED - Tell, Explain, Describe). Do not interrupt their dialogue, or make assumptions, which might give particular answers. Do not repeat the disclosure again and again. Never promise confidentiality but explain why information needs to be shared ie. for their wellbeing.



Record

Record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the child (as much as possible in the child's own words) and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure. Record in writing the child's name, address and date of birth along with the child's behaviour and emotional state, who else was present at the time of the disclosure. Log this concern on CPOMS as soon as possible (themanorprepschool.cpoms.net). When the child has finished speaking, do not leave the child alone. Call for immediate assistance from the DSL or deputy DSL or follow the procedures for allegations against staff, volunteers, and Proprietors. The DSL (or other responsible person within the scope of this policy) will then deal with the matter. The official school safeguarding form should also be completed by the person who receives the allegation and forwarded to the DSL.



Take responsibility by SHARING INFORMATION WITH THE DSL or Deputy DSL

- Only tell those people that it is necessary to inform.
- Do not try to investigate the allegation yourself – this is not our role or responsibility but that of statutory agencies (MASH/Children's Services and/or police).
- Immediately consult our Designated Safeguarding Lead so that any appropriate action can be taken to protect the student if necessary.
- Do not approach or inform the alleged abuser.

ALLEGATIONS AGAINST ADULTS/SCHOOL STAFF/VOLUNTEERS

Risk of Harm to Students

If you become aware that a member of staff/volunteer/Governor may have:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to a child

Report immediately to the Head

Unless there is clear evidence to prove that the allegation is incorrect, **the Head then must:**

Any concern or allegation against the Head of School must be reported to the Chair of Governors:

Shaun Forrestal – 07428 616799, shaun@theforrestals.net

Unless there is clear evidence to prove that the allegation is incorrect, **the Chair of Governors then must:**

Report the allegation within one working day to the Local Authority Designated Officer (LADO) team:

The LADO team: 01865 810603
LADO.safeguardingchildren@oxfordshire.gov.uk

The LADO will:

1. Consider the relevant facts and concerns regarding the adult and child or children, including any previous history
2. Decide on next course of action - usually straight away, sometimes after further consultation with other multi-agency parties such as the Police and HR.

If the allegation threshold is NOT met, the LADO will agree with you an appropriate response

(e.g. for the agency to undertake further enquiries or undertake an internal investigation)

If the allegation threshold is met a strategy meeting will normally be held either by phone or in person. Normally a senior manager / safeguarding lead, the LADO, HR, Police and social care are invited to attend. Relevant information is shared, risks to children are considered and appropriate action agreed – e.g. child protection and other enquiries, disciplinary measures or criminal proceedings. A record of the meeting will be made, and regular reviews will take place until a conclusion is reached.

SECTION TWO: OVERARCHING SAFEGUARDING POLICY

GENERAL INTRODUCTION

The Manor Preparatory School fully recognises the responsibility it has towards safeguarding all pupils in our care and is committed to taking all reasonable measures to ensure that risks to its pupils' welfare are minimised. The safety and well-being of all our pupils is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment, so that every pupil can learn in safety. We expect respect, good manners and fair play to be shown by everyone so that every pupil can develop his/her full potential and feel positive about him/herself as an individual. All pupils should care for and support each other.

This policy is made freely available to current and prospective parents in the school office and is on the school website under 'Policies'. We ensure that both prospective and current parents are aware of the Safeguarding Children Policy: prospective parents are referred to it in the first letter replying to an inquiry about the school and in the information supplement to the prospectus; current parents are reminded of it on an annual basis via the school newsletter. Copies of the policy are available on request. This policy applies to all aspects of the school and to all pupils, whether in normal school time, or during out of school care sessions. School trips are also included within this policy.

The statutory framework for child protection was established in *The Children Act* (1989). The duty of Independent School proprietors and/or governors to safeguard and promote the welfare of children who are pupils at the school was explicitly stated in the *Education Act 2002*. The Manor Preparatory School will safeguard and promote the welfare of children who are pupils at the school, in compliance with the documents referred to in the appendices of this policy.

The Manor Preparatory School follows the requirements and guidance of the Education (Independent School Standards) Regulations 2014.

In addition, The Manor Preparatory School follows the requirements and guidance of **Keeping Children Safe in Education (Sept 2020)**.

Safeguarding is Everyone's Responsibility

The School fully recognises that safeguarding is the responsibility of everyone in the organisation and that there is a corresponding Governance requirement to assist all staff to do this and involve staff in shaping policies and procedures.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.

The Principle of Early Help

All school staff are prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from EYFS to Year 6 in the case of The Manor's children. In the first instance staff should discuss early help requirements with the Designated Safeguarding Lead. Staff may be required to support other agencies and professionals in an early help assessment. The DSL will oversee the process by which agreement for early help is obtained from the child (where appropriate) and from the parents/carers; the DSL will respond appropriately if a child/parents refuse to consent to an early help assessment. Early help arrangements may include an EHA (Early Help Assessment) or TAF (Team around the Family). Please also see the section of this policy which expands upon this: "In school provision for early help" (Section 5).

The school includes in its definition of 'everyone' all those who come into contact with the children and their families and carers – staff (full-time and part-time), peripatetic teachers, club leaders, regular volunteers, although we recognise governors' duties to take a proportionate risk based approach to the level of information that is provided to temporary staff and volunteers (KCSIE Sept 2020).

AIMS AND OBJECTIVES

The School aims to:

- Provide a safe educational environment for pupils
- Maintain vigilance in detecting abuse and operate clear procedures for all staff to follow in cases of suspected abuse, whether it be from an adult or another pupil
- Ensure that pupils who are vulnerable, at risk and/or likely to suffer significant harm are identified and appropriate action is taken to keep them safe
- Monitor effectively pupils who are vulnerable or at risk, including disabled pupils
- Promote an ethos in which pupils feel safe, able to talk openly and are listened to
- Prevent unsuitable people working with children
- Promote, and share with parents and pupils, safe practice
- Ensure that all parents and guardians are aware of the School's child protection responsibilities
- Ensure that proper written records of any child protection concerns/cases are kept and maintained confidentially
- Operate robust and sensible Health and Safety policies and ensure that health and safety issues are recognised and dealt with efficiently and without delay.
- Ensure that child protection issues are included within the school curriculum (as part of 'Learning for Life'/PSHEE/PSED, pupils are given opportunities to develop the skills they need to recognise and stay safe from abuse).
- Ensure that the Governing Body undertakes an annual review of the Child Protection Policies and of the efficiency with which the related duties have been carried out.

LINKS TO KEY DOCUMENTS

The Manor's Safeguarding Policy has regard to the following documents:

- [Keeping Children Safe in Education](#) (September 2020) (KCSIE)
- Non-statutory interim supplements to KCSIE: [Safeguarding and remote education during coronavirus \(COVID-19\)](#)

- KCSIE incorporates the additional statutory guidance, [Disqualification under the Childcare Act 2006](#) (August 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)
- KCSIE refers also to [When to call the police, non-statutory guidance from the National Police Chiefs' Council](#)
- [Working Together to Safeguard Children](#) (July 2018 – updated in 2019 but without changing the date on the published version) (WT)
- WT refers to the non-statutory but important advice: [Information sharing](#) (July 2018)
- [Prevent Duty Guidance: for England and Wales](#) (July 2015 and updated April 2019) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:
- [The Prevent duty: Departmental advice for schools and childminders](#) (June 2015)
- [The use of social media for on-line radicalisation](#) (July 2015)

DEFINITION OF SAFEGUARDING

KCSIE (Sept 2020) defines safeguarding as follows:

Safeguarding and promoting the welfare of children is defined as (KCSIE Sept 2020):

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes

Children includes everyone under the age of 18.

TRANSPARENCY

The Manor Preparatory School prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting the school. Copies of this policy, together with our other policies relating to issues of child protection are on our website, and we hope that parents and guardians will always feel able to take up any issues or worries that they may have with the school. We will never ignore an allegation of child abuse and will always listen to any concerns thoroughly. Open communications are essential.

EQUAL TREATMENT

The Manor Preparatory School is committed to equal treatment for all, regardless of an individual's race, ethnicity, religion, sexual orientation or social background.

We aim to create a friendly, caring and perceptive environment in which every individual is valued. We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each student. Please see Equal Opportunities Policy.

SECTION THREE: DESIGNATED SAFEGUARDING LEAD

DESIGNATED SAFEGUARDING LEAD (DSL)

The Governing body of The Manor ensures that a senior member of staff, from the Senior Leadership Team, is appointed to the role of Designated Safeguarding Lead (DSL). The DSL takes lead responsibility for safeguarding and child protection.

This policy has been constructed in accordance with locally agreed Inter-Agency procedures. The Manor Preparatory School, as a result of its location, comes under the Oxfordshire Children and Families Assessment Team (South). Regardless of where a pupil actually lives, all new cases are referred in the first instance to Oxfordshire's Multi-Agency Safeguarding Hub (MASH). 'Open cases' are dealt with by the Children and Families Assessment Team (South). All contact with MASH and the Oxfordshire Children and Families Assessment Team (South) is normally made through the:

- Designated Safeguarding Lead:
Varun Footring - 01235 858480 / 07929 857030 / vfootring@manorprep.org

or in his absence through the Deputy Designated Safeguarding Lead:

- Victoria Evans 01235 858496 / 07423 682590 / vevans@manorprep.org
- Neil Jackson 01235 858456 / 07435 987404 / njackson@manorprep.org
- Pippa McConnell 01235 858485 / 07552 848843 / pmcconnell@manorprep.org

The Deputy DSLs are trained to the same level as the DSL.

Individual staff are also able to make direct contact with these bodies but would inform the Designated Safeguarding Lead too. **The key thing is for everyone to feel that they have a personal responsibility for safeguarding and can contact the relevant authorities directly should they so wish.**

The governing body ensures that the Designated Safeguarding Lead is properly supported to carry out the task and is given time to fulfil the duties/training that the role demands. The Designated Safeguarding Leads have their training in Safeguarding annually. The school recognises that the Designated Safeguarding Leads are required to have 'status and authority' within the school. The Head, Deputy Head Pastoral, Deputy Head Academic and the Head of Early Years have taken additional training in that they are part of the pool of registered Oxfordshire trainers in Child Protection. The required annual training for the Designated Safeguarding Lead is set out in Annex B of KCSIE and covers inter-agency working, participation in child protection case conferences, supporting children in need, record-keeping and promoting a culture of listening to children.

The Designated Safeguarding Lead will receive updated Child Protection training at least every year. This will include inter-agency working protocols and training in the OSCB's approach to 'Prevent' duties. (The required training content for the DSL is set out in Annex B of KCSIE and also includes child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture

of listening to children.) The DSL will have higher level training in the Prevent strategy, where possible, to be able to assess the risk of children being drawn into terrorism, including being drawn into support for the extremist ideas that are part of terrorist ideology.

Please also see the Job Description of the DSL in the appendix to this policy.

The DSL benefits from specialist training in Prevent through the online training module on Channel promoted in the non-statutory advice; the DSL is able to provide advice and support to other members of staff on protecting children from radicalisation.

SECTION FOUR: SAFER RECRUITMENT

SAFER RECRUITMENT

Please see The Manor's separate Recruitment Policy.

The Manor Preparatory School follows the Government's recommendations for the safer recruitment and employment of staff who work with children. This includes compliance with the Independent School Standards Regulations. In particular, the School follows the guidelines in Part Three of KCSIE about all aspects of Safer Recruitment described in that document. The School is, therefore, aware of - and carries out - the KCSIE requirement that anyone employed as a teacher is not subject to a prohibition order issued by the Secretary of State – this check is completed using the Employer Online Service. All members of the teaching and non-teaching staff at the school, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, are checked with the Disclosure and Barring Service before starting work. All Governors, volunteer helpers and contractors working regularly during term-time, such as contract catering staff, are vetted. Assurance is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils at The Manor or on another site. A rigorous check of identity, professional qualifications, the right to work in the UK, references, curriculum vitae, employment history including explanation of any gaps and medical fitness, as well as further checks on people who have lived or worked outside the UK are also undertaken by the school before an offer is confirmed and the person actually starts work.. Any such reference should be from a senior person with appropriate authority. The school operates 'Safer Recruitment' procedures, which are outlined in our separate policy called 'Recruitment Policy'. Everyone employed by the school is interviewed by at least one person who has had Safer Recruitment specialist training. This training is regularly updated. Please also see The Manor Preparatory School's Recruitment Policy.

Safer recruitment (KCSIE September 2020)

In line with Part Three of KCSIE 2020, the Governing Body prevents people who pose a risk of harm from working with children by adhering to their statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised. The school has written recruitment and selection policies and procedures in place.

At least one person on any appointment panel has undertaken Safer Recruitment training.

The School is aware of the Secretary of State prohibitions

a) Teacher prohibition orders

Teacher prohibition orders prevent a person from carrying out teaching work in schools, sixth form colleges, 16 to 19 academies, relevant youth accommodation and children's homes in England. A person who is prohibited from teaching must not be appointed to work as a teacher in such a setting. A check of any prohibition can be carried out using the [Teacher Services' System](#). Prohibition orders are

described in the Teaching Regulation Agency's (TRA) publication [Teacher misconduct: the prohibition of teachers](#).

Teacher prohibition orders are made by the Secretary of State following consideration by a professional conduct panel convened by TRA. Pending such consideration, the Secretary of State may issue an interim prohibition order if it is considered to be in the public interest to do so.

b) Section 128 direction

A Section 128 direction (The Independent Educational Provisions in England (prohibitions on Participation in Management) Regulations 2014) prohibits or restricts a person from taking part in the management of an independent school. A person who is prohibited, is unable to participate in any management of an independent school such as: a management position in an independent school, academy or free school as an employee; a trustee of an academy or free school trust; a governor or member of a proprietor body for an independent school; or a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities. A check for a section 128 direction can be carried out using the [Teacher Services' System](#). Where the person will be engaging in regulated activity, a DBS barred list check will also identify any section 128 direction. This applies to internal as well as external appointments.

The School follows the guidance of KCSIE (Sept 2020) in relation to the following:

Individuals who have lived or worked outside the UK

Individuals who have lived or worked outside the UK **must** undergo the same checks as all other staff in schools or colleges (set out in paragraphs 154 and 160 of KCSIE 2020). This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, schools and colleges **must** make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include, where available:

- [criminal records checks for overseas applicants](#) - Home Office guidance can be found on [GOV.UK](#); and for teaching positions
- obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Advice about which regulatory or professional body applicants should contact is available from the National Recognition Information Centre for the United Kingdom, [UK NARIC](#).

Where available, such evidence can be considered together with information obtained through other pre-appointment checks to help assess their suitability.

Where this information is not available schools and colleges should seek alternative

methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment. Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, schools and colleges should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment. Further information can be found in DfE Guidance: [Recruit teachers from overseas](#).

Visitors and Visiting Speakers Policy

Please see Appendix 7 of this policy.

SECTION FIVE: HELP FOR PUPILS

SCHOOL'S ARRANGEMENTS TO FULFIL SAFEGUARDING AND WELFARE ROLES

Teaching pupils the skills needed to keep them safe, including online, as part of a broad and balanced curriculum

The PSHEE/PSED (Learning for Life) curriculum, including our Relationships, Health and Sex Education curriculum and 'Switched On Online Safety' curriculum, provides age-appropriate guidance for pupils so that they develop the skills they need to recognise and stay safe from abuse. The school's policy is to raise awareness of child protection issues among pupils and to equip pupils with the skills and self-confidence needed to keep them safe. Child protection is included in the curriculum to help pupils recognise when they do not feel safe and to identify who they should tell. They are made aware that it is not possible for teaching staff to make promises about confidentiality in child protection matters. Should a child have suffered abuse, they are assured that they are valued and not to be blamed for any abuse that has occurred. Pupils can access help on Child Protection matters, including Childline, Get Connected and the Samaritans. Our Medical Centre displays advice on where pupils can seek help.

The Governors and management of the school consider how children may be taught about safeguarding, including online, through the curriculum and PSHEE/PSED.

Particular attention is paid to school practices to help children to adjust their behaviour to reduce risks, and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and access to the internet. These practices are age-appropriate and delivered through a planned component of the curriculum. Children are taught about the risks posed by adults or young people who use the internet and social media to bully, groom, radicalise or abuse other people, especially children, young people and vulnerable adults. Internet safety is integral to The Manor's computing curriculum and is embedded in PHSEE and SRE. Staff are aware that the latest resources promoted by DfE can be found at

- The [UK Safer Internet Centre](#)
- CEOP'S [Thinkuknow website](#)
- [The use of social media for online radicalisation - Publications - GOV.UK](#)

Please see Curriculum Policy and E-Safety and Acceptable Use Policy for details of how the school's broad and balanced curriculum promotes skills and values which reinforce children's safety.

LOOKED AFTER CHILDREN

The Governors and management of the school ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by the local authority. This includes ensuring that staff have the information they need about the child's status, the most up to date assessment information from the relevant Local Authority, the most recent care plan and contact arrangements with parents, care arrangements and delegated authority to carers, and information available to the DSP.

CHILDREN WHO NEED A SOCIAL WORKER (CHILD IN NEED AND CHILD PROTECTION PLANS)

The school recognises that children who need a social worker due to safeguarding or welfare needs are potentially at a greater risk of harm. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

The local authority should share the fact that a child has a social worker with the designated safeguarding lead, who should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

MENTAL HEALTH SUPPORT

The school recognises the important role we play in supporting the mental health and wellbeing of our pupils.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Governors work with the Deputy Head Pastoral and SLT to ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Negative experiences and distressing life events can affect mental health in a way that can bring about changes in a young person's behaviour or emotional state, displayed in a range of different ways, all of which can be an indication of an underlying problem. This can include:

- Emotional state (fearful, withdrawn, low self-esteem)
- Behaviour (aggressive or oppositional; habitual body rocking)
- Interpersonal behaviours (indiscriminate contact or affection seeking, over-friendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).

Where there are concerns about behaviour, the school will instigate an assessment to determine whether there are any underlying factors such as undiagnosed learning difficulties, difficulties with speech and language, child protection concerns or mental health problems.

The Manor recognise the two key elements that can enable schools to reliably identify children at risk of mental health problems as set out by the government guidance document 'Mental Health and Behaviour in Schools Guidance':

- **Effective use of data** so that changes in pupils' patterns of attainment, attendance or behaviour are noticed and can be acted upon; along with
- **An effective pastoral system** so that at least one member of staff (e.g. a form tutor or class teacher) knows every pupil well and has received training to spot where bad or unusual behaviour may have a root cause that needs addressing. Where this is the case, the Deputy Head Pastoral should be informed who can then escalate the issue and take decisions about what to do next. In these instances, the Deputy Head pastoral will provide the opportunity for pupils to seek support in a confidential way.

If the school suspects that a pupil is having mental health difficulties, we will not delay putting support in place, using a graduated response process:

- An assessment to establish a clear analysis of the pupil's needs;
- a plan to set out how the pupil will be supported;
- action to provide that support; and
- regular reviews to assess the effectiveness of the provision and lead to changes where necessary.

The school will refer to tools such as the 'Strengths and Difficulties Questionnaire' and the 'Boxall Profile' to support us through the process where necessary. These will help us to provide a basis for ascertaining whether the initial intervention is working or whether something different needs to be tried. We will also work collaboratively with other agencies if children need further support.

Early intervention to address underlying causes of disruptive behaviour should include an assessment of whether appropriate provision is in place to support any SEN or disability that a pupil may have. The school may consider use of a multi-agency assessment for a pupil who demonstrates persistent disruptive behaviour. Such assessments may pick up unidentified SEN, disability or mental health problems but the scope of the assessment could go further, for example, by seeking to identify housing or family problems. Whilst not all children with mental health difficulties will have SEN, persistent or serious mental health difficulties will often meet the definition of SEN, in that they lead to pupils having significantly greater difficulty in learning than the majority of those the same age. The graduated response process set out in the SEND Code of Practice provides a framework for deciding what support to offer, which would be good practice regardless of whether or not a pupil has SEN. For pupils with persistent mental health difficulties, the SENCO will ensure colleagues understand how the school identifies and meets pupils' needs, provide advice and support to colleagues as needed and liaise with external SEND professionals as necessary.

For children with the most complex problems, additional in-school interventions may include:

- **support for the pupil's teacher**, to help them manage the pupil's behaviour within the classroom, taking into account the needs of the whole class;
- **additional educational one to one support for the pupil** to help them cope better within the classroom;

- **an individual health care plan.** The Governing body ensures that the school makes arrangements to support pupils with medical conditions. If mental health professionals have recommended medication, this should be detailed in the individual health care plan. School staff should be aware of any medication that children are taking, and how this should be stored and administered.
- **one to one therapeutic work** with the pupil, delivered by trained mental health specialists (within or beyond the school), which might take the form of cognitive behavioural therapy, behaviour modification or counselling approaches. Where possible, such therapy should be scheduled so as to minimise the disruption to the pupil's attendance in school; and
- **family support and/or therapy could also be considered by mental health professionals** to help the child and their family better understand and manage behaviour.

IN-SCHOOL PROVISION FOR LISTENING TO CHILDREN

The school realises the great importance of 'the child's voice' and for all members of the school community to listen to the views of the child. The School ensures that its arrangements to "listen" to children are effective, including the use of counsellors/listeners, use of helplines, questionnaires, worry boxes and other systems to gain views and insight. The Heads of Y1/2, Y3/4 and Y5/6 all offer specific times each week where they make themselves available to children. In our regular questionnaires of children, the school checks that pupils confirm that they have someone they can talk to if they experience difficulties. The Form Teacher plays a major role in this regard but all staff are aware that children may choose to confide in them. There is also a professional School Counsellor available to support certain pupils and staff members, individually. Sessions with the School Counsellor are organised either through the School Nurse or Deputy Head Pastoral.

IN-SCHOOL PROVISION FOR EARLY HELP

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves

The school is very aware of the key principle of early help so that problems are, wherever possible, nipped in the bud before they can escalate to becoming more serious.

The school's arrangements include:

- In-school listening to children provision (see above) and an awareness of the importance of 'the child's voice'. Listening provision may well include advice to the child on how they can play a part in improving the situation.
- Focus on child welfare and pastoral matters in all staff meetings, particularly in weekly meetings of the individual sections of the school.
- Full Senior Leadership Team involvement in the welfare of children
- Principle of involvement of parents as soon as issues are raised
- Excellent links to the local agencies including OSCB, MASH, the Children's Social Care Team and the LCSS, who may advise on local processes:
 - EHA (Early Help Assessment)
 - TAF (Team around the Family)

Guidance on these processes is also available from their website:

<https://www.oxfordshire.gov.uk/>. By typing EHA or TAF into the search box, all of the relevant forms and advice sheets are made available.

PROMOTION OF WELFARE

The ethos of The Manor Preparatory School is to promote social and moral well-being, to teach pupils to take care of and to value themselves, and to think in terms of making a positive contribution to society as adults. All our pupils take part in a large number of charitable activities. We see this as making an important contribution towards the development of the whole person, who grows up to value society and to expect to make a personal contribution towards the general.

SAFEGUARDING PUPILS ONLINE

The Manor is fully aware of Annex C of KCSIE (Sept 2020) dedicated to online safety which emphasise the importance of a whole school approach.

The Manor realises its duty to protect pupils online. Please see the Cyber-Bullying Policy, E-Safety and Acceptable Use Policy and Anti-Bullying Policy.

Since the use of technology has become a significant component of many safeguarding issues (Child sexual exploitation; radicalisation; sexual predation), The Manor educates the whole school community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

We focus mainly on 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

Filters and monitoring

The Governing Body and staff do all that they reasonably can to limit children's exposure to the above risks from the school IT system, and to fulfil their Prevent duty, by ensuring the school has appropriate filters and monitoring systems in place.

For information about the school's Firewall and Content Filtering, please refer to our E-Safety and Acceptable Use Policy.

Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them a safe environment in which to learn, the school considers the age range of the pupils, the number of pupils, how often they access the school's IT system and the proportionality of costs vs risks.

The School consults the UK Safer Internet Centre for guidance as to what "appropriate" might look like:

- [UK Safer Internet Centre: appropriate filtering and monitoring](#)

Guidance on e-security is available from the National Education Network [NEN](#). Buying advice for schools is available [buying for schools](#).

The School has a policy on the use of mobile technology in the school. Whilst the Governing Body and staff ensure that appropriate filters and monitoring systems are in place, the School takes care that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

Training of Staff, Pupils and Parents about Online Safety

As The Manor community increasingly works online, it is essential that children are safeguarded from potentially harmful and inappropriate online material.

The School ensures that as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, including online, that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach. The school ensures that appropriate filters and monitoring systems are in place and realises it is impossible for filtering systems to be 100% effective. The school supplements filters with behaviour management and supervision of children online.

The training of staff in online safety is carried out internally through guidance at staff meetings; by online training (for example, through our TES Develop online learning platform and the guidance on the NSPCC website); through training sessions from external providers such as Childnet; by the provision of appropriate policies and training documents.

The training for staff includes training on how to identify children who may be particularly at risk of harm because of their or others' use of technology or the internet. Staff are also instructed on how to intervene in such cases and how to escalate concerns by informing the DSL.

The training of parents in online safety is done through communications from the school in terms of policies and guidance; through the E-Safety Agreement that parents discuss with their children and sign; through the provision of training sessions (for example Childnet), specifically for parents; through letters to parents on topics such as how to set up parental control settings on iPads and other tablets.

Information and support

There is a wealth of information available to support schools and colleges to keep children safe online. The following is not exhaustive but should provide a useful starting point and additional information to support schools with keeping their children safe online (including when they are online at home) is provided in Annex C of KCSIE 2020 :

www.thinkuknow.co.uk

www.disrespectnobody.co.uk

www.saferinternet.org.uk

www.internetmatters.org

www.pshe-association.org.uk

educateagainsthate.com

[The use of social media for online radicalisation - Publications - GOV.UK](#)

BULLYING (INCLUDING CYBERBULLYING), THRESHOLD FOR REPORTING A BULLYING ISSUE

Bullying, harassment and victimisation and discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the school. Any kind of bullying is unacceptable. Please see the Cyber-Bullying Policy, E-Safety and Acceptable Use Policy and Anti-Bullying Policy.

So that it is easy to report bullying, including cyber-bullying and bullying outside school, the threshold for reporting a bullying issue to external agencies (such as police/children's social care) is known: cases of bullying that are particularly serious or persistent are reported. Since a bullying incident is a child protection concern, the same criteria for external involvement apply as for other safeguarding matters – which is that where a child is suffering significant harm, or is at risk of suffering significant harm, the School has a positive duty to consult external agencies. Care is taken not to impose a high threshold for referrals, either in policy or practice.

SECTION SIX: TRAINING AND KNOWLEDGE

INDUCTION OF NEW STAFF, GOVERNORS AND VOLUNTEERS AND STAFF TRAINING

All new staff, governors and regular volunteers are given training in Child Protection at the start of their employment or voluntary work with the school. All staff, including temporary staff and volunteers, are provided with induction that includes:

1. Safeguarding Policy, Staff Behaviour Policy including Whistle-blowing procedures
2. Behaviour Policy (Pupil)
3. Safeguarding response to children missing education
4. Role of the DSL including identity of DSL and Deputies
5. Online safety (E-Safety and Acceptable Use Policy, a copy of Part 1 and Part 5 of KCSIE (Sept 2020) **(this is read by all new staff and by existing staff at regular intervals and where there is any change to the KCSIE document)**)
6. A copy of KCSIE (Sept 2020) Annex A for school leaders, and all staff working directly with children

At induction hard copies of the above documents are provided to 'staff'.

Induction training will take place on the day that the person starts work at the school, if not before.

Thereafter, staff and regular volunteers will be provided on at least an annual basis with training updates in safeguarding and child protection; temporary staff and volunteers, who may be regular, must be made aware of the Child Protection arrangements i.e. they are given up to date information but do not necessarily attend the annual training. In practice, we invite regular volunteers to attend the annual training.

In addition, there will also be full generalist Child Protection training in line with OSCB advice which the Oxfordshire Safeguarding Children Board specifies to be every three years. Staff training will include online training.

The regular formal training of staff is supplemented with a considerable number of informal updates, for example e-bulletins staff meetings and INSET training. These occur at least annually and in practice much more regularly.

Specialist training in Safeguarding Children and Inter-Agency Working will be attended by the Designated Safeguarding Lead, the Deputy DSLs and the Head in accordance with the statutory requirements (at least every 2 years). This training will include training in the OSCB's approach to prevent duties, and the training specified in Annex B of KCSIE (Sept 2020). As OSCB develops higher level training in the 'Prevent' strategy, the DSL will have even more training in this area to be able to stem the risk of children being drawn into terrorism, including their being drawn into support for extremist ideas that are part of terrorist ideology. Meanwhile, the DSL has accessed the online Prevent training in the [non-statutory advice](#).

In its training, the School also follows the principles of [What to do if you're worried a child is being abused](#) (March 2015)

All staff are trained in KCSIE and must **understand** and follow KCSIE Part 1.

In order to ensure that staff can discharge their role and responsibilities in relation to all the matters raised in KCSIE Part 1 (Sept 2020), the School ensures that the latest KCSIE Part One (presently Sept 2020) is **understood** by staff via the following mechanisms: online and in person training; assessments/quizzes; group discussions and/or verbal or written briefings summarising the provisions of Part 1.

In addition, school leaders and staff who work directly with children must read Part 5 and Annex A of KCSIE 2020 (this applies to both incoming and existing staff).

CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

The School is aware of the importance of safeguarding disabled children and those with special needs and takes due regard, following the broad principles of DfE document “*Safeguarding Disabled Children: Practice Guidance*” (2009), a copy of which is accessible by referring to Appendix 3 of this policy.

The Manor is aware that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges and that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
- Children with SEND can be disproportionately impacted by things like bullying – without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.
- The Manor recognises that children with SEND can be more prone to peer group isolation than other children. Extra pastoral support will be considered for those children.

CHILDREN IN NEED OF ADDITIONAL SUPPORT

The School is aware that action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk. Staff are also required to read Annex A of KCSIE (Sept 2020), the relevant parts of which form part of this policy.

The School is aware of DfE advice and information:

- [Mental health and behaviour in schools \(November 2018\)](#)
- [Counselling in schools: a blueprint for the future \(February 2016\)](#)

CARE LEAVERS AND PREVIOUSLY LOOKED AFTER CHILDREN

The Manor is aware that care leavers and previously looked after children may be vulnerable and additional pastoral support will be considered. Action will be taken in line with KCSIE, Part 2 (Sept 2020).

DEFINITION OF ABUSE / SIGNS OF ABUSE

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

Definition of Abuse

The definition of abuse is as follows:

“A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children”. (KSCIE 2020)

The Manor follows Annex A of KCSIE (Sept 2020) which contains additional information about specific forms of abuse and safeguarding issues such as children missing in education and child sexual exploitation (CSE).

The Statutory Framework for the Early Years Foundation Stage states that *‘Training made available by the provider must enable staff to identify signs of possible abuse and neglect at the earliest opportunity, and to respond in a timely and appropriate way. 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 the 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 above guidance also relates to all staff throughout the school, dealing with pupils of all ages. In addition, all staff need to be aware of the following:

“Child abuse is the term used when an adult harms a child or a young person under the age of 18 ... Child abuse can take four forms, all of which can cause long term damage to a child: physical abuse, emotional abuse, neglect and child sexual abuse. Bullying and domestic violence are also forms of child abuse.

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

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

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children

can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

“A child may be experiencing abuse if he or she is:

- *Frequently dirty, hungry or inadequately dressed*
- *Left in unsafe situations, or without medical attention*
- *Constantly “put down,” insulted, sworn at or humiliated*
- *Seems afraid of parents or carers*
- *Severely bruised or injured*
- *Displays sexual behaviour which doesn’t seem appropriate for their age*
- *Growing up in a home where there is domestic violence*
- *Living with parents or carers involved in serious drug or alcohol abuse*

“Remember, this list does not cover every child abuse possibility. You may have seen other things in the child’s behaviour or circumstances that worry you.

“Abuse is always wrong and it is never the young person’s fault.”

Significant Harm is defined as:

- Ill-treatment (including sexual abuse and physical abuse)
- Impairment of health (physical or mental) or development (physical, intellectual, emotional, social or behavioural) as compared to a similar child
- Harm includes the impairment of a child’s health or development as a result of witnessing the ill-treatment of another person (Adoption and Children Act 2002)

Signs of abuse (physical, sexual, emotional abuse and neglect) are outlined below so that staff are aware of them and can act accordingly:

PHYSICAL ABUSE

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

Signs that **MAY INDICATE** Physical Abuse:

- Bruises and abrasions (specific areas and relevant to age group)
- Damage or injury around the mouth i.e. torn frenulum (web of skin joining upper lip and gum)
- Bi-lateral injuries such as two bruised eyes
- Marks – Bite, Weal, Fingernail, Strap/Belt, Welts, etc
- Burns and scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Severe bruising and injuries to the genital areas
- Drowsiness or erratic behaviour without obvious explanation
- Parental attitude to injuries
- **Typical accidental injuries** involve bony prominences, match the child’s history and are in keeping with the development of the child

- **Typical abusive injuries** may effect soft tissue areas such as the ears, inner arms or forearms (when raised defensively), chest/abdomen, inner thighs or the soles of the feet. Accidental injuries in the 'triangle of safety' (ears, side of face and neck, top of shoulders) are unusual. Concern should also be raised by injuries which are in a noticeable/unusual pattern or do not match the explanation offered.

EMOTIONAL ABUSE

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

Signs that **MAY INDICATE** Emotional Abuse:

- Lack of self-confidence / esteem or continual self deprecation
- Sudden speech disorders
- Self harm (including eating disorders)
- Drug, alcohol, solvent abuse
- Lack of empathy (including cruelty to animals)
- Concerning interactions between parent/carer and the child (eg. excessive criticism of the child or lack of boundaries)
- Physical development lags e.g. milestones delayed or underweight, lethargic
- Over-reaction to mistakes
- Fear of new situations
- Extremes of passivity and/or aggression
- Compulsive stealing
- Fear of parents being contacted
- Deterioration in general well-being
- Comments that cause concern

SEXUAL ABUSE

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

sexual abuse of children by other children is a specific safeguarding issue in education (see section on Peer on Peer Abuse).

Signs that **MAY INDICATE** Sexual Abuse:

- Sudden changes in behaviour & school performance
- Displays of affection which are sexual & age inappropriate
- Self harm, self mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour, for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults, anxiety of being left with specific adults
- Bed wetting / incontinence
- Sleep disturbances or nightmare
- Unexplained gifts or money
- Depression and withdrawal
- Eating disorders
- Fear of undressing for gym activities
- Sexual transmitted disease & pregnancy
- Chronic problems with health such as vaginal discharges
- Fire setting

NEGLECT

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

Signs that **MAY INDICATE** Neglect:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Poor relationships with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight (the same applies to weight gain, or being excessively overweight)
- Emaciation
- Low self-esteem
- Poor dental hygiene

SPECIFIC SAFEGUARDING ISSUES (Including Child Sexual Exploitation and Female Genital Mutilation)

Staff are reminded that expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the [TES website](#) and also on its own website www.nspcc.org.uk. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE) – see also below
- Bullying including cyberbullying
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM) – see also below
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Mental health
- Peer on peer abuse
- Private fostering
- Radicalisation
- Serious violence
- Sexting
- So-called ‘honour-based’ abuse (including FGM and forced marriage)
- Teenage relationship abuse
- Trafficking

CONTEXTUAL SAFEGUARDING

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Children’s social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here:

<https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

Link to OSCB guidance on contextual safeguarding:

<https://www.oscb.org.uk/safeguarding-themes/contextual-safeguarding/>

PEER ON PEER ABUSE

Please also see the Anti-Bullying Policy and Behaviour, Discipline and Exclusion Policy.

The Manor is aware of the possibility of peer on peer abuse. Procedures to minimise the risk of peer on peer abuse include:

- Providing a developmentally appropriate PSHEE/PSED (Learning for Life) syllabus which develops students' understanding of acceptable behaviour and keeping themselves safe. This includes talks from visiting speakers (e.g. from the NSPCC and Childline)
- Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk
- Developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils

The different forms peer on peer abuse can take are:

- Bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment. Part five of KCSIE (Sept 2020) sets out how schools and colleges should respond to reports of child on child sexual violence and sexual harassment. All staff are trained annually in managing a report of child-on-child sexual violence and sexual harassment in line with KCSIE (Sept 2020) and '[Sexual Violence and Sexual Harassment Between Children in Schools and Colleges \(May 2018\)](#)';
- sexting (also known as youth produced sexual imagery): please see page 46 for school's approach to this;
- upskirting, which is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence and anyone of any gender can be a victim.;
- initiation/hazing type violence and rituals.

How allegations of peer on peer abuse will be investigated: please see Section 8 of this Safeguarding Policy where there is a section on dealing with allegations of peer on peer abuse.

The Manor recognises that different forms of peer on peer abuse may take place and that different gender issues can be prevalent.

The Manor also recognises the gendered nature of peer on peer abuse (ie. that it is more likely that girls will be victims and boys perpetrators).

The Manor is aware that abuse is abuse and is never tolerated or passed off as 'banter' or 'part of growing up' or 'just having a laugh'.

How victims of peer on peer abuse will be supported:

- A discussion with the DSL will consider what action is necessary to ensure the immediate safety of the identified victim/s and what further enquiries are necessary to assess any further risk. Advice will be sought from OSCB, MASH or the Children and Families Assessment Team South
- Where a young person has abused a sibling, planning must include consideration of the support needs of the parents. If victim and perpetrator are members of the same family/household, before making any arrangements to return the perpetrator to the family/household it is critical to ensure that the victim's views have been heard and that s/he feels safe
- After receiving advice from at least one of the above named agencies, the DSL may conclude that the victim is not in need of a child protection plan, but may be a child in need of support to address her/his needs arising from the abuse – for example referral to Amazon Young People's Counselling Service, CAMHS or another victim support agency

The Manor is aware that safeguarding issues can manifest themselves through peer on peer abuse in a variety of ways and that the perpetrator should also be supported and thought given to whether s/he may be in need of early help or additional support.

Occasionally allegations may be made against pupils by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that, to be considered a safeguarding allegation against a pupil, some of the following features will be found. If the allegation:

- Is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other pupils in the school
- Indicates that other pupils may have been affected by this pupil
- Indicates that young people outside the school may be affected by this pupil

Sexual Exploitation – encouraging other children to engage in inappropriate sexual behaviour (e.g. having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight), photographing or videoing other children performing indecent acts.

References are made in the school's Anti-bullying and Behaviour policies in the context of such abuse.

The alleged perpetrator

Young people who abuse others frequently have considerable needs themselves, so an assessment of the alleged perpetrator's needs should be carried out.

Any decision on action in respect of the alleged perpetrator must be based on the risk they pose to other children and what can be done to minimise this risk. If the alleged perpetrator is over the age of 10, consideration should also be given to whether action under the criminal justice system would be appropriate.

If there is evidence that the alleged perpetrator has also been the victim of abuse, the police will consider whether to initiate a separate criminal investigation relating to this.

The alleged perpetrator is likely to pose a continuing risk to others unless the opportunity for further abuse is ended and the young person and their family have agreed to work with relevant agencies to address the problem. It has also been proposed that the risk remains high unless the young person accepts responsibility for the abusive behaviour, but more recent research has suggested that in the case of sexually harmful behaviour, denial may be rooted in shame and a well-founded fear of consequences of admission. Consequently, while denial will have consequences for the treatment approach, it does not necessarily indicate that sexually harmful behaviour is likely to be repeated.

Assessment of an alleged perpetrator's needs will include consideration of:

- The nature, extent and context of the abusive behaviours;
- The young person's development and family and social circumstances;
- Whether the young person appears to pose a continuing risk and, if so - Who is likely to be at risk from him/her (for example self, other children, **Adults at Risk**, particular children, particular adults), and

The nature and degree of the risk;

- The young person's need for services, both those which relate to his/her harmful behaviour and other significant needs;
- Whether the young person is also at risk of significant harm and should be the subject of a child protection conference; and
- Whether action is to be taken within the criminal justice system.

If the abusive nature involves upskirting, the Designated Safeguarding Lead will inform the police due to this being a criminal act. The Designated Safeguarding Lead will also contact children's social care in these instances to support the child and help investigate the factors which led them to take images of this nature.

If the abusive behaviour is sexual in nature, it may be helpful during this assessment to consult the sexually harmful behaviour team.

If there is a criminal case pending, the young person may have been instructed not to co-operate with an assessment and this must be taken into consideration when discussing the offence with them.

If the **Assessments** concludes that the young person poses a continuing risk to others, children's social care will arrange a risk management meeting. This meeting should be attended by:

- Persons who have responsibility for the welfare of any child who has been identified as currently being at risk from the perpetrator;
- Persons who have responsibility for the welfare of the perpetrator;
- Persons who have access to resources which are likely to be required to safeguard any child; and

- If the young person appears to pose a risk to **Adults at Risk**, adult social care and carers of any adult who has been identified as currently being at risk from him/her.

It may be appropriate to invite the sexually harmful behaviour team to attend the meeting or to submit written or verbal advice on the issues to be discussed.

It is important to keep the risk management meeting separate from any child protection conference. The purpose of the risk management meeting is to reduce the risk which the perpetrator poses to children and **Adults at Risk** both at present and in the longer term. This will include:

- Ensuring the safety of children who are likely to come into contact with the perpetrator in the immediate future;
- Action to address the perpetrator's behaviour and attitudes; and
- Monitoring progress.

The meeting will make recommendations and, where possible, will make commitments about action to be taken and resources to be provided for the safety of the children involved. Any recommendations should be based on the following assumptions:

- A victim of abuse must not be left in contact with her/his abuser without adequate protection; and
- Moving the perpetrator away from the victim to another place where there are children may not reduce the overall risk to potential victims, and may actually increase it.

The long-term control of risk may depend on an addressing any unmet needs of the perpetrator. This will be co-ordinated by children's social care.

Other children

The strategy discussion will consider:

- Whether the alleged perpetrator appears to pose a risk to any other children and young people or to **Adult at Risk**;
- Whether any further assessment of this risk is needed;
- What immediate action, if any, should be taken to minimise this risk; and
- Whether to initiate section 47 enquiries in respect of any of these children and young people.

Issues

Particular difficulties arise in responding to a child or young person who abuses another child because:

- There is no clear dividing line between abusive behaviour and normal childhood behaviour;

- Many adults who abuse children repeatedly established this pattern of behaviour in childhood or adolescence, but a single incident of abuse does not indicate that a young person is likely to abuse again; and
- Some young people who abuse have themselves been abused, but this cannot be assumed in any particular case.

The guiding principles for dealing with these situations are:

- The needs of the victim and the needs of the alleged perpetrator must be considered separately;
- In addition to safeguarding the identified victim, agencies must consider whether the alleged perpetrator seems to pose a risk to any other children;
- 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;
- There should be a co-ordinated approach by child welfare, youth offending, education and health agencies. No agency should start a course of action that has implications for any other agency without appropriate consultation.

DOMESTIC ABUSE

The cross-government definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Also known as coercive control, the use of control and coercion in relationships is a form of domestic abuse and, since December 2015, a criminal offence. Controlling and coercive behaviour is outlined in Government guidance issued under section 77 of the Serious Crime Act 2015 as part of the Government's non-statutory definition of domestic violence and abuse. It is described as:

- Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour; and
- Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim

Coercive control is a form of abuse that involves multiple behaviours and tactics which reinforce each other and are used to isolate, manipulate and regulate the victim. This pattern of abuse creates high levels of anxiety and fear. This has a significant impact on children and young people, both directly, as victims in their own right, and indirectly due to the impact the abuse has on the non-abusive parent. Children may also be forced to participate in controlling or coercive behaviour towards the parent who is being abused.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [national crime agency human-trafficking](#)
- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge – For women and children, against Domestic Violence](#)
(Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247)
- [Safelives: young people and domestic abuse](#)
- [Operation Encompass](#)

SO-CALLED 'HONOUR-BASED' ABUSE (INCLUDING FEMALE GENITAL MUTILATION AND FORCED MARRIAGE)

So-called 'honour-based' abuse (HBA) 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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Indicators

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 [the Multi agency statutory guidance on FGM](#) and the [Multi-agency guidelines: Handling case of forced marriage](#).

Actions

If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach.

FORCED MARRIAGE

The Manor is aware of and follows the KCSIE guidance on Forced Marriage. Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [Multi-agency guidelines](#), with pages which focus on the role of schools and colleges. School staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fm@fco.gov.uk

FEMALE GENITAL MUTILATION (FGM)

The Manor's staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Staff are asked to note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-Agency Practice Guidelines referred to previously (please see Appendix). Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

- **Actions.** If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. After mandatory reporting commenced in October 2015, these procedures remain when dealing with concerns regarding the potential for FGM to take place. **Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.**
- Teachers have a mandatory duty to report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

The Manor follows the KCSIE (Sept 2020) guidance on FGM:

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated

health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college’s designated safeguarding lead and involve children’s social care as appropriate. The duty 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. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#)

CHILDREN STAYING WITH HOST FAMILIES

The Manor is aware that if the school directly arranges hosted accommodation for children, then the school is a regulated activity provider and should request an enhanced DBS check (with barring information) for the host. If the school does not directly arrange the accommodation but brokers an arrangement direct between families, which the school can evidence is a private arrangement, the hosting would not be regulated activity.

In both situations, pursuant to their general safeguarding duties, The Manor would take care to provide sufficient information to parents and pupils about the arrangements, including what is in place to support pupils who have concerns over their safety.

The guidance in Annex E of KCSIE is followed in relation to any children staying with host families.

HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The DSL and DDSs are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. In Oxfordshire, this must be reported to the relevant local council through their ALERT portal. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children’s social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a

new place to live. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information including definitions and indicators are below and in Annex A of KCSIE 2020.

CHILD CRIMINAL EXPLOITATION (CCE)

Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Child Criminal Exploitation can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

CHILD SEXUAL EXPLOITATION (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or

(b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.
-

Further guidance can be found in the guidance document: 'Child sexual exploitation: guide for practitioners.'

COUNTY LINES

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primary crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a Safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office](#).

- [national crime agency human-trafficking](#)
- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse](#)

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

PREVENTING RADICALISATION

The Manor follows the KCSIE (Sept 2020) guidance on this matter. Protecting children from the risk of radicalisation is seen as part of The Manor's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. Children are vulnerable to extremist ideology and radicalisation. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur

through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The Manor's DSL is aware of local procedures for making a Prevent referral. In Oxfordshire, the DSL should call 0345 050 7666 and ask for Oxfordshire Multi-Agency Safeguarding Hub (MASH).

PREVENT

The Prevent Lead at The Manor is the DSL.

The Manor follows the KCSIE (Sept 2020) guidance as follows:

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. The Prevent duty is seen as part of The Manor's wider safeguarding obligations. The DSL and Deputy DSLs are familiar the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also cover childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

The statutory "Revised Prevent duty guidance: for England and Wales" (for schools) summarises the requirements on schools in terms of four general themes:

- Risk Assessment: The Manor assesses the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools to have distinct policies on implementing the Prevent duty.
- Working in Partnership: The Prevent duty builds on existing local partnership arrangements. The Manor ensures that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board. Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. We ensure that there is an effective engagement with parents on Prevent through our website and through letters to parents, and via Curriculum evenings. The Manor will discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding

policies and procedures unless they have specific reason to believe that to do so would put the child at risk.

- Staff Training: The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- IT Policies: Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools.

The Department for Education has also published advice for schools on the [Prevent Duty \(June 2015\)](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support. The Government has launched [educate against hate](#), a website designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people. The website provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue.

CHANNEL

The Manor staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

In relation to 'Prevent', The Manor focuses on the following key areas:

- Risk assessment
- Working in partnership (eg with external agencies)
- Staff training
- IT policies
- Arrangements to respond to pupils who may be targeted or influenced to participate in radicalisation or extremism
- Appropriate school systems and filtering in relation to IT in order to keep children safe from terrorist or extremist material.

The Manor follows the KCSIE (Sept 2020) guidance as follows:

School and college staff should understand when it is appropriate to make a referral to the Channel programme. Channel guidance is available at: [Channel guidance](#). Home Office Prevent eLearning packages for staff are available [here](#). Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college

may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. The CTSA 2015 also requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels.

SERIOUS VIOLENCE

All staff at The Manor should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Staff at The Manor are committed to ensuring that our pupils:

- Feel safe at school all the time;
- Understand very clearly what unsafe situations are; and
- Are highly aware of how to keep themselves and others safe.

For further information, please see the Home Office guidance on [preventing youth violence and gang involvement](#).

MENTAL HEALTH

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis or a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a Safeguarding concern, immediate action should be taken in line with our Safeguarding procedures by speaking to the DSL or a Deputy DSL.

Further guidance can be found in the Department for Education publications: Preventing and Tackling Bullying (2017) and Mental Health and Behaviour in Schools (2018).

REPORTING DUTIES IN RELATION TO ATTENDANCE AND ADMISSIONS (PUPILS JOINING OR LEAVING THE SCHOOL)

Attendance

Attendance registers take place twice daily, at the start of each morning session and once during each afternoon session. Any unexplained absences are investigated.

In addition, informal registers are taken at the start of every lesson (or group of continuous lessons if they occur with the same group of children in the same place). Any issues are immediately reported to the school office where they are dealt with as a matter of urgency.

Admissions (pupils joining or leaving the school)

The school carries out its duties in relation to [‘Children Missing Education’ \(2016\)](#) and the ‘School’s Responsibilities’ with regard to Admissions and Attendance Registers.

The school carries out its duties including ensuring that the admission register contains:

- name in full;
- sex;
- name and address of every person known to the proprietor to be a parent of the pupil (and an indication of which parent the pupil normally lives with and which parents hold parental responsibility as defined by Section 3 Children Act 1989) – NB parents holding parental responsibility, even if not actually caring for the child, have a right to receive relevant information from the school in respect of any pertinent matter affecting the child, unless a court order indicates otherwise.
- Where a parent notifies The Manor that a pupil will live at another address, in addition or instead, the new address, the full name of the parent with whom the pupil will normally live in future and the date from which it is expected the pupil will normally live there, where it is reasonably practicable for the school to ascertain this information;
- more than one telephone number which can be contacted in case of an emergency, where reasonably possible;
- day, month and year of birth;
- day month and year of admission or re-admission to the school;
- name and address of the school last attended, if any;
- an indication of boarding or day attendance (in schools which include boarders);
- The name of the destination school (or additional school, in the case of dual registration) notified by a parent and the first date of attendance, where it is reasonably practicable for the school to ascertain this information.

In addition The Manor carries out its duties in relation to admissions as follows:

- The name of a pupil must be included in the register from the beginning of the first day on which the school has agreed, or has been notified, that the pupil will attend the school. If a pupil fails to attend on the agreed or notified date, The Manor undertakes reasonable enquiries to establish the child’s whereabouts and considers notifying the Local Authority at the earliest opportunity. For most pupils the expected first day of attendance is the first day of the school year.
- Deletions from the admissions register are also regulated. The Manor informs the local authority where a pupil’s name is going to be deleted from the admission register on

certain grounds. In summary, these are: 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. When removing a pupil's name, the notification to the Local Authority must include:

- The full name of the pupil
- The full name and address of any parent with whom the pupil normally resides
- At least one telephone number of the parent
- The pupil's future address and destination school, if applicable
- The ground in regulation 8 under which the pupil's name is to be removed from the admission register
- Additionally, The Manor notifies the Local Authority immediately when the school removes a pupil's name from the admissions register at non-standard transitions, i.e. where a compulsory school-aged child leaves a school before completing the school's final year or joins a school after the beginning of the school's first year. There are fifteen official separate grounds for removing a pupil, including the original ones above, set out in detail in ['Children Missing Education' \(2016\)](#). The Manor gives the Local Authority the precise reason or reasons (out of the 15 'grounds' above) in each relevant case. Additionally the school provides the Local Authority with:
 - The full name of the pupil
 - The full name and address of any parent with whom the pupil lives
 - At least one telephone number of the parent with whom the pupil lives
 - The full name and address of the parent who the pupil is going to live with, and the date the pupil is expected to start living there, if applicable
 - The name of the pupil's destination school and the pupil's expected start date there, if applicable

Schools are also under a duty to provide information to the local authority for standard transitions if requested. Inspectors may remind schools that there is overlap also with KCSIE (Sept 2020) which recognises children missing in education as a safeguarding issue particularly when a child leaves with no other destination.

- The Manor will notify the Local Authority within five days of **adding** a pupil's name to the admission register at a non-standard transition point. The notification will include all the details contained in the admission register for the new pupil.
- In relation to deletions from the register, the duty arises as soon as the grounds for deletion are met and in any event before deleting the child's name. As to non-standard admissions, the notification is to be made within five days of the entry on the admission register.
- The Manor understands that its right under the regulations to delete a pupil for non-return within 10 school days after authorised leave of 10 school days or more, or after 20 school days unauthorised absence (in both cases, in the absence of illness or other unavoidable cause), does not arise until the school and local authority have jointly made reasonable enquiries (described in the guidance) as to the pupil's whereabouts and failed. Inspectors may remind schools that, as independent schools, their right to remove a pupil will in addition be subject to the terms of their own school/parent contract.
- The Manor will notify the local authority when a child or pupil fails to attend school regularly or is absent without leave for more than 10 school days (continuous).

- Where a parent notifies The Manor in writing that they are home educating, The Manor deletes that child's name from the admission register and informs the local authority. However, where parents orally indicate that they intend to withdraw their child to be home educated, The Manor considers notifying the local authority at the earliest opportunity.

POLICY ON CHILDREN WHO RUN AWAY OR GO MISSING

Should a child run away or go missing from school, the School will follow the procedures set out in its policy 'Lost or Uncollected Child Procedure' and will inform the relevant authority (including, if necessary, the police) as well as the parents.

The School will consult the Oxfordshire Children's Social Care Team (South) for advice on how to follow up any incident of a child running away or going missing from either school or home.

The Manor is aware that a child going missing from education is a potential indicator of abuse or neglect or that the child or the child's family might have been 'radicalised' (please see sections on Prevent and Channel). Staff follow the school's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

The Manor has in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. All staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

All pupils must be placed on both the admissions registers and the attendance register.

In Reception and Years 1-6, an electronic attendance register is taken every morning between 8.45am and 8.55am and each afternoon at the following times:

- Reception, Y1 and Y2 – 1.35-1.40pm
- Y3, Y4, Y5 and Y6 – 2.10-2.15pm

If the teacher registering a class is unable to use the electronic register, a hard copy of the register is completed and then sent to the school office where the data will be entered onto the electronic register.

An informal register is also taken at the start of any lesson for which a class or group has had to move to a new location or where a new teacher has taken over.

In Pre-Nursery and Nursery a hard copy and an electronic copy of the register is taken at the beginning of both the morning and afternoon sessions.

The Manor informs the local authority, where the child is resident, of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;

- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered and have apparently moved;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

The local authority is notified when The Manor deletes a pupil from its register under the above circumstances. This is done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. The Manor complies with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

The Manor knows it must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State). The Manor reports the circumstances as soon as possible to the Local Authority.

In the case of pupils who leave The Manor, we confirm that a departing pupil has actually arrived at the new school. We would inform the Local Authority if this were not the case.

The Manor is aware of the KCSIE (Sept 2020) guidance children missing from education.

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

A child going missing from education is a potential indicator of abuse or neglect. School and college staff should follow the school's or college's procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

Schools and colleges should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

Schools

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers.

All schools must inform their local authority of any pupil who is going to be removed from the admission register where the pupil:

- has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education;
- has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered;
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

The local authority must be notified when a school is to remove a pupil from its register for any of the five grounds above. This should be done as soon as these grounds for removal from the register are met, and in any event no later than removing the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

LOCKDOWN POLICY

Please see the school's separate Lockdown Policy.

TOILET/CHANGING ROOM ACCESS POLICY

1. This policy applies to all adults working at The Manor and relates to the appropriate action an adult should take when entering a pupils' toilet area or changing rooms.
2. This policy is to ensure children safeguarding and to maintain their dignity. It is also to protect any adult from a false accusation of a child protection nature.
3. Staff should refrain from entering a pupils' toilet area or changing room whilst children are on the school site unless it is necessary to enter these areas.
4. If a female member of staff needs to enter a pupils' toilet area/changing room, during times that children could be in school, then they should knock at the door and then slowly enter the area shouting out to make any child in the area aware of the member of staff's presence.
5. If a male member of staff needs to enter a boys' toilet area/changing room, during times that children could be in school, then they should knock at the door and then slowly enter the area shouting out to make any child in the area aware of the member of staff's presence.

6. If a male member of staff needs to enter a girls' toilet area/changing room, during times that children could be in school, then they should not enter the room on their own. They should seek the assistance of a female member of staff to enter the area first. The area should be vacated of all children before the male member of staff enters the area.
7. If in exceptional circumstances a female member of staff is unavailable to go first into the toilets, then two male members of staff should go to the outside door and loudly shout 'Is anyone there please?' If there is no answer, they can slowly enter together.
8. If maintenance or other work needs to be carried out in a pupils' toilet area/changing room area then either another member of staff should remain at the door preventing any child entering the area, or an "out of bounds" sign should be placed in front of the door way preventing any child entering the area.

USE OF CAMERAS, MOBILE PHONES WITH CAMERAS (Including Policy on the use of mobile phones and cameras in EYFS) AND TAKING, STORING AND USING IMAGES OF CHILDREN

At The Manor Preparatory School, we are an open and inclusive community that is very proud of all of the achievements of all of our pupils in their academic, artistic and sporting endeavours. We celebrate our diversity and give all of our many visitors a warm welcome.

We particularly welcome parents to our concerts, plays and sporting events, as well as to more formal occasions during the school year. The school walls are decorated with examples of pupils' work, team photographs and photographs of trips and expeditions in which our pupils have participated. We may use electronic notice boards inside the school to enhance our displays. Our website is updated regularly, and parents are sent our newsletters and/or e-bulletins in order to keep them fully abreast with the news of our active community.

Parents of all pupils at The Manor have agreed the School's Terms and Conditions (updated June 2018), in which Paragraph 6.15 reads as follows:

The School requires photographs or images of the Pupil to identify them, to keep individuals (including the Pupil and Parents) and the School premises secure via CCTV, and to carry out necessary School administration. The Parents acknowledge that their consent is not required for such uses because their uses are in the School's legitimate interests and that any impact this may have on the Pupil's privacy does not override these interests. Subject to your consent (which you have the right to withdraw or amend at any time), we will also make use of Pupil images or photographs to share with third party journalists and other schools and to market, promote and fundraise for the School in various online and offline media. Further information can be found in the School's policy regarding images of pupils.

In addition, the School's Data Protection Policy is available on the website.

Internal photographs (moving and still) are for school use only. They will appear on display boards/screens around the school, used as academic evidence, as a record of the wealth of activities that take place and for workbooks. Children and their work may or may not be identified in these photos and we consider these photographs to be

necessary in the school's legitimate interests, namely celebrating children's achievements and advancing their education and well-being. The child's first name only (if at all) will be displayed alongside any photos.

For press coverage and third party use (such as a trip venue wishing to take photos or another school) we will seek permission on a case by case basis.

We will always complain to the Independent Press Standards Organisation (IPSO) if newspapers and magazines fail to follow the appropriate code of practice for the protection of young people, including the children of celebrities.

For external use (for examples please see the galleries and videos sections of the website), we will seek consent on joining the school for permission to use photographs of children in the following ways: media use, including the school website, social media, promotional material, advertising and educational websites (such as The Good Schools Guide and Attain). These photos may not name the child or, at the most, the child's first name only will be published. We will record drama productions to enable you to purchase DVDs of your child's performance. You may withdraw consent at any time by sending an email to karnold@manorprep.org. Please note, however, that if you withdraw consent it may not be possible to remove a child's image on materials already printed and/or in circulation.

Use of Cameras, Recording Equipment, Mobile Phones and Other Handheld devices (Parents)

Parents are welcome to take photographs of their own children taking part in outdoor and sporting events except swimming where no photography/video of any description is allowed. When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and recording devices with consideration and courtesy for the comfort of others.

We ask parents not to take close-up photographs of other pupils who are on their own, without the prior agreement of that child's parents. Group photos where your child is the main subject of the photograph are acceptable.

Parents must not upload any images, moving or still, other than those of your own child, onto social media sites (this includes photographs of members of staff or other adults).

Parents may not take any devices with a camera facility into changing rooms or backstage, nor to any areas where photography or filming may embarrass or upset pupils. Parents are also reminded that copyright issues may prevent us from permitting the filming or recording of some plays and concerts.

Photographs of Swimmers

The policy of The Manor means that it is strictly forbidden to use any camera/recording device at all (including mobile telephones) for swimming events, both home and away as well as during lessons.

Use of Mobile Phones

Since the regulations surrounding children in the Early Years Foundation Stage are much more stringent, parents should not use cameras or mobile phones in the presence of Early Years Children; with the exception of the events mentioned in the section above. Parents should only use them, as far as is possible, off site or in an emergency.

Use of cameras, mobile phones and recording equipment by staff

- All new teaching and office staff are given guidance on the school's policy on camera and mobile phone use and the taking, using and storing of images of children.
- Staff should not use any personal devices in the presence of children, unless it is unavoidable. All phones should be switched off or be set to 'silent' during lessons. Staff are not permitted to take pictures of children with any personal camera, or personal device with a camera facility.

Policy on the use of mobiles and cameras in EYFS

Early Years staff are not permitted to have personal mobile phones in the classroom – they must be kept in a designated staff area or a locked cupboard during the school day. Early Years staff are only permitted to use their own phones for calls only during their breaks and in a place where children are not present.

On Early Years' outings a school mobile telephone should be taken, for emergency contact. If members of staff take their own mobile phones on outings, for use in case of an emergency, they must not make or receive personal calls. Members of staff will not use their personal mobile phones for taking photographs of children on outings.

Parents are not allowed to use mobile phones/cameras where EYFS children are present.

Whole School

- i Members of staff may not use a personal camera (or any personal device with a camera facility) to take photographs of pupils in or outside school – every department has a school camera available to them, and the Marketing Assistant has a spare camera. Staff are instructed always to ensure:
 - a) images are only downloaded onto a school computer and are then deleted from the camera
 - b) no personal use is made of the imagesThe only exception to this is if the staff member is also a parent at the school and the primary subject of the photograph is their own child.
- ii No mobile phones or cameras should be taken into changing areas or toilet areas.
- iii Any personal calls should be made at staff breaks or in non-contact lessons and in a place where children are not present. If you have a personal emergency (or on rare other occasions) a school landline may be used.
- iv All personal mobile phones and cameras brought into school can be subject to scrutiny at any time by the DSL or DDSs.
- v Staff need to check with the Marketing and Admissions Assistant about using any photographs of children whose parents have requested that their images should not be used for any purposes.

Anyone found to be in breach of this policy will face the possibility of disciplinary action.

PROCEDURES FOR DEALING WITH SEXTING CASES

The Manor is aware that, if any Manor pupil were to be involved in sexting, it would be a criminal activity for both the sender and the recipient. The member of staff would tell the DSL, who would seek immediate advice from the OSCB, MASH or the police.

The DfE provides [Searching Screening and Confiscation Advice](#) for schools. The UK Council for Child Internet Safety (UKCCIS) Education Group has published [Guidance for schools and colleges on responding in instances of 'sexting'](#).

In terms of educating children about the dangers of sexting, the subject is approached in PSHEE/PSED (Learning for Life) lessons as part of the pupil's education and our strategy to prevent the occurrence of sexting.

Please also see The Manor's Anti-Bullying Policy; Behaviour, Discipline and Exclusion Policy; and E-Safety and Acceptable Use Policy.

SUMMARY OF SPECIFIC SAFEGUARDING ISSUES

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the [TES](#), [MindEd](#) and the [NSPCC](#) websites. School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- [bullying including cyberbullying](#)
- [children missing from education](#)
- [child missing from home or care](#)
- [child sexual exploitation \(CSE\)](#)
- [domestic abuse](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#)
- [forced marriage](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [hate](#)
- [mental health](#)
- [missing children and adults strategy](#)
- [Peer on peer abuse \(Sexual violence and sexual harassment between children in schools and colleges\)](#)
- [private fostering](#)
- [preventing radicalisation](#)
- [relationship abuse](#)
- [sexting](#)
- [trafficking](#)

SECTION SEVEN: EARLY YEARS

EARLY YEARS

Particular attention is given to the Early Years Foundation Stage (EYFS). The Head of Early Years receives the appropriate two-yearly training in Safeguarding Children and Inter-Agency Working, liaising with local statutory children's agencies, as appropriate. In conjunction with the Designated Safeguarding Lead, the Head of Early Years takes lead responsibility for safeguarding children within the Early Years setting and liaising with local statutory children's agencies as appropriate. The school undertakes to inform Ofsted and the Independent Schools' Inspectorate of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations as soon as is practicable but at the latest within 14 days.

The School follows the 'Statutory Framework for the Early Years Foundation Stage' (April 2017). In particular, the School is aware of the following:

Safeguarding and Welfare Requirements

- 3.3 *Schools are not required to have separate policies to cover EYFS requirements provided the requirements are already met through an existing policy.*
- 3.4 *The safeguarding policy and procedures must include an explanation of the action to be taken when there are safeguarding concerns about a child and in the event of an allegation being made against a member of staff, and cover the use of mobile phones and cameras in the setting.*
- 3.5 *A practitioner must be designated to take lead responsibility for safeguarding children in every setting.*
- 3.6 *Providers must train all staff to understand their safeguarding policy and procedures, and ensure that all staff have up to date knowledge of safeguarding issues. Training made available by the provider must enable staff to identify signs of possible abuse and neglect at the earliest opportunity and to respond in a timely and appropriate way. 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, or that a girl may have been subjected to (or is at risk of) female genital mutilation; 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.

Providers may also find ['What to do if you're worried a child is being abused: Advice for practitioners'](#) helpful.

- 3.7 *Providers must have regard to the Government's statutory guidance 'Working Together to Safeguard Children'. If providers have concerns about children's safety or welfare, they must notify agencies with statutory responsibilities without delay. This means the local children's social care services and, in emergencies, the police.*

ANNUAL APPRAISALS AND REGULAR SUPERVISION MEETINGS FOR EYFS STAFF

The revised EYFS requires that all staff must have regular individual supervision meetings with their manager, to reflect on their own work and practice, and with 'safeguarding' as a routine item for discussion. Supervision should be an individual meeting between a manager and each staff member, including teaching assistants, in order to support their role as key persons working with children and their families. The frequency of meetings should be determined according to the needs of the families and the staff member supporting them. This is in addition to regular staff appraisals and other opportunities for staff training.

We ask all employees at their annual appraisal meeting if there are any changes in their circumstances that would mean their current DBS check is no longer accurate and valid, or if there is any change to their 'Disqualification Statement'. Staff are aware that they have a duty to disclose information about disqualification on an annual basis.

EYFS AND LATER YEARS (UNDER-8's) CHILDCARE: DISQUALIFICATION FROM WORKING IN CHILDCARE

The School and its HR Department are fully aware of our responsibilities of recruiting and employing staff who are not disqualified in the EYFS and later years (Under 8s) Childcare.

The School understands that KCSIE incorporates the 'Disqualification under the Childcare Act 2006' in relation to those who work in childcare (EYFS and under 8's childcare). The Manor does not knowingly employ people to work in childcare or be directly concerned in its management if they are 'disqualified'. This also applies to others such as volunteers, supply/agency staff, self-employed people, staff from other organisations contracted to provide childcare, governors who volunteer with the relevant groups or are directly concerned with their daily management, who are also potentially within the scope of the guidance.

The Manor follows all the ISI guidance concerning 'Disqualification under the Childcare Act 2006' (August 2018) as detailed in its latest Regulatory Handbook.

Please also see the school's Recruitment Policy.

SECTION EIGHT: ALLEGATIONS

ALLEGATIONS AGAINST STAFF AND VOLUNTEERS

Staff know that they are obliged to 'whistle-blow' if they have concerns about a member of staff (including supply staff and volunteers) and must inform the Head without delay. Where there are concerns about the Head, this should be referred to the Chair of Governors. (This can be done by contacting Mr Shaun Forrestal, Chair of Governors, without informing the Head). **Shaun Forrestal's details are:**

Email : shaun@theforrestals.net

Mobile Phone: 07428 616799

Staff should also consult the Whistle-blowing Policy section within the Staff Behaviour Policy (found within this Safeguarding Policy).

The School follows Part 4 of KCSIE (Sept 2020) in dealing with allegations of abuse against teachers and other staff (including supply staff and volunteers). In all cases in which it is alleged that a person who works with children has:

- (a) behaved in a way that has harmed a child, or may have harmed a child
- (b) possibly committed a criminal offence against or related to a child or
- (c) behaved toward a child or children in a way that indicates she or he may pose a risk of harm to children or
- (d) behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The Manor must follow LADO procedures where one or more of the criteria above is met. In operating the LADO procedures The Manor must consider whether the allegation can be properly investigated if the person concerned remains in work.

Immediate contact should be made with the LADO(s) by the Head to discuss any allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. GDPR cannot be allowed to stand in the way of safeguarding children. Discussions are recorded in writing, and any communication with both the individual and the parents of the child/children agreed. The Manor will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The Manor will give due weight to the views of the LADO, KCSIE and WT when making a decision about suspension. Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

If a member of staff, governor or volunteer is accused of abuse or improper conduct the Head, Alastair Thomas, must be informed as soon as possible. The school's procedures aim to strike a balance between the need to protect children and the need to protect staff and volunteers from false or unfounded allegations. These procedures follow the guidance in Part 4 of KCSIE (Sept 2020). The Head liaises with Oxfordshire Child Protection team for guidance. If the Head is absent, the allegation should be passed to the Chairman of Governors.

The school ensures that all staff, teaching and non-teaching, governors and volunteers understand that there is a procedure to be followed on all occasions. If an allegation is

made against a teacher the quick resolution of that allegation must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays are eradicated. The local authority designated officer (LADO) will be informed within one working day of all allegations that come to the Head's attention or that are made directly to the police. The Manor 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. In borderline cases, the Designated Contact may discuss the case with the LADO informally and without naming the school or individual. All allegations are to be reported straight away, to the Head (or, in his absence, the Chair of Governors – please see the first paragraph of this section for his contact details).

The Head will discuss the allegations with the LADO, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. Discussions will be recorded in writing, and communication with both the individual and the parents of the child/children agreed. The Head will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The Manor will give due weight to the views of the LADO and the policy when making a decision about suspension.

The school is aware that since 1 October 2012, there are restrictions on the reporting or publishing of allegations against teachers, and so The Manor would make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

ALLEGATIONS AGAINST THE DESIGNATED SAFEGUARDING LEAD (DSL)

If the accused member of staff is the Designated Safeguarding Lead, the Head (or the Chair of Governors if the Head is unavailable) will be informed immediately without the DSL's knowledge and the Head will seek guidance from the LADO on the best procedure. In the case of serious harm, the police should be informed from the outset. If the Head is unavailable, the Chair of Governors should be contacted. The DSL must therefore not be informed of the allegation prior to contact with the Head and LADO.

ALLEGATIONS AGAINST SUPPLY TEACHERS

In some circumstances, the school may need to consider an allegation against an individual not directly employed by us, where our disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business. Whilst the school is not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should The Manor decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The governing body should discuss with the agency whether it is appropriate to suspend the

supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by The Manor, are under the supervision, direction and control of the governing body when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or taken into account by the school during the investigation.

When using an agency, the school will inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about The Manor's policies.

PROCEDURES FOR DEALING WITH ALLEGATIONS OF ABUSE BY PUPILS AND PROCEDURE TO MINIMISE THE RISK OF PEER ON PEER ABUSE

If a pupil considers they have been abused by another pupil or pupils, in the first instance the procedure of the Anti-Bullying Policy needs to be followed so that an adult is informed as soon as possible. At that stage, the adult – member of staff or parent – should inform the Designated Safeguarding Lead, without delay; he will decide on the appropriate course of action, if necessary consulting the Oxfordshire Child Protection team. If there is a 'reasonable cause' to suspect that a child is suffering, or likely to suffer, significant harm, any such abuse will be referred to local agencies. It would be an expectation that in the event of disclosures about 'pupil on pupil' abuse that all children involved, whether perpetrator or victim, are treated as being 'at risk'. Measures to minimise the risk of peer on peer abuse, which takes into account the different ways boys and girls behave, include our Childnet sessions about online behaviour, measures outlined in our Anti Bullying Policy and talks from Childline.

COMMUNICATION WITH PARENTS/CARERS FOLLOWING AN ALLEGATION OR DISCLOSURE OF POSSIBLE ABUSE BY ANY PUPIL

When communicating with parents/carers following an allegation or disclosure of possible abuse by any pupil, we will follow the Oxfordshire County Council Procedures as outlined in ['Allegations of abuse made against staff and volunteers working with children'](#).

Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching

a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are on-going as set out in section 141F of the Education Act 2002 (see paragraph 20). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

SECTION NINE: LINKS TO OTHER AGENCIES

LOCAL CHILDREN SAFEGUARDING BOARD AND MASH

Oxfordshire Safeguarding Children Board

County Hall (3rd Floor)

New Road

Oxford

OX1 1ND

Tel: 01865 815843

Email: oscb@oxfordshire.gov.uk

www.oscb.org.uk

OSCB set the Local Procedures relating to Safeguarding. The full Local Procedures are available on the OSCB website

Oxfordshire MASH

Cowley Police Station

Oxford Road

Oxford

OX4 2LE

Tel: 0345 050 7666

Email: mash-childrens@oxfordshire.gcsx.gov.uk

CHARITY COMMISSION

The School is aware that the Charity Commission must be informed if there are any serious incidents or concerns in the area of safeguarding. Informing the Charity Commission would be undertaken by the Clerk to the Governors on behalf of the Board of Governors.

OTHER ORGANISATIONS

The school ensures that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils either at the school or another site.

REPORTING ARRANGEMENTS WITH THE DBS AND TRA

The Manor recognises our 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;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

In these cases, referrals should be made as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has

foundation, and we will ensure we have sufficient information to meet the referral duty criteria explained in the DBS referral guidance, which can be found on GOV.UK.

In the above context, ceasing to use a person'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. 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 and as a consequence could lead to the school being removed from the register of independent schools. '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 co-operate with an investigation. Proprietors of independent schools 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 Manor also has a duty to consider making a referral to the **Teaching Regulation Agency (TRA)** where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". The School is aware that advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in [Teacher misconduct: the prohibition of teachers \(April 2018\)](#); further guidance is on the [TRA website](#).

PUPILS' PAST AND FUTURE SCHOOLS

When a pupil leaves The Manor, the School checks that the child actually attends the new school. This applies both to pupils leaving at the normal time (end of Year 6) as well as to those leaving at other times. The School asks the Nursery/School that a child comes from for any information relevant to safeguarding.

INFORMATION SHARING PROTOCOL

The school shares information on safeguarding matters (including bullying) with other schools and with other agencies in line with the OSCB Information Sharing Protocol and in line with 'Working Together to Safeguard Children 2018' through effective implementation of the Safeguarding Policy and procedures, and effective communication and good co-operation with local agencies.

COMMUNICATION WITH THE CHILD'S G.P.

The School is aware that it has the right to contact a child's own doctor if it is a child protection matter and that the doctor has a duty to communicate openly with the school (even in situations where there is no Child Protection Plan), providing that the Designated Contact considers that there may be a child protection concern. See General Medical Council policy 'Protecting children and young people'.

CONTACT NUMBERS, EMAIL ADDRESSES AND WEBSITES

Please see the 'Safeguarding and Prevent Contact Details' sheet (Appendix 8) which is also displayed prominently all around the school site.

SECTION TEN: GUIDANCE TO STAFF

STAFF BEHAVIOUR POLICY INCLUDING WHISTLEBLOWING POLICY

This policy provides clear guidance about staff behaviour and actions to avoid putting pupils at risk of harm, or of allegations of harm to a pupil. All the points requested by the Independent School Standards Regulations are considered within this policy (eg in relation to one to one tuition, sports coaching, conveying a pupil).

School staff are in a unique position of trust and influence as role models for pupils. Therefore, staff must adhere to behaviour that sets a good example to all pupils within the school.

Staff must have regard to the ethos and values of the school and must not do or say anything which may bring the school or governing body into disrepute. Staff should act in accordance with the school's policies and procedures at all times. Breach or failure to observe this policy will result in action being taken under the school disciplinary procedures including, but not limited, dismissal.

(a) Staff Interaction with Pupils

The school offers guidance to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil and so on). The school follows the principles of ['Code of Conduct – Guidance for Staff to Promote Safer Working Practice for All Adults Who Work With Children and Young People' \(June 2020\)](#) (established by the Department for Education in September 2011 and adopted by Oxfordshire County Council). The principles form part of staff training and staff induction. This code is placed on the agenda of a Staff Meeting once a year and forms an official part of this Safeguarding Policy, which staff are required to follow.

Staff must also note that the above 'Code of Conduct' also refers to **former** pupils unless permission is requested (and received) in advance from the Head to depart from the guidance for specific reasons.

Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. They need to treat all pupils with respect and to try, as far as possible, not to be alone with a child or young person. Where this is not possible, for example, in an instrumental music lesson, or an individual coaching lesson, it is good practice to ensure that others are within earshot. There will also be certain times where it is beneficial for a member of staff to be alone with a pupil (for example, discussing a friendship issue or offering support in some way). In 1:1 situations, it is good practice to ensure where possible that the location has visual access to it and it is not in a remote part of the school. In any 1:1 situation the teacher should avoid physical contact with the child although individual music lessons are a special case (please see Paragraph b). Around the school, where possible, a gap or barrier should be maintained between teacher and child at all times although it is accepted that younger children, especially those in the Pre-Prep, often require physical reassurance. Any physical contact should be the minimum required for care, instruction or restraint. Staff should avoid taking one pupil on his/her own in a car, wherever possible; if this cannot be avoided, it is vital that

the member of staff has specific permission from the child's parents, and a Deputy Head, if the Head is unavailable.

In our Terms and Conditions for parents, it is written that 'Parents give their consent to such physical contact as may accord with good practice and be appropriate and proper for teaching and instruction and for providing comfort to a pupil in distress or to maintain safety and good order, or in connection with the Pupil's health and welfare.'

This 'Code of Conduct' document must be followed in its entirety by staff, as it forms part of the overall Safeguarding Policy of the school. Staff need to download this link and proactively familiarise themselves with all aspects of this document.

Some of the key principles of this document are below:

Adults should avoid any conduct which would lead any reasonable person to question their motivation and intentions. Staff need therefore to make a conscious effort to put themselves in the position of a neutral observer rather than simply see a situation from their own point of view. Staff need to be particularly aware of the reputational damage to themselves and the school that can be caused by accusations or allegations against staff: this is one of the reasons why they should avoid putting themselves in vulnerable positions where their actions could be misinterpreted by a neutral observer.

Please also be aware that the child may misunderstand the (albeit well meant) actions of an adult, particularly if these actions involve physical contact, and this misunderstanding or misinterpretation may also be shared by their parents when reported by the child to them. This is another reason why staff should be particularly vigilant about their own behaviour.

Adults should always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. If staff or other adults in the school community become aware that another adult has acted incorrectly in relation to Safeguarding Policy or the 'Code of Conduct' document, they should follow the whistleblowing policy and immediately report and record any incident that they witness or learn about with this potential to the Head, or if he is not available to a Deputy Head or the Head of Early Years.

If an occasion has occurred where a member of staff realises that something has happened involving themselves which could be misconstrued or interpreted as breaking this code, they should immediately tell the Head or SLT member in order for the member of staff to present their own point of view.

The giving of gifts or rewards to children or young people should be part of an agreed policy for supporting positive behaviour or recognising particular achievements. If gifts/rewards are given, they should be given in such a way that no one could accuse the giver of favouritism or courting popularity. In any event the gifts should only be of nominal value. If the member of staff is in doubt about the situation, they should check with the Head or a member of SLT. *Adults need to be aware that the giving of gifts can be misinterpreted by others as a gesture either to bribe or groom a young person.*

Adults should ensure that their relationships with children and young people clearly take place within the boundaries of a respectful professional relationship.

It is crucial that in all circumstances, adults should only touch children in ways which are appropriate to their professional or agreed role and responsibilities.

When physical contact is made with the child this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. When a child is in pain or very distressed, it may be necessary to hold a child for longer than usual. Teachers should only instigate physical contact in line with the guidelines above; please be aware that some children do not respond well to physical contact.

Unless the child is in need of particular comfort, it would be unusual for a teacher to initiate the holding of the hand of the child who is in Year Three or above.

When children approach an adult and give them a hug or hold the adult's hand or show affection to the adult in other ways, it is permissible for the adult to acknowledge this verbally and then gently to 'unpeel' the child in a reasonably swift, reassuring and age-appropriate way as we would not wish the child to feel rejected.

The Manor makes adults aware of relevant professional guidance in respect of physical contact with children and meeting the medical needs of children and young people where appropriate. The school is explicit about what physical contact is appropriate for adults working in their setting:

It is natural that there will be an element of physical contact from the teacher when the children require reassurance and support. There will be occasions when the EYFS pupils may sit on a teacher's knee for support.

It is acceptable for teachers to give children of all ages a reassuring or congratulatory quick hug or pat on the back in line with the guidance above. However, in this litigious age, staff should be aware that any action of initiating hugs with children is liable to misinterpretation when seen by others or when discussed by the child at home.

The guidance above therefore –When physical contact is made with the child this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background-remains very important.

Physical contact beyond this (e.g. a kiss, a pat on the bottom, or rubbing a child's ear) would be seen as absolutely unacceptable and would lead to disciplinary action and/or the involvement of external agencies in line with the Local Authority Designated Officer's advice. Please understand that a tap on the bottom could also be misconstrued as smacking.

As a general rule, staff should never touch a child if they are alone with them, even if the child is distressed (if a child was exceptionally distressed it is possible that very brief physical contact be allowable whilst at the same time trying to attract the attention of other staff or taking the child to an area in which there were other staff): this is in order to avoid

any danger of the child reporting matters in a different way from that which the teacher may have intended. In these circumstances, the adult should move to a situation where there is another adult. The exceptions to this are when a child is receiving First Aid or medical attention; or in certain situations as permitted in the Policy for Music Teachers on Physical Contact and the Policy for Teachers of Dance, Drama and Games, both of which are in the Safeguarding Policy.

In one-to-one situations, it is advisable where possible to teach with the door open or ajar, although of course there will be some situations where this would be impracticable e.g. in instrumental music lessons.

It is acceptable of course for staff to restrain children as a last resort if the child is about to do something which could endanger themselves or others. For some children, there may also be a specific Restraint Plan in place.

(b) Policy for Music Teachers on Physical Contact

This Policy is based on guidance issued by the Incorporated Society of Musicians.

Accusations of sexual misconduct or other indecent behaviour are devastating. A teacher's self-esteem, self-confidence and personal and private lives can be seriously affected. In today's climate and with increased public awareness of sexual misconduct and student abuse, pupils are taught to be alert to the behaviour and conduct of adults. Therefore it is important we have clear guidelines on physical contact.

Teaching singing or an instrument may involve touching pupils – to adjust posture, demonstrate how to hold an instrument, correct hand position, breathing, embouchure, and so on. Most teachers do this unselfconsciously and their pupils think nothing of it, but teacher's actions can sometimes be misunderstood.

The best way to overcome anxieties and misunderstanding is to be aware of the boundaries of appropriate and inappropriate touch and for the teacher to tell the pupil what they are going to do in advance. The teacher can physically demonstrate what is going to happen. As tuition progresses, the teacher should keep the pupil(s) informed of any changes in the kind of physical contact that is required.

Touch is appropriate when it is to assist a pupil to achieve an activity and when permission has been granted or gained. Other than touching the hands and arms, it is not advisable to touch a pupil below the shoulder unless there is a justifiable reason. Nor is it advisable to touch a pupil around the chest, waist, diaphragm or ribs in order to teach breathing.

To reduce the need for touch, there are other strategies teachers might consider: the pupils being asked to watch and copy the teacher; teaching with the use of a mirror; or a wider range of vocabulary and imagery.

If any unusual physical contact occurs between the teacher and a pupil, even accidentally, the teacher should not delay in reporting it to the Director of Music (who will inform the Head without delay) or directly to the Head.

(c) Policy for Teachers of Dance, Drama and Games

Any touching of pupils should be entirely appropriate and necessary. Wherever possible, teachers should tell pupils what they are going to do in advance. To reduce the need for touch, teachers should consider the other strategies outlined above.

(d) Communicating with Pupils

Unless there is no alternative and safety is an issue, Staff should not give their personal mobile phone numbers to pupils, nor should they communicate with them by text message or personal email. If they need to speak to a pupil by telephone, they should use where possible one of the school's telephones. The Group Leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her, and may ask the pupils for their mobile numbers. A school mobile should be used wherever possible for any contact with pupils that may be necessary. The Group leader will delete any record of pupils' mobile phone numbers at the end of the trip or visit.

(e) Physical Restraint

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself or herself or on another, and then only as a last resort, when all efforts to defuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the Head or Head of Section of the school who will decide what to do next. Please read the School's Physical Restraint Policy for more details.

(f) The Manor's Policies on Email Etiquette, Social Media and Acceptable Use of Technologies

All staff are required to follow these policies, which support our safeguarding of all members of the school community. Staff should not give their personal contact details to a pupil, past or present. There should never be any inappropriate electronic communication with a pupil, past or present. If there is a situation which could conceivably be misinterpreted as anything inappropriate, the Head should be consulted.

Adults should not give their personal contact details to children and young people including email, home or mobile telephone numbers, unless the need to do so is agreed with senior management and parents/carers.

Adults should not have any form of communication with the child or young person which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact.

Staff should have no contact with pupils on social media. If a pupil tries to contact a member of staff on social media, this should be reported to the Head.

For further information, please refer to the Acceptable Use Policy.

(g) Anti-Bullying, Behaviour and Discipline, Dignity at Work Policies

All staff are required to follow these policies.

Under no circumstances is corporal punishment allowed.

(h) Safer Working Practice

[‘Code of Conduct – Guidance for Staff to Promote Safer Working Practice for All Adults Who Work With Children and Young People’ \(June 2020\)](#). can be accessed via this link. It also applies to past pupils unless the Head has permitted the member of staff to adopt a different arrangement in a particular instance.

(i) Relationships with Present and Former Pupils

In line with the Independent School Standards Regulations, staff know that it is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual.

(j) Infatuation

If a pupil or parent develops infatuations towards members of staff, all such situations must be responded to sensitively to maintain the dignity of those concerned.

Staff should also be aware that such circumstances carry a high risk of words or actions being misinterpreted and for allegations to be made against staff. Any indications of an infatuation towards you or another member of staff must be reported to the Head.

(k) Gifts/Hospitality

Staff need to take care that they do not accept any gift/offer of hospitality that might be construed as a bribe by others, or lead the giver to expect preferential treatment. However, there may be occasions where pupils or parents wish to give a small token of appreciation to staff, for example at religious festivities or at the end of the year.

It is unacceptable to receive gifts on a regular basis or to suggest to pupils that gifts are appropriate or desired. Money must not be accepted as a gift. If you are unsure whether to accept a gift you should consult the Head.

All staff are required to follow our Gifts and Hospitality Policy (including Bribery Prevention), which can be found in the ‘All Policies’ shared drive on Google.

(l) Visits to Pupils’ Homes

It may sometimes be deemed necessary to conduct visits to pupils’ homes. In these cases, please refer to our Home Visits Policy which can be found in the ‘All Policies’ shared drive on Google.

(m) Use of Personal Cameras and Devices

For information on use of personal cameras and devices, please refer to our E-Safety and Acceptable Use Policy which can be found on the school website [here](#) or in the ‘All Policies’ shared drive on Google.

(n) Supervision of Sensitive Areas

Pupils are entitled to respect whilst they are changing. However, there needs to be an appropriate level of supervision in order to safeguard young people and meet health and safety requirements.

For our procedures, please refer to our Toilet/Changing Room Access Policy on page 47 of the Safeguarding Policy.

(o) Educational Visits

Please refer to our Educational Visits Policy for information about our procedures during these visits, including on overnight trips.

(p) Dress and Appearance

All staff must dress in a manner that is appropriate to a professional role and that promotes a professional image. Staff should dress in a manner that is not offensive, revealing or sexually provocative and in a manner that is absent from political or contentious slogans.

All staff are required to follow our Dress Policy, which can be accessed within the Staff Handbook.

(q) Drugs and Alcohol

The Manor is a non-smoking site. Staff must not smoke on the school premises or outside school gates. Any member of staff wishing to smoke must leave the school grounds. Staff must not smoke whilst working with or supervising pupils offsite.

Staff must not consume or be under the influence of alcohol, illicit drugs or other illegal substances on or near the school premises when pupils are present.

(r) Confidentiality and Safeguarding

- Members of staff may have access to confidential information about pupils and their families. Staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil on a need to know basis.
- Staff should never use confidential or personal information about a pupil or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the pupil.
- All staff are likely at some point to witness actions which need to be confidential. For example, where a pupil is bullied by another pupil, this needs to be reported and dealt with in accordance with our Anti-Bullying Policy. These incidents must not be discussed outside the school.
- Staff have a statutory duty to share with the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead any information which gives rise to concern about the welfare or safety of a pupil or that might suggest a pupil is in need or at risk of significant harm. Staff should pass on information without delay in accordance with the school's Safeguarding Policy and this should be recorded. Staff must never promise a pupil that they will not act on or pass on any information that they are told by the pupil.
- Where a concern involves the risk of radicalisation, all schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the

Prevent Duty and staff should refer to pages 40-42 of our Safeguarding Policy for further information about this duty and procedures to be followed.

- Any media or legal enquiries should be passed to the Head and only approved staff and Governors should communicate to the media about the school.

(s) WHISTLEBLOWING POLICY AND PROCEDURE

The Manor has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, a failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside The Manor.

About this Policy

The Manor is committed to conducting its business with honesty and integrity, and expects all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The Manor's policy on whistleblowing is intended to demonstrate that it: -

- will not tolerate malpractice;
- respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- will invoke The Manor's disciplinary procedure in the case of false, malicious, vexatious or frivolous allegations; and
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

Procedure

This procedure is separate from The Manor's adopted procedures regarding grievances. Individuals should not use the whistleblowing procedure to raise grievances about their personal employment situation. If you are uncertain whether something is within the scope of this procedure you should seek advice from the Head or the Bursar.

This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

A whistleblower is a person who raises a genuine concern relating to suspected malpractice within The Manor. If you have any genuine concerns related to suspected malpractice affecting any of The Manor's activities (a whistleblowing concern) you should report it under this procedure.

If staff and volunteers feel unable to raise an issue with The Manor or feel that their genuine concerns are not being addressed, they may report their concerns to other whistleblowing channels, such as:

- Protect, an independent whistleblowing charity, previously known as Public Concern at Work (helpline: 020 3117 2502, email: whistle@protect-advice.org.uk, website: www.pcaw.co.uk).
- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: help@nspcc.org.uk).

Safeguarding

Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with Keeping Children Safe in Education (Sept 2020), as staff have a statutory obligation to whistleblow in all cases of a child protection nature. In particular:

(i) staff should raise any initial safeguarding concerns about a child with the Designated Safeguarding Lead in accordance with the School's Safeguarding Policy. If the safeguarding concern involves suspected malpractice by an employee, contractor, volunteer or casual worker at The Manor, staff should follow the advice below (without first notifying the Designated Safeguarding Lead).

(ii) staff should raise any concerns about another staff member with the Head, or if the concern is about the Head, with the Chair of Governors (without first notifying the Head) in accordance with the procedures in the School's Safeguarding Policy.

Staff should follow the procedures described in the Safeguarding Policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or staff to properly safeguard the welfare of pupils if they are concerned that the School's Safeguarding Policy is not being observed or adhered to correctly.

In exceptional circumstances, or if at any point there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care or the police immediately

This Whistleblowing Policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are at this end of this policy

Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity, then the Police will in all cases be informed.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should discuss this with the Head or Bursar and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are set out above.

Raising a whistleblowing concern

You are at liberty to raise a whistleblowing concern to the Head, Deputy Heads or the Bursar. If the person expressing the concern feels unable to approach the Head, the Deputy Heads or the Bursar directly, then the Whistleblowing Governor, Sian Champkin, should be the first point of contact.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this procedure. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. You will be kept informed of progress and, whenever possible and subject to third party rights, informed of the resolution. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied that your concern is being properly dealt with you will have a right to raise it in confidence with the Governing Body.

Investigation and outcome

Once you have raised a concern, the Whistleblowing Officer will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases, the Whistleblowing Officer may appoint an investigator or team of investigators, which may include staff with relevant experience of investigations or specialist knowledge of the subject matter. The School will ensure that all involved have a clear understanding of the roles of those conducting the investigation and that of the Head, at the start of the process. Whistleblowers will be reminded to read this Whistleblowing Policy in full before the investigation starts.

The manner in which the process is conducted is also important and should reflect the culture and ethos of The Manor. Those raising the concerns should be assured that what they have done is right and should feel supported throughout. The investigation will focus on facts, rather than opinions. Wherever possible, questions to witnesses or to the member of staff about whom allegations have been made will focus on non-leading questions (for example, "Tell me...", "Describe to me...", "Explain to me what happened...") and on the clarification of concerns. The investigation may involve witnesses being asked if they have noticed any other matters of a similar nature – for example of a safeguarding nature if the whistleblowing concern is in that area – in connection with the member of staff; there may be questions about the perceived impact of the matter on the child, should that be relevant. Questions may involve areas in which policy may have been breached and any reason or explanations of this. In the case of safeguarding matters, the guidance of the LADO will be followed and in other cases the school may also consult external advisers. The investigator(s) will report to the Whistleblowing Officer and clarify the facts of the case: it is the responsibility of the Whistleblowing Officer to decide how the matter is taken forward. The investigation may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

The Whistleblowing Officer may decide that the investigation should lead to further action, which may include a Disciplinary Procedure.

If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with the Whistleblowing Officer. If you are still not happy with the way in which your concern has been handled, you may contact the Chair of Governors via the Clerk to the Governors under the Grievance Procedure. Contact details are at the end of this policy.

External Procedures

Where all internal procedures have been exhausted, a member of staff shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the individual reasonably believes: -

- that exceptionally serious circumstances justify it;
- that The Manor would conceal or destroy the relevant evidence;
- where they believe they would be victimised by The Manor; or
- where the Secretary of State has ordered it.

Malicious Accusations

False, malicious, vexatious or frivolous accusations will be dealt with under The Manor's Disciplinary Procedure.

Protection from Reprisal or Victimisation

No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblowing procedures.

Protection and support for the alleged perpetrator

Support for the alleged perpetrator is also vital to fulfilling the school's duty of care to all employees. The alleged perpetrator should be informed of concerns or allegations as

soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a work colleague for support. They should also be given access to support and counselling.

The Whistleblowing Officer should appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

The alleged perpetrator will be advised not to threaten or retaliate against whistleblowers in any way. If there is any such conduct, the alleged perpetrator involved may be subject to disciplinary action.

Contacts

Whistleblowing Officer	Alastair Thomas, Head - 01235 858460 / 07826 398855 head@manorprep.org
Governor Responsible for Whistleblowing	Sian Champkin, Governor – 07776 235778 schampkin@gmail.com
Chair of Governors	Shaun Forrestal, Chair of Governors - 07428 616799 shaun@theforrestals.net
Telephone Counselling (24hr)	First Assist - 0800 912 0827 <i>(please quote scheme verifier 71735)</i>
Personal Counselling	Fiona McNally - 07935 435550 willowtreepsychotherapy@outlook.com
Public Concern at Work (Independent whistleblowing charity)	Helpline: 020 3117 2520 E-mail: whistle@protect-advice.org.uk Website: www.pcaw.org.uk

(t) The Manor Philosophy: How staff should communicate with children

All children are entitled to receive their education free from humiliation, oppression and abuse and it is the responsibility of all adults to ensure that education takes place in an environment which is caring and protective. The Manor is committed to values of tolerance and respect for others and strongly opposes all forms of bullying. Every

member of the school community, children, parents, teaching and non-teaching staff has an important part to play in producing and maintaining an atmosphere where each individual feels cared for and valued. The PSHEE/PSED (Learning for Life) programme and use of circle time have a vital role to play in combating bullying.

Role of staff

In general terms, staff should speak to children:

- With mutual respect (following the ‘Do as you would be done by’ tenet)
- With eye contact
- With courtesy – ‘please’ and ‘thank you’ etc
- In a clear, calm manner
- Making them feel liked and valued even when the child has done something wrong
- Attentively – listening carefully to what they have to say
- In a warm, friendly and approachable manner
- With humour, where appropriate
- Treating all as individuals
- With firmness when necessary but always tempered by kindness
- Establishing clear limits re behaviour/what is acceptable
- Using language appropriate to the age/maturity of the child
- Respecting child’s privacy and cultural background
- Sensitivity to personal circumstances and characteristics
- Finding an appropriate time and place to discuss any sensitive issue
- In an encouraging, positive tone

When speaking to children staff should avoid:

- Shouting/aggression (Although obviously there may be occasions when one needs to raise one’s voice, shouting can be seen as an unacceptable form of bullying.)
- Sarcasm/heavy irony
- Negative personal comments (eg: about a child’s appearance or family)
- Intimidation
- Favouritism/discrimination/stereotyping
- In a cold, unfriendly manner
- Using negative comparisons with other pupils or siblings
- Criticising the child’s character (it is fine to criticise the deed, but not the doer)
- Speaking in a condescending or threatening tone
- Repeatedly singling out persistent miscreants
- Intemperate or inappropriate language
- Derogatory comments/implications about children, teachers and/or lessons
- Embarrassing or humiliating a child, eg showing a child’s work to the class as an example of what not to do/taking in marks aloud if there is a danger that any child will be humiliated. However, there will inevitably be times when a child will be reminded of expectations when other children are present (eg forgetting homework, talking out of turn, etc).
- If a child has to start a piece of work again, the old piece of work should be put to one side for disposal/recycling at a later time (ie not in front of the child or other children).
- In addition, staff should avoid unnecessary negative, intolerant comments when speaking about children in the Staff Room or elsewhere.

Children can be bullied by teachers, usually inadvertently, and this must be consciously avoided, particularly as children are quick to pick up on it and to see it as justification for making their own unkind comments.

(u) Fundamental British Values

Staff must actively promote Fundamental British Values such as respect for the rule of law, democracy, and mutual respect and tolerance of those with different faiths and beliefs, and ensure that they do not therefore undermine these values in any way.

(v) Promotion of Non-Partisan Approach and Prohibition of Potential Indoctrination

In terms of political views, the School promotes a non-partisan approach (i.e. children are offered a balanced presentation of opposing views) and therefore any sort of potential political indoctrination is prohibited.

(w) Staff Vigilance

Staff are expected to show great vigilance in all areas that could affect children. These include:

- Pupils' online safety and protection from cyberbullying
- Radicalisation (eg by a particular faith in order to carry out unlawful acts)
- Pupils' mental health and well-being.

STAFF WELFARE

The physical and mental welfare of the staff are of prime importance to the school.

SLT, the School Nurse and HR Officer are all available for any member of staff to discuss any matters which are of concern to them; indeed staff welfare is a key responsibility for the HR Officer.

The School has access to a professional Counsellor who is in school regularly.

It is possible that a member of staff does not recognise or wish to acknowledge their own difficulties, in which case it is good practice for a colleague to draw the attention of one of the staff mentioned in paragraph 2 above, to the situation of the relevant member of staff.

All staff are also welcome to make use of the services outlined below:

a) Personal Counselling

FirstAssist offers confidential and professional support, on problems such as:

- Workplace Issues
- Financial Concerns
- Marital and Relationship Difficulties
- Alcohol and Drug Misuse
- Family Worries
- Stress
- Bereavement

Please note:

- This service is available 24 hours a day, 365 days a year

- It is confidential
 - Is available to you and your immediate family
 - It helps **you** to help **yourself**, now and in the future
- Please call 0800 912 0827 quoting scheme verifier 71735

b) Legal Advice

First Assist offers advice on legal matters, such as:

- Neighbour disputes
 - Debt problems
 - Consumer Disputes
 - Matrimonial issues
 - Motoring law
 - Contracts
 - Property Disputes/contract issues
- Call 0800 912 0827 quoting scheme verifier 71735

This service is **confidential**. (Excludes advice concerning occupational/employment or health and safety issues).

SECTION ELEVEN: LINKS TO OTHER POLICIES

LINKS TO OTHER POLICIES

This policy needs to read in conjunction with these other policies which relate to the safeguarding of children:

1. Recruitment Policy
2. Anti-Bullying Policy
3. Cyber-Bullying Policy
4. E-Safety and Acceptable Use Policy
5. Use of Reasonable Force and Positive Handling Policy
6. Health and Safety Policy (including Risk Assessment Policy)

SECTION TWELVE: RECORD KEEPING, GOVERNORS' DUTIES IN RELATION TO SAFEGUARDING, REVIEW AND MONITORING

RECORD KEEPING

All concerns, discussions, and decisions and the reasons for those decisions will be recorded in writing when they relate to child protection. These are recorded on the school CPOMS secure online Safeguarding platform (themanorprepschool.cpoms.net). These are kept confidentially and are only accessible to the Designated Safeguarding Lead and Deputy Designated Safeguarding leads. They are reviewed regularly so that concerning patterns of behaviour can be spotted. These are kept confidentially by the Designated Safeguarding Lead and reviewed regularly so that concerning patterns of behaviour can be spotted.

MANAGEMENT AND MONITORING OF SAFEGUARDING – Review of policies and procedures including nominated Governor to take leadership for safeguarding and Governors' duties

The Deputy Head Pastoral, as Designated Safeguarding Lead, has the key activities of the DSL role within his Job Description including the fact that he is also the Prevent officer. He is also given sufficient time, funding, supervision and support to fulfil his child welfare and safeguarding responsibilities. The training that the Deputy Head Pastoral attends ensures that his knowledge and experience improve; he is also challenged on aspects of Safeguarding policy and practice by the Governor with responsibility for safeguarding and Prevent duties. The required training for the DSL is set out in Annex B of KCSIE and covers inter-agency working, participation in child protection case conferences, supporting children in need, record keeping, promoting a culture of listening to children, and Prevent duties.

The Governor with special responsibility for Safeguarding visits the school regularly (at least once a term) and asks questions of staff to check that they know the procedures. These are recorded and put into the minutes of the Governors' Annual review of safeguarding. Her name is Mrs Jan Rimmer and she is contactable via the Bursar. In line with KCSIE, she is the Governor who takes leadership responsibility for safeguarding arrangements.

Governors assist all staff in realising their own fundamental role in recognising that safeguarding is everyone's responsibility.

The Governors will undertake an annual review of the policy and procedures for Child Protection (in consultation with the Designated Contact) including Prevent duties and of the efficiency which the related duties have been discharged: some or all of these reviews will take place even more often if required. They are also responsible for ensuring that any deficiencies or weaknesses in Child Protection arrangements are remedied without delay. Throughout the year (i.e. not just at the Annual Review of Child Protection Policies), the Governors are responsible for approving amendments to Child Protection procedures in the light of changing regulations or recommended best practice. The Deputy Head Pastoral, as Designated Safeguarding Lead, ensures that the Governors are furnished with the relevant information detailing any suggested changes to the policy and procedures, training undertaken by staff and governors, and other relevant issues. Although all Governors are responsible for Safeguarding Children, the Governor with

specific responsibility for this area is Mrs Jan Rimmer. She receives additional training in Safeguarding from Oxfordshire Safeguarding Children Board so that she is well-placed to question and review school practice in this area. She is also the governor with particular responsibility for 'Prevent' duties. Her contact details are:

Email: dandridge.house@btinternet.com

Mobile Phone: 07884 280893

The Governors consider carefully how children are taught about safeguarding, including online, through the curriculum and PSHEE/PSED. Particular attention is paid by the Governors to school practices to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation, with special attention to the safe use of electronic equipment and the internet. Governors are aware that:

- These practices should be age-appropriate and delivered through a planned component on the curriculum.
- That internet safety is integral to the school's computing curriculum and is embedded in PSHEE/PSED and RSHE.
- The latest resources promoted by DfE can be found at:
[The use of social media for online radicalisation - Publications - GOV.UK](#)
The UK Safer Internet Centre (www.saferinternet.org.uk)
CEOP's Thinkuknow website (www.thinkuknow.co.uk)

In line with Working Together to Safeguard Children (2018), the Governors will ensure that the school contributes to interagency working through effective implementation of the child protection policy and procedures, and good co-operation with local agencies.

The Designated Safeguarding Lead and his deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children (2018). . Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. The '[NPCC - When to call the police](#)' guidance document should help the Designated Safeguarding Lead and his deputies to understand when they should consider calling the police and what to expect when they do.

Governors and Manor staff are aware that the three safeguarding partners have named schools as relevant agencies and that this places us under a statutory duty to co-operate with their published arrangements.

Governors and Manor staff understand that in Oxfordshire, the three safeguarding partners have decided to maintain and strengthen the Oxfordshire Safeguarding Children Board (OSCB) and as such, we will continue to work with this board for our multi-agency safeguarding arrangements.

The Governors are fully aware of their duties in relation to safeguarding, which include the following:

- Ensuring there is an effective Child Protection Policy and Staff Code of Conduct/Behaviour Policy in place

- Ensuring that the Child Protection Policy includes reference to online safety and sexting
- Ensuring that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare
- Ensuring that the school's safeguarding arrangements reflect local protocols for assessment and the OSCB's threshold document, and that The Manor supplies information as requested to the OSCB
- To recognise the importance of information sharing between professionals and local agencies, recognising that 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
- To ensure that all staff members undergo safeguarding and child protection training at induction, that their training is regularly updated in line with advice from the OSCB and that staff receive child protection updates at least annually
- To ensure that children are taught about safeguarding including online, through teaching and learning opportunities
- To ensure staff's involvement in the creation and refinement of the Safeguarding Policy, drawing on the experience of the DSL and other staff

The policy, practice and efficiency of the implementation of the Safeguarding Policy is discussed and formally minuted at the full Governors' Meeting each June.

COMPLAINTS

Copies of the School's Complaints Policy can be sent to parents on request and are available on the School's website.

STAFF INVOLVEMENT IN SHAPING SAFEGUARDING POLICIES AND PROCEDURES

The principle of staff involvement in shaping safeguarding policies and procedures is fully accepted. Staff are invited and encouraged to give their views at full and section staff meetings, as well as individually to the SLT including via the Professional Development Review process, as well as on immediate basis where necessary.

APPENDICES

1. ['Keeping Children Safe in Education' \(Sept 2020\)](#)
2. ['Guidance on Code of Conduct for Employers, Staff and Volunteers working with Children and Young People' \(June 2020\)](#)
3. ['Safeguarding Disabled Children: Practice Guidance'\(2009\)](#)
4. [Oxfordshire multi-agency safeguarding arrangements for children](#)
5. General Medical Council ['Protecting Children and Young People'](#)
6. Job description of Designated Safeguarding Lead
7. Visitors and Visiting Speakers Policy
8. Safeguarding and Prevent Contact Details - Poster
9. [Working Together to Safeguard Children \(2018\)](#)
10. [Oxfordshire Multi-Agency Thresholds of Need Matrix \(2019\)](#)

JOB DESCRIPTION

Job Title:	Designated Safeguarding Lead
Department:	
Line Manager:	Governor Responsible for Safeguarding

NB: The Manor is aware that KSCIE (2020) places great emphasis on the seniority of the DSL and makes it clear that, although some responsibilities may be delegated to the Deputy DSLs, ultimate lead responsibility lies with the DSL.

Job Description:
<p>AIMS</p> <ul style="list-style-type: none"> • To operate as the named lead for Safeguarding (including Prevent duties) • To ensure that all statutory requirements are met including training and documentation • To identify and ensure a consistent and professional approach to safeguarding and Prevent within the named team at the school • To ensure clear demarcation and delegation with respect to other staff • To ensure there is positive representation in all meetings both within and beyond the school • To ensure there is effective liaison with stakeholders (governors, parents/carers, pupils and staff) on all matters relating to safeguarding and Prevent <p>RESPONSIBILITIES:</p> <ul style="list-style-type: none"> • Ensure that clear information and guidance is in place for the named members of the school's safeguarding and Prevent team • Receive and co-ordinate referrals, ensuring appropriate action plans and documentation is in place • Maintain accurate and confidential files for all Prevent, safeguarding and child protection issues • Liaise and co-ordinate with colleagues and monitor all recommendations as they relate to the school • Work to ensure that those who are vulnerable or at risk are known to staff and monitored appropriately • Provide information, support and guidance to all staff on matters of Prevent and safeguarding • Liaise with HR to ensure training records for all staff are kept • Deliver training to new staff as part of the induction process • To implement the school's Prevent and safeguarding policy and procedures • Encourage good practice by promoting and championing the Prevent and safeguarding policy and procedures

- Respond appropriately to disclosures or concerns which relate to the well-being of a child
- To maintain accurate, confidential and up-to-date documentation on all cases of Prevent, safeguarding and child protection and report where require.
- To work directly with children in need and their families in order to promote, strengthen and develop the potential of parents/carers and their children in order to prevent children becoming looked after and/or suffering significant harm
- Where required, liaise with statutory agencies and ensure they have access to all necessary information
- To initiate and refer pupils in most instances to outside agencies and co-ordinate referrals
- To liaise with school staff in initiating multi-agency referrals for pupils
- When appropriate, to act as lead professional and coordinate Team Around the Family meetings
- To ensure that vulnerable pupils who are victims of abuse are supported appropriately and sensitively and that all actions assigned to the school from planning and interventions meetings are successfully carried out and monitored
- To collate and produce statistical information with regards to safeguarding and pupil groups
- To work with identified pupil premium group pupils and their families to narrow the attainment gap
- To plan and assist on Prevent and safeguarding training within school
- Attend and participate in Child Protection Conferences and Planning and Review meetings whilst working closely with colleague's in Children's Services as required, some of which may take place out of normal working hours
- Plan and complete professional assessments of need and risk in respect of parents and carers using the Local Authority procedures for children in need and significant harm. Taking the lead responsibility to coordinate the multi-agency approach to prevent and address child protection issues and children in need within the school
- To maintain confidentiality at all times
- To liaise and coordinate with colleagues and outside organisations regarding the Early Help Assessment and to coordinate and monitor all referrals and recommendations with the school
- From referrals, develop a register of students who are 'At Risk' or have child protection plans
- To adhere to the Schools' policies as outline in the staff handbook

The DSL also follows all the guidelines of the role of the Designated Safeguarding Lead as specified in KCSIE (Sept 2020) Annex B, namely:

Manage referrals

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and

- Refer cases where a crime may have been committed to the Police as required.

Work with others

- Act as a point of contact with the three safeguarding partners;
- Liaise with the Head to inform him or her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the “case manager” (as per Part four of KCSIE 2020) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- Liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- Act as a source of support, advice and expertise for staff.

Undertake training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to provide them with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children’s social care, so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care arrangements;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the school’s child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand the relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- Understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners;
- Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- Ensure the school or college's child protection policies are known, understood and used appropriately;
- Ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this;
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this; and
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role will include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Child protection file

- Where children leave the school, the designated safeguarding lead ensures 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 should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required
- In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives

Availability

- During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy)

would be expected to be available in person; however, in exceptional circumstances availability via phone and or Google Meet or other such media is acceptable

- Adequate and appropriate cover arrangements for any out of hours/out of term activities will be made to ensure that either the designated safeguarding lead or a deputy is available at these times.

This job description is not an exhaustive list of duties and the individuals appointed will be required to undertake any other reasonable duties that support the development of safeguarding and child protection provision within the school.

Other Duties

Staff are expected to carry out other duties as reasonably requested by the Head or the SLT.

Staff Handbook

To follow the directions contained in the Staff Handbook, which change from time to time.

Review Arrangements:

The details contained in this Job Description reflect the content of the job at the date it was prepared. However, it is inevitable that over time, the nature of the job may change. Existing duties may no longer be required and other duties may be gained without changing the general nature of the post or the level of responsibility entailed. Consequently, the school will expect to revise this Job Description from time to time and will consult with the post holder at the appropriate time.

APPENDIX 7

Visitors and Visiting Speakers' Policy

This policy should be read with the Safeguarding Policy and Safer Recruitment Policy.

1. Introduction

Visitors are welcome to The Manor Preparatory School. They make a contribution to the life and work of the school in many different ways. The learning opportunities and experience they may bring are encouraged and appreciated. It is the school's responsibility, however, to ensure that the security and welfare of its pupils are not compromised at any time. The school is equally responsible to the whole school community for ensuring that visitors comply with the guidelines.

It is our aim to safeguard all children under this school's responsibility both during school time and in extra-curricular activities which are arranged by the school. The aim is to ensure the pupils of The Manor Preparatory School can learn and enjoy extra-curricular experiences, in an environment where they are safe from harm, including any risk of being influenced or radicalised by those espousing extremist ideology.

It is our objective to establish a clear protocol and procedure for the admittance of external visitors to the school which is understood by all staff, governors, visitors and parents and conforms to child protection guidelines.

The school is deemed to have control and responsibility for its pupils anywhere on the school site, during normal school hours, during after-school activities and on school organised (and supervised) off-site activities.

The policy applies to all external visitors entering the school site during the school day or for after-school activities (including peripatetic tutors, sport coaches, and topic related visitors e.g. business people, authors, artists etc.); the code of behaviour demanded of visitors needs to be shared by all members of the school community (pupils, staff, parents, contractors).

This policy applies to all visitors invited to The Manor Preparatory School.

2. Visitors Invited to the School

Where possible permission should be granted by the Head before any visitor is asked to come into school. The Head and/or members of the Senior Leadership Team should be given a clear explanation as to the relevance and purpose of the visit and intended date and time for the visit.

During the school's response to COVID-19, a copy of The Manor COVID-19 Risk Assessment for Full Re-opening' will be available on the school website and where possible, this will be provided to visitors before their arrival. Upon their arrival, staff

will ensure that visitors have read the risk assessment and are aware of the safety guidance contained within it.

- All external visitors must report to the School Office first - they must not enter the school via any other entrance.
- At the School Office, all visitors must state the purpose of their visit and who has invited them. They must produce formal identification including photograph eg driving licence or passport: this must be checked in all cases if they are not a parent or prospective parent.
- All visitors will be required to sign in and will be told about the Safeguarding, Fire and Health and Safety arrangements. The details of these arrangements are on the reverse of the Visitor's badge.
- All visitors will be required to wear a Visitor's Badge (this includes prospective parents but not existing ones).
- A staff member will be asked to come to the School Office to receive the visitor. The contact will then be responsible for them when they are on site.
- At no point should a visitor be left on their own with children unless the children are with current or prospective parents in a situation authorised by a member of SLT. (Please see below for details)
- In the event of a fire alarm/drill, the visitor should be accompanied to the assembly point in the Front Lawn.
- On departing the school, visitors should leave via the School Office, sign out and return their Visitor's Badge.

Visitors whose purpose is to work with pupils in some capacity:

- Visitors may work with pupils in a variety of capacities, for example, to deliver a lesson (normally supervised by a member of staff), to meet with small groups of pupils or individuals or alternatively they may be working with a pupil on a one to one basis (e.g. educational psychologist).
- Staff should ensure all normal visitor policy requirements are followed.
- Any visitor who is not DBS checked must not be alone with pupils at any point. This includes whole class or small group teaching or one to one interviews of pupils (pupils). The exception to this is other times when children are giving tours to prospective parents when it is deemed reasonable for pairs of pupils to show around prospective parents, as this is established practice and not a risk, as pupils are always within a short distance of a teacher. Pupils do not take prospective parents to the fields.
- If a visitor has DBS clearance they *may* be able to work with pupils unaccompanied by another member of staff (teaching a class or a one to one interview) - see point below.
- A full list of all people cleared to work in the school is kept by the HR Officer. If the name of the visitor whom you wish to work with children is not on this list then you as the member of staff responsible for the visitor must check with HR in advance to ensure any additional checks are completed in time for the visit. It is recommended that this check is a minimum of two weeks before the visitor is expected to allow for any additional checks to take place.
- Regular visitors to the school must have DBS clearance.

- Any visitor delivering a lesson or assembly must comply with the requirements of the visiting speakers' policy, including having due regard to the Prevent Duty as outlined below.

3. Use of External Agencies and Speakers (e.g. Explorer Dome, History off the Page - not supply teachers)

At The Manor Preparatory School we encourage the use of external agencies or speakers to enrich the experiences of our pupils; however, we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our pupils.

We ensure that we do not use agencies or speakers whose messages are inconsistent with the school's values and ethos.

All External Agencies and Speakers must read and sign the Visiting Speakers' agreement. (Appendix 1). They should be sent this before their visit and should hand in a signed copy, or sign a form at The Manor saying that they will comply with the agreement.

Our school will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to pupils support fundamental British Values and our school values in line with the Prevent Duty
- Any messages communicated to pupils are consistent with the ethos of the school and do not marginalise any communities, groups or individuals
- Any messages communicated to pupils do not seek to glorify criminal activity or violent extremism or seek to radicalise pupils through extreme or narrow views of faith, religion, culture or other ideologies
- Activities are properly embedded in the curriculum wherever possible.
- Activities are matched to the needs of pupils.

We recognise, however, that the ethos of our school is to encourage pupils to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this. Therefore by delivering a broad and balanced curriculum, augmented by the use of external sources where appropriate, we will strive to ensure our pupils recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help pupils develop the critical thinking skills needed to engage in informed debate.

4. Unknown/uninvited Visitors to the School

- Any visitor to the school site who is not wearing an identity badge should be challenged politely to enquire who they are and their business on the school site.

- They should then be escorted to the School Office to sign in and be issued with a Visitor's Badge.
- In the event that the visitor refuses to comply, they should be asked to leave the site and the Head informed immediately.
- The Head and/or members of the Senior Leadership Team will consider the situation and decide if it is necessary to inform the police.
- If an unknown/uninvited visitor becomes abusive or aggressive, they will be asked to leave the site immediately and warned that if they fail to leave the school grounds, police assistance will be called for.

5. Governors

- All governors have DBS clearance.
- Governors should sign in and out in the School Office and wear a Governor's Identity Badge whilst on site.
- New governors will be made aware of the policy and familiar with its procedures as part of their induction.

6. Staff Development

As part of their induction, new staff will be made aware of this policy and will be asked to ensure compliance with its procedures at all times.

VISITING SPEAKERS' AGREEMENT

At The Manor Preparatory School we understand the importance of visitors and external agencies to enrich the experiences of our pupils.

In order to safeguard our children we expect all visiting speakers to read and adhere to the statements below.

Statement to be signed by Visiting Speaker to The Manor Preparatory School.

I shall ensure that:

- I present my ID including photograph (eg driving licence or passport) on arrival at the school.
- Any messages communicated to pupils do not undermine in any way the Fundamental British Values (rule of law, democracy, tolerance of those with different beliefs and individual liberty) and our school values.
- Any messages communicated to pupils are consistent with the ethos of the school and do not marginalise any communities, groups or individuals.
- Any messages communicated to pupils do not seek to glorify criminal activity or violent extremism or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other ideologies.
- Activities are matched to the needs of pupils.
- Visitors will also be accompanied by a member of staff at all times.

VISITORS NAME.....

ID TYPE.....SEEN BY.....

FIRE PROCEDURES ISSUED.....

VISITING WHOM.....

SIGNATURE OF VISITOR.....DATE.....

SAFEGUARDING AND PREVENT CONTACT DETAILS

ANY CONCERNS? FOLLOW THE SAFEGUARDING POLICY

Login to **CPOMS** - themanorprepschool.cpoms.net

IMMEDIATELY tell the Designated Safeguarding Lead (DSL) or a Deputy DSL.

Please also remember that **ANYONE** can make a referral if necessary.

TO REPORT A NEW CONCERN ABOUT A CHILD: Oxfordshire's Multi-Agency Safeguarding Hub (MASH)	0345 0507666 mash-children@oxfordshire.gov.uk
TO TALK ABOUT AN ONGOING CONCERN: Children's Social Care Team, South Emergency Duty Team	01865 323041 0800 833408
IF YOU ARE UNSURE WHETHER TO MAKE A REFERRAL: LCSS (Local Community Support Service, South) Request a 'no names' consultation	0345 2412608 LCSS.South@oxfordshire.gov.uk
TO REPORT CONCERNS ABOUT CHILD SEXUAL EXPLOITATION: Kingfisher Team	01865 309196
TO REPORT CONCERNS ABOUT CHILD RADICALISATION: Oxfordshire's Multi-Agency Safeguarding Hub (MASH)	0345 0507666 mash-children@oxfordshire.gov.uk
TO REPORT CONCERNS ABOUT A PROFESSIONAL OR PERSON IN A POSITION OF TRUST: LADO (Local Authority Designated Officer) for Oxfordshire	01865 810603 lado.safeguardingchildren@oxfordshire.gov.uk
Police - Non-emergency enquiries	101
Ofsted - Concerns	0300 123 4666
NSPCC - Child Protection Helpline	0808 800 5000 help@nspcc.org.uk
CEOP (Child Exploitation and Online Protection)	www.thinkuknow.co.uk
DBS (Disclosure and Barring Service)	03000 200 190 customerservices@db.s.gsi.gov.uk
Anti-Terrorist Hotline	0800 789321
Crime Stoppers	0800 555111
Department for Education - General enquiries	0370 0002288
Department for Education - Preventing extremism in schools and children's services	0207 3407264 counter.extremism@education.gov.uk
OSCB (Oxfordshire Safeguarding Children Board) – Access website for local procedure concerning all aspects of safeguarding, including 'Prevent'.	01865 815843 oscb@oxfordshire.gov.uk www.oscb.org.uk