

# SAFEGUARDING POLICY

Including:

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

**WHOLE SCHOOL POLICY (INCLUDING EYFS)**

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<b>Date Policy Reviewed:</b>	14 March 2024
<b>Date of Next Review:</b>	1 September 2024
<b>Person(s) Responsible for Review:</b>	Deputy Head Pastoral and Head, followed by Governors

For information about The Manor's Safeguarding procedures in the event of a closure due to infectious illness, please refer to our Infectious Illness Emergency Plan.

# SAFEGUARDING POLICY

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<b>Key Personnel</b>	<b>Name/s</b>	<b>Contact Details</b>
Designated Safeguarding Lead (DSL)	Mr Varun Footring	01235 858480 07929 857030 <a href="mailto:vfootring@manorprep.org">vfootring@manorprep.org</a>
Deputy DSLs	Mrs Pippa McConnell  Mr Neil Jackson	01235 858485 07552 848843 <a href="mailto:pmcconnell@manorprep.org">pmcconnell@manorprep.org</a>  01235 858453 07435 987404 <a href="mailto:njackson@manorprep.org">njackson@manorprep.org</a>
Deputy DSLs (During 'Manor Fun' Holiday Club)	Mrs Caroline Reid Mr Harrison Read Mr Richard Valentine	01235 858485 <a href="mailto:creid@manorprep.org">creid@manorprep.org</a> <a href="mailto:hread@maonrprep.org">hread@maonrprep.org</a> <a href="mailto:rvalentine@manorprep.org">rvalentine@manorprep.org</a>
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Nominated Safeguarding Governor	Mr Tom James	07484 800277 <a href="mailto:tjames@manorprep.org">tjames@manorprep.org</a>
Head	Mr Alastair Thomas	01235 858460 07920 291445 <a href="mailto:head@manorprep.org">head@manorprep.org</a>
Chair of Governors	Mr Shaun Forrestal	07428 616799 <a href="mailto:sforrestal@manorprep.org">sforrestal@manorprep.org</a>
Education Safeguarding Advisory Team / Local Authority Designated Officers (LADOs)	Jo Lloyd Donna Crozier Sandra Barratt Lorna Todd Becky Langstone Sophie Kendall	01865 810603  <a href="mailto:Lado.safeguardingchildren@oxfordshire.gov.uk">Lado.safeguardingchildren@oxfordshire.gov.uk</a> <a href="mailto:ESAT.safeguardingchildren@oxfordshire.gov.uk">ESAT.safeguardingchildren@oxfordshire.gov.uk</a>
Education Prevent Leads	Jo Lloyd Karen Crossan	01865 810603 <a href="mailto:lado.safeguardingchildren@oxfordshire.gov.uk">lado.safeguardingchildren@oxfordshire.gov.uk</a>
Locality Community Support Service (LCSS) worker	Emma Walker	<a href="mailto:Emma.Walker@Oxfordshire.gov.uk">Emma.Walker@Oxfordshire.gov.uk</a>
Multi Agency Safeguarding Hub (MASH)		0345 050 7666
Out of hours Emergency Duty Team (EDT)		0800 833408
Police		101 or in emergencies 999

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

### INTRODUCTION

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.

KCSIE 2023 states: "No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

The following procedures apply to all staff working in the school and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or is at risk of harm.

All staff are aware that very young children with those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or be threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

In this policy, we use the term 'victim'. It is a widely recognised and understood term. It is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, staff at The Manor should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

In this policy, we also use the terms 'alleged perpetrator(s)' and where appropriate, 'perpetrator(s)'. These are widely used and recognised terms. However, staff at The Manor should think carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. As above, The Manor will determine the appropriate terminology to use on a case-by-case basis.

This policy provides the basis for good practice within the school for Safeguarding work. It should be read in conjunction with the Oxfordshire Safeguarding Children's Board [Safeguarding Policies and Procedures](#).

## **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 as safeguarding issues must only be discussed with the DSL, a deputy DSL or relevant agencies e.g. MASH, the police, social workers). The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available. Please refer to the flow diagram on page 13.
2. In the absence of the DSL or a deputy, be prepared to refer directly to Children's Social Care (and the police if appropriate), if there is the potential for immediate significant harm.
3. 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). Concerns about the Head should be directed to the Chair of Governors. Staff may also contact the LADO directly using the details on page 5. Please refer to the flow diagram on page 16 below and to the Whistleblowing Policy.
4. If it is not possible to see the DSL or a DDSL in person, contact should be made by phone from a private location.
5. 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: <https://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 Pastoral's Office.
6. This report 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 accurate, 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. Review the evidence and decide whether there are sufficient grounds for suspecting significant harm, referring to Oxfordshire's Threshold of Needs. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm, the DSL (or Deputy) must make a referral to Children's Social Care via MASH or the child's social worker (if applicable) and the police (if appropriate) immediately, 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**.

The MASH referral form can be accessed [here](#).

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

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that staff provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).

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. 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.
3. 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.
4. 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.
5. If there is not considered to be a risk of significant harm, the DSL or deputy DSL will either actively monitor the situation, consider early intervention support via the Oxfordshire Early Help/Team Around the Family (TAF) process, or contact the LCSS or other outside agencies for support, as appropriate.
6. 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.



## **DSL CONTACT DETAILS:**

Mr Varun Footring – 01235 858480 / 07929 857030 / [vfootring@manorprep.org](mailto:vfootring@manorprep.org)

## **DEPUTY DSL CONTACT DETAILS:**

Mrs Pippa McConnell 01235 858485 / 07552 848843 / [pmcconnell@manorprep.org](mailto:pmcconnell@manorprep.org)

Mr Neil Jackson 01235 858453 / 07435 987404 / [njackson@manorprep.org](mailto: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).

During The Manor's school holiday club, 'Manor Fun', in addition to the staff above, Mrs Caroline Reid, Mr Harrison Read and Mr Richard Valentine are the Deputy DSLs on site:

01235 858485 / [creid@manorprep.org](mailto:creid@manorprep.org), [hread@manorprep.org](mailto:hread@manorprep.org), [rvalentine@manorprep.org](mailto:rvalentine@manorprep.org)

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.

## **IF THE DSL OR A DEPUTY DSL IS UNAVAILABLE**

If the above staff are unavailable, then any member of staff who has a concern about a child's welfare has the responsibility to contact the **Oxfordshire MASH** by calling them and then following up with an online referral:

**MASH phone number:** 0345 050 7666

**MASH online referral form:**

<https://www.oxfordshire.gov.uk/business/information-providers/multi-agency-safeguarding-hub>

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

## **ADVICE FOR SUPPORTING CHILDREN AND/OR PARENTS WITH DISCLOSURES**

### **Recognise:**

If you have a concern about a child or if a child tells you they are being abused, exploited or neglected, staff will appropriately respond by always stopping to listen and offering reassurance. You should be aware that in some cases, parents may disclose abuse to you. A member of staff who is approached by a child should listen positively and try to reassure them.

You cannot promise complete confidentiality and should explain that you they may need to pass information to other professionals, to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Keep calm, don't panic, and don't appear shocked or angry. React calmly and be aware of your non-verbal messages.

Keep responses short, simple, slow and gentle.

Don't stop a child or parent who is talking freely about what has happened. Observe and listen.

Do not ask leading questions; instead, ask open questions. Staff may find it helpful to use questions beginning with 'what', 'when', 'who' and 'how', or using 'TED' questions (tell, explain, describe).

You may make brief notes, if appropriate

If you have difficulty in understanding the child or parent's communication method, reassure them that you will find someone quickly who can help.

Tell the child they are not to blame and have done the right thing by telling you.

Avoid making comments or judgements about what is shared.

Avoid criticising the alleged perpetrator personally

What you might say if a child or parent tells you about abuse:

‘What you are saying is important.’

‘I’m glad you were able to tell me.’

‘I will do my best to help you.’

‘This is so important I need to talk to someone about it.’

### **Record:**

Tell the child or parent what will happen next, and be honest about what you can do.

Make a written record of:

- What was said (including questions that you asked to clarify the information)

- Who was present

- Anything else that happens after the child or parent has spoken to you and before they are seen by children’s services or the police

Write your account in as much detail as possible, making sure to record what the child said using the child’s words (do not interpret).

Written information should always be factual and not opinion based, and naturally avoid judgements

Written records must be recorded on CPOMS, or where this is not possible, on a paper Record of Concern Form available in the Deputy Head Pastoral’s office or directly from the DSL or Deputy DSL.

### **Reassure:**

Tell the child they have done the right thing in reporting.

## **KEY TERMINOLOGY**

### **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 SUFFERING, OR LIKELY TO SUFFER, SIGNIFICANT HARM - Section 47**

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries 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.

### **CONFIDENTIALITY**

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

### **NON-RECENT ABUSE**

If a child discloses non-recent abuse, staff should follow the procedures as outlined above and contact the Designated Safeguarding Lead immediately, who will then consider next steps.

Where the allegation is in relation to a member of staff, volunteer, supply staff or contractor, staff should inform the Head or Chair of Governors as appropriate who will then contact the LADO in line with the local authority’s procedures for dealing with non-recent allegations. The LADO will

coordinate with children social care and the police. **Abuse can be reported no matter how long ago it happened.**

Where an adult makes an allegation to The Manor that they were abused as a child, the individual will be advised to report the allegation to the police.

## **SHARING INFORMATION AND GDPR**

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.

GDPR (General Data Protection Rules) and the UK Data Protection Act 2018 outline data protection principles which contain guidance about sharing information. 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' (2023) 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. However, 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 \(2023\)](#), which includes a myth-busting guide to information sharing
- in [Keeping Children Safe in Education 2023](#)
- 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/her absence, a Deputy DSL *immediately* (within 24 hours)

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

(If CPOMS cannot be accessed, a physical record of concern form must be completed, available in the Deputy Head Pastoral Office or from the DSL/DDSL).

The DSL will consider if it is necessary to contact the Oxfordshire MASH and/or police (where appropriate) or the child's social worker (where relevant); this may be in the presence of the member of staff who reported the matter if appropriate.

**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 contacts MASH:**

MASH – 0345 0507666  
MASH Emergency Duty Team - 0800 833408  
If the child is at immediate risk dial 999



#### **MASH ACTIONS**

Acknowledge receipt of referral  
Decide on next course of action  
Feedback decision to referrer e.g:  
Further Assessment including  
Child Protection process /Strategy Discussion  
No further action required for Children's Services **and Early Help Assessment recommended**  
Referred to other agency for service provision



#### **CHILD HAS ADDITIONAL OR UNMET NEEDS DSL WILL:**

Consult with the family  
Arrange additional internal/external pastoral support for the child, as appropriate  
Consider support through the Early Help/Team Around the Family process or consult other relevant agencies for advice and/or support



#### **MONITORING AND IF REQUIRED:**

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



**ALLEGATIONS AGAINST ADULTS/SCHOOL STAFF/SUPPLY  
STAFF/VOLUNTEERS/CONTRACTORS/GOVERNORS**

**ALLEGATIONS AGAINST STAFF**

**If you become aware that a member of staff/supply staff/volunteer/contractor/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](mailto: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](mailto: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.

If you believe that a member of the school staff is harming a child (an allegation) and this has been reported to the Head and/or Chair of Governors and no / insufficient action has been taken, or where there is a conflict of interest in reporting the matter to them, then you are able to contact the Designated Officers team (LADO) on 01865 810603 or email [lado.safeguardingchildren@oxfordshire.gov.uk](mailto:lado.safeguardingchildren@oxfordshire.gov.uk)

## SECTION TWO: INTRODUCTION TO SAFEGUARDING AND CHILD PROTECTION

### GENERAL INTRODUCTION

The purpose of this policy is to provide staff, governors, volunteers and contractors with the framework they need to keep children safe and secure in our school and to inform parents and guardians how we will safeguard their children whilst they are in our care.

At The Manor Preparatory School, our Governing Board takes seriously its responsibility under Section 11 of the Children Act and duties under “Working Together to Safeguard Children 2023” to safeguard and promote the welfare of children; to work together with other agencies to ensure adequate arrangements exist within our setting to identify and support those children who are suffering harm or are likely to suffer harm.

We recognise that all our staff and governors have a full and active part to play in protecting our pupils from harm, and that the child’s welfare is our paramount concern. All staff members, governors, volunteers and external providers know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child.

Our school should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child.

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 has been written in line with Keeping Children Safe in Education 2023 and should be used in conjunction with this document.

All staff will sign to confirm they have read and understood this policy.

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: All prospective parents are sent a prospectus and information booklet, including a clear indication of how they can access the Safeguarding Policy or request a copy; 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 2023)**.

## **OUR SAFEGUARDING CULTURE**

**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.**

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. **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. We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to. We maintain an attitude of ‘it could happen here’ where safeguarding is concerned.

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 2023).

## **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 safeguarding issues are included within the school curriculum (as part of ‘Learning for Life’ (PSHEE/PSED) and Computing, 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.
- Take all reasonable action to limit children’s exposure to the risks from the school’s IT system and ensure the school has appropriate filters and monitoring systems in place and regularly review their effectiveness in line with national expectations.

## **LINKS TO KEY DOCUMENTS**

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

- [Keeping Children Safe in Education \(September 2023\) \(KCSIE\)](#)



- 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](#) (2023)
- [Prevent Duty Guidance: for England and Wales](#) (December 2023) (Prevent).
- [The use of social media for on-line radicalisation](#) (July 2015)
- [Charity Commission guidance on charity and trustee duties to safeguard children](#) (June 2022)
- [Filtering and Monitoring Standards for Schools and Colleges](#) (March 2023)

## DEFINITION OF SAFEGUARDING

Safeguarding and promoting the welfare of children is defined as (KCSIE Sept 2023):

- 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

**Child protection** is an aspect of safeguarding but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

The term **staff** applies to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity. This also includes parents and governors.

**Child** refers to all young people who have not yet reached their 18<sup>th</sup> birthday. On the whole, this will apply to all pupils of our school; however, the policy will extend to visiting children and students from other establishments.

**Parent** refers to birth parents and other adults in a parenting role for example, adoptive parents, step parents, guardians and foster carers.

**Abuse** could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care. Explanations of these are given within Section Six of this policy.

## EQUAL TREATMENT

Our school acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged and children are supported to understand how to treat others with respect. Any discriminatory behaviours are challenged and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. The Manor will take positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils or students with certain protected characteristics in order to meet their specific needs. This includes making reasonable adjustments for disabled children and young people and those identified as having special educational needs.

Please see our Equal Opportunities Policy.

## **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. Please also see the section of this policy which expands upon this: "In school provision for early help" (Section 5).

## **MULTI-AGENCY WORKING**

We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the police and Children's Social Care.

We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.

We will participate in Child Safeguarding Practice Reviews (CSPR's), other reviews and file audits as and when required to do so by the Oxfordshire Safeguarding Children's Board. We will ensure we have a clear process for gathering evidence required for reviews and audits and embed recommendations into practice and complete required actions within agreed timescales.

## **USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES**

When hiring or renting out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), The Manor Preparatory School will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by The Manor Preparatory School, under the direct supervision or management of our school staff, our arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The Manor Preparatory School will therefore seek assurance that the body concerned has the appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The DfE guidance on '[Keeping children safe in out-of-school settings](#)' details the safeguarding arrangements that schools should expect these providers to have in place.

## **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.

## SECTION THREE: DESIGNATED SAFEGUARDING LEAD

### DESIGNATED SAFEGUARDING LEAD (DSL)

The Governing Body of The Manor ensures that a senior member of staff with 'status and authority', 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, and they are supported by Deputy Designated Safeguarding Leads. Their details can be found in Section One of this policy.

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

The governing body ensures that the Designated Safeguarding Lead is properly supported and is given time to fulfil the duties/training that the role demands. The Designated Safeguarding Lead and Deputy DSLs receive Level 3 Safeguarding Training from the OSCB bi-annually.

In addition to their Level 3 training, Designated Safeguarding Lead and deputies 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 C of KCSIE).

The DSL will have higher level training in the Prevent strategy, 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. The DSL undertakes specialist training in Prevent through the online training module provided by the [Home Office](#); this ensures that the DSL is able to provide advice and support to other members of staff on protecting children from radicalisation.

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 (2013). Locally, the three safeguarding partners (these are the local authority Chief Executives, Chief Constables of police and Chief Executives of ICBs ) 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.

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

## **SECTION FOUR: SAFER RECRUITMENT**

### **SAFER RECRUITMENT**

The Governing Body and Leadership Team are responsible for ensuring that the school follows 'Safer Recruitment' procedures, which are outlined in our separate 'Recruitment Policy'.

The Manor Preparatory School is responsible for ensuring that the school maintains an accurate Single Central Record (SCR) in line with statutory guidance. This is monitored and reviewed to ensure compliance by the Governing Body and the Head. We are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools. We advise all staff to disclose any reason that may affect their suitability to work with children that could be a transferable risk to their role.

The Manor Preparatory School follows the Government's recommendations for the safer recruitment and employment of staff who work with children in line with Part Three of KCSIE 2023. This includes compliance with the Independent School Standards Regulations. 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 is 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 (best practice is checking the name on their birth certificate, where this is available), 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 Manor will also carry out an online search on shortlisted candidates to help identify any issues that are publicly available online, and will inform shortlisted candidates about this process. Everyone employed by the school is interviewed by at least one person who has had Safer Recruitment specialist training. This training is regularly updated.

The Manor only accepts copies of a curriculum vitae alongside an application form. A curriculum vitae on its own will not provide adequate information.

### **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 a role that involves teaching work (as defined in the [Teachers' Disciplinary \(England\) Regulations 2012](#)). 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. A check of any prohibition can be carried out using the [Teacher Services' System](#). The TRA's role in making prohibition orders and the processes used to impose them are described in more detail in the publication "[Teacher misconduct: disciplinary procedures for the teaching profession](#)" and "[Teacher misconduct: the prohibition of teachers: Advice on factors relating to decisions leading to the prohibition of teachers from the teaching profession](#)".

#### **b) Section 128 direction**

A section 128 direction prohibits or restricts an unsuitable individual from participating in the management of an independent school. An individual who is subject to a section 128 direction is unable to:

- take up a management position in an independent school, academy, or in a free school as an employee;
- be a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school; or,
- be 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 2023) 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. 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. Following the UK's exit from the EU, schools should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world. 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 (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the [Regulated Professions database](#). Applicants can also

contact the [UK Centre for Professional Qualifications](#) who will signpost them to the appropriate EEA regulatory body.

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](#).

### **CONTRACTORS AND PROVIDERS**

The Manor will ensure that contractors and providers are aware of the school's Safeguarding Policy and procedures, and that this will be referred to and followed if an allegation is made regarding a member of their agency. We will require that employees and volunteers provided by these organisations use the school's procedures to report concerns.

We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with KCSIE 2023. If assurance is not obtained, permission to work with our children or use our school premises may be refused.

### **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 Governing Board ensures that children are taught about how to keep themselves and others safe, including online. The Manor recognises that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse and children with special educational needs. Preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

The Learning for Life (PSHEE/PSED) curriculum, including our Relationships, Health and Sex Education (RSHE) 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, including radicalisation. 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.

Pupils are signposted to sources of help on Child Protection matters, including school staff, Childline, Get Connected and the Samaritans. Our Medical Room also displays advice on where pupils can seek help.

Further resources to support teaching children about safeguarding can be accessed below:

- The Department has produced a one-stop page about RSHE for teachers on GOV.UK, which can be accessed here: [Teaching about relationships sex and health](#)
- DfE advice for schools|: [teaching online safety in schools](#);
- UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#);
- UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#);
- The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors;
- The [UK Safer Internet Centre](#)
- National Crime Agency's CEOP education programme: [Thinkuknow](#);
- Public Health England: [Every Mind Matters](#)
- [The use of social media for online radicalisation - Publications - GOV.UK](#)
- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support
- LGFL '[Undressed](#)' provides schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

Please see the Curriculum Policy, Relationships, Sex and Health Education Policy, Learning for Life (PSHEE/PSED) 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 (CHILDREN WE CARE FOR)**

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 (please note that in Oxfordshire, the term 'Children We Care For' is used instead of 'Looked After Children'). In particular, they will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They will also ensure they have information about the child's care arrangements and the levels of authority delegated to the carer by looking after him/her. The Designated Safeguarding Lead will ensure they have details of the child's social worker and the name of the virtual school head in the authority that looks after the child (please refer to sections 190-197 of KCSIE 2023 for further information on the roles and responsibilities of virtual school heads, in addition to the Government statutory guidance on ['Promoting the education of looked-after and previously looked-after children'](#) and the non-statutory guidance on ['Promoting the education of children with a social worker'](#)). The Manor recognises that a previously looked after child potentially remains vulnerable and will ensure all staff have the skills, knowledge and understanding to keep previously looked after children safe. The Manor recognises that when dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard those children, who are a particularly vulnerable group.

## **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. The Mental Health Lead at The Manor is Mr Varun Footring.

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.

**If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection procedures outlined in section one of the Safeguarding Policy, and speaking to the Designated Safeguarding Lead or a deputy as soon as possible.**



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 recognises 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 challenging 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 effect 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 the 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 and Deputy Head Pastoral 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, 1:1 check-ins with Form Teachers and Heads of Section, and other systems to gain views and insight. 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/Key Person 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.

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

### **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 or has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

The school is very aware of the key principle of early help so that problems are, wherever possible, addressed and supported 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
- The DSL and DDSL will work to establish strong and co-operative relationships with relevant professionals in other agencies including ESAT, OSCB, MASH, the Children's Social Care Team and the LCSS, who may advise on local processes:
  - o EHA (Early Help Assessment)
  - o TAF (Team around the Family)

Guidance on these processes is also available from their website: [Early Help](#).

Staff are made aware of the Early Help process and their role in it. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking Early Help Assessments. In all cases, the staff member should initially discuss concerns with the Designated Safeguarding Lead to agree a course of action.

## **PROMOTION OF WELFARE**

The ethos of The Manor Preparatory School is to promote social and moral wellbeing, 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 greater good.

## **SAFEGUARDING PUPILS ONLINE (INCLUDING POLICY ON PUPIL MOBILE PHONES)**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The Manor is fully aware of the importance of an effective whole school approach to online safety, to empower us to protect and educate pupils, staff and parents in their use of technology, and establishes mechanisms to identify, intervene and escalate any incident where appropriate. Online safety is a running and interrelated theme when devising and implementing policies and procedures. Online safety is considered whilst planning the curriculum, any teacher training, the role and responsibilities of the Designated Safeguarding Lead and any parental engagement.

Please see the Cyber-Bullying Policy, E-Safety and Acceptable Use Policy and Anti-Bullying Policy.

We focus mainly on four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce – risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Pupils are not permitted to bring mobile phones to school, although pupils on the school Joint Bus Service are permitted to have them for safety reasons (for example, to warn a parent that they are delayed on their journey home). They must be handed in to the School Office during the day and collected before the return coach journey. The Manor recognises that during the coach journey, children may have unlimited access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means that some children may sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. To mitigate this risk, children from The Manor are sat at the front of the JBS buses, where it is easier for them to be supervised. We tell the children not to use their mobile phones unless they are contacting a parent, and any concerns raised by JBS staff will be passed on to the Deputy Head Pastoral, to be followed up on by The Manor.

The Manor keeps in regular contact with parents with regard to online safety, using communications to reinforce the importance of children being safe online and to explain our filtering and monitoring. Where children are asked to do activities online, such as via Google Classroom, information about online resources to be accessed and who children will be interacting with online is communicated to parents.

The Manor reviews our approach to online safety regularly, using the 360 safe review tool.

## **REMOTE LEARNING**

Please refer to ‘Section F – Remote Learning’ in The Manor’s E-Safety and Acceptable Use Policy.

## **FILTERING 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 on school devices and school networks, and monitoring their effectiveness. This includes blocking harmful and inappropriate content without unreasonably impacting on teaching and learning, as well as ensuring that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The Manor’s Designated Safeguarding Lead, Head, IT Manager and Safeguarding Governor

monitor internet usage regularly and report to the Governing Board on their findings and actions.

The Manor refers to the DfE's '[Filtering and Monitoring Standards](#)' to support us in this area, with the Designated Safeguarding Lead taking the lead role in ensuring we meet these standards. Filtering and monitoring provision is reviewed regularly, and is formally discussed with the Safeguarding Governor on a half-termly basis. The full Governing Board review this area at least annually.

The school supplements filters with behaviour management and supervision of children online. If staff have any concerns in relation to filtering and monitoring, these must be reported to the Designated Safeguarding Lead.

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

Whilst considering our 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 also consults the UK Safer Internet Centre for guidance as to what "appropriate" filtering might look like:

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

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.

### **Information Security and Access Management**

The Manor recognises that education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technology.

Guidance on e-security is available from the [National Education Network](#). The Manor also refers to the DfE [Cyber security standards for schools and colleges](#). Broader guidance on cyber security, including considerations for Governors, can be found at [Cyber security training for school staff - NCSC.GOV.UK](#).

### **Training of Staff, Pupils and Parents about Online Safety**

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 training of staff in online safety is carried out internally through guidance at staff meetings; by online training (for example, through our EduCare 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 and the NSPCC), specifically for parents; and through letters to parents on topics such as how to set up parental control settings on iPads and other tablets.

### **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. 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, KNOWLEDGE AND INFORMATION ABOUT SAFEGUARDING ISSUES (INCLUDING CHILD ON CHILD ABUSE)

### INDUCTION OF NEW STAFF, GOVERNORS AND VOLUNTEERS AND STAFF TRAINING

All new staff, governors and regular volunteers undergo safeguarding a child protection training (including online safety) at induction. All staff, including temporary staff and volunteers, are provided with induction that includes:

1. Safeguarding Policy (including policy and procedures for dealing with child-on-child abuse), Staff Behaviour Policy including Whistle-blowing procedures and policy
2. Behaviour Policy (Pupil)
3. Anti-Bullying Policy
4. Safeguarding response to children missing education
5. Role of the DSL including identity of DSL and Deputies
6. Online safety (E-Safety and Acceptable Use Policy (including Cyber-Bullying). This includes, amongst other things, an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
7. A copy of Part 1, Part 5 and Annex B of KCSIE (Sept 2023) **(this is read by all new staff and by existing staff at regular intervals and where there is any change to the KCSIE document, and staff must confirm that they have understood the content)**

Induction for Governors also includes training on the Governance of Safeguarding, to support them in their strategic leadership responsibility for The Manor's safeguarding arrangements. The Safeguarding Governor also undertakes Level 3 Designated Safeguarding Lead training.

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, including Prevent, online safety, filtering and monitoring, to continue to provide them with relevant skills and knowledge to safeguard children effectively; 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, staff's Level 2 Generalist Child Protection training is refreshed every three years, in line with OSCB advice.

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.

The Governors ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. Governors recognise the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and that teachers need to have a clear understanding of the needs of all pupils.

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 C of KCSIE (Sept 2023). In

Oxfordshire, the DSL is advised to complete 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)

In order to ensure that staff can discharge their role and responsibilities in relation to all the matters raised in KCSIE (Sept 2023), the School ensures that the latest KCSIE Part One (presently Sept 2023) 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 this document.

## **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, including online. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children can be more prone to peer group isolation, child-on-child abuse or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools, or the consequences of doing so.

Any reports of abuse involving children with SEND at The Manor will involve close liaison between the Designated Safeguarding Lead and the SENCO. The Designated Safeguarding Lead works closely with the SENCO to identify concerns for children with SEND as early as possible, and support children and their families as appropriate. The Manor will consider extra pastoral support and attention to these children, along with ensuring appropriate support for communication is in place.

Further information can be found in the DfE's:

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#)

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND.
- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people.



## **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 2023.

## **CHILDREN WHO ARE LESBIAN, GAY, BI, OR TRANS (LGBT)**

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

## **ABUSE AND NEGLECT**

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.

### **Definitions and Indicators of abuse and neglect**

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional 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. Children may be abused by an adult or adults or by another child or children.

**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.

### **Indicators of physical abuse / factors that should increase concern**

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle

- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

**In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:**

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adult words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

**You should be concerned if the child or young person:**

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

Link to OSCB guidance on physical abuse

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

**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.

**Indicators of emotional abuse**

**Developmental issues**

- Delays in physical, mental and emotional development

- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

### **Behaviour**

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

### **Social issues**

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

### **Emotional responses**

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

It is sometimes possible to spot emotionally abusive behaviour from parents and car/ers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Link to OSCB guidance on emotional abuse

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

Link to OSCB guidance on Domestic Abuse

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

**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.

## **Indicators of sexual abuse**

### **Physical observations**

- Damage to genitalia, anus, or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

### **Behavioural observations**

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity. Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed

Link to OSCB guidance on sexual abuse

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

The Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people identify and respond appropriately to concerns of child sexual abuse: [‘Supporting practice in tackling child abuse’ - CSA Centre](#)

**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.

Link to the OSCB guidance on Neglect and toolkit :

<http://www.oscb.org.uk/safeguarding-themes/neglect/>

### **Indicators of neglect**

The following is a summary of some of the indicators that may suggest a child is experiencing neglect. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The OSCB childcare and development checklist/toolkit provides a more detailed list of indicators of neglect and is available to all staff

### **Physical indicators of neglect**

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

### **Behavioural indicators of neglect**

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food

### **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://www.contextualsafeguarding.org.uk/about-us/>

Link to OSCB guidance on contextual safeguarding:

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

## **SAFEGUARDING ISSUES**

All staff should have an awareness of other safeguarding issues that can put children at risk of harm:

### **CHILD ON CHILD ABUSE**

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

**All** staff should be aware that children can abuse other children (often referred to as child on child abuse) and that it can take many forms. It can happen both inside and outside of school and online. It is important that all staff can recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

All staff should understand that even if there are no reports at The Manor it does not mean it is not happening, it may be the case that it is just not being reported. As such, it is important that if staff have **any** concerns regarding child on child abuse they should speak to the Designated Safeguarding Lead (or a deputy) in line with the procedures outlined in Section One of this policy. The Designated Safeguarding Lead will then make decisions around next steps.

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

The Manor has a zero-tolerance approach to child on child abuse. The Manor recognises that it is more likely that girls will be victims and boys’ perpetrators, but that all child on child abuse is unacceptable and will be taken seriously.

Procedures to minimise the risk of child on child abuse include:

- Providing a developmentally appropriate Learning for Life (PSHEE/PSED) 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 children to confidently report abuse, knowing their concerns will be treated seriously. These include regularly reminding the children that they can talk to any member of staff if they have worries, as well as running listening sessions with Heads of Section. There are posters across the school with references to staff who children can talk to such as teachers, Heads of Section, the Deputy Heads, School Nurse and the Head. We also have Childline posters on display around the school for if the children would feel more comfortable reporting concerns anonymously. Whenever children report concerns to staff, we listen to them and reassure them that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression they are creating a problem by reporting abuse, sexual violence or sexual harassment. No victim will ever be made to feel ashamed for making a report.
- Delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk
- Delivering regular online lessons in Computing
- Developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);

- abuse in intimate personal relationships between children;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;. Part five of KCSIE (Sept 2023) 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 2023).
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nude images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

**All** staff should be clear as to The Manor's policy and procedures with regards to child on child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

### **Identification and Response to Child on Child Abuse, whether inside or outside school or online:**

If a child considers they have been abused by another child (whether inside or outside school or online), 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, whether they are a member of staff, supply staff, volunteer, contractor or parent, should inform the Designated Safeguarding Lead, without delay. Adults may also have concerns regarding child on child abuse without a child making a disclosure to them, in which case they should speak directly to the Designated Safeguarding Lead, without delay.

The Designated Safeguarding Lead will decide on the appropriate course of action, if necessary consulting the LCSS. The Designated Safeguarding Lead may consider using the Brook Sexual Behaviour Traffic Light Tool or the NSPCC traffic light tool ([‘Responding to children who display sexualised behaviour’](#)) to assess and respond appropriately to sexual behaviour in children, as well as to understand healthy sexual development and distinguish it from harmful behaviour.

If the information available to the Designated Safeguarding Lead gives reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, they will make a safeguarding referral to the MASH immediately (where a crime/potential crime has been committed the police will also be notified). If social care and the police intend to pursue this



further, they may ask to interview the children in school, or they may ask for parents to come to school to be spoken to also.

It may also be that social care feel that it does not meet their criteria, in which case Designated Safeguarding Lead may challenge that decision, with that individual or their line manager. If on discussion however, the Designated Safeguarding Lead agrees with the decision, they may be required to inform parents.

It would be an expectation that in the event of disclosures about child on child abuse that all children involved, whether perpetrator or victim, are treated as being 'at risk'. At this point, the Designated Safeguarding Lead will consider intent. For example, has this been a deliberate or contrived situation for one child to be able to harm another? The Designated Safeguarding Lead should remember to include all risk factors and what can be put in place to mitigate and lower the risk.

**How victims of child on child abuse will be supported (including any other children affected):**

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 the LCSS or MASH.

Whenever children report concerns, it is essential that all victims are listened to and reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Whenever children report concerns to staff, we listen to them and reassure them that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression they are creating a problem by reporting abuse, sexual violence or sexual harassment. No victim will ever be made to feel ashamed for making a report.

What support children require depends on the individual child. After receiving advice from at least one of the above named agencies, it may be concluded that the victim would benefit from counselling or one to one support via a mentor. It may also feel that they are able to deal with the incident(s) on their own or with support of family and friends. It is important that children are monitored and offered support should they require it in the future.

If the incidents are of a bullying nature, children may need support in improving peer groups/relationships with children or restorative work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group – for example a speaker on cyber bullying. It may be that through the continued curriculum, certain issues can be discussed and debated more frequently.

If the child feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have someone named they can talk to, support strategies for managing future issues and identified services to offer additional support.



## **The alleged perpetrator/children who have displayed harmful behaviour**

It is important to understand why the child has behaved in such a way. It may be that the child is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases, support such as one to one mentoring or counselling may also be necessary. Particular support from identified services may be necessary through an Early Help referral and the child may require additional support from family members.

Please note that if a referral has been made, social care and police must make decisions before the School takes any actions.

Once the support required to meet the child's needs has been put in place, it is important that the child understands the impact of their behaviour. This may be in the form of restorative justice (e.g. making amends with the child they have targeted if this has been some form of bullying). In the cases of sexually harmful behaviour it may be a requirement for the child to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth justice service). If there is any form of criminal investigation ongoing it may be that the child cannot be educated on site until the investigation has concluded. In which case, the school will need to provide the child with appropriate support and education whilst off site.

Even following the conclusion of any investigation, a child's behaviour may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the child and the risks towards others are measured by all of those agencies involved including the child and their parents. This may mean additional supervision of the child or protective strategies if the child feels at risk of engaging in further inappropriate or harmful behaviour.

The Manor may also choose a consequence such as internal or external suspension for a period of time to allow the child to reflect on their behaviour.

### **After Care**

It is important that following the incident the children involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that children do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the children following the incident(s) are imperative.

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.

## **CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT**

Part 5 of the statutory guidance in Keeping Children Safe in Education 2023 sets out how our school/college will manage reports of child on child sexual violence and harassment. This document is read and understood by DSLs and referred to as needed, particularly if a report of child on child sexual violence or sexual harassment is made.

If a report is made, the Designated Safeguarding Lead will lead how the report is dealt with, given the high-profile nature of the report. This will be in liaison with the Headteacher. Where the DSL is unavailable, a Deputy DSL will lead. On a case-by-case basis, there will be consideration made as to the gender of the DSL or Deputy, so that the victim feels comfortable with how the investigation is managed.

When it comes to action to manage the report, the needs and wishes of the victim will take centre stage. Considerations should include how the investigation proceeds and what support the victim requires. Sexual violence and sexual harassment are not acceptable and will not be tolerated. Reports will not be passed off as banter or part of growing up.

Where a report of rape, assault by penetration or sexual assault is made, children's social care and the police will be informed. Before doing so, this will normally be discussed with the victim and their parents/carers, explaining why it is important for other agencies to know and how these agencies will be able to support the victim (further guidance can be found on page 114 of KCSIE 2023). Other allegations will be managed within the school and/or with support from children's social care providers.

The guidance and the DfE advice set out the steps the school will take to manage the students involved, including risk assessments, separating the students in lessons, investigating the report, and supporting the victim and alleged perpetrator

Our school also uses NSPCC Sexual Behaviours Traffic Light tool to support in identifying problematic or harmful sexual behaviours:

<https://learning.nspcc.org.uk/media/2685/responding-to-children-who-display-sexualised-behaviour-guide.pdf>

## **UPSKIRTING**

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' 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. Anyone of any sex, can be a victim.

## **PROCEDURES FOR DEALING WITH THE SHARING OF NUDE AND SEMI-NUDE IMAGES AND SEXTING CASES**

The Manor is aware that it is an offence to possess, distribute, show and make indecent images of children. The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18. The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal. Children and young people who share nudes and semi-nudes of themselves, or peers, are breaking the law, although The Manor recognises that children and young people should not be unnecessarily criminalised and situations should be considered on a case by case context, considering what is known about the children and young people involved and if there is an immediate risk of harm.

The DfE provides [Searching Screening and Confiscation Advice](#) for schools. The UK Council for Child Internet Safety (UKCCIS) Education Group has published [Sharing nudes and semi-nudes: advice for education settings working with children and young people.](#)

When an incident involving sexting, nudes or semi-nudes comes to the attention of any member of staff at The Manor:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with the appropriate staff. This may include the staff member(s) who heard the disclosure and the Deputy DSLs
- There should be subsequent interviews with the children or young people involved (if appropriate)
- Parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is a good reason to believe that involving them would put the child or young person at risk of harm
- A referral should be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

A disclosure may not be a single event and the child and young person may share further information at a later stage, therefore multiple reviews and risk assessments may be needed depending on the situation.

In the case of an incident:

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal.**
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young person involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

In terms of educating children about the dangers of sexting, the subject is approached in Learning for Life (PSHEE/PSED) and Computing lessons.

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

### **CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS**

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

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at:

[www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org)

### **CHILDREN AND THE COURT SYSTEM**

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

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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

### **CHILDREN WITH FAMILY MEMBERS IN PRISON**

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

### **MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM**

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

### **DOMESTIC ABUSE**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse), all of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

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.

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the Designated Safeguarding Lead or Deputy) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8am to 1pm, Monday to Friday on 0204 513 9990 (charged at local rate).

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [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 or charge and in confidence, 24 hours a day on 0808 2000 247)

- [Safelives: young people and domestic abuse](#)
- [Home: Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

## **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 doubt 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 HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found in [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 who might be at risk of HBA or who has suffered from HBA, they should speak to the Designated Safeguarding Lead (or a deputy). As appropriate, the Designated Safeguarding Lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority 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 (see section on FGM below).

## **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: Handling case of forced marriage](#) (pages 75-80 of which focus on the role of schools and colleges) and Multi-agency statutory guidance for dealing with forced marriage, which can both be found at '[The right to choose: government guidance on forced marriage](#)'. School staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fm@fco.gov.uk](mailto:fm@fco.gov.uk)



In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

### **FEMALE GENITAL MUTILATION (FGM)**

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM or already having suffered FGM. [Harmful Practices - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](#)

- **Indicators** - There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines, and Chapter 9 of those Guidelines (pp42-44) focuses on the role of schools and colleges. Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to schools and colleges.
- **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. 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 will be a statutory duty upon that individual to report it to the police.
- **Mandatory Reporting Duty** -From October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve the Integrated Front Door as appropriate.

### **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 D 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 Designated Safeguarding Lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants (for example, money gifts or affection), and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- Appear with unexplained gifts, money or new possessions;
- Associate with other children involved in exploitation;
- Suffer from changes in emotional well-being;
- Misuse drugs and alcohol;
- Go missing for periods of time or regularly come home late; and
- Regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

## **CHILD CRIMINAL EXPLOITATION (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### **CHILD SEXUAL EXPLOITATION (CSE)**

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Some additional specific indicators that may be present in CSE are children who:

- Have older boyfriends or girlfriends; and
- Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#).

Non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, is also available: [Multi-agency practice principles for responding to child exploitation and extra-familial harm](#).

### **COUNTY LINES**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell 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 any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- Go missing and are subsequently found in areas away from their home
- Have been the victim or perpetrator of serious violence (e.g. knife crime)
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- Are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- Owe a 'debt bond' to their exploiters
- Have their bank accounts used to facilitate drug dealing

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.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office](#) and [The Children's Society County Lines Toolkit for Professionals](#).

## **CYBERCRIME**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
  - denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources;
- and,

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

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

## **PREVENTING RADICALISATION**

The Prevent Lead at The Manor is the DSL.

The Manor follows the KCSIE (Sept 2023) 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 susceptible 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 with 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).

The Manor follows the KCSIE (Sept 2023) 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 with the [Prevent duty guidance: for England and Wales](#).

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

- **Leadership and partnership:**

The Designated Safeguarding Lead will:

- ensure staff understand the risk of radicalisation that results in support for terrorism or involvement in terrorism by making sure they can access training resources and further guidance.
- build and promote the capabilities to deal with radicalisation concerns, such as a formal pathway to escalate concerns and refer through to Prevent
- promote the importance of Prevent and the role staff can play in countering terrorism
- Ensure effective partnership with specified authorities, local Prevent leads, the police and local authorities. This should be facilitated through multi-agency forums, such as local, regional or national strategic Prevent boards. Where a Prevent referral is adopted, The Manor will cooperate as reasonably practicable with local authority-led Channel panels, in accordance with Section 37 of the Counter-Terrorism and Security Act 2015 (CTSA 2015).

- **Capabilities:**

- The Designated Safeguarding Lead will ensure that staff have appropriate training on Prevent. This will include understanding what radicalisation means and why people may be susceptible to extremist ideologies used to encourage people into participating in or supporting terrorism. Staff should be aware of the terms 'radicalisation', 'terrorism' and 'extremism'. Staff should also know what measures are available to prevent radicalisation into terrorism and how to recognise the extremist ideologies that drive people to become terrorists or support terrorism. Staff should have awareness of the signs of radicalisation and should understand how to escalate and refer concerns to Prevent. This will involve contacting the Designated Safeguarding Lead (DSL), who would then be able to assist with referring onwards to Prevent, either by contacting the police or local authority.
- Those with Prevent-specific responsibilities, such as the DSL and DDSLs, will undertake additional, more regular training so they can support others on Prevent matters and update them on relevant issues.
- The Designated Safeguarding Lead should also conduct a risk assessment to help build an understanding of national, regional and local risks, and help tailor approaches and manage risk accordingly. The Manor should have proportionate and appropriate capabilities to manage risk.
- The Prevent [national referral form](#) should be used when making referrals.

- **Reducing permissive environments**

- Taking action to limit the potential harm and influence of radicalisers, as well as extremist narratives and content which can reasonably be linked to terrorism, can help reduce the risk of people from becoming terrorists or from supporting terrorism. [GOV.UK Prevent duty training](#) provides further information on extremist narratives.
  - The Manor has measures in place to prevent their facilities being exploited by radicalisers. This includes seeking to ensure that any event spaces or IT equipment are not being used to facilitate the spread of extremist narratives which encourage people into participating in or supporting terrorism. Such measures will help to limit access to platforms that can be used to radicalise others.
  - The Manor will also build resilience through the curriculum, supporting children to have the knowledge, skills and values that will prepare them to be citizens in modern Britain. In England, schools are required to actively promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. There are also opportunities in the curriculum to explore relevant topics, such as in Learning for Life and Relationships, Sex and Health Education (RSHE). This includes learning around building positive relationships and the importance of respecting difference. The Manor also builds resilience through our ethos and the ways in which we organise the school, including by promoting democracy through school elections.
- **IT Policies**
    - Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Please see the 'Filtering and Monitoring' section of this policy for more information.
  - **External Speakers and Events**
    - Schools should consider the extent to which any external speakers and events held on their premises pose a risk of radicalising learners into terrorism.
    - Encouragement of terrorism, including glorifying the commission or preparation of acts of terrorism, fundraising for the purposes of terrorism, and inviting support for a proscribed terrorist organisation, are all criminal offences. The Manor should not provide a platform for these offences to be committed.
    - When deciding whether to host a particular speaker, The Manor should consider carefully whether the views being expressed, or likely to be expressed, constitute views that are used to encourage people into participating in or supporting terrorism, or are shared by terrorist groups.
    - As part of managing the risk of radicalisation, schools' safeguarding policies should set out clear protocols for ensuring that any visiting speakers, whether invited by staff or by children themselves, are suitable and appropriately supervised. In England, the Prevent duty complements schools' other responsibilities for ensuring that speakers do not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Please refer to our Visiting Speakers Policy for further information.

The Department for Education has also published supporting advice for schools and further education settings on [managing the risk of radicalisation](#) in their education setting.

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are robust, informed and with good intention.



- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

## **CHANNEL**

The Manor staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible 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 Manor 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.

Channel guidance is available at: [Channel guidance](#).

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

## **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 and may be at risk of criminal exploitation.

There are a number of indicators, which may signal 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 and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment and having been involved in offending, such as theft or robbery.



A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#).

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](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

## **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. Please refer to page 24 of this policy for further information.

## **FURTHER INFORMATION ON 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](#)
- [behaviour in schools](#)
- [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](#)
- [private fostering](#)
- [preventing radicalisation](#)

## **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.

Further information about attendance can be found in The Manor's 'Attendance Policy'.

### ***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, will be recorded 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:

- o The full name of the pupil
  - o The full name and address of any parent with whom the pupil normally resides
  - o At least one telephone number of the parent
  - o The pupil's future address and destination school, if applicable
  - o 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:
    - o The full name of the pupil
    - o The full name and address of any parent with whom the pupil lives
    - o At least one telephone number of the parent with whom the pupil lives
    - o 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
    - o 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 2023) 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 that they are home educating, they must write to the Head to let us know they intend to take responsibility for the child's education. This letter/email will then be forwarded by the Head on to the Elective Home Education Team, together with a completed School Exit form. The local authority then registers the child as EHE and contacts the family, and The Manor follows their usual process for deleting names from the register when the child leaves the school. Please see page 59 for further information.

## **POLICY ON CHILDREN WHO ARE ABSENT FROM OR MISSING EDUCATION (INCLUDING CHILDREN WHO RUN AWAY)**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage.

The Manor recognises that it is important our response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in the future. It is important that staff are aware of The Manor's unauthorised absence procedures and children missing education procedures.

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.

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 has in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions, to help prevent the risk of them going missing in the future. The Manor closely monitors attendance to provide early help to children and families when problems are first emerging. We will also support in cases where children are known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community. The Designated Safeguarding Lead, who is also the Attendance Officer, reports regularly to the Safeguarding Governor and to the full Governing Board on attendance data; Governors monitor and review attendance data, providing support and challenge around current trends in the school community, and ensuring staff receive adequate training on attendance.

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.

In Reception and Years 1-6, an electronic attendance register is taken every morning between 8.45am and 8.50am 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.

As detailed in the section above on 'Reporting duties in relation to attendance and admissions', 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.

Where there are emerging concerns about attendance, The Manor follows the [procedures](#) as outlined by the County Attendance Team to support children and families and make referrals as appropriate.

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.

Further information and support includes:

- DfE guidance on school attendance, '[Working together to improve school attendance](#)', including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

- Information regarding schools' duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: '[Children Missing Education](#)'.
- General information and advice for schools and colleges can be found in the Government's [Missing Children and Adults Strategy](#).

### **ELECTIVE HOME EDUCATION (EHE)**

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, The Manor will work together with the Local Authority and other key staff and professionals to coordinate a meeting with parents/carers where possible. Ideally, this will be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. Further information can be accessed in the DfE guidance on [Elective Home Education](#).

### **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 are safeguarded 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. We recognise that children in the EYFS and Year 1 and 2 may need more support in these areas due to their age and stage of development, and support will be given by staff as appropriate.
4. In Years 3-6, where possible, when staff need to supervise or enter the room, female staff should supervise girls and male staff should supervise boys.
5. In Years 3-6, if a member of staff needs to enter a pupils' toilet area/changing room for children of the same sex, 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 and giving them the opportunity to cover up if they want to.
6. For children in Year 3-6, if a member of staff needs to enter a toilet area/changing room for children of the opposite sex, during times that children could be in school, then they should not enter the room on their own wherever possible. They should seek the assistance of a second member of staff of the opposite sex to enter the area first. The area should then be vacated of all children before the first member of staff enters the area. If in exceptional circumstances a member of staff of the opposite sex is unavailable to go first into the toilets, then two members of staff of the same sex should go to the outside door and loudly shout 'Is anyone there please?' If there is no answer, they can slowly enter together.
7. 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 doorway 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 around 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.

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.

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. Parents may withdraw consent at any time by sending an email to [ksherbourne@manorprep.org](mailto:ksherbourne@manorprep.org). Please note, however, that if they withdraw consent it may not be possible to remove a child’s image on materials already printed and/or in circulation.

Parents of all pupils at The Manor have agreed the School’s Terms and Conditions, 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.

### **Use of Cameras, Recording Equipment, Mobile Phones and Other devices with imaging and sharing capabilities(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 use any mobile phones, cameras or other devices with imaging and sharing capabilities in 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 mobile phone, camera or other device with imaging and sharing capabilities at all for swimming events, both home and away as well as during lessons.

### **Policy on the use of staff mobile phones, cameras and other devices with imaging and sharing capabilities in EYFS**

Early Years staff are not permitted to have personal mobile phones, cameras or other devices with imaging and sharing capabilities 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, cameras or other devices with imaging and sharing capabilities for taking photographs of children on outings.

Parents are not allowed to use mobile phones, cameras or other devices with imaging and sharing capabilities where EYFS children are present.

### **Whole School Policy on the use of staff mobile phones, cameras and other devices with imaging and sharing capabilities**

- i Members of staff may not use a personal phone, camera or other device with imaging and sharing capabilities (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 images

The 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, cameras or other electronic devices imaging and sharing capabilities 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 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.

## SECTION SEVEN: EARLY YEARS

### EARLY YEARS

Particular attention is given to the Early Years Foundation Stage (EYFS). The Head of Pre-Prep 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 Pre-Prep takes lead responsibility for safeguarding children within the Early Years setting and liaising with local statutory children's agencies as appropriate.

The School follows the 'Statutory Framework for the Early Years Foundation Stage' (September 2023). 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 *Providers must be alert to any issues of concern in the child's life at home or elsewhere. Providers must have and implement a policy, and procedures, to safeguard children. These should be in line with the guidance and procedures of the relevant local safeguarding partners (LSP). 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. (...) The lead practitioner is responsible for liaison with local statutory children's services agencies, and with the LSP. They must provide support, advice and guidance to any other staff on an ongoing basis, and on any specific safeguarding issue as required. The lead practitioner must attend a child protection training course that enables them to identify, understand and respond appropriately to signs of possible abuse and neglect (as described at paragraph 3.6)*
- 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’ and to the ‘Prevent duty guidance for England and Wales’. All schools are required to have regard to the government’s ‘Keeping Children Safe in Education’ statutory guidance, and other childcare providers may also find it helpful to refer to this guidance. 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 guidance 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 Section 3 of this policy and the School’s Recruitment Policy.**

## **SECTION EIGHT: ALLEGATIONS MADE AGAINST/CONCERNS RAISED IN RELATION TO TEACHERS (INCLUDING THE DSL, SUPPLY TEACHERS, OTHER STAFF, VOLUNTEERS AND CONTRACTORS)**

Staff know that they are obliged to 'whistle-blow' if they have concerns about a member of staff (including supply teachers, other staff, volunteers and contractors) and must inform the Head without delay. If the Head is absent, the allegation should be passed to the Chair of Governors.

Where there are concerns about the Head, this should be referred to the Chair of Governors without informing the Head.

**The Chair of Governors is Shaun Forrestal and his details are:**

**Email :** [sforrestal@manorprep.org](mailto:sforrestal@manorprep.org)  
**Mobile Phone:** 07428 616799

If the Chair of Governors is not available, then the Local Authority Designated Officer team for Oxfordshire should be contacted directly using the details on page 5.

There may be situations when the Head or Chair of Governors will want to involve the police immediately, for example, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation against adults working with children and young people has been received by the Head or Chair of Governors, they will contact the LADO team on 01865 810603 or [lado.safeguardingchildren@oxfordshire.gov.uk](mailto:lado.safeguardingchildren@oxfordshire.gov.uk) within 24 hours and before carrying out any investigation into the allegation other than preliminary enquiries. This includes allegations relating to individuals or organisations using the school premises for the purpose of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities).

In liaison with the LADO team, the school will determine how to proceed and if necessary, a referral will be made to the MASH and/or the police.

The team will assess the information provided and advise on next steps, in line with KCSIE 2023 part 4, and Oxfordshire County Council's Designated Officers' local procedures.

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

If you believe that a member of the school staff is harming a child (an allegation) and this has been reported to the Head and/or Chair of Governors and no / insufficient action has been taken, or where there is a conflict of interest in reporting the matter to them, then you are able to contact the Designated Officers team (LADO) on 01865 810603 or [email lado.safeguardingchildren@oxfordshire.gov.uk](mailto:lado.safeguardingchildren@oxfordshire.gov.uk)

If you believe that a child is being abused by individuals outside the school, you can make a referral to Children's Social Care by calling the MASH on: **0345 050 7666** (office hours) or **08450 507666** (outside of office hours).

Further guidance for staff can be accessed through:

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2> and through the NSPCC website  
<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

For staff concerns that **do not** pertain to a staff member posing a risk of harm to children, staff should consult the Whistle-blowing Policy section within the Staff Behaviour Policy (found within this Safeguarding Policy).

The School follows Part 4 of KCSIE (Sept 2023) in dealing with allegations of abuse against teachers, including supply teachers, other staff, volunteers and contractors. 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 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. Our policy has three sections:

1. Allegations that may meet the harms threshold
2. Allegations/concerns that do not meet the harms thresholds – referred to for the purposes of this policy as 'low level concerns'
3. Communication with parents/carers following an allegation or disclosure of possible abuse

## **1. ALLEGATIONS THAT MAY MEET THE HARMS THRESHOLD**

This part of the policy is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This policy should be followed where it is alleged that anyone working in the school, including supply teachers, volunteers and contractors, has:

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

The last bullet point above includes behaviour that may have happened outside of a school or college, that might make an individual unsuitable to work with children. This is known as transferrable risk. Where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken. The Manor will seek advice from the LADO if in doubt.

### **The initial response to an allegation**

Where The Manor identifies that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately as per the processes explained in Part one of this guidance.

There are two aspects to consider when an allegation is made:

- **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected

abuse to the local authority children's social care as described in section one of this policy.

- **Investigating and supporting the person subject to the allegation** - the case manager (either the Head or the Chair of Governors) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action without delay and within 24 hours.

When dealing with allegations, The Manor will:

- apply common sense and judgement;
- deal with allegations quickly, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation

Immediate contact (within one working day) should be made with the LADO(s) by the case manager 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 fully understands the local authority arrangements for managing allegations. Contact details for the LADO are contained in section one of this policy. 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. However, before contacting the LADO, the case manager may conduct basic enquiries to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

In cases where the adult is unaware of the concern or allegation, it may not be appropriate to tell them immediately – it may prejudice a possible Police investigation. When to inform the individual of the allegation should be considered carefully on a case by case basis, with guidance as required from the LADO, and if appropriate children's social care and the police.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance Working Together to Safeguard Children. If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour, in line with The Manor's 'Use of Reasonable Force' policy.

Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the Designated Safeguarding Lead and make a risk assessment of the situation. It may be necessary for the Designated Safeguarding Lead to make a referral to children's social care.

Where it is clear that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO will discuss the next steps with the case manager.

### **No further action**

Where the initial discussion leads to no further action, the case manager and the LADO should:



- record the decision and justification for it; and,
- The purpose of a strategy discussion and those likely to be involved is described in Working Together to Safeguard Children
- agree on what information should be put in writing to the individual concerned and by whom

### **Further enquiries**

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of staff at The Manor.

Should there is a lack of appropriate resource within The Manor, or the nature or complexity of the allegation requires it, the allegation will require an independent investigator. In this case, The Manor will ensure we secure the services of a person who is independent of the school.

The case manager will monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews will be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Wherever possible, the first review will take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, will be set at the review meeting if the investigation continues. The LADO will provide advice and guidance to schools and colleges when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

### **Allegations against supply teachers and all contracted staff**

In some circumstances, The Manor will have to consider an allegation against an individual not directly employed by the school, where our disciplinary procedures do not fully apply because agencies will have their own policies and procedures.

Where The Manor is not the employer of supply teachers, we will ensure allegations are dealt with properly. In no circumstances will The Manor decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. In liaison with the Governing Board, the case manager will discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, 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 with any enquiries from the LADO, police and/or children's social care. The Manor recognise that schools will usually take the lead because agencies do not have direct access to children or other school or college 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 Manor 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 agencies are taken into account by the school during the investigation.

When using a supply agency, The Manor will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This will include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

### **Allegations against Governors**

If an allegation is made against a governor, the Chair of Governors will follow the steps outlined above in liaison with the LADO. If an allegation is substantiated, the Chair of Governors will follow the procedures in this policy to consider removing them from office.

### **Allegations against the Designated Safeguarding Lead**

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.

### **Suspension**

The Manor will give due weight to the views of the LADO, KCSIE and Working Together to Safeguard Children when making a decision about suspension.

Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step. The case manager must consider carefully whether the circumstances warrant suspension from contact with children at The Manor, or until the allegation is resolved. It should be considered only in cases where there is cause to suspect a child or other children at The Manor is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. If in doubt, the case manager should seek views from the HR Officer and the LADO, as well as the police and children's social care where they have been involved.

Where The Manor is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at a school or sixth form college, they should take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual must not carry out teaching work.

In many cases, an inquiry can be resolved quickly and without the need for suspension. The case manager will decide on whether the individual should continue to work at the school or college based on consultation with the LADO, who will provide relevant information they have received from the police or children's social care on whether they have any objections to the member of staff continuing to work during the investigation of the case. The case manager should be as inventive as possible to avoid suspension.

Based on advice from The Manor's HR Officer and/or a risk analysis drawn up with the LADO, the following alternatives should be considered by the case manager before suspending a member of staff:

- redeployment within the school or college so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the school or college so the individual does not have unsupervised access to children;

- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or where available, work for the local authority or academy trust.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false.

If immediate suspension is considered necessary, the case manager should record the rationale and justification for such a course of action. This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be given within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within The Manor and provided with their contact details

Children's social care or the police may give their view to the LADO but they cannot require the case manager to suspend a member of staff or a volunteer, although the case manager should give appropriate weight to their views. The power to suspend is vested in the Governing Board, who are the employers. However, where a strategy discussion, or initial assessment, concludes that there should be enquiries by the children's social care, and/or an investigation by the police, the LADO should canvass police and children's social care for views about whether the accused member of staff should be suspended from contact with children. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment about whether the person poses a risk of harm to children.

## **Supporting those involved**

### **Duty of care**

The welfare of a child is paramount and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. The Manor will offer appropriate welfare support at such a time and recognise the sensitivity of the situation. Information is confidential and will not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation

The Manor has a duty of care to our employees. We will:

- manage and minimise the stress caused by the allegation;
- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;
- advise the individual to contact their trade union representative, or a colleague for support;
- appoint a named representative to keep the person informed about progress of the case;
- provide access to counselling or medical advice where appropriate; and

- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence

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

- formally told about the allegation as soon as possible. The case manager should consult the LADO and where involved children's social care and/or the police on what information can be disclosed;
- kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member; and
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002.

### **Confidentiality and Information Sharing**

In an allegations management meeting or during the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible The Manor will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the school disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delaying the conclusion of their investigation or any court case.

Children's social care should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the The Manor without delay.

The Manor will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 amended the Education Act 2002, to introduce reporting restrictions. These provisions made it an offence (except in the limited circumstance expressly permitted by the legislation), for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation).

The reporting restrictions apply until:

- the point that the accused person is charged with a relevant offence; or
- the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation

The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a court lifts the reporting restrictions in response to a request to do so.

The legislation prevents the "publication" of material by any person that may lead to the identification of the teacher who is the subject of the allegation. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public." This means that a parent who, for

example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). In circumstances where The Manor needs to make parents aware about an allegation, the school will make parents and others aware that there are restrictions on publishing information.

The case manager will take advice from the LADO, police and children's social care to agree the following:

- who needs to know and exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

### **Allegation Outcomes**

The definitions that will be used when The Manor determines the outcome of an allegation are set out below:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Ultimately the options open to The Manor depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future. Suspension should not be the default position, an individual should be suspended only if there is no reasonable alternative.

If the allegation is substantiated and:

- the person is dismissed; resigns, or otherwise ceases to provide their services; or
- the The Manor ceases to use the person's services,

the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

In the case of a member of teaching staff, the case manager must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

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

### **Following a criminal investigation or a prosecution**

The police should inform the LADO and The Manor immediately when:

- a criminal investigation and any subsequent trial is complete;
- it is decided to close an investigation without charge; or,
- it is decided not to continue to prosecute after the person has been charged

In those circumstances, during the joint assessment meeting the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so,

how to proceed. The information provided by the police and/or children's social care should also inform that decision. The options will depend on the circumstances of the case and the consideration should take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

### **Returning to work**

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that, in discussion with the HR Officer and/or the LADO. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school or college.

### **Managing the situation and exit arrangements**

#### **Resignations and 'settlement agreements'**

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, should not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children. Such an agreement will not prevent a thorough police and/or school investigation where that is appropriate

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

Wherever possible, the accused should be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information available, should continue even if the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed. Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome should be made clear when providing references to prospective employers. This is

particularly important where the person moves into another position involving working with children.

It is not appropriate to reach a settlement/compromise agreement if the person subject to the allegation resigns or their services cease to be used. However, in limited circumstances The Manor may use settlement agreements to end the employment relationship on agreed terms, but not where there is an allegation that the individual poses a risk to children.

Where a settlement/compromise agreement is used, schools and colleges should not let it prevent the employer from:

- fulfilling their legal duty to refer cases to the DBS where the referral criteria are met. Non-compliance of this duty is a criminal offence; or
- providing a reference to potential employers when requested; or
- considering whether to make a referral to the Teaching Regulations Agency where the criteria are met.

### **Record Keeping**

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, the following information will be kept on the file of the person accused:

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

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time

Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

### **References**

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious will not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference. Substantiated allegations will be included in references, provided that the information is factual and does not include opinions.

### **Learning Lessons**

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to The Manor's procedures to help prevent similar events in the future. This should include issues arising from



any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual. For all other cases the case manager will consider the facts and determine whether any lessons can be learned and if improvements can be made.

### **Non Recent Allegations**

Where an adult makes an allegation to The Manor that they were abused as a child, the individual will be advised to report the allegation to the police. Non recent allegations made by a child will be reported to the LADO. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

## **2. LOW LEVEL CONCERNS**

The Manor's Low Level Concerns policy has been devised to create and embed a culture of openness, trust and transparency in which our values and expected behaviour as are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

### **What is a low level concern?**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in section one of this policy. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly with the Head or Chair of Governors as outlined above, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

The Manor aims to achieve the purpose of our low-level concerns policy by:

- ensuring that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empowering staff to share any low-level safeguarding concerns;

- addressing unprofessional behaviour and supporting individuals to correct it at an early stage;
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised; and
- helping identify any weakness in our safeguarding system.

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

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Head without delay. In the Head's absence or where the concern is in relation to the Head, staff should contact the Chair of Governors as soon as possible. Depending on the nature of some low-level concerns, the Head may wish to consult with the DSL and take a more collaborative decision making approach. Where concerns are raised about supply staff and contractors, the Head or Chair of Governors as appropriate will notify to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff are encouraged and to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards

### **Recording low-level concerns**

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible

These records will be kept confidential by the Head or Chair of Governors as appropriate. They will be held securely, in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed by the Head and/or Chair of Governor as appropriate so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Records will be retained at least until the individual leaves their employment.

### **References**

Part three of KCSIE 2023 is clear that schools and colleges should only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

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

If a low-level concern is raised (including by a third party), the Head or Chair of Governors as appropriate will collect as much evidence as possible by speaking:

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

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of will be recorded along with the rationale for their decisions and action taken. In Oxfordshire, the LADO recommends that schools should still call them about all low level concerns for advice; the Head, DSL or Chair of Governors will contact the LADO if low-level concerns in relation to safeguarding are raised.

### **3. COMMUNICATION WITH PARENTS/CARERS FOLLOWING AN ALLEGATION OR DISCLOSURE OF POSSIBLE ABUSE**

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: 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. All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work. There may be times where an individual's actions in their personal life come under scrutiny from the community, the media or public authorities, including with regard to their own children, or children or adults in the community. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. The Manor expects staff to adhere to Part 2 of the DfE's '[Teachers' Standards](#)' with regard to this point, which outline appropriate 'Personal and Professional Conduct'. Such behaviour may also result in prohibition from teaching by the Teaching Regulation Agency (TRA) a bar from engaging in regulated activity, or action by another relevant regulatory body.

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 to, 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 [Guidance for Staff to Promote Safer Working Practice for All Adults Who Work With Children and Young People' \(February 2022\)](#) (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 guidance 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. This guidance 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.

Staff must also note that the above guidance 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.'

The key principles of Oxfordshire's Safer Working Practice 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, the Staff Behaviour Policy or the 'Safer Working Practice' 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, the Head of Pre-Prep or the Director of Finance and Operations.

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, Deputy Head Pastoral or Head of Section of the school who will decide what to do next. Please read the School's Use of Reasonable Force and Positive Handling 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.

There is no expectation for staff to share their personal contact details with parents for the purposes of school-related matters.

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' \(February 2022\)](#). 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 staff can access in the 'All Policies' shared drive on Google. For other members of the school community, copies of this policy can be requested from the school office.

#### **(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 staff can access in the 'All Policies' shared drive on Google. For other members of the school community, copies of this policy can be requested from the school office.

#### **(m) Use of Personal Cameras and Devices**

For information on use of personal cameras and devices, please refer to Section 7 of this policy and our E-Safety and Acceptable Use Policy, which can be found on the school website [here](#). Staff can also access this policy 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 59 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 page 52 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](mailto:whistle@protect-advice.org.uk), website: <https://protect-advice.org.uk/>).
- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: [help@nspcc.org.uk](mailto: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 2023), 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, Head of Pre-Prep or the Director of Finance and Operations. If the person expressing the concern feels

unable to approach the Head, the Deputy Heads, Head of Pre-Prep, or the Director of Finance and Operations directly, then the Whistleblowing Governor, Siân Felwick, 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

<b>Whistleblowing Officer</b>	Alastair Thomas, Head - 01235 858460 / 07826 398855 <a href="mailto:head@manorprep.org">head@manorprep.org</a>
<b>Governor Responsible for Whistleblowing</b>	Siân Felwick <a href="mailto:sfelwick@manorprep.org">sfelwick@manorprep.org</a>
<b>Chair of Governors</b>	Shaun Forrestal, Chair of Governors - 07428 616799 <a href="mailto:sforrestal@manorprep.org">sforrestal@manorprep.org</a>
<b>Telephone Counselling (24hr)</b>	First Assist - 0800 912 0827 ( <i>please quote scheme verifier 71735</i> )
<b>Personal Counselling</b>	Fiona McNally - 07935 435550 <a href="mailto:willowtreepsychotherapy@outlook.com">willowtreepsychotherapy@outlook.com</a>
<b>Public Concern at Work</b> (Independent whistleblowing charity)	Helpline: 020 3117 2520 E-mail: <a href="mailto:whistle@protect-advice.org.uk">whistle@protect-advice.org.uk</a> Website: <a href="http://www.pcaw.org.uk">www.pcaw.org.uk</a>

### (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:

### **Employee Assistance**

Confidential and professional support, on problems such as:

- Workplace Issues
- Financial Concerns
- Marital and Relationship Difficulties
- Alcohol and Drug Misuse
- Family Worries
- Stress
- Bereavement
- Neighbour disputes
- Consumer disputes
- Motoring law
- Contracts
- Property disputes/contract issues

Call 0800 012 1473 and quote HA12155

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

### **Willow Tree Counselling and Psychotherapy**

It is possible for staff to use the counselling services provided by Willow Tree Counselling. The contact details for Fiona McNally at Willow Tree Counselling are:

[willowtreepsychotherapy@outlook.com](mailto:willowtreepsychotherapy@outlook.com)

[www.willowtreepsychotherapy.co.uk](http://www.willowtreepsychotherapy.co.uk)

07935 435550

## **SECTION TEN: LINKS TO OTHER POLICIES**

### **LINKS TO OTHER POLICIES**

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

1. Recruitment Policy
2. Anti-Bullying Policy
3. E-Safety and Acceptable Use Policy
4. Attendance Policy
5. Cyber-Bullying Policy (contained within E-Safety and Acceptable Use Policy)
6. Use of Reasonable Force and Positive Handling Policy
7. Health and Safety Policy (including Risk Assessment Policy)
8. Relationships, Health and Sex Education Policy
9. Mental Health and Wellbeing Policy
10. SEND/Learning Support Policy

## **SECTION ELEVEN: RECORD KEEPING, GOVERNORS' DUTIES IN RELATION TO SAFEGUARDING, REVIEWING AND MONITORING**

### **RECORD KEEPING**

All concerns, discussions, and decisions and the reasons for those decisions will be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school or college. These are recorded on the school CPOMS secure online Safeguarding platform (<https://themanorprepschool.cpoms.net>). 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 with his deputies, the Head and the Safeguarding Governor. .

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome

If in doubt about recording requirements, staff should discuss this with the Designated Safeguarding Lead (or a deputy).

### **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, Neglect lead and Designated Senior Mental Health Lead. 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 C 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 Head takes overall responsibility for safeguarding, ensuring the DSL and the DSL team are fulfilling their role. The Head undertakes training to the same level as the Designated Safeguarding Lead.

The Governing Board are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multiagency safeguarding arrangements.

Governors ensure they facilitate a whole school approach to safeguarding, assisting all staff in realising their own fundamental role in recognising that safeguarding is everyone's responsibility. This means ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at heart. Governors will ensure that where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide. They will ensure that systems are in place and are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The Governing Board ensures that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at The Manor are effective and support the delivery of a robust whole-school approach to safeguarding. The Deputy Head Pastoral, as Designated Safeguarding Lead, ensures that the Governors are provided with the relevant information detailing any suggested changes to the policy and procedures, training undertaken by staff and governors, and other relevant issues.

The Governors will undertake an annual review of the policy and procedures for Child Protection (in consultation with the Designated Safeguarding Lead) 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. Although all Governors are responsible for Safeguarding Children, the Governor with specific responsibility for this area is Mr Tom James. He receives additional training in Safeguarding from Oxfordshire Safeguarding Children Board so that he is well-placed to question and review school practice in this area. He is also the governor with particular responsibility for 'Prevent' duties. The Governor with special responsibility for Safeguarding meets with the DSL and his deputies regularly (at least twice a term) and also 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. His contact details are:

**Email:** [tjames@manorprep.org](mailto:tjames@manorprep.org)  
**Mobile Phone:** 07484 800277

The Governors consider carefully how children are taught about safeguarding, including online, through the curriculum and specifically Learning for Life (PSHEE/PSED) lessons. 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.

In line with Keeping Children Safe in Education (2023) and Working Together to Safeguard Children (2023), 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 Governors are fully aware of their duties in relation to safeguarding, which include having the following systems in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare:

- An effective child protection policy which:
  - reflects the whole school approach to child-on-child abuse;
  - reflects reporting systems as set out in KCSIE 2023;
  - describes procedures which are in accordance with government guidance;
  - refers to locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners;
  - includes policies as reflected in Part Two of KCSIE 2023, such as online safety and special educational needs and disabilities (SEND)

- is reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt; and  
– is available publicly either via the school website or by other means

- A **behaviour policy**, which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying). Further information can be found in the DfE Guidance, '[Behaviour in Schools](#)' (2022).
- A **staff behaviour policy** which should, amongst other things, include: acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media
- **Appropriate safeguarding arrangements** in place to respond to children who go missing from education, particularly on repeat occasions

These policies and procedures, along with Part One (or Annex A if appropriate) of this guidance and information regarding the role and identity of the Designated Safeguarding Lead (and deputies), will be provided to all staff on induction. Governors will take a proportionate risk-based approach to the level of information that is provided to temporary staff and volunteers.

In addition, Governors will ensure:

- **Child protection files** are maintained as set out in Annex C of KCSIE 2023;
- **Appropriate safer recruitment policies** in accordance with Part Three of KCSIE 2023 are in place; and
- Where reasonably possible, the school holds **more than one emergency contact number** for each pupil. This goes beyond the legal minimum. It is good practice to give the school additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. Further information can be found in the department's [School Attendance Guidance](#).
- The importance of information sharing between professionals and local agencies is understood by staff, 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
- All staff members (including volunteers) undergo safeguarding and child protection training at induction, that their training is regularly updated in line with advice from the LADO and that staff (including volunteers) receive child protection updates at least annually
- 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 Autumn Term.

## **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 via an annual online survey and on immediate basis where necessary.



## APPENDICES

1. [‘Keeping Children Safe in Education’ \(Sept 2023\)](#)
2. [‘Guidance on Code of Conduct for Employers, Staff and Volunteers working with Children and Young People’ \(February 2022\)](#)
3. [‘Safeguarding Disabled Children: Practice Guidance’\(2009\)](#)
4. [Oxfordshire multi-agency safeguarding arrangements for children \(January 2021\)](#)
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 \(2023\)](#)
10. [Oxfordshire Multi-Agency Thresholds of Need Matrix \(2021\)](#)

**JOB DESCRIPTION**

<b>Job Title:</b>	Designated Safeguarding Lead
<b>Department:</b>	
<b>Line Manager:</b>	Head and Governor Responsible for Safeguarding

NB: The Manor is aware that KSCIE (2023) 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.

<p><b>Job Description:</b></p> <p><b>AIMS</b></p> <ul style="list-style-type: none"> <li>● To operate as the named lead for Safeguarding (including Prevent duties)</li> <li>● To ensure that all statutory requirements are met including training and documentation</li> <li>● To identify and ensure a consistent and professional approach to safeguarding and Prevent within the named team at the school</li> <li>● To ensure clear demarcation and delegation with respect to other staff</li> <li>● To ensure there is positive representation in all meetings both within and beyond the school</li> <li>● To ensure there is effective liaison with stakeholders (governors, parents/carers, pupils and staff) on all matters relating to safeguarding and Prevent</li> </ul> <p>The DSL follows all the guidelines of the role of the Designated Safeguarding Lead as specified in KCSIE (Sept 2023) Annex C and by the Oxfordshire Education Safeguarding Advisory Team (ESAT), namely:</p> <p><b>Manage referrals</b></p> <p>The designated safeguarding lead is expected to:</p> <ul style="list-style-type: none"> <li>● Refer cases of suspected abuse and neglect to MASH and the police, where appropriate, in a timely manner avoiding any delays that could place the child at increased risk;</li> <li>● Identify any safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.</li> <li>● Refer to the <a href="#">Oxfordshire Threshold of Needs</a> to assist with decision making.</li> <li>● To the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;</li> <li>● Where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;</li> <li>● Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding, including contextual safeguarding.</li> <li>● Have responsibility to ensure there is at least one key adult for ‘Operation Encompass’* and a point of contact for Child Exploitation. *Guiding principles of the scheme are here <a href="https://www.operationencompass.org/school-participation">https://www.operationencompass.org/school-participation</a>. An annual information letter must be sent to parents.</li> <li>● To ensure that the Local Authority are notified if children are persistently absent or <a href="#">missing from education</a></li> </ul>
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## Working with others

- Act as a source of support, advice and expertise for all staff;
- Act as a point of contact with the safeguarding partners;
- Liaise with the Head to inform him of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#);
- As required, liaise with the “case manager” (as per Part 4 of KCSIE 2022) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, mental health leads and the special educational needs co-ordinator (SENCO) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically;
- Act as the Senior Mental Health Lead and liaise with the School Nurse where safeguarding concerns are linked to mental health;
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- Work with the Head and relevant strategic leads, taking responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school. This includes:
  - ensure that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
  - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes

## Information sharing and managing the child protection file

- The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. They should maintain a chronology of significant incidents for each child with safeguarding concerns, including a record of decisions made and the reasons for those decisions.
- Information should be kept confidential and stored securely, and kept separate from the child’s educational record. The designated safeguarding lead will keep concerns and referrals in a separate child protection file for each child on CPOMS.

Records will include:

- ❖ a clear and comprehensive summary of the concern;
  - ❖ details of how the concern was followed up and resolved;
  - ❖ a note of any action taken, decisions reached and the outcome.
- They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

- Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. 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.
- Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### **Raising awareness**

The designated safeguarding lead should:

- Ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work the Governing Board 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 or college in this;
- 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; and,
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

### **Training, knowledge and skills**

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. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, 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 referral 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;

- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the 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. This includes understanding the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and ensuring staff are aware of these
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND 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 or college may put in place to protect them.

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 allow them to understand and keep up with any developments relevant to their role.

### **Providing support to staff**

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes. The school will have a framework for providing an opportunity for staff who are working directly with vulnerable young people to have regular access to an appropriate manager to talk through and reflect on their involvement with the case; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

The DSL will ensure all staff undertake appropriate annual updates in order to:

- be able to recognise signs of abuse and how to respond to them, including special circumstances such as child exploitation, female genital mutilation, fabricated or induced illness
- understand the assessment process for providing early help and intervention e.g. OSCB thresholds of need, preventative education and the local offer
- have a working knowledge of how the local authority conducts initial and review child protection (CP) case conferences and contribute effectively to these

- be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers, young carers, those who are privately fostered, vulnerable to exploitation, radicalisation and subject to listening to or hearing domestic abuse
- Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them
- Ensure each member of staff has read and understood the school's safeguarding policy and procedures, including providing induction on these matters to new staff members. Induction and training must include the school's behaviour policy and the school's procedures for managing children who are absent from education, as well as the staff code of conduct, the child protection policy, responsibilities in relation to filtering and monitoring in relation to ICT and dealing with disclosures and managing allegation processes.
- Organise face-to-face whole-school Safeguarding training for all staff members at least every three years.

#### **Awareness raising:**

- Ensure our school's child protection policies are known, understood and used appropriately
- Ensure our school's safeguarding policy is reviewed annually (as a minimum) and the procedures are updated and reviewed regularly
- Ensure our safeguarding policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of the school or college in this.
- Ensure that all staff are aware of the school's policy on ICT and understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

#### **Understanding the views of children**

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

#### **Quality assurance:**

- Monitor the implementation of and compliance with policy and procedures, including periodic audits of Safeguarding files (at a minimum once a year).
- Complete the 175/157 annual safeguarding report and submit to the Local Authority
- Provide regular reports to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.
- Take lead responsibility for remedying any deficiencies and weaknesses identified in Safeguarding arrangements.

#### **Holding and sharing information**

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE 2023, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping

#### **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, 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.



# 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.

- 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 on 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. 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.

VISITOR'S NAME.....

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

FIRE PROCEDURES ISSUED.....

VISITING WHOM.....

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

## APPENDIX 8

### SAFEGUARDING AND PREVENT CONTACT DETAILS

#### ANY CONCERNS? FOLLOW THE SAFEGUARDING POLICY

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

Login to **CPOMS** to record your concern in writing - <https://themanorprepschool.cpoms.net>

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

<b>TO REPORT A NEW CONCERN ABOUT A CHILD (INCLUDING RADICALISATION):</b> Oxfordshire's Multi-Agency Safeguarding Hub (MASH)	0345 0507666 <a href="https://www.oxfordshire.gov.uk/business/information-providers/multi-agency-safeguarding-hub">https://www.oxfordshire.gov.uk/business/information-providers/multi-agency-safeguarding-hub</a>
<b>TO TALK ABOUT AN ONGOING CONCERN:</b> Children's Social Care Team, South Emergency Duty Team	01865 323041 0800 833408
<b>IF YOU ARE UNSURE WHETHER TO MAKE A REFERRAL:</b> LCSS (Local Community Support Service, South) Request a 'no names' consultation	0345 050 7666 <a href="mailto:LCSS.South@oxfordshire.gov.uk">LCSS.South@oxfordshire.gov.uk</a>
<b>TO REPORT CONCERNS ABOUT CHILD SEXUAL EXPLOITATION:</b> Kingfisher Team	01865 309196
<b>TO REPORT CONCERNS ABOUT A PROFESSIONAL OR PERSON IN A POSITION OF TRUST:</b> LADO (Local Authority Designated Officer) for Oxfordshire	01865 810603 <a href="mailto:lado.safeguardingchildren@oxfordshire.gov.uk">lado.safeguardingchildren@oxfordshire.gov.uk</a>
Police	999 – Emergency (children at immediate risk) 101 – Non-emergency enquiries
Ofsted - Concerns	0300 123 4666
NSPCC - Child Protection Helpline	0808 800 5000 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
CEOP (Child Exploitation and Online Protection)	<a href="https://www.ceop.police.uk/">https://www.ceop.police.uk/</a> <a href="http://www.thinkuknow.co.uk">www.thinkuknow.co.uk</a>
DBS (Disclosure and Barring Service)	03000 200 190 <a href="mailto:customerservices@dbb.gov.uk">customerservices@dbb.gov.uk</a>
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 <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>
OSCB (Oxfordshire Safeguarding Children Board) – Access website for local procedure concerning all aspects of safeguarding, including 'Prevent'.	01865 815843 <a href="mailto:oscb@oxfordshire.gov.uk">oscb@oxfordshire.gov.uk</a> <a href="http://www.oscb.org.uk">www.oscb.org.uk</a>