

## SAFEGUARDING POLICY

Date policy reviewed:	1 September 2025
Date of next review:	1 September 2026
Person(s) responsible for review:	SLT (DH Pastoral)

The Manor recognises its responsibility for safeguarding and child protection. This policy is based on the 'Child Protection and Safeguarding Policy for Educational Establishments' provided to Oxfordshire schools by the Education Safeguarding Advisory Team (Oxfordshire County Council). This policy is also based on guidance from 'Keeping Children Safe in Education' (2025) and 'Working Together to Safeguard Children' (2023). It will be reviewed and updated at least annually and/or following any updates to national and local guidance and procedures.

## **CONTENTS**

Section	Content	Page
1	Introduction	
2	Legal Framework	
3	Roles and Responsibilities	
4	Supporting Children	
5	Children with Special Educational Needs and Disabilities	
6	Procedures for dealing with a concern and record keeping	7
7	Concerns and Allegations about staff	9
8	Information Sharing	9
9	Multi Agency Working	10
10	Safer Recruitment	10
11	Training	11
12	Whistleblowing in a Safeguarding Context	11
13	Site Security	12
14	Use of mobile phones, cameras and other electronic devices with imaging and sharing capabilities	12
15	Use of school premises for non-school activities	13
16	Quality Assurance	13
17	Policy Review	13

APPENDICES		
APPENDIX A: Child on Child Abuse Policy	14	
APPENDIX B: The role of the Designated Safeguarding Lead		
Managing Referrals	20	
Record Keeping		
Multi Agency Working and Information Sharing		
Raising Awareness		
Training Knowledge and skills		
Quality Assurance	21	
Support for Staff	21	
APPENDIX C: Policy on children who are absent from or missing	22	
education, including children who run away	25	
APPENDIX D: Safeguarding Definitions Safeguarding Definitions	25 25	
Categories of Abuse	26	
APPENDIX E: Specific forms of abuse and safeguarding issues	28	
Child abduction and community safety incidents	28	
Child sexual exploitation and child criminal exploitation	28	
County Lines	28	
Children and the court system	29	
Children who are absent form education	29	
Children with family members in prison	29	
Online Safety, Remote Learning, Cybercrime and Filtering & Monitoring	30	
Cybercrime		
Filtering and monitoring		
Domestic abuse		
Operation Encompass		
Homelessness	32 32	
Mental Health		
Modern slavery and the National Referral Mechanism	33	
Preventing radicalisation	33	
Channel	34 35	
Sexual Harassment, Violence, Harmful Sexual Behaviours		
So- called 'honour' – based abuse (including female genital mutilation and	37	
forced marriage)	38	
APPENDIX F: Further Information		
Concerns and Allegations about Staff including Supply staff, Volunteers		
and Contractors	39	
Pre-Appointment Checks and Safer Recruitment		
APPENDIX G: Safeguarding and Prevent Contact Details Poster		

Key Personnel	Name(s)	Contact details
Designated	Mr Varun Footring	01235 858480
Safeguarding Lead		07904 951265
(DSL), including		vfootring@manorprep.org
Prevent, Neglect		
and Mental Health		
Lead		
Deputy DSLs	Mrs Pippa	01235 858485
	McConnell	07552 848843
	(Designated	pmcconnell@manorprep.org
	Safeguarding	
	Lead for EYFS)	
		01235 858453
	Mr Neil Jackson	07435 987404
		njackson@manorprep.org
Deputy DSLs for	Miss Beth Davis	01235 858485
'Manor Fun'	Mr Harrison Read	bdavis@manorprep.org
Holiday Club	Mr Richard	hread@maonrprep.org
	Valentine	rvalentine@manorprep.org
Head	Mrs Rachel	01235 858460
	Hamlyn	07793 769863
		head@manorprep.org
Nominated	Mr Mark Skidmore	07590 059551
Safeguarding		mskidmore@manorprep.org
Governor		
Chair of Governors	Peter Dickson	07867 375295
		pdickson@manorprep.org
Local Authority	Jo Lloyd	01865 810603
Designated Officer	Sandra Barratt	
(LADO)	Amie Pilcher	<u>Lado.safeguardingchildren@oxfordshire.gov.uk</u>
Education	Jo Lloyd	01865 810603
Safeguarding	Becky Langstone	ESAT.safeguardingchildren@oxfordshire.gov.uk
Advisory Team	Sophie Kendall	
(ESAT)	E 147 II	F W II 00 ( ) 11:
Locality Community	Emma Walker	Emma.Walker@Oxfordshire.gov.uk
Support Service		
(LCSS) worker		0045 050 7000
Multi Agency		0345 050 7666
Safeguarding Hub		
(MASH)		0000 000 100
Emergency Duty		0800 833408
Team (EDT)		404 :
Police		101 or in emergencies 999

#### 1. INTRODUCTION

- 1.1. It is essential that everybody working at The Manor understands their safeguarding responsibilities. Everyone who comes into contact with children and families has a role to play in ensuring children and young people are safe from abuse, neglect, exploitation, and harm. The Manor is committed to safeguarding children and aims to create a culture of vigilance. All staff should ensure that any decisions made are in the best interests of the child.
- 1.2. Our pupils' welfare is our paramount concern. The Governing Board will ensure that The Manor safeguards and promotes the welfare of pupils and works together with agencies to ensure that we have adequate arrangements to identify, assess and support those children who are likely to suffer or are suffering abuse, harm or neglect. <a href="https://www.oscp.org.uk/concerned-about-a-child/">https://www.oscp.org.uk/concerned-about-a-child/</a>
- 1.3. This policy provides the basis for good practice within the school for Safeguarding work. It should be read in conjunction with the <a href="Keeping Children Safe">Keeping Children Safe</a> in <a href="Education (2025">EYFS</a>
  <a href="Statutory Framework for Group and School-Based Providers (2025)</a>, the <a href="Oxfordshire Safeguarding Children's Safeguarding procedures">Oxfordshire Safeguarding Children's Safeguarding procedures</a>, as well as the safeguarding appendices within this policy. These are in keeping with relevant national procedures and reflect what the partnership considers to be safe and professional practice in this context.
- 1.4. This policy applies to all members of staff in our school, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers. The arrangements in this policy also apply to all aspects of The Manor's out of school care and holiday activities (Manor Fun).

#### 2. THE LEGAL FRAMEWORK

2.1. This policy and the accompanying procedures have been developed in accordance with the following statutory guidance and local safeguarding procedures:

Working Together to Safeguard Children 2023: A guide to multi-agency working to help, protect and promote the welfare of children, December 2023

<u>Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2025</u>

EYFS Statutory Framework for Group and School-Based Providers, September 2025

#### 3. ROLES AND RESPONSIBILITIES

3.1. The Manor's **Designated Safeguarding Lead (DSL)** has overall designated responsibility for safeguarding and ensures there is always appropriate cover for this role. The responsibilities of all Designated Safeguarding Leads are described in detail in Appendix B.

- 3.2. The **Governing Board** is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.
- 3.3. All staff members, governors, volunteers and external providers know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child.
- 3.4. The Manor acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents.
- 3.5. The school and Governing Board takes all reasonable action to limit children's exposure to the risks from the school's IT system, ensuring the school has appropriate filters and monitoring systems in place and regular reviews of their effectiveness.

#### 4. SUPPORTING CHILDREN

- 4.1. Our school will support all pupils by:
  - ensuring the content of the curriculum includes social and emotional aspects of learning through Learning for Life (including RSHE) and other curriculum contexts and ensuring that pupils are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it'.
  - ensuring a comprehensive curriculum response to online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly. Please refer to our Online Safety Policy for further information.
  - encouraging pupils to talk about feelings and ensuring they are listened to by a range of appropriate adults.
  - supporting children to feel safe, develop confidence and independence and increase the development of self-esteem and self-assertiveness and responding to concerns of aggression or bullying.
  - liaising and working together with other support services and those agencies involved in safeguarding children, including Early Help (<u>via the Strengths and Needs and Team</u> <u>Around the Family process</u>) and preventative services as required in Working Together to Safeguarding Children (2023)
  - considering intra-familial harms and any necessary support for siblings.
  - having a Behaviour Policy that is aimed at supporting vulnerable pupils in the school. The Manor's Behaviour, Discipline and Exclusions Policy, Anti-Bullying Policy and Online Safety and Acceptable Use Policy outline measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.

- having clear procedures in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence, and sexual harassment (which could take place on or off-line). Please see Appendix A for further information.
- acknowledging the importance of 'contextual safeguarding', which considers wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare.
- alerting the local authority if it is aware of any child being looked after under a Private Fostering arrangement. On admission to school, and at other times, the school will be vigilant in identifying any private fostering arrangement.
- acknowledging that a child that is looked after ('Children We Care For'), in kinship care
  or has been previously looked after by the Local Authority potentially remains vulnerable,
  and ensuring that all staff have the skills, knowledge and understanding to support these
  children.
- taking positive action, where it can be shown that it is proportionate, to deal with
  disadvantages affecting pupils with certain protected characteristics in order to meet their
  specific needs. For example, taking positive action to support girls if there was evidence
  that they were being subjected to sexual violence or sexual harassment. This includes
  making reasonable adjustments for disabled children and those identified as having special
  educational needs.
- acknowledging that a child being lesbian, gay or bisexual can sometimes be targeted by other children.
- offering support to children that are gender questioning with consideration to their individual needs, in partnership with their parents and any clinical advice
- Being aware that where a school places a pupil with an alternative provision provider, it
  continues to be responsible for the safeguarding of that pupil and should be satisfied that the
  placement meets the pupil's needs. The school will follow <u>DfE guidance on Alternative</u>
  <u>Educational Provision</u>.

## 5. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

- 5.1. 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).
- 5.2. 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.
- 5.3. 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.
- 5.4. 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.
- NSPCC Safeguarding children with special educational needs and disabilities
   (SEND) and
   NSPCC Safeguarding child protection/deaf and disabled children and young
   people

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

- 6.1. If a member of staff has a concern about a child or if a child tells them they are being, or at risk of being, abused, exploited or neglected, staff will appropriately respond by listening and offering reassurance. Staff should:
  - 1. Make an accurate factual record as soon as possible including details of:
    - Dates and times of their observations/incident
    - Dates and times of any discussions in which they were involved
    - Any injuries
    - Explanations given by the child/adult
    - What action was taken
    - Any actual words or phrases used by the child

Concerns are logged and kept on CPOMS (Child Protection Online Monitoring System), which can be accessed here: https://login.cpoms.net/. Staff should click

Add Incident' and then type their account, which will be automatically sent to the DSL, DDSLs and Head. If you do not have access to CPOMS, separate 'Record of Concern' forms are available and can be provided to you by a member of the Safeguarding Team.

- 2. Listen to the wishes and feelings of the child, do not make any promises but keep the child informed (age appropriate) of the action that will be taken.
- 3. Report it to the DSL or a DDSL.
- 4. Where necessary, the DSL will liaise with the School Nurse to consider if there is a requirement for immediate medical intervention; however, urgent medical attention should not be delayed if these staff are not immediately available.
- 5. In the absence of the DSL or DDSL due to unforeseen circumstances, staff will refer directly to MASH or the child's social worker (if applicable) and the police (if appropriate) if there is a significant concern.
- 6. The DSL or DDSL will review the evidence and decide whether there are sufficient grounds for suspecting significant harm, referring to Oxfordshire's <u>Threshold of Needs</u>. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm, the DSL or DDSL must make a referral to Children's Social Care via MASH or the social worker (if applicable) and the police (if appropriate) immediately.
  - Where a pupil needs urgent medical attention and there is suspicion of parental abuse causing the medical need, the DSL or DDSL should seek immediate advice from the MASH about informing the parents, remembering that parents should normally be informed if a child requires urgent medical 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.
- 7. If there is not considered to be a risk of significant harm, the DSL or DDSL 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.
- 6.2. The DSL or DDSL will ensure any decisions and justifications for those decisions will be recorded in writing on CPOMS, with clear outcomes documented following any action taken.
- 6.3. The DSL, DDSL or most appropriate member of staff will discuss any concerns we have with the child's parents. There may be occasions when this is not appropriate, and if so, school staff would consult with other agencies prior to involving parents. We will record any decision not to discuss with parents and why.
- 6.4. Safeguarding records are kept for individual children on CPOMS and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe

and secure. See ICO guidance 'For Organisations' which includes information about your obligations and how to comply, including protecting Personal information and providing access to official information.

- 6.5. All safeguarding records will be transferred in accordance with GDPR/KCSIE to the child's receiving school/setting within 5 school days.
- 6.6. The Head will be kept informed of any significant concerns by the DSL, and all other staff are informed on a need-to-know basis.
- 6.7. Please note that the above procedures also apply if a child discloses non-recent abuse.

# 7. CONCERNS AND ALLEGATIONS ABOUT STAFF – For further details please refer to Appendix D

- 7.1. All staff understand the processes and procedures to manage any safeguarding concern or allegation (no matter how small) about staff members (including supply staff, volunteers and contractors).
- 7.2. If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, volunteers and contractors), then this should be referred to the Head or the Deputy Head Pastoral in their absence. Allegations about the Head should be referred to the Chair of Governors. The Head, Deputy Head Pastoral or Chair of Governors will then consult with the LADO.
- 7.3. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold as outlined in Appendix D, then this should still be shared with the Head (or Deputy Head Pastoral in their absence) or Chair of Governors in accordance with The Manor's Allegation Management and Low-Level Concerns Policy.
- 7.4. Please note that the above procedures also apply if an allegation relates to non-recent abuse. All staff should be aware that abuse can be reported no matter how long ago it happened. Please refer to The Manor's Allegation Management and Low-Level Concerns Policy for further information.

#### 8. INFORMATION SHARING

- 8.1. We recognise that all matters relating to safeguarding are confidential.
- 8.2. All staff members have a professional responsibility to share information with other agencies to safeguard children.
- 8.3. All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing to safeguard and promote children's welfare.
- 8.4. We will ensure that staff members are confident about what they can and should do according to the law, including how to obtain consent to share information and when information can be shared without consent.

8.5. Staff should not assume a colleague or another professional will act to share information that might be critical in keeping children safe.

#### 9. MULTI AGENCY WORKING

- 9.1. 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.
- 9.2. We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.
- 9.3. We will participate in Child Safeguarding Practice Reviews (CSPRs), other reviews and file audits as and when required to do so by the Oxfordshire Safeguarding Children's Partnership. We will ensure that we have a clear process for gathering the evidence required for reviews and audits and embed recommendations into practice and complete required actions within agreed timescales.

# 10. SAFER RECRUITMENT Please read in conjunction with The Manor's Recruitment and Selection Policy

- 10.1. The Manor is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
- 10.2. The governing board and Senior Leadership Team are responsible for ensuring that the school follows the safer recruitment processes outlined within Keeping Children Safe in Education (2025).
- 10.3. The Manor maintains an accurate Single Central Record (SCR), in line with statutory guidance. This is monitored and reviewed on at least a termly basis to ensure compliance by the governing board and the Head.
- 10.4. The governing board will ensure that at least one person on every recruitment panel has completed Safer Recruitment training.
- 10.5. The Manor is committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2018 and related obligations under the Childcare Act 2006 in schools.
- 10.6. 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. The school will require that employees and volunteers provided by these organisations use The Manor's procedures to report concerns.
- 10.7. We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with Keeping Children Safe in Education (2025). If assurance is not obtained, permission to work with our children or use our school premises may be refused.

- 10.8. When we commission services from other organisations, we ensure that compliance with our policies and procedures is a contractual requirement.
- 10.9. We advise all staff to disclose any reason that may affect their suitability to work with children that could be a transferable risk to their role.

#### 11. TRAINING

- 11.1. All staff in our school receive appropriate safeguarding training at induction in line with the requirements in KCSIE (2025), which is updated at least annually, and all staff are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately.
- 11.2. Our DSL undergoes training to provide them with the knowledge and skills required to carry out their role. Our DSL, DDSLs, the Head and the Safeguarding Governor refresh their DSL training every 2 years.
- 11.3. Safeguarding training is provided to all new staff on appointment as part of their induction process including online safety which, amongst other things, includes an understanding of the expectations and applicable roles and responsibilities in relation to filtering and monitoring. This information will be regularly updated.
- 11.4. The Governing Board will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in are effective and support the delivery of a robust whole school approach to safeguarding. The training will be regularly updated.
- 11.5. We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work.
- 11.6. The Designated Safeguarding Lead will update school staff and volunteers on any changes to safeguarding legislation and procedures and relevant learning from Child Safeguarding Practice Reviews (CSPRs) in line with Working Together to Safeguard Children (2023). These updates will occur annually or more frequently when necessary and will include safeguarding and child protection updates such as online safety (for example, via emails, e-bulletins and staff meetings), to provide them with the skills and knowledge to continue to safeguard children effectively.
- 11.7. The school will maintain accurate and up to date records of staff induction and training.

#### 12. WHISTLEBLOWING IN A SAFEGUARDING CONTEXT

12.1. Whilst The Manor has a separate Whistleblowing Policy, this is a summary that outlines the process when there is a concern about poor or unsafe practice and potential failures in the school's safeguarding provision. This does not replace the Whistleblowing Policy and should be read in conjunction with the school policy.

- 12.2. Whistleblowing is a term that is used where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed. All staff and volunteers should feel able to raise concerns and know they will be taken seriously by the Senior Leadership Team.
- 12.3. Whistleblowing concerns should be raised with a member of The Manor's Senior Executive Team. If the person expressing the concern feels unable to approach these staff directly or if you feel your concern is not being dealt with, then the Whistleblowing Governor, Siân Felwick, should be the first point of contact (sfelwick@manorprep.org).
- 12.4. If the concern is about the Head, this should be raised with the Chair of Governors.
- 12.5. As outlined in the Whistleblowing Policy, any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued.
- 12.6. If you would prefer to raise your concerns outside of the school or you feel that your genuine concerns are not being addressed, then you are able to contact other whistleblowing channels such as:
  - Protect, an independent whistleblowing charity (helpline: 020 3117 2502, email: whistle@protect-advice.org.uk, website: <a href="https://protect-advice.org.uk/">https://protect-advice.org.uk/</a>).
  - The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>)

### 13. SITE SECURITY

- 13.1. All staff members have a responsibility to ensure our buildings and grounds are safe; this includes ensuring the safety of any visitors to the school. The Manor ensures that thorough risk assessments are in place for all areas of the school, including for planned activities with associated risks.
- 13.2. The school will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site. Concerns of this nature should be referred to a member of the Senior Leadership Team immediately.
- 13.3. Further information can be found in The Manor's Risk Assessment Policy, Security Policy and Lockdown Policy.

# 14. USE OF MOBILE PHONES, CAMERAS AND OTHER ELECTRONIC DEVICES WITH IMAGING AND SHARING CAPABILITIES

14.1. The Manor are aware of our duty under the EYFS Statutory Framework (2025) to reference in our Safeguarding Policy how mobile phones, cameras and other electronic devices with imaging and sharing capabilities are used in our setting. Please refer to

Sections 10 and 11 of The Manor's Online Safety and Acceptable Use Policy for further information on this subject.

#### 15. USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

15.1. When hiring or renting out The Manor's facilities to organisations for the purposes of working with children, The Manor will 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. We will also ensure that safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use of the premises; and that failure to comply with this would lead to termination of the agreement. The DfE guidance on 'After-school clubs, community activities and tuition: safeguarding guidance for providers' details the safeguarding arrangements that The Manor expects these providers to have in place, in line with Keeping Children Safe in Education (2025)

## 16. QUALITY ASSURANCE

- 16.1. We will ensure that systems are in place to monitor the implementation of, and compliance with, this policy and accompanying procedures. The Safeguarding Team at The Manor meet on a weekly basis and a review meeting takes place between the DSL and the Safeguarding Governor on at least a termly basis. Safeguarding is also reviewed at Governor level at the termly Education and Welfare Committee and Full Board meetings. The DSL and the Head also meet on a weekly basis to review matters relating to safeguarding and pastoral care at The Manor.
- 16.2. The Manor's Senior Leadership Team and the Governing Board will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.
- 16.3. The Manor is aware that the Charity Commission must be informed if there are any serious incidents or concerns in the area of safeguarding.

#### 17. POLICY REVIEW

- 17.1. This policy will be reviewed at least annually and will be ratified by the Governing Board. All other linked policies will be reviewed in line with The Manor's policy review cycle.
- 17.2. The Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures.
- 17.3. Additional updates to the Safeguarding Policy and appendices will take place when needed.

#### APPENDIX A: CHILD ON CHILD ABUSE POLICY

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

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 6 of this policy.

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. 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.

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. 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 of 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 safety lessons in Computing and Learning for Life (PSHEE/PSED)
- 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 (2025) 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 (2025).
- 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).

# 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, in line with Section 6 of this policy. 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.

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, consulting with external agencies as appropriate.

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 school 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.

What support children require depends on the individual child. For example, 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 a Strengths and Needs (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 practice (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 harassment:

Part Five of the statutory guidance in KCSIE (2025) sets out how our school will manage reports of child on child sexual violence and harassment. This document is read and understood by the DSL and DDSLs and referred to as needed.

If a report is made, the Designated Safeguarding Lead or a deputy will lead how the report is dealt with. This will be in liaison with the Head. 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 in KCSIE 2025). Other allegations will be managed within the school and/or with support from children's social care providers.

The guidance sets 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

# 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, the Head 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.

#### APPENDIX B: THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD

## Managing referrals:

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

## Record keeping:

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

## Multi-agency working and information sharing:

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

## Raising awareness:

The Designated Safeguarding Lead should:

- Ensure each member of staff has access to, and understands, The Manor's Safeguarding Policy and procedures, and that training is regularly updated and at least annually.
- Ensure The Manor's Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Board regarding this.
- Ensure the Safeguarding Policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school in this process
- Link with the safeguarding partnership arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- Help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.
- Encourage a culture of listening to children and taking account of their wishes and feelings in any action the school takes to protect them. The Manor utilises counsellors, questionnaires, worry boxes, 1:1 check-ins with Form Teachers, Heads of Section and the Deputy Head Pastoral, and other systems to ensure children's voices are heard. Further information can be found in The Manor's Mental Health and Wellbeing Policy.

## **Training:**

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

## **Quality assurance:**

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

## **Support for staff:**

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

# APPENDIX C: POLICY ON CHILDREN WHO ARE ABSENT FROM OR MISSING EDUCATION, INCLUDING CHILDREN WHO RUN AWAY

Please also refer to The Manor's Attendance Policy.

#### 1. COMMITMENT TO FULL TIME EDUCATION

All children, regardless of background or circumstances, are entitled to a full-time education that is suitable to their age, ability, aptitude, and any special educational needs they may have. The Manor is committed to ensuring that no child is denied access to appropriate education and complies fully with all statutory requirements regarding school attendance and admissions.

Local authorities have a duty to identify children of compulsory school age who are missing education in their area. The Manor actively supports this duty through close monitoring of pupil attendance and timely reporting.

The Manor complies with its duties as outlined in the DfE guidance, <u>'Children Missing Education' (2024)</u>, and the 'School's Responsibilities' with regard to Admissions and Attendance Registers.

## 2. SAFEGUARDING AND CHILDREN MISSING EDUCATION

Absence from school, particularly prolonged or repeated absence, may signal a range of safeguarding concerns. These include, but are not limited to:

- Neglect
- Child sexual and criminal exploitation (including county lines)
- Mental health issues
- Substance misuse
- Travel to conflict zones
- Female Genital Mutilation (FGM)
- Honour-based abuse
- Forced marriage

Staff are trained to be alert to these risks and to respond appropriately when children are persistently absent or missing from education.

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.

The Manor recognises that early intervention is essential in identifying and addressing these risks.

#### 3. PROCEDURES FOR ABSENCE AND MISSING PUPILS

The Manor maintains robust safeguarding responses for children who go missing from education, especially those who are repeatedly absent, to help prevent the risk of them going missing again in the future. The Manor's procedures for monitoring and supporting positive attendance are outlined in the Attendance Policy. We will also support in cases where children are known to local authority children's social care and have a social worker (such as children on a child in need or child protection plan, or looked after children), where going missing from education may increase known safeguarding risks within the family or in the community.

When a child is absent from school, the procedures in the Attendance Policy will be followed.

If a child runs away or goes missing during the school day, The Manor will:

- Follow the 'Lost or Uncollected Child Procedure'
- Notify parents and the relevant local authority, including the police if appropriate
- Consult the Oxfordshire Children's Social Care Team for guidance

These procedures are aimed at preventing further episodes and addressing underlying concerns.

Additionally, The Manor must report any pupil who fails to attend regularly or has been absent without authorisation for 10 consecutive school days or more to the local authority. Whilst our duty is to report after 10 consecutive days, The Manor will report any circumstances of concern as soon as possible to either the County Attendance Team, Children Missing Education Team and/or Children's Social Care as appropriate.

Where there are any other concerns about a pupil's attendance which are not improving through internal support, The Manor liaises with the County Attendance Team and makes referrals as necessary to provide early help to the child and family.

## 4. ATTENDANCE MONITORING AND RECORD KEEPING

The Manor adheres to statutory requirements by maintaining both an admission register and an attendance register for all pupils. Please refer to our Attendance Policy for further information.

## 5. REPORTING DUTIES TO THE LOCAL AUTHORITY WHEN A PUPIL IS REMOVED FROM ROLL

The Manor complies with its legal obligation to inform the local authority when a pupil is removed from the admissions register at a non-standard transition time.

The local authority is notified 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.

When a pupil leaves The Manor, The Manor confirms with their next school that they have started attending. If confirmation cannot be obtained, the local authority Children Missing Education Team is informed to ensure the child is not missing education.

#### 7. OVERSIGHT AND GOVERNANCE

The Designated Safeguarding Lead (DSL), who is also the Senior Attendance Champion, monitors attendance and reports regularly to the Head, the Safeguarding Governor, the Education and Welfare Committee, and the Full Governing Board. Governors review attendance trends and ensure staff are appropriately trained to manage attendance and identify safeguarding concerns related to persistent absence.

## 8. SUPPORTING GUIDANCE

The Manor follows all relevant government guidance, including:

- DfE statutory 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.

#### APPENDIX D: SAFEGUARDING DEFINITIONS

- Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by
  inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in
  an institutional or community setting by those known to them or, more rarely, by others (e.g.
  via the internet). They may be abused by an adult or adults or another child or children.
- Children are any people who have not yet reached their 18<sup>th</sup> birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSiE applies to providers of post 16 education as set out in the Education and Training (Welfare of Children) Act 2021.
- **Early Help** is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children rather than reacting later. It is particularly important that the Designated Safeguarding Lead (and their deputies) know what the local early help process is and how and where to access support.
- Safeguarding and promoting the welfare of children is defined as:
  - Providing help and support to meet the needs of children as soon as problems emerge.
  - Protecting children from maltreatment, whether that is within or outside the home, including online.
  - Preventing impairment of children's mental and physical health or development.
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
  - Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the child.
  - Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.
- Significant harm is the threshold that justifies compulsory intervention in the family in the
  best interests of the child. Section 47 of the Children Act 1989 states 'where the question of
  whether harm suffered by a child is significant turns on the child's health or development; his
  health or development shall be compared with that which could reasonably be expected of a
  similar child.'
- **Vulnerable children:** Any child may benefit from Early Help, but all school and college staff should be particularly alert to the potential need for early help for a child who:
  - is disabled or has certain health conditions and has specific additional needs
  - has special educational needs (whether or not they have a statutory Education, Health and Care plan)
  - has a mental health need
  - is a young carer
  - is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines

- is frequently absent from education, missing/goes missing from home, or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and is in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

## Further information about Early Help can be found here:

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

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

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

#### It may feature:

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

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

- Neglect is the persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, it may involve a parent failing to:
  - provide adequate food, clothing and shelter, including exclusion from home or abandonment
  - protect a child from physical and emotional harm or danger
  - ensure adequate supervision, including the use of inadequate care givers
  - · ensure access to appropriate medical care or treatment

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

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

#### APPENDIX E: SPECIFIC FORMS OF ABUSE AND SAFEGUARDING ISSUES

Appendix E contains important additional information about specific forms of abuse and safeguarding issues for our staff awareness and is in line with Keeping Children Safe in Education (2025).

#### Child abduction and community safety incidents

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

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

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

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

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

The DfE provide further guidance here: <u>Child sexual exploitation: guide for practitioners</u>
A full list of indicators can be found here: <u>Child Sexual Exploitation - Oxfordshire Safeguarding Children Partnership</u>

### **County Lines**

Is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines.' They exploit children and vulnerable adults to move the drugs and

money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence and weapons, including knives, corrosives and firearms. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery and missing persons and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

## Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children: <u>5-11-year olds</u> and <u>12-17-year olds</u>.

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 <u>child arrangements information tool</u> with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

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

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

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

## 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, <u>NICCO</u> provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

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

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

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

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

The Manor has an Online Safety and Acceptable Use Policy, which covers the use of mobile phones, cameras and other digital recording devices e.g. iPads. Children at The Manor are not permitted to use personal mobile devices at school. Devices are only permitted in school if children use the Joint Bus Service, and these must be left at the school office for the duration of the school day. The policy also reinforces the importance of online safety, including making parents aware of what the school asks children to do online (e.g. sites they need to visit or who they'll be interacting with online).

The Manor's Remote Teaching and Learning Policy outlines how to follow safeguarding procedures when planning remote education strategies and teaching remotely.

Guidance to support schools and colleges understand how to help keep pupils, students and staff safe whilst learning remotely can be found at

https://www.gov.uk/guidance/safeguarding-and-remote-education and https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools

## Cybercrime

The Manor are aware that children with particular skills and interests in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

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

Additional advice can be found at: <u>Cyber Choices</u>, <u>When to call the Police</u> and <u>National Cyber Security Centre - NCSC.GOV.UK</u>

## Filtering and monitoring

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

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

The appropriateness of any filters and monitoring systems are a matter for individual schools and will be informed in part, by the risk assessment required by the Prevent Duty. The Manor uses the 'Securly' cloud-based filtering solution, which is designed primarily for schools to ensure safe and secure internet access for students.

To support schools and colleges to meet this duty, the Department for Education's <u>Meeting</u> <u>digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK</u> set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

The Governing Board reviews the standards and in liaison with the DSL, discusses with IT staff and service providers what more needs to be done to support The Manor in meeting them. Additional guidance on "appropriate" filtering and monitoring can be found at:

- <u>UK Safer Internet Centre</u>: The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be assessed at <a href="https://saferinternet.org.uk/blog/filtering-and-monitoring-webinars-available">https://saferinternet.org.uk/blog/filtering-and-monitoring-webinars-available</a>.
- Southwest Grid for Learning: The SGfL has created a tool to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).
- Support for schools when considering what to buy and how to buy it is available via the: <a href="schools">schools</a>' buying strategy with specific advice on procurement here: <a href="buying for schools">buying strategy</a> with specific advice on procurement here: <a href="buying for schools">buying strategy</a> with specific advice on procurement here: <a href="buying for schools">buying strategy</a> with specific advice on procurement here: <a href="buying for schools">buying for schools</a>.
- The Department has published <u>Generative AI: product safety expectations</u> to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

#### **Domestic abuse**

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

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long-lasting, emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

## **Operation Encompass**

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

#### 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 local authority children's social care where a child has been harmed or is at risk of harm.

#### **Mental Health**

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

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

For further information, please refer to The Manor's Mental Health and Wellbeing Policy and the guidance below:

- <u>DfE Guidance on Promoting Children and Young People's Emotional Health and</u>
   Wellbeing
- DfE guidance on Preventing Bullying
- DfE Guidance on Mental Health and Behaviour in Schools

## Modern slavery and the National Referral Mechanism

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

#### Preventing radicalisation

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

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

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

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

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

risk assessment

- working in partnership
- staff training
- IT policies

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

The Manor follows the measures outlined in the DfE's <u>Prevent duty guidance: for England and Wales</u>. The Manor's DSL and deputies are also aware of local procedures for making a Prevent referral; in Oxfordshire, the DSL will report these to MASH in the first instance. Please refer to The Manor's Prevent Duty Risk Assessment for further information.

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

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

The Department for Education has also published advice for schools on the Prevent duty and is intended to complement the Prevent guidance and signposts other sources of advice and support.

https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

#### Channel

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

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

Statutory guidance on Channel is available at: <u>Channel guidance</u> and <u>Channel training from the</u> Home Office

#### **Serious Violence**

All staff at 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.

For further information, please see the Home Office guidance on <u>preventing youth violence and gang involvement</u> and its <u>Criminal exploitation of children and vulnerable adults: county lines guidance.</u>

## Sexual Harassment, Violence, Harmful Sexual Behaviours

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

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

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

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

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

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

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

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

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

#### **Female Genital Mutilation**

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

## **Mandatory FGM Reporting Duty for teachers**

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

## **Forced Marriages**

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

# APPENDIX F: CONCERNS AND ALLEGATIONS ABOUT STAFF, INCLUDING SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS

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

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

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

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

There are two levels of allegation/concern:

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

Concerns may arise in several ways and from a number of sources. For example: suspicion, complaint or disclosure made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks undertaken.

All allegations must be referred to the Head, or in their absence the Deputy Head Pastoral, who will then consult with the LADO. Where allegations relate to the conduct of the Head, these should be referred to the Chair of Governors, who will then consult with the LADO.

#### **Low Level Concerns**

The Governing Board ensures The Manor has policies and processes to deal with concerns (including allegations) which do not meet the harm threshold (low level concerns). It is important that schools have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children, and these are outlined in our separate Allegation Management and Low Level Concerns Policy.

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

A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including

inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:

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

Such concerns should always be referred to the Head, recorded and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where concerns relate to the Head, these should be referred to the Chair of Governors.

Please refer to The Manor's Allegations Against Staff and Low Level Concerns Policy for further information.

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

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

When appointing new staff, schools and colleges must:

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

#### In addition:

- independent schools must check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State
- schools must ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State for prohibition checks or

- any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012
- all schools and colleges providing childcare must ensure that appropriate checks are carried out to ensure that individuals employed to work in reception classes or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.

## Single Central Record

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

- for schools, all staff, including teacher trainees on salaried routes, agency and third-party supply staff, even if they work for one day
- for colleges, details of staff, including agency and supply staff providing education to children under the age of 18, and
- for independent schools, all members of the proprietor body. In the case of academies and free schools, this means the members and trustees of the academy trust.

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

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

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

#### In addition:

• independent schools (including academies and free schools) must record details of the section 128 checks undertaken for those in management positions.

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

Our school follows Part 3 of Keeping Children Safe in Education (2025) and this information should be read in conjunction with the Recruitment Policy.

## 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.

TO REPORT A NEW CONCERN ABOUT A CHILD (INCLUDING RADICALISATION:	0345 0507666 <a href="https://www.oxfordshire.gov.uk/business/info">https://www.oxfordshire.gov.uk/business/info</a> <a href="mailto:rmation-providers/multi-agency-safeguarding-">rmation-providers/multi-agency-safeguarding-</a>
Oxfordshire's Multi-Agency Safeguarding Hub (MASH)	hub
TO TALK ABOUT AN ONGOING CONCERN: Children's Social Care Team, South Emergency Duty Team	01865 323041 0800 833408
IF YOU ARE UNSURE WHETHER TO MAKE A REFERRAL OR FOR SUPPORT WITH EARLY HELP:  LCSS (Local Community Support Service, South)  Request a consultation (please note that you must have consent from the family to undertake this consultation)	0345 050 7666 LCSS.South@oxfordshire.gov.uk
TO REPORT CONCERNS ABOUT CHILD SEXUAL EXPLOITATION: Kingfisher Team	01865 309196
TO REPORT CONCERNS ABOUT A PROFESSIONAL OR PERSON IN A POSITION OF TRUST:  LADO (Local Authority Designated Officer) for Oxfordshire	01865 810603   lado.safeguardingchildren@oxfordshire.gov.uk
Police	999 – Emergency (children at immediate risk) 101 – Non-emergency enquiries
Ofsted - Concerns	0300 123 4666
NSPCC - Child Protection Helpline	0808 800 5000 help@nspcc.org.uk
CEOP (Child Exploitation and Online Protection)	https://www.ceop.police.uk/ www.thinkuknow.co.uk
DBS (Disclosure and Barring Service)	03000 200 190 customerservices@dbs.gov.uk
Anti-Terrorist Hotline	0800 789321
Crime Stoppers	0800 555111
Department for Education - General enquiries	0370 0002288
Department for Education - Preventing extremism in schools and children's services	https://report-extremism.education.gov.uk/counter.extremism@education.gov.uk
OSCP (Oxfordshire Safeguarding Children Partnership) – Access website for local procedure concerning all aspects of safeguarding, including 'Prevent'.	01865 815843 oscb@oxfordshire.gov.uk www.oscp.org.uk