Christ Church Cathedral School

SAFEGUARDING (CHILD PROTECTION) POLICY

Incorporating

Staff Code of Conduct, Whistleblowing Policy, Physical Restraint & Use of Reasonable Force Policy and Searching & Confiscation Policy
Also see Anti-bullying Policy, Behaviour Policy, Safer Recruitment Policy, Relationships & Sex Education Policy, Internet and ICT Policy

This policy applies to all pupils, including those in the Early Years Foundation Stage (EYFS). It is applicable whenever pupils are the responsibility of the school, including off site. When the word 'staff' is used this includes all members of staff including governors, self-employed staff, staff employed by a third party, supply staff, contractors, volunteers, students and those on work experience.

Contents

1. CONTACTS

School
The Deputy Head (Academic), Anna Fairhurst is the Designated Safeguarding Lead (DSL)

Fairhurst.a@cccs.org.uk; 01865 242561
There is one Deputy DSL:
- *the Deputy Head (Pastoral), Nick Harrison*
- *harrison.n@cccs.org.uk; 01865 242561*

The DSL takes lead responsibility for all safeguarding matters within the school. The DSL and Deputy DSL are the members of staff responsible for co-ordinating action within the school and for liaising with other agencies according to Oxfordshire's procedures.

The Governor particularly responsible for Safeguarding matters is William Hawkes (contact through the school – schoolsecretary@cccs.org.uk)

Oxfordshire County Council
(A complete contact list for all relevant Oxfordshire personnel may be found in Appendix 1 at the end of this policy.)

Concerns about children
Referrals and named enquiries go to Oxfordshire's Multi-Agency Safeguarding Hub (MASH)
0345 050 7666 during office hours (8.30am – 5pm, Monday to Thursday, 8.30am – 4pm, Friday)

Outside office hours call the Emergency Duty Team on **08450 507666**
mash-childrens@oxfordshire.gcsx.gov.uk

On - going concerns or "No Names Consultation" contact Children's Social Care Assessment

Team
Oxford City   01865 328563
North Oxfordshire   01865 323039
South Oxfordshire   01865 323041
Emergency Duty Team   0800 833 408
If a pupil does not live in Oxfordshire a referral should be made to the Local Authority where the child is resident.

Concerns about the conduct of adults

Local Authority Designated Officer (LADO)
All concerns about the behaviour of adults should be made to the LADO
01865 810603
lado.safeguardingchildren@oxfordshire.gov.uk

It is the school's policy that referrals about pupils are made by the DSL; however, anyone may make a referral and staff may raise concerns directly with Children's Services. If there is a risk of immediate serious harm to a pupil a referral should be made to Children's Services immediately or by calling the police on 999.

2. INTRODUCTION

(a) CCCS recognises its responsibilities for child protection and is committed to safeguarding and promoting the welfare of children at all times. It expects everyone to share this commitment thereby creating an open environment where staff, pupils and parents feel able to raise concerns, where concerns will be listened to and appropriate action taken.

(b) CCCS believes that the child's welfare is paramount and safeguarding and promoting this is our priority. Children have the right to protection, regardless of age, gender, race, culture or disability. They have a right to be safe. We are alert to signs of all forms of abuse and neglect, including the use of technology to abuse or exploit children, and follow procedures to ensure that children receive effective support and protection at the earliest opportunity. **At all times we must consider first what is in the best interests of the child.**

(c) CCCS follows the Child Protection procedures published by the Oxfordshire County Council's Children's Services Division of the Learning and Culture Department through the Oxford Safeguarding Children Board (OSCB), overseen since May 2019 by the County Safeguarding Partners whose website oxfordshirescb.proceduresonline.com gives full details of procedures.

(d) The School's DSL and DDSL are required to work closely with the safeguarding partners and any other appropriate safeguarding agencies and are aware of the procedures for so doing. These inter-agency procedures are used in the process of protecting children up to the age of eighteen years from all forms of abuse and neglect, including online and are also available to be used where there are concerns that a child may be drawn into terrorism.

(e) This policy pays due regard to the statutory guidance:

'Keeping Children Safe in Education" Updated September 2023 (KCSIE)
https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

"Working Together to Safeguard Children" August 2018
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
and

Disqualification under the Childcare Act, February 2006 (March 2015)
https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006

A full list of other relevant legislation and guidance to which this policy pays due regard may be found in Appendix 2 at the end of this policy.

(f) Safeguarding arrangements at CCCS draws upon the expertise of staff which is taken into consideration when shaping practice and policies.

(g) First, and most importantly, we respect our children. This is explicit in the Staff Code of Conduct (see Appendix 4) and in the daily practice of staff. The school's ethos promotes a strong safeguarding culture which enables all pupils to feel secure and it supports pupils' personal development in ways that will foster self-esteem, self-confidence and independence.

(h) Staff ensure that pupils know how to approach adults if they – or those they know – are worried or in difficulty, and understand that they will be listened to and their concerns taken seriously. There are variety of routes for pupils to raise any concerns. (See paragraph 11 below on Listening to Pupils)

(i) Our teaching of PSHE and Citizenship, which includes Relationships and Sex Education, helps to develop appropriate attitudes amongst the pupils and make them aware of the impact of their decisions on others.

(j) Pupils are taught how to stay safe (including online) and how to recognise different risks in different situations, and how to behave in response to them. As part of PSHE and Computing, the children are taught about e-safety and ways in which they can guard themselves from harm while using electronic media.

(k) The Staff Code of Conduct includes guidance on physical contact and intimate care and is designed to ensure that staff have clear guidance and behave appropriately towards children at all times.

3. AIMS AND OBJECTIVES

This policy aims to ensure that all staff are clear about the actions necessary if they have possible safeguarding concerns about a child or the behaviour of an adult.
Its aims are:

(a) To raise the awareness of all staff of their responsibility to identify and report all concerns, however minor they may appear. This will include concerns about suspected abuse, including domestic violence, radicalisation, child sexual exploitation, sexting, child on child abuse, sexual violence and sexual harassment, online grooming and abuse as well as other issues.

(b) To ensure effective communication between all staff when dealing with safeguarding.

(c) To lay down the correct procedures for those who have a safeguarding concern.

(d) To provide early help to pupils and families.

(e) To work with other agencies to ensure the identification, assessment and support of those children who are in need and/or suffering significant harm or who may suffer significant harm without appropriate intervention.

(f) To support those children who have suffered harm or neglect.

(g) To identify, monitor and support those pupils who may be in need of additional support from other agencies apart from Children's Services, e.g. Child and Adolescent Mental Health Services (CAMHS).

However, procedures are not a substitute for good professional practice. We listen and work in partnership with children, parents and any other adults who have parental responsibility. Anti-discriminatory practice is followed to ensure that individuals and families from ethnic and cultural minorities receive an appropriate, sensitive and effective response. Account is always taken of the particular needs of the child, such as race, culture, religion, class, disability, age, health or sexual orientation.

4. DEFINITIONS AND RESPONSIBILITIES

Safeguarding is defined in KCSIE September 2023 as:
- Protecting children from maltreatment
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision safe and effective care;
- Taking action to enable all children to have the best outcomes

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

4 (a) Responsibility of the DSL and DDSL

- The Deputy Head Academic, Anna Fairhurst (Designated Safeguarding Lead) has ultimate lead responsibility for safeguarding in the school. The Deputy DSL is the Deputy Head Pastoral, Nick Harrison.
- The DSL and Deputy DSL are the designated members of staff for co-ordinating action within the school and for liaising with other agencies according to Oxfordshire's procedures.
- The DSL and DDSL promote a strong safeguarding culture throughout the school so children are more likely to share concerns and know they will be listened to and taken seriously. They should promote the culture that all staff should reassure victims that they are being taken seriously and that they are supported and kept safe.
- They ensure the Safeguarding Policy is known, understood and used appropriately throughout the school.
- The DSL's role is consistent with the full description found in Annex C of KCSIE September 2023 upon which the DSL's job description is based.
- The DSL will take all reasonable action to limit children's exposure to the risks from the school's IT system and ensure the school has appropriate filters and monitoring

systems in place and regularly review their effectiveness in line with national expectations.

- The DSL and DDSL will ensure that the school has 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).

The role of the Headmaster

- To actively promote a culture of safeguarding so the safety and welfare of children is embedded within all the school's processes and procedures
- To create a safe environment and a caring ethos within the school
- To have read and understood all parts of Keeping Children Safe in Education thereby ensuring that the school's policy and procedures follow statutory guidance.
- To provide supervision for the DSL and DDSL.
- To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the school's Whistleblowing procedures.
- To ensure that all temporary staff and volunteers are made aware of the school's arrangements for safeguarding children;
- To ensure that pupils' safety and welfare is addressed through the curriculum and related policies (Anti-bullying, Behaviour, Equal Opportunities, Online Safety, PSHE)
- To ensure systems are in place, which are easily understood and easily accessible for pupils to report concerns, including abuse.
- To know how to deal with any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns
- to seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults
- To receive required training to understand safer recruitment processes and ensure that safeguarding awareness is covered in every interview to recruit new staff with at least one member of each interview panel having undergone Safer Recruitment training.
- To monitor the effectiveness of this policy and procedures and liaise with the governors and senior leaders over any proposed amendments.

4. (b) Responsibility of the Governing Body

The Governor particularly responsible for Safeguarding matters is William Hawkes (contact through the school office schoolsecretary@cccs.org.uk) though the Governing Body collectively is ultimately responsible for safeguarding.
The Governors will be sent all new safeguarding legislation when necessary and alerted to their responsibilities by the Headmaster.

The Governing Body fully recognises its responsibilities towards safeguarding.
It will:
- Facilitate a whole school approach to safeguarding ensuring that safeguarding is at the forefront of process and policy development.

- Nominate a governor for safeguarding and child protection who will monitor the school's compliance with statutory requirements and practice and champion child protection issues
- Ensure the school operates safer recruitment procedures and that a compliant Single Central Register is maintained
- Be familiar with Keeping Children Safe in Education Annex C and ensure that the Designated Safeguarding Lead's job description is in keeping with this
- Ensure that the Designated Safeguarding Lead has sufficient time, funding, supervision and support to carry out the role.
- Ensure all staff receive appropriate induction and ongoing safeguarding training in accordance with KCSIE and local requirements
- Ensure the school has an effective staff code of conduct
- Ensure children are taught about staying safe, paying attention particularly to practices which help the pupils to reduce risks, including the safe use of the internet and electronic equipment.
- Ensure there are a range of other policies in place to ensure the safety of pupils and promote their welfare
- Ensure that the school has procedures for dealing with allegations of abuse against members of staff that comply with the Local Safeguarding Partners.
- Ensure IT systems have filters installed to guard against the risk of any inappropriate internet activity, whilst not over-blocking which may place restrictions on what children can be taught.
- Ensure an annual report is made to the full governing body, and copied to the Education Child Protection Service. Any weaknesses will be rectified without delay.
- Ensure that this Safeguarding and Child Protection policy is reviewed at least annually, and updated if needed, and that this review includes the effectiveness of procedures and their implementation and ensures that the school contributes to inter-agency working in line with *Working Together 2018,* through effective communication and co-operation with local agencies*.*
- To ensure the policy is shared with staff and that it is available on the school's website.
- Ensure that the Oxfordshire County Council "Safeguarding Audit" is completed at the beginning of the Michaelmas term
- Ensure that the Oxfordshire County Council "School's Annual Safeguarding Report" is completed and sent to the LADO after the Michaelmas Governors' meeting
- Ensure that all safeguarding concerns, discussions and decisions are recorded in writing, kept confidential and stored securely
- Ensure that the child is at the centre of safeguarding, that their wishes and feelings are taken into account and that their concerns will be taken seriously

4(c) Staff Responsibilities

School staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating (KCSIE 2023).

All staff must:

- Read and understand Part 1 of KCSIE.

- Understand and follow this policy, the Staff Code of Conduct and whistleblowing procedures and be aware of other systems, policies and procedures within the School which support safeguarding
- Be aware of the signs of abuse and neglect so that they are able to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm
  - To be aware of the signs child on child abuse
  - To be aware that that even if there are no reports of child on child abuse, or any other form of abuse, it does not mean it is not happening, it may just not be being reported.
- Know how to respond to a child who discloses harm or abuse of any kind
- Report any concerns whatsoever to the DSL
- Report to the DSL if they have a mental health concern about a child
  Understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- Undertake regular safeguarding training at the required level as and when required teach pupils how to keep themselves safe, including online
- If they have any concern about the behaviour of a member of staff, report it immediately as outlined in this policy below.
- Be aware that children are at risk of abuse and also consider carefully the risk of abuse from situations outside pupils' families.
- Take positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils or students with certain protected characteristics in order to meet their specific need. This includes making reasonable adjustments for disabled children and young people and those identified as having special educational needs.

5. CATHEDRAL DUTIES

(a) As a Cathedral school many pupils have significant additional choral and music duties.

(b) When Cathedral Choristers become the responsibility of Cathedral staff during Cathedral practices and services and on Cathedral events and tours, the school Safeguarding Policy still applies.

(c) The Cathedral Staff have responsibility for the welfare of pupils during these times and consequently there is also a safeguarding policy to cater for the specific circumstances to be found in the Cathedral setting. This Policy is approved by the Headmaster, makes reference to the school Safeguarding Policy and in no element contradicts it. It is available on the school website.

(d) The same is true of the Worcester Choristers who have a Safeguarding Policy in operation to cater for the different circumstances found when the boys are at Worcester College. The Worcester College Policy is also available on the school website.

(e) The same is true of the Pembroke Choristers who have a Safeguarding Policy in operation to cater for the different circumstances found when the boys are at Pembroke College. The Pembroke College Policy is also available on the school website.

6. TRAINING AND INDUCTION

(a) Our DSL and DDSL undergo training to provide them with the knowledge and skills required to carry out their role. Our DSL and members of our DSL team undergo their DSL training every 2 years to fulfil their role.

(b) Training includes local interagency working protocols, participating in child protection conferences, supporting children in need, record keeping, and promoting a culture of listening to children. It also includes training in OSCB's approach to the Prevent duties and the identification of those children at risk of radicalisation.

(c) The DSL and DDSL also have regular updates, at least annually, to increase their knowledge on specific topics.

(d) Both the Headmaster and the Bursar receive Safer Recruitment training to ensure that recruitment is undertaken safely and in line with appropriate procedures. No appointments are made without either the Headmaster or the Bursar being involved.

(e) Staff, including volunteers in regulated activity, also receive safeguarding training every 3 years or as otherwise advised by OSCB. They also receive updates at least annually.

(f) Whole staff training is delivered by the Designated Safeguarding Lead (an OSCB licensed trainer), and covers procedures to be followed and specific topics particularly relevant to the school context. It includes training on Prevent, on-line safety, child on child abuse and to how to manage a report of child-on-child sexual violence and sexual harassment.

(g) Volunteers and part-time staff are informed of this training and are offered the opportunity to participate: if they are unable to attend, small-group training is made available to them on an alternative date.

(h) Separate 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, applicable roles and responsibilities in relation to filtering and monitoring. This information is regularly updated.

(i) As part of their induction, (also see Induction Policy new staff, temporary staff and volunteers are given safeguarding training and provided with:
- school's safeguarding policy
- the staff code of conduct
- the whistleblowing policy
- the identity and function of the DSLs
- the pupil behaviour policy
- anti-bullying policy
- online safety policy

- children missing education policy
- Part 1 and Annex B of KCSIE for school leaders and those who work directly with children or Annex A only for those who do not work with children.

(j) Governors receive training every 3 years to ensure they understand their strategic role, their statutory responsibilities and their responsibilities as set out by local multi-agency safeguarding arrangements.

(k) The Designated Safeguarding Lead provides briefings to the school on any changes to safeguarding legislation and procedures and relevant learning from Child Safeguarding Practice Reviews (CSPR's) in line with Working Together 2018. These occur annually or more frequently when necessary and 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 safeguard children effectively.

7. INFORMATION SHARING

Information will be shared according to the HM Government guidance Information Sharing (July 2018). The guidance states that practitioners should use their judgement when making decisions on what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a pupil. ***Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.***

The guidance states that the information shared should be:

- **Necessary and proportionate** - Any information shared must be proportionate to the need and level of risk.
- **Relevant** - Only information that is relevant to the purposes should be shared with those who need it.
- **Adequate** - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- **Accurate** - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
- **Timely** - Information should be shared in a timely fashion to reduce the risk of harm.
- **Secure** - Wherever possible, information should be shared in an appropriate, secure way.
- **Record** - Information sharing decisions should be recorded whether or not the decision is taken to share.

The School will seek advice if there is ever any uncertainty about the sharing of information.

8.   MULTI AGENCY WORKING

8.1.   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.

8.2.   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

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

9. FORMS OF CHILD ABUSE

(a) Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one label. In most cases multiple issues will overlap with one another. As school staff are in regular and frequent contact with children, they are particularly well placed to observe signs of abuse or unexplained changes in behaviour or performance, which may indicate abuse or neglect.

(b) Pupils may also make a direct disclosure to a member of staff or with younger children evidence may come to light through their play.

(c) In many safeguarding cases, it is not one major incident which triggers a referral but a series of seemingly minor events. It is therefore of the utmost importance that all concerns are recorded and reported to the DSL immediately.)

(d) Staff may also become concerned without a disclosure being made or without specific concrete evidence. There may be a change in a pupil's behaviour or art or written work may show signs of confusion or distress.

(e) There may also be concerns raised about a parent/carer's interaction with a pupil or concerns around issues such as parental alcohol misuse, domestic abuse or parental mental health.

(f) Child abuse comes in many forms: Online abuse, sexual abuse, physical abuse, neglect, emotional abuse, child sexual exploitation, female genital mutilation, bullying and cyber bullying, domestic abuse, grooming and harmful sexual behaviour. Abuse can occur wholly on-line or on-line abuse may be used to facilitate off-line abuse.

(g) Some forms of abuse and other specific issues mentioned within this policy may appear to be less likely than others to occur in the context of this school. However, staff must always be vigilant and **Staff should never have the attitude that 'it could not happen here'.**

In KCSIE, important definitions are provided:

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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. KCSIE, 2023)

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

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

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

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

Affluent Neglect

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be more difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents. Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing, particularly in the teenage years. This can lead to increased risks with children who may have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

10. RECOGNISING THE SIGNS OF ABUSE

The NSPCC lists signs which might suggest that abuse is occurring.

Online abuse

A child may be experiencing abuse online if they:
- Spend much more or much less time online, texting, gaming or using social media
- Are withdrawn, upset or outraged after using the internet or texting
- are secretive about who they're talking to and what they're doing online or on their mobile phone
- Have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

Sexual abuse

Children who are sexually abused may:
- Stay away from certain people
- They might avoid being alone with people, such as family members or friends
- They could seem frightened of a person or reluctant to socialise with them.
- Show sexual behaviour that's inappropriate for their age
- A child might become sexually active at a young age
- They might be promiscuous
- They could use sexual language or know information that you wouldn't expect them to.
- Have physical symptoms
- Anal soreness
- An unusual discharge
- Sexually transmitted infection (STI)

Physical abuse

- Bruises (particularly in atypical places)
- Burns / Scalds
- Bite marks
- Fractures / Broken bones
- Injuries or health problems
- Also consider fabricated illness

- Injuries inconsistent with the explanation

Neglect

- Be smelly or dirty/unwashed clothes
- Have inadequate clothing, e.g. not having a winter coat
- Seem hungry or turn up to school without having breakfast or any lunch money
- Untreated injuries, medical and dental issues
- Repeated accidental injuries caused by lack of supervision
- affluent neglect – physically well cared for but rarely seeing parents and possibly a succession of different carers
- Recurring illnesses or infections
- Not been given appropriate medicines
- Missed medical appointments such as vaccinations
- Poor muscle tone or prominent joints
- Skin sores, rashes, flea bites, scabies or ringworm
- Thin or swollen tummy
- Anaemia
- Tiredness
- Faltering weight or growth and not reaching developmental milestones (known as failure to thrive)
- Poor language, communication or social skills.
- Living in an unsuitable home environment for example dog mess being left or not having any heating
- Left alone for a long time
- Taking on the role of carer for other family members.

Emotional Abuse

- Be overly-affectionate towards strangers or people they haven't known for very long
- Lack confidence or become wary or anxious
- Not appear to have a close relationship with their parent, e.g. when being taken to or collected from nursery etc.
- Be aggressive or nasty towards other children and animals

Older children may:
- Use language, act in a way or know about things that you wouldn't expect them to know for their age
- Struggle to control strong emotions or have extreme outbursts
- Seem isolated from their parents
- Lack social skills or have few, if any, friends.

11. PUPILS REQUIRING ADDITIONAL SUPPORT

(a) The school is mindful of its responsibilities towards those pupils who may need additional support. Pupils with special educational needs are particularly vulnerable to abuse (including child on child abuse), both statistically and because it is more difficult, in many cases, to identify.

(b) Additional barriers can exist when recognising abuse and neglect in this group of children which can include:
- the assumption that indicators of possible abuse e.g. behaviour, unpredictable moods or injuries relate to the child's disability rather than to potential abuse
- the fact that pupils with SEN can be proportionately affected by bullying and yet are less likely to show outward signs of abuse
- pupils with SEN are often less effective communicators

(c) As such staff should always be particularly sensitive in their consideration of those with SEN and should be quick to discuss them with the SENDCo, their teachers and the DSL.

(d) The Deputy Head (Academic) is the designated teacher responsible for the welfare and progress of looked-after children (if any are on the roll.) She has responsibility for their welfare and progress and has up to date assessment information from the local authority, the most recent care plan and contact arrangements with parents, and delegated authority careers.

(e) It is the responsibility of each individual member of staff to read the procedures and become acquainted with them.

(f) Children requiring the input of a social worker are particularly at risk. Local authorities should share with the School the fact that a child has a social worker and the DSL should use this information to ensure that decisions are made in the best interests of the child and that the support available in school, both pastoral and academic, promotes the welfare of the child.

(g) Pupils with other vulnerabilities e.g. mental health issues, eating disorders, risk of self-harm may also require additional support and referral to appropriate external agencies.

12. LISTENING TO PUPILS

(a) Pupils are regularly reminded that CCCS is a place where there concerns or worries will be listened to and taken seriously.

(b) There are numerous ways a child may use to report a concern or worry. All pupils have a Form Tutor, there are matrons on duty at all times and the school employs a counsellor. There is a weekly Form Meeting, where views are sought and through PSHE there is opportunity for discussion.

(c) In the boarding house, staff are available at all times and the Housemaster and Tutors have a particular pastoral focus upon the boys in the House. The boys also have access to the independent listener.

(d) The Headmaster's door is open whenever practical and boys are encouraged to visit him if they so desire.

(e) Contact details for Childline and the NSPCC helplines are displayed clearly at points around the school.

(f) Pupils are told that they must always contact someone if they feel they would like to discuss anything of concern.

13. WHAT TO DO IF STAFF HAVE A CONCERN

Although it is the policy of the school that all referrals are made by the DSL, if, a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anyone can make a referral.

(a) If staff members have **any concerns** about a child they must contact the DSL as soon as possible and no later than the same working day.

(b) **All concerns must be recorded** and must be signed and dated. All safeguarding concerns must be recorded on the MyConcern safeguarding system.

(c) Staff having conversations directly with the pupil or who overhear anything, must keep a written record of the conversation or concerns arising. The record should include the date, time and place of the conversation, who was present, what was said by the pupil and (where possible) what questions were asked by the adult.

(d) Staff should make the record as soon as possible after speaking to the pupil before the conversation is discussed with the DSL. It is important to record as much as can be remembered, using the pupil's own words.

(e) The record should contain facts and information only, taking care to avoid personal opinion.

(f) Notes made of such disclosures or concerns could become part of a statutory assessment by Children's Services and/or part of a criminal investigation so must be completed accurately.

(g) If more than one member of staff is present when a pupil discloses information or behaves in a manner which gives rise to concerns, each member of staff must make a separate safeguarding report to the DSL.

(h) The form must be completed so all the facts known are recorded and so the DSL has a full picture of what has given rise to the concern.

(i) It is important to record all concerns regarding the welfare of pupils, even those which may appear minor. This is because it is common for minor pieces of evidence to

emerge over time and build up a pattern. This type of recording also allows information from various members of staff to be collated.

(j) If a physical injury is noticed it is expected that staff should ask the child or parent how the injury happened. However, if the answer does not appear to correspond with the injury, staff must not press for further information or make investigative enquiries but report the matter to the DSL.

(k) On receipt of the completed safeguarding report, the DSL must record the action taken and this must also be signed and dated on the form.

(l) Action taken will be in line with the OSCB threshold of need.

(m) Action will depend on the nature of the concern. It may include one or more of the following:
- monitoring the pupil in school
- a discussion with parents
- early help intervention from the school and/or another agency
- referral to Children's Services
- referral to the LADO
- report to the police

(n) The member(s) of staff making the report will be informed by the DSL of the action taken.

(o) If the pupil's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

(p) Any member of staff can take advantage of the "No Names Consultation" service in Oxfordshire which allows staff to discuss a case with a member of the team without having to reveal any names. Details are available at the front of in this policy.

14. KEY POINTS TO FOLLOW IF STAFF SUSPECT, OR ARE TOLD OF, ABUSE

Never think abuse or neglect is impossible in our school, or that an accusation against someone you know well and trust is bound to be wrong.

(a) **Always stop and listen carefully** to a pupil who wants to tell you about incidents or suspicions of abuse. Keep an open mind - staff should not take a decision as to whether or not abuse has taken place.

(b) **Reassure the pupil**, if they have made a disclosure that he/she is right to tell and is not to blame. If appropriate, explain what you are going to do next.

(c) **Write notes, if you can,** of exactly what the child is saying while he or she is speaking (these may help later if you have to remember exactly what was said) - and keep your original notes, however rough and even if you wrote on the back of something else (it's what you wrote at the time that may be important later - not a tidier and improved version

you wrote up afterwards!). If you don't have the means to write at the time, make notes of what was said as soon as possible afterwards. Date and sign the notes you make.

(d) **Do not promise confidentiality**. If asked, explain that if you are going to be told something very important that needs to be sorted out, you will need to tell the people who can sort it out, but that you will only tell people who absolutely have to know.

(e) **Do not cross question the pupil.** You must not ask leading questions, that is, a question which suggests its own answer. (e.g. "did he do X to you?" - just ask "what do you want to tell me?" or "is there anything else you want to say?") The child may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.

(f) Be aware that younger pupils may disclose issues of a safeguarding nature in general conversation or through their play, rather than as a specific disclosure to a member of staff.

(g) Do not attempt any examination or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. It may be possible to observe the pupil during the normal school routine, for example in a physical education (PE) class. If a pupil wants to show you his or her injuries, make sure that a colleague is with you as a witness. Try to arrange for one of you to be the same sex as the pupil.

(h) **Do not attempt to investigate matters further;** your role is to listen, record and report your concerns to the DSL. Social services and police staff are the people trained to do this - you could cause more damage.

(i) **Immediately tell the DSL** (unless they are themselves accused or suspected of abusing) – *do not tell other staff or children what you have been told.*

(j) **Discuss with the DSL** whether any steps need to be taken to protect the pupil who has told you about the abuse (this may need to be discussed with the pupil who told you)

(k) **Enter the report into MyConcern.**

(l) Be prepared to follow up with the pupil, but only in conjunction with advice from the DSL.

(m) As soon as possible (and within 24 hours) the DSL will refer the matter to the Local Assessment Team or Schools' Safeguarding Team (helped by your notes). The school will follow their advice about what to do next. They will set up any necessary investigations, and will advise.

(n) If you feel a child wants to tell somebody something, remember that there are published lists of people to whom he/she may talk [see Anti-Bullying Policy, Section B]. If the child does not feel able to talk to you don't force the issue - read through the list with him/her, or point him/her to it.

Actions where there are concerns about a child

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                    Staff have concerns about child (1)          ┌─────────────────────┐
                                                                 │  School/college action │
                                                                 └─────────────────────┘
                                                                 ┌─────────────────────┐
                                                                 │  Other agency action   │
                                                                 └─────────────────────┘

  Referral not required,        Referral made if        Designated
  school/college takes          concerns                safeguarding lead or
  relevant action, possibly     escalate                staff makes referral to
  including early help (2)                               children's social care
  and monitors locally                                  (and calls police if
                                                         appropriate)

         Within 1 working day, social worker makes decision about type of response
                                         required

  Child in need of        Section 47 (3)       Section 17 (3)       No formal
  immediate               enquiries            enquiries            assessment
  protection:             appropriate:         appropriate:         required: referrer
  referrer informed       referrer             referrer             informed
                          informed             informed

  Appropriate             Identify child       Identify if child    School/college
  emergency action        at risk of           in need and          considers early
  taken by social         significant          offer                help assessment
  worker, police or       harm: possible       appropriate          (2) accessing
  NSPCC (4)               child                support              universal services
                          protection                                and other support
                          plan (3)

  At all stages, staff should keep the child's circumstances under review and re-refer if
  appropriate, to ensure the child's circumstances improve – the child's best interests
                             must always come first
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15. PRESERVING EVIDENCE

(a) All evidence (which could include a pupil's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be preserved and added to the report on MyConcern.

(b) If evidence is found on an electronic device, the device involved should be confiscated.

(c) Staff **must not** view images, look for further images, copy or print any images or forward images by email or any other electronic means.

16. REFERRAL PROCEDURES

a) Referrals to Children's Services do not require prior parental consent. However, parents will usually be notified that a referral is going to be made unless to do so would put the child at greater risk.

b) If an allegation involves a member of the child's family, Children's Services will contact the parents but, when reporting the suspicion, the DSL should clarify who will be informing the parents.

c) The child's parents must be informed and the DSL should agree with Children's Services who will contact the parents.

d) If the allegation involves someone other than a member of the child's family, the matter must still be reported immediately, but as the child may not remain at immediate risk, Children's Services may not need to respond so urgently.

e) If the Designated Safeguarding Lead is concerned about the child's safety and is not confident that he/she should be sent home, it is the responsibility of the Safeguarding Team or Police to secure the immediate safety of the child. The child will remain in school until one of these agencies intervenes.

f) The DSL, having clarified the details of the disclosure, will contact the appropriate Local Assessment Team or Schools' Safeguarding Team as soon as possible and no later than 24 hours from the time of the clarification of the initial disclosure.

g) The OSCB (or relevant local authority) should make a decision within 1 working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. The DSL must follow up on the referral should that information not be forthcoming.

h) OSCB may recommend a number of options including.

i) The child is monitored further in school

j) Advice, support and information is provided for the family, including signposting to other agencies

k) An early help assessment is completed

l) A Team Around the Family (TAF) is set up and led by the school

m) A Child And Family Assessment (CAFA) is undertaken because the child appears in need

n) The family is supported by the Family Help Team

o) A strategy meeting is required, which the school will be invited to attend, which may lead to a Section 47 investigation because there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm.

p) If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

q) If early help is appropriate the DSL will support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.

r) Early help means providing support as soon as a problem emerges at any point in a child's life. All school staff should be prepared to identify families and/or children who

may benefit from early help as providing support at this stage is more effective in promoting the welfare of the child than reacting later.

s) Additional support systems in school may form part of early help strategies e.g. pastoral school support, counsellor, school mentors, Team Around the Family (TAF) and should feed into Local Authority early help measures as required. Evidence is kept of all early help interventions.

t) If early help. Team Around the Family and/or other support is appropriate, the case will be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

17. CHILD PROTECTION RECORDS

a) Safeguarding reports are kept securely on MyConcern.

b) Records are kept of all concerns, whether or not there is a need to refer the matter to Children's Services or another agency.

c) All records will show a clear chronology of any concerns and any decisions and/or action taken.

d) Minutes of any case conferences or discussions with social workers or other professionals involved with the pupil must also be retained in the pupil's online file.

e) If a pupil moves to another school, all child protection records are transferred securely, within 5 days, to the DSL at the new school and a receipt is obtained confirming they have been received. Parental permission is not required for records to be shared with the new school.

f) On a case by case basis the DSL will also consider sharing information proactively with the new school to ensure key staff are aware of the pupil's needs and can have any support in place when the pupil arrives.

g) Safeguarding records will be requested from previous schools/nurseries for any new pupils joining the school.

18. E-SAFETY AND ONLINE BEHAVIOUR

(a) The school adopts an approach to online safety which seeks to reduce risk as far as possible without depriving pupils of the benefits of technology.

(b) The pupils receive education about all aspects of keeping themselves safe online and appropriate online behaviour. (See CCCS Acceptable Use Policy)

(c) The breadth of issues classified within online safety is considerable, but is categorised in KCSIE into three main areas of risk:

Content: being exposed to illegal, inappropriate or harmful material
Contact: being subjected to harmful online interaction with other users
Conduct: personal online behaviour that increases the likelihood of, or causes, harm
Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams

(d) The school does all it reasonably can to limit the pupils' exposure to the above risks in school and pupils also receive guidance on the safe use of the internet and are educated about the risk of online harm (including anti-bullying) through their PSHE and Computing lessons.

(e) Cyber-bullying by pupils, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through the school's anti-bullying policy and procedures.

(f) Social networking sites and other apps can be sources of risk of inappropriate and harmful behaviour. If staff suspect that a pupil may be at risk of or suffering from online harm, they must report this to the DSL following procedures set out in this policy.

(g) The practice of children sharing images is commonplace. However, this online technology has also given children the opportunity to produce and distribute inappropriate imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

(h) If a member of staff becomes aware of an incident involving inappropriate material (whether this has taken place in or out of school) they should follow the safeguarding procedures and report it to the DSL immediately.

(i) The member of staff should confiscate the device involved. Staff should not view images, delete images or look for further images. They should not copy or print images, nor forward images by email or any other electronic means.

(j) Parents will be informed at an early stage of inappropriate online behaviour, unless there is reason to believe that involving parents would put the pupil at risk of harm.

(k) If there is concern a young person has been harmed or is at risk of harm a referral will be made to Children's Services.

19. ONLINE SAFETY, REMOTE LEARNING 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 and extremism.
- **Contact:** being subjected to harmful online interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other
- **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 your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/)

The school has an Online Safety policy, which covers the use of mobile phones, cameras and other digital recording devices e.g. i-Pads. For online safety, within the policy there is support about children accessing the internet whilst they're at school using data on their phones. This considers that many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G networks. This access means some children, whilst at school, sexually harass, bully and control others via their mobile and smart technology, share indecent images consensually and non-consensually and view and share pornography and other harmful content. This has been carefully considered within schools ICT Policy, including the management of devices, filtering and monitoring and access to smart technology. The policy also reinforces the importance of online safety, including making parents aware of what the school asks children to do online (e.g. sites they need to visit or who they'll be interacting with online)

Filters and monitoring

Governing bodies and proprietors 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, governing bodies and proprietors ensure their school has appropriate filters and monitoring systems in place and that there is regular review of their effectiveness.

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

The appropriateness of any filters and monitoring systems are a matter for individual schools and will be informed in part, by the risk assessment required by the Prevent Duty.

To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards (see below link) which 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

Governing bodies and proprietors understand their responsibilities for periodically reviewing the effectiveness of these procedures and the standards and will discuss this with IT staff and service providers, discussing what more needs to be done to support schools and colleges in meeting this standard. This includes an understanding of responsibilities to have an appropriate level of security protection and an understanding of evolving cyber-crime technologies and e-security.

Monitoring and filtering standards: https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges

Cyber security standards: https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges

The policy for remote learning demonstrates an understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely. The school maintains the capability to provide remote education when it is not possible for some or all of their pupils to attend in person.

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

20. SPECIFIC SAFEGUARDING ISSUES (FURTHER INFORMATION MAY BE FOUND IN KCSIE)

20(a) Child Sexual Exploitation and Child Criminal Exploitation

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, such as county lines drug distribution. Child sexual exploitation does not always involve physical contact and can happen online. CSE is a form of Child sexual abuse. It can occur over time or be a one off occurrence. Some of the following signs may be indicators of these forms of abuse:

- Be involved in abusive relationships, intimidated and fearful of certain people or situations
- Hang out with groups of older people, or antisocial groups, or with other vulnerable peers
- Associate with other young people involved in sexual exploitation
- Get involved in gangs, gang fights, gang membership

- Have older boyfriends or girlfriends
- Spend time at places of concern, such as hotels or known brothels
- Not know where they are, because they have been moved around the country
- Go missing from home, care or education
- Appear with unexplained gifts or possessions
- Who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Both boys and girls (for whom the indicators of CCE and CSE may be different) are more likely to suffer CSE if being involved with CCE

20 (b) Female genital mutilation (FGM)

FGM is illegal in the UK and there is a mandatory duty on staff to report cases of FGM to the police if it is believed that an act of FGM has been carried out.
Although CCCS is predominately a school for boys, it is essential that staff are aware of FGM practices and the need to be aware of the reporting of this by siblings. Indicators of FGM may include:

- Child may talk about a special procedure/ceremony that is going to take place
- Talk of something somebody did that they are not allowed to talk about.
- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Have unusual behaviour after an absence from school or college
- Be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear.

20(c) Honour based abuse (HBA)

This form of abuse encompasses crimes which have been committed to protect or defend the honour of a family or community, including FGM, forced marriage and practices such as breast ironing.

20(d) Prevention of Radicalisation

(a) Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation. Staff should be highly vigilant for pupils who express intolerant views of others, particularly of those of different religious faiths or for whom the Western World is evil.

(b) The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. CCCS is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

(c) The Counter-terrorism and Security Act 2015, places a duty on authorities (including schools) 'to have due regard to the need to prevent people from being drawn into terrorism'. The School must also have regard to the document "Prevent Duty Guidance: for England and Wales (March 2015)" and its supplementary documents "The Prevent duty (June 2015) and "The use of social media for on – line radicalisation" (July 2015) updated 10th April 2019

(d) Staff are made aware of this duty and training includes Prevent awareness training in line with advice from OSCB.

(e) ICT staff are aware of this duty in order to enable them to ensure the correct filters are in place so pupils are safe from terrorist and extremist material when accessing the internet at school. Pupils will also be taught in Computing lessons and in PSHE of the dangers of radicalisation through the Internet.

(f) Pupils are aware that school, and in particular PSHE lessons, are a safe space in which they can understand and debate controversial issues and develop effective ways or resisting pressures by developing positive character traits such as resilience, determination, self-esteem and confidence.

(g) Although decisions about seeking support for children in danger of radicalisation would normally involve both pupils and parents, their consent is not required for a referral to be made when there are reasonable grounds to believe that they are at risk of significant harm.

(h) When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they must speak with the Designated Safeguarding Lead. The DSL will consider the level of risk to identify the appropriate referral, whether it be to Channel or Children's Social Care. The Oxfordshire MASH (0845 050 7666) are the first port of call as recommended by OSCB and will advise on the approach to be taken if in doubt.

(i) Oxfordshire is a Prevent low risk area. Staff or those concerned that someone is in danger of radicalisation can contact the Police on 101, the DfE dedicated helpline 0207 3407264 and counter-extremism@education.gsi.gov.uk

(j) 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.

(k) Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are at risk of being drawn into terrorism and, where considered appropriate and necessary, consent is obtained and support arranged and provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges are required to have regard to Keeping Children Safe in Education and, as partners, are required to cooperate with local Channel panels. Channel guidance can be found here: https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance

20(e) Bullying and cyber bullying (also see Anti-Bullying Policy)

Indicators may include
- Belongings getting "lost" or damaged
- Physical injuries such as unexplained bruises
- Being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- Not doing as well at school
- Asking for, or stealing, money (to give to a bully)
- Being nervous, losing confidence, or becoming distressed and withdrawn
- Problems with eating or sleeping
- Bullying others
- Anxiety when checking messaging websites and social media

The school recognises that children who bully may be victims of abuse themselves and will also require support.

20(f) Domestic abuse

The witnessing of domestic abuse can have a long-lasting effect on children's health, wellbeing and ability to learn. They may also be at risk of injury if they live in a family where there is domestic violence. The child may blame themselves for the abuse. Children who witness domestic abuse may:

- Become aggressive or unusually withdrawn
- Display anti-social behaviour
- Suffer from depression or anxiety
- Not do as well at school - due to difficulties at home or disruption of moving to and from refuges.

20(g) Grooming

Children may be groomed by other children as well as adults. This may take place in person or online.

Children may become:
- Be very secretive, including about what they are doing online
- Have older boyfriends or girlfriends
- Go to unusual places to meet friends
- Have new things such as clothes or mobile phones that they can't or won't explain
- Have access to drugs and alcohol.

20(h) Child on child abuse

a) Children may also be harmed by other children or young people. CCCS has a zero-tolerance approach to such abuse and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". It will be treated as a safeguarding issue where it is reasonable to suspect that the child is suffering or likely to suffer significant harm.

b) It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

c) All staff must understand that even if there are no reports in the school it does not mean it is not happening, it may be the case that it is just not being reported. It is important if staff have any concerns regarding child on child abuse they speak to the DSL or deputy DSL immediately.

d) All children involved whether victim or perpetrator will be treated "at risk" and supported.

e) Child on child abuse is most likely to include, but not limited to:
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment (also see KCSIE and DfE guidance *Sexual violence and sexual harassment between children in schools and colleges)*
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  Also see DfE *Searching Screening and Confiscation Advice* for schools and the UKCIS Education Group *Sharing nudes and semi-nudes: advice for education settings working with children and young people* which outlines how to respond to an incident of nudes and semi-nudes being shared

- 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
- Upskirting (which is a criminal offence), 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 cause the victim humiliation, distress, or alarm; and
- Initiation/hazing type violence and rituals.

(g) Child on child abuse in the form of sexual harassment may appear to be more likely to be perpetrated by boys upon girls. However, in a predominantly boys' school, we must still be aware of the risk of child on child abuse and ensure that all instances of such abuse are taken seriously.

(h) Child on child abuse can take place between children of a similar age and also between children of different ages, for example with a perpetrator much older than the victim.

(i) As a predominately boys' school, staff are also mindful of developing positive attitudes within its pupils towards the opposite sex and of promoting an ethos of mutual respect and equality.

(i) Staff are made aware of the harm caused by child on child abuse and will follow the school's Behaviour Policy, Anti-bullying Policy and safeguarding procedures as appropriate. The school's behaviour and anti-bullying policies make it clear that such behaviour will not be tolerated and robust procedures are in place to ensure that if such abuse occurs that it is dealt with firmly and swiftly.

20(i) Preventative Strategies to minimise the risk of child on child abuse

The School aims to create an environment which helps to minimise the occurrence of child on child abuse by taking a proactive, preventive and educative approach. Opportunities are sought to give teaching and learning opportunities to pupils, within the context of both the PSHE and wider curriculum.

Opportunities for such education to take place, including education about abusive behaviour, includes but is not limited to the following:
- School Assemblies
- PSHE lessons
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom)
- Promote positive values and to encourage a culture of tolerance and respect amongst all members of the School community
- Creating conditions in which pupils can aspire to and realise safe and healthy relationships
- Creating a culture in which pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to

- Responding to cases of child on child abuse promptly and appropriately.

The school has an ethos where pupils feel safe to share information about anything that is upsetting them and any derogatory language or behaviour is always challenged by staff. There is a strong and positive PHSE curriculum and pastoral care system, which gives pupils an open forum to talk things through and explore disputes or difficulties.

20(j) Responding to Child on Child Abuse

There may be occasions when a child's (or children's) behaviour warrants a response under child protection rather than anti-bullying procedures. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the DSL will refer the abuse to external agencies, including, as necessary, the police, and the MASH in accordance with the procedures in this policy.

A pupil (or pupils) against whom an allegation of abuse has been made may be excluded from the School during the investigation.

The School will take advice from OSCB and the MASH on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved, including the pupil or pupils accused of abuse. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the OSCB LADO and the MASH, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

The threshold for dealing with an issue of pupil behaviour or bullying as a safeguarding matter is subject to local guidance and professional judgement. However, it may be appropriate to regard a young person's behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the young people concerned;
- The perpetrator has repeatedly tried to harm one or more other children;
- There are concerns about the intention of the alleged perpetrator;
- There is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'

The management of children and young people with harmful behaviour (including sexually harmful behaviour) can be complex and the School will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator so that all children involved will be treated as being "at risk".

Victims of child on child bullying will be supported by the processes outlined above but, in addition, the school has many ways of further supporting victims such as The School Counsellor, the pupil's Form Tutor, and indeed any member of staff whom the pupil chooses to talk to. In the case of boarders, the housemaster, house tutors and matrons are always

available to support. The red and amber list system will ensure that pupils are discussed at staff meetings and that action plans will be created for them.

20(k) Sexual violence and sexual harassment

Child on child abuse can take the form of sexual violence and sexual harassment. Advice on how to manage a report of sexual violence and sexual harassment is summarised in KCSIE September 2023 Part 5 and all staff will have been talked through the procedure at safeguarding briefings. The advice includes the following practice:

- Not promising confidentiality
- Only sharing information with those who need to know in order for the investigation to progress
- The victim should understand what the next steps should be
- Not to abuse the trust of the child disclosing, given that trust has been placed in the member of staff
- Listening carefully to the child, being non - judgemental and not asking leading questions
- Thinking carefully about best way to make a record of the report; writing up should be done immediately afterwards, based on contemporaneous notes
- Only recording facts not opinions
- Illegal images should not be forwarded and only viewed if completely necessary
- Ideally reports should be managed with two members of staff present
- Informing DSL or Deputy DSL as soon as is possible

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.

A particularly common form of child on child bullying is sexting, the transmission by children on mobile phones of sexually explicit imagery, often referred to as nudes or semi-nudes, which may be consensual or non-consensual. Such behaviour will not be tolerated and will be considered very seriously. Computing lessons and the PSHE course will ensure that pupils understand the gravity of this situation.

Pupils are encouraged to report incidents of inappropriate behaviour reported to them by another pupil. Such reports may fall under the School's Anti-bullying procedures or may be treated as safeguarding concerns and dealt with in accordance with this policy if the incident is considered to have caused or is likely to cause a child considerable harm.

As a school with boarding provision, we are acutely aware that children are particularly vulnerable in residential settings and that we should be particularly alert to the quality of the relationships between pupils and to the potential of child-on-child abuse. Boarding staff take a great deal of time to talk through how boarders are interacting and there is always a handover between staff who have been on duty. The Housemaster has a weekly meeting with the Headmaster at which all boarders are discussed.

20 (I) Harmful sexual behaviour

(a) This is defined by the DfE as *'Sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, may be harmful towards self or others, or abusive towards another child, young person or adult.'*

(b) Harmful sexual behaviour may include:
- Using sexually explicit words and phrases at an inappropriate age
- Inappropriate touching
- Using sexual violence or threats
- Sexual acts with other children or adults
- Inappropriate online behaviour

(c) The boundary between what is abusive and what is part of normal childhood experimentation can sometimes be difficult to determine and decisions around this will focus on the related concepts of true consent, power imbalance and exploitation.

(d) Developmental sexual activity is what would be expected from children and young people as they move from infancy through to an adult understanding of their relationships with others. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and the seeking of consent.

(e) Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

(f) Harmful sexual behaviour encompasses a range of behaviour, which can be displayed towards younger children, peers, older children or adults. It can occur online and offline or a mixture of both.

(g) Children's sexual behaviour can be categorised using the 'traffic light' approach:
- **Green** behaviours reflect safe and healthy sexual development. They are:
  - ➢ Displayed between children or young people of similar age or developmental ability
  - ➢ Reflective of natural curiosity, experimentation, consensual activities and positive choices
- **Amber** behaviours have the potential to be outside safe and healthy development. They may be:
  - ➢ Unusual for that particular child or young person
  - ➢ Of potential concern due to age or developmental differences
  - ➢ Of potential concern due to activity type, frequency, duration or the context in which they occur.
  - ➢ Amber behaviours signal the need to make a report to the DSL who would consider a referral.
- **Red** behaviours are outside safe and healthy behaviour. They may be:
  - ➢ Excessive, secretive, compulsive, coercive, degrading or threatening
  - ➢ Involving significant age, developmental or power differences
  - ➢ Of concern due to the activity type, frequency, duration or the context in which they occur.

> ➢ Red behaviours would indicate a need a report to the DSL who would make a referral to Children's Services.

(h) The school will respond with interventions that address the behaviour of the perpetrator, while also providing an appropriate level of support, as harmful sexual behaviour may be an indicator that the perpetrator has also been abused.

(i) The school is aware that LGBT children, or those who are perceived to be, could be vulnerable to abuse or discrimination. LGBT inclusion, as well as promoting all forms of equality (including zero tolerance for misogyny or misandry), is part of the Relationships and Sex Education curriculum.

20 (m) Children Missing Education

All staff should be aware that children going missing from education, particularly repeatedly, can act as a vital warning sign of a range of issues including neglect, child sexual and criminal exploitation - particularly county lines. School staff should follow the school's procedures for dealing with children who are persistently absent and children missing education to identify such abuse as early as possible and, in the case of absent pupils, this helps prevent the risk of them becoming a child absent from education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and have a social worker (such as a child who is a child in need, who has a child protection plan or is a child we care for), where being absent from education may increase known safeguarding risks within the family or in the community. See 'working together to improve school attendance' for further guidance: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1099677/Working_together_to_improve_school_attendance.pdf

Early intervention is necessary. Staff are made aware of our unauthorised absence and children missing from education procedures.

(a) The local authority will be informed of any child whose name is added to or deleted from the admission register at non-standard transition points, (that is other than entering the school in the Nursery and leaving the school in Year 8) in accordance with regulation 12(3) (in relation to joiners) and regulation 12(6) (in relation to leavers) of the Education (Pupil Registration) (England) Regulations 2006.

20 (n) Upskirting

Upskirting is the practice of taking photographs under people's clothing without their permission or knowledge in order to obtain sexual gratification or cause the victim humiliation, distress or alarm. This act is a criminal offence and can carry a prison sentence. Anyone of any gender can be a victim.

20 (o) Serious violence

All staff should be aware of the 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

20 (q) Prejudiced Behaviour

This refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities, special educational needs, medical conditions, ethnic, cultural and religious backgrounds, sexual orientation, gender, home life and sexual identity. These factors can make it more difficult for a child to report abuse.

21. MENTAL HEALTH

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

(b) Staff are in a very good position to identify those with a mental health problem or who may be in danger of developing one and may become aware of warning signs which indicate a pupil is experiencing mental health or emotional wellbeing issues.

(c) Warning signs must always be taken seriously and raised with the DSL.

(d) Warning signs include but are not limited to:
- Physical signs of harm or injuries that are repeated or appear non-accidental
- Evidence of self-harm
- Panic Attacks
- Changes in eating / sleeping habits
- Increased isolation from friends or family, becoming socially withdrawn
- Changes in activity and mood
- Decline in academic achievement
- Talking or joking about self-harm or suicide
- Expressing feelings of failure, uselessness or loss of hope
- Secretive behaviour
- Reporting physical pain or nausea with no evident cause
- An increased attendance at the medical room
- Sudden weight loss or gain

(e) Staff should also be aware of the impact of Adverse Childhood Experiences (ACEs) on mental health. These include:

- Loss or separation – resulting from death, parental separation, divorce, hospitalization
- Loss of friendships (especially in adolescence)
- Family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- Life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- Traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- Other traumatic incidents such as a natural disasters or terrorist attacks

(f) Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

- Mental health professionals have classified these as:
- Emotional disorders - phobias, anxiety states and depression
- Conduct disorders - stealing, defiance, fire-setting, aggression and anti-social behaviour
- Hyperkinetic disorders - disturbance of activity and attention
- Developmental disorders - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- Attachment disorders - children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- Other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic depressive disorder

(g) When the school suspects that a pupil is having mental health difficulties, support will be put in place, using a graduated response process.
- An assessment to establish a clear analysis of the pupil's needs;
- A plan to set out how the pupil will be supported;
- Action to provide that support
- Regular reviews to assess the effectiveness of the provision

A pupil may disclose concerns about themselves (or another pupil) to any member of staff so all staff need to know how to respond appropriately.
If a pupil chooses to disclose concerns to a member of staff, the response should always be to listen calmly and carefully, being supportive and non-judgemental.
The member of staff who receives a disclosure should report this to the DSL and complete a CCCS Safeguarding Form. (Appendix 3)

Staff should always treat mental health concerns in the same way as other safeguarding concerns and should report the matter to the DSL or DDSL.

The School will make reference to the Government's Guidance contained in [Mental Health and Behaviour in Schools.](#)

https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2 and Rise above for resources compiled by Public Health England

22. USE OF TECHNOLOGY: CAMERAS, MOBILE PHONES AND OTHER ELECTRONIC DEVICES WITH IMAGING AND SHARING CAPABILITIES (including in the EYFS)

(a) Staff must not take video footage or photographs of pupils except for school purposes.

(b) No images should be placed in the public domain without the permission of the headmaster

(c) School devices should be used wherever possible. In the EYFS, only school devices may ever be used

(d) Photographs or videos of pupils must not be stored on personal cameras, mobile phones or other devices and any images should be uploaded to the school's server if they need to be stored for later use

(e) Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing

(f) Parents are asked to restrict photography whether on cameras, mobile phones or other devices to major school events. General filming in school by parents is not permitted

(g) Parents should be aware that other parents in the school may object to photographs being taken which, inadvertently or otherwise, include their child; therefore, any images taken must be for personal use only and should not be shared on social media

(h) Other visitors, volunteers and contractors in school are not permitted to take photographs in any area of the school without specific permission from the head

(i) The general use of mobile telephones in all areas of the school (calls, texting and email) by parents and others is actively discouraged.

23. ALLEGATIONS AGAINST STAFF (also see Whistleblowing Policy)

The school follows the statutory guidance in Part 4 of KCSIE September 2023.

As part of its overall safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in the school (including self-employed staff, supply teachers, volunteers and contractors).

a) **If there is a concern about a member of staff or volunteer, however minor it may appear, it must be reported. Staff must never think that abuse by an adult is not possible in this school, or immediately disbelieve an accusation against someone who is known well and trusted.**

b) Allegations that a member of staff has abused a pupil or pupils either inside the school premises or during a school trip or visit could be made by:

- Parents
- The abused pupil
- Other members of staff
- Other pupils
- The Police or Social Services
- A third party

c) An allegation would normally be made directly to the Head; but if another member of staff is told first, he/she must ensure that the Head is informed immediately.

d) An allegation concerning a member of staff, a supply worker, volunteer or any other adult must be reported to the Headmaster or the Safeguarding Governor in his absence.

e) An allegation about the Headmaster must be referred straight to Sarah Foot, the Chair of Governors, without informing the Headmaster.

f) In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head or to a Governor, the LADO should be contacted directly and without hesitation.

g) If faced with an anonymous allegation the school will handle it in exactly the same way as if it knew the identity of the person making the allegation i.e. immediately contacting the LADO to take advice and acting according to instructions.

h) **These procedures relate to staff who are currently working in the school regardless of whether the school is where the abuse is alleged to have taken place and regardless of whether it involves pupils at this school. Allegations against former staff or volunteers will be referred to the police.**

i) 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.

j) Any case of allegations against staff, including those considered borderline, will be discussed with the LADO without delay and can initially be done on a 'no names' basis. It is not within the school's remit to determine the threshold for what is to be reported.

In serious cases of harm, the Police should be informed. The DSL and DDSL have access to NPCC 'When to call the Police' to help understand when to take this course of action.

k) Allegations that might indicate that a person is unsuitable to work with children are where a person has:

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

23(a) Procedures

The school will respond promptly and sensitively to all allegations.
We undertake to:

(a) Take any allegation of abuse, involving a member of staff, very seriously.
Immediately involve the LADO of the Oxfordshire Safeguarding Children's Board (OSCB) this must be done within 24 hours01865 810603; Lado.safeguardingchildren@oxfordshire.gov.uk

(b) The school will not undertake its own investigation without first consulting the LADO

(c) Discussions with the LADO will be carefully recorded in writing and a reference number recorded when given

(d) Act in accordance with advice from OSCB personnel

(e) The head will only lead enquiries at school level if agreed with the LADO.

(f) In the case of a referral and investigation, the head must ensure, before contacting any interested parties, that there is no objection by the investigating agencies.

(g) If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity whilst the allegation is being investigated. The head will take advice from the LADO and other agencies to agree:

- How to manage speculation and gossip
- What, if any, information can be given to the wider community to reduce speculation
- If necessary, how to manage the press.

(h) Confidentiality about the allegation will be maintained throughout and can only be removed if and when the teacher is charged with an offence or the DfE/TRA publish information about an investigation or decision in a disciplinary case. The school should guard against unwanted publicity.

(i) The head, in consultation with the LADO, will make the decision whether or not to suspend the person involved but this will not be the default response. The reasons for the suspension will be recorded and the member of staff notified.

(j) The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

(k) The DSL will also consult the LADO if the behaviour of a member of staff which does not concern children might indicate whether the member of staff is a risk to children. A perpetrator of domestic abuse, for instance, might not be a person suitable to work with children.

23(b) Support for the Pupil

Our priority is to safeguard the young people in our care. We will give all the support that we can to a pupil who has been abused. The DSL and Deputy DSL will consider how best to support and monitor the pupil concerned through any process of investigation, liaising closely with parents, guardians, OSCB, or other agencies involved to identify the support strategies that will be appropriate.

It may be that a pupil allegation is subsequently found to be malicious. Where this is the case disciplinary sanctions in accordance with the School's policy may be invoked and the matter referred to the police if there is reason to believe that a criminal offence has been committed.

23(c) Suspension

Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about his or her conduct. Even so, it is a serious step, and we will take legal advice beforehand as well as consulting the LADO, and will normally only suspend a member of staff where:

There is a serious risk of harm (or further harm) to the child,
The allegations are as serious as to constitute grounds for dismissal, if proven,
The police are investigating allegations of criminal misconduct.

If a member of live-in boarding is suspended pending an investigation of a child protection nature, alternative accommodation off site will be provided.

23(d) Outcome of an investigation

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

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

- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Records concerning allegations of abuse must be preserved until the accused has reached normal pension age or for 10 years from the date of the allegation if longer.

After the conclusion of an investigation, the Headmaster considers what can be learned from the incident. This is the case for all allegations, not just those which are substantiated.

23(e) Allegations involving supply staff/third party employer/contractor

Where a member of staff is the subject of an allegation and is employed by a supply agency or third party, the School will ensure that allegations are dealt with properly and the LADO is consulted.

Governors will discuss with the employer whether to suspend the individual.

Though the school would take the lead in the discussions with the LADO, the supply agency or employer will also be involved. The supply agency/employer must share information with the School, particularly if there have been any previous concerns.
When using an agency/third party employer, the School will alert the agency of its policy for managing allegations.

23(f) Record keeping and references

a) Allegations that are found to be malicious will be removed from personnel records. However, for all other allegations, the following information is kept on the personnel file of the person accused:

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

b) Records provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

c) Records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

d) Allegations that are proved to be unsubstantiated, false, malicious or unfounded should not be referred to in employer references.

e) Substantiated allegations will be included in references; any information being purely factual and not including opinions.

23(g) Non recent allegations

Where an adult makes an allegation to the School that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, will also be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it occurred.

23(h) Low Level Concerns

The term 'low-level' concern does not mean that the matter is insignificant, it simply means that the behaviour towards a child does not meet the 'harms threshold'.

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 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 1:1 basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language
- Behaviour that may look inappropriate, but may not be in specific circumstances,
- Through to that which is ultimately intended to enable abuse.

Staff must report any such concerns immediately to the Head or the Safeguarding Governor as outlined above.

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

When a low-level concern has been raised by a third party, the headmaster or DSL will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.

The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

All low-level concerns will be recorded in writing. The record will include:
- details of the concern;
- the context in which it arose;
- evidence collected by the DSL where the concern has been raised via a third party;
- the decision categorising the type of behaviour;
- action taken;
- the rationale for decisions and action taken;
- the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)

Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

The purpose of low level reporting is to protect both pupils and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.

Low level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.

A staff member who reports a Low Level concern, or a more serious allegation, in good faith will suffer no detriment as a result, and will benefit from the protection set out in the school's Whistleblowing Policy.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.

24. DBS and TRA REPORTING

(a) There is a legal requirement for the School to report within one month to the DBS anyone, member of staff, volunteers or students whose services we no longer use because he or she is considered unsuitable to work with children. Failure to do so constitutes an offence.

(b) The school also has a legal duty to respond to requests from the DBS for information about members of staff which it holds already.

(c) For teaching staff, the school also has a legal responsibility to report the matter to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002.

(d) Further details regarding referrals are to be found on the TRA website or GOV.UK In all cases where the school has ceased to use a person's services because of safeguarding concerns, it should be reported to the DBS.

25. SAFER RECRUITMENT (for full details see Safer Recruitment Policy)

(a) The school follows the statutory guidance in Part 3 of KSCIE to ensure safer recruitment practices are followed at all times, including checking that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State

(b) All employees of CCCS are appointed in line with Safer Recruitment procedures and undergo a series of statutory pre-employment checks, including an enhanced DBS with Barred List information. The same applies to all relevant Cathedral staff and staff/volunteers in other organisations, for example staff on residential courses, sports' and other coaches, peripatetic music teachers and the occasional one to one tutorial.

(c) CVs are only accepted alongside a full application form, because CVs on their own do not contain all the information required to support safer recruitment.

(d) As part of their due diligence during the recruitment process, the school will often conduct online searches (including publicly available social media searches).

(e) As a choir school, many adults who work with pupils are not directly employed members of the school staff. However, the school ensures that all adults who work directly with its pupils have undergone all the same safeguarding checks as undertaken for staff employed directly.

(f) The school maintains an accurate Single Central Record (SCR) in line with statutory guidance. This is monitored and reviewed to ensure compliance by the safeguarding governor and the headmaster

(g) The school ensures 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 requires that employees and volunteers provided by these organisations use the school's procedures to report concerns.

(h) We 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: Statutory Guidance for Schools and Colleges, 2023.* If assurance is not obtained, permission to work with our children or use our school premises may be refused.

26. SUPERVISION

(a)The pupils are often in the public domain. All staff who are responsible for them are aware of these circumstances. The school is situated in the centre of a busy City and, as such, our focus upon the security of our pupils is particularly important. All our choirs are also expected to walk, accompanied, across town, journeys which require particular vigilance.

(b) As a music school, pupils are often alone in the company of teachers. Teaching is always done in rooms which have a glass panel in the door so the member of staff and the pupil can be seen clearly.

27. STAFF CODE OF CONDUCT

All staff understand the need to uphold the Staff Code of Conduct to ensure the safety of the pupils, and so their actions cannot be misinterpreted and they minimise the risk of an allegation against them.

APPENDIX 1

OXFORDSHIRE SAFEGUARDING AND PREVENT CONTACT DETAILS
Although it is the policy of the school that all referrals are made by the DSL, anyone can make
a referral. If there is a risk of immediate serious harm to a pupil, a referral should be made to
Children's Services or the police immediately.

SAFEGUARDING CONTACT DETAILS

Concerns about children New referrals and named enquiries go to Oxfordshire's Multi-Agency Safeguarding Hub (MASH) Referrals about children not resident within Oxfordshire should be made to the Local Authority where the child resides.		0345 050 7666 0333 014 3325 0800 833408 (out of hours emergency team) mash-childrens@oxfordshire.gcsx.gov.uk
On - going concerns or "No Names Consultation"contact Children's Social Care assessment Team		Oxford City 01865 328563 North Oxfordshire 01865 323039 South Oxfordshire 01865 323041 Emergency Duty Team 0800 833 408
LADO	**Concerns about adults** Local Authority Designated Officer (LADO) (Oxfordshire). Also lead 'Prevent' Officer. All concerns about the behaviour of adults should be made to the LADO	01865 810603 Lado.safeguardingchildren@oxfordshire.gov.uk ESAT.safeguardingchildren@oxfordshire.gov.uk
CAMHS	Family Assessment and safeguarding service (FASS)	01865 902418 FASS@oxfordhealth.nhs.uk
Police	Child Abuse Investigation Unit Police Enquiry Centre	01865 335 200 101(non-emergency Police telephone number)
Ofsted Complaints		0300 123 1231
NSPCC Child Protection Helpline		0800 800 5000
CEOP (Child Exploitation and Online Protection		www.thinkuknow.co.uk
DBS (Disclosure and Barring Service, PO Box 110, Liverpool, L6 9EF)		Customerrelations@dbs.gsi.gov.uk 0151 676 1997
Oxfordshire Safeguarding Children Board – Access website for local procedure concerning all aspects of safeguarding, including 'Prevent'.		www.oscb.org.uk oscb@oxfordshire.gov.uk 01865 815843

PREVENT CONTACT DETAILS

Contact preventreferralsoxon@thamesvalley.pnn.police.uk or ring LADO (above)

Anti-Terrorist Hotline	0800 789321
Crime Stoppers	0800 555111
The Department of Education dedicated telephone and mailbox for non-emergency advice for staff and governors	0207 3407264
The Government website in respect of Prevent	counter-extremism@education.gsi.gov.uk
Additional websites in respect of Prevent	www.gov.uk/report-suspicious-activity-to-mi5
	www.gov.uk/report-terrorism
The Prevent Strategy	www.gov.uk/government/policies/protecting-the-uk-against-terrorism/supporting-pages/prevent
	www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf
The Prevent Duty	Prevent duty guidance - Publications - GOV.UK

Information sharing advice: https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

What to do if you are worried a child is being abused: https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

NSPCC: https://www.nspcc.org.uk/

Whistleblowing guidance: https://www.gov.uk/whistleblowing

MASH leaflet for parents:
https://www2.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/socialandhealthcare/childrenfamilies/MashLeafletForParents.pdf

When to call the Police by the National Police Chiefs Council – NPCC:
When to call the Police

APPENDIX *2*

LEGISLATION AND GUIDANCE

This policy pays due regard to the following statutory guidance and other government advice.

(a) DfE statutory guidance 'Keeping children safe in education (KCSIE) (Sept 2023)

(b) Interim supplements to KCSIE issued during the Coronavirus pandemic

(c) DfE Guidance 'Coronavirus (COVID-19): safeguarding in schools, colleges and other providers' (2020 subject to ongoing DfE updates)

(d) 'Safeguarding and remote education during coronavirus (COVID-19)

(e) Safeguarding and remote education during coronavirus (COVID-19)

(f) DfE Guidance Schools COVID-19 operational guidance (August 2021)

(g) Actions for early years and childcare providers during the Coronavirus (COVID-19) outbreak   (August 2021)

(h) Safer Recruitment Consortium Guidance for safe working practice for those working with children and young people in education settings' (April 2020)

(i) Disqualification under the Childcare Act 2006 (September 2018)

(j) DfE guidance 'Teaching online safety in school' (June 2019)

(k) Mental health and behaviour in schools: departmental advice (November 2018)

(l) HM Gov guidance 'Working together to safeguard children' (July 2018)

(m) DfE advice 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)

(n) DfE advice 'Sexual violence and sexual harassment between children in schools and colleges' (May 2018) summarised in Part 5 of KCSIE

(o) Designated teacher for looked after children (February 2018)

(p) The specific legal requirements in the "Safeguarding" section of Safeguarding and promoting children's welfare, Part 3 of the Statutory Framework for the Early Years Foundation Stage (2021)

(q) DfE statutory guidance 'Children missing education' (September 2016)

(r) Prevent Duty Guidance for England and Wales (originally issued March 2015 revised July 2015) ("Prevent") Prevent is supplemented by non-statutory advice: The Prevent duty: Departmental advice for schools and childcare providers (June 2015) and a briefing note for schools about the use of social media for on-line radicalisation (July 2015)

(s) HM Gov advice 'What to do if you're worried a child is being abused' (March 2015)

(t) Teacher misconduct: the prohibition of teachers (October 2015)

(u) DfE statutory guidance 'Disqualification under the Childcare Act 2006' (February 2015)

(v) Paragraphs 7 and 16 of the Schedule to the Education (Independent School Standards) Regulations 2014 (SI 2014 No.3283)

(w) UKCIS Education Group's Sharing nudes and semi-nudes: advice for education settings working with children and young people

(x) DfE Statutory Guidance "Relationships Education, Relationships and Sex Education (RSE) and Health Education"

(y) Advice and guidance from Oxford Safeguarding Children Board
https://www.oscb.org.uk/about-us/

(z) DfE statutory guidance 'Children missing education' (September 2016)

APPENDIX 3

STAFF CODE OF CONDUCT

(a) This code of conduct is intended to protect children and to help staff reduce further the risk of any vulnerability to false or malicious allegations. Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse and must avoid any conduct, which would lead any reasonable person to question their motivation and intentions. Therefore, they should work in an open and transparent way.

(b) All staff need to understand the importance of maintaining appropriate boundaries in their dealings with pupils.

(c) Staff must ensure their actions and approach to individual pupils or their teaching styles do not give any grounds for doubt or suspicion of unprofessional conduct on the part of colleagues, parents or pupils.

(d) Staff should take care that their relationships with pupils reflect the age, gender and maturity of the pupils. It will be particularly important to ensure that all aspects of demeanour, language and attitudes - however conveyed - do not give rise to misunderstandings or reinforce negative or stereotypical attitudes. Ambiguous or ambivalent comment and conduct, in particular, should be avoided.

(e) Failure to follow the Staff Code of Conduct contained within this policy or other school policies and procedures may result in formal disciplinary procedures being instigated.

(f) It should be noted that forming inappropriate relationships with pupils or young people who are pupils at another school will also be regarded as gross misconduct. Such behaviour gives rise to concern that the member of staff involved cannot be trusted to maintain appropriate boundaries with pupils or young people.

(g) Members of staff need to take particular care when dealing with a pupil who:

- Appears to be emotionally distressed, or is generally vulnerable and/or who is seeking expressions of affection from a member of staff
- Appears to hold a grudge against a member of staff
- Acts in a sexually provocative way, or who is inclined to make exaggerated claims about himself or herself and others, or to fantasise, or one whose manner with adults is over-familiar or
- May have reason to make up an allegation to cover the fact that he/she has not worked hard enough e.g. for examinations.

(h) These behaviours may be indicators that a pupil has been, or is currently being, abused and should therefore be reported to the DSL in accordance with this policy.

Physical contact with pupils including intimate care

(a) There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. Staff should, therefore, use their professional judgment at all times.

(b) Staff should not have unnecessary physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or

onlookers. Touching pupils, including well-intentioned informal and formal gestures such as putting a hand on the shoulder or arm, may, if repeated regularly, be inappropriate. Staff must not make gratuitous physical contact with pupils and should avoid attributing 'touching' to their teaching style as a way of relating to pupils. Staff should always remain sensitive to any discomfort expressed verbally or non-verbally by the child.

(c) Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, and the DSL informed.

(d) There will be occasions when physical contact will be acceptable. In general these will fall into one of three categories:

Action to prevent harm or injury to the pupil or to others.

If it is necessary to prevent a pupil causing injury to him/herself or to others the use of minimum force and contact necessary to prevent harm or injury is acceptable and defensible. Such incidents <u>must </u>always be reported accordingly to Head of Pre-Prep, Headmaster and DSL. A record will be kept on Engage and parents informed immediately. Where a difficulty arises from the interplay between the rule against corporal punishment and the legitimate use of reasonable force, the DfE's Advice for Schools is a useful resource.

Comforting a pupil in distress.

There is no easy definition of what is acceptable since much will depend on the circumstances, the age of the pupil, the extent and cause of the distress and the alternative means of providing comfort. Colleagues will need to use their professional judgement and discretion in relation to these factors. They should consider how others might perceive the action, even if no one else is present, and ensure that it does not develop into unnecessary contact. Particular care must be taken in instances which involve the same pupil over a period of time.

Unavoidable contact

It is acknowledged that some staff, for example, those who teach PE and games, or who offer music tuition, will, on occasions, have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise.

In these instances staff should observe the following guidelines

- Explain the intended action to the pupil

- Ask his or her permission if appropriate e.g. to examine an injury under clothing if sustained in school and for which medical treatment may be needed

- Do not proceed with the action if the pupil appears to be apprehensive or reluctant, or if you have other concerns about the pupil's likely reaction

- Ensure that the door is open and ask a colleague to be present

All staff must be alert to the possibilities of misinterpreting any contact. To avoid such misunderstanding all planned contact must be demonstrably unavoidable. It may be, for example, that alternative methods involving demonstrations of particular techniques by the teacher or a particularly competent pupil may be more appropriate than modifying a pupil's technique by physical contact. It will generally not be acceptable for physical contact to take place between adolescent pupils and staff.

Intimate care

(a) Intimate care can be defined as any care which involves washing, touching or carrying out a procedure to intimate personal areas which most people usually carry out themselves but some pupils are unable to do because of their young age, physical difficulties or other special needs. Examples include care associated with continence and menstrual management as well as more ordinary tasks such as help with washing, toileting or dressing. It also includes supervision of pupils involved in intimate self-care.

(b) Every child's right to privacy and modesty will be respected. Wherever possible, the pupil's wishes and feelings will be sought and taken into account.

(c) If intimate care is needed two members of staff should be present although the dignity and privacy of the pupil must always be considered. This should be done with the pupil's agreement.

(d) Where the pupil is of an appropriate age and level of understanding, permission should be sought before starting an intimate procedure. Staff who provide intimate care should speak to the pupil personally by name, explain what they are doing and communicate with all children in a way that reflects their ages.

(e) All pupils will be supported to achieve the highest level of autonomy that is possible given their age and abilities. Staff will encourage each individual pupil to do as much for him/herself as possible.

In cases of doubt or uncertainty staff should always seek advice from the Headmaster or Deputy Head.

For more information on what to do if physical restraint is necessary see the Physical Restraint and Use of Reasonable Force Policy below.

Communication with pupils

(a) Members of staff should avoid unnecessary contact with pupils outside school hours.

(b) Staff should not give their personal mobile phone numbers, home address, home telephone number or email addresses (other than the school email address to pupils, nor should they communicate with them by text message or personal email.

(c) Nor should they communicate with pupils via any form of social media site. If they need to speak to a pupil by telephone, they should use one of the school's telephones and email using the school system.

(d) They should not make arrangements to meet pupils, individually or in groups, outside school.

(e) They should not invite pupils (groups or individuals) to their home.

(f) Members of staff who are friends with parents of pupils or who, for example, are voluntary workers in youth organisations attended by pupils will of course have contact with those pupils outside school and pupils may visit their homes. However, they should still respect the above advice wherever possible and should keep the head informed of such relationships. They should ensure that pupils do not see anything in their home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour.

(g) The group leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her and may ask the pupils for their mobile numbers before allowing them out in small, unsupervised groups. The school mobile should be used for any contact with pupils that may be necessary. The group leader will delete any record of pupils' mobile phone numbers at the end of the trip or visit and should ensure that pupils delete any staff numbers that they may have acquired during the trip.

(h) It will rarely be appropriate for staff to write personal notes or letters, or to send e-mail, to individual pupils. If a teacher believes it to be necessary to write a personal note to a pupil, s/he should discuss the purpose and context with a senior colleague, who should refer to the Headmaster if further guidance is required.

(i) If staff are required to email a pupil regarding the submission of work, advice over aspects of subjects being covered or other professional matters they must only use the school email system and must ensure that the email is ccd to the parent.

(j) Email communication should be written carefully so it cannot be misinterpreted and to avoid any displays of affection or over familiarity.

(k) Staff should not contact pupils or parents through any social networking sites and must not accept requests through such sites from present or past pupils, unless the pupil is

over 18. Even in the case of an ex-pupils over 18 staff must be cautious that their actions are not misinterpreted.

(l) Staff must keep passwords secure and ensure that no other person can gain access to their e-mail account and maliciously send messages which appear to have been written by them.

(m) Staff must not use unregulated chat rooms for children and should be aware that it is impossible to determine the age of any participant in these environments. Managed services are available in which on-line discussions for educational purposes can be organized in a secure environment for bona fide participants

(n) Staff should use their own social networking sites with great caution so neither they nor the school is brought into disrepute. Maximum privacy settings should be utilised at all times.

Comments and discussions with pupils

(a) Staff must not swear, blaspheme or use any sort of offensive language in front of pupils.

(a) Staff must avoid comments to or about pupils which could be taken to have sexual overtones. It is equally unacceptable for colleagues to encourage debate and discussion between groups of pupils, which could be interpreted as having sexual overtones which are not justified in the context of the teaching programme.

(b) Schemes of Work should highlight particular areas of sensitivity. (Specific guidance may be needed to assist newly qualified or other staff who are new to this area of work.) This will call for the exercise of careful judgment in responding to questions raised by pupils.

(c) Notwithstanding the advice given above it is recognised that, in order to discharge particular pastoral responsibilities, staff may from time to time need to engage in conversation with pupils which cover sensitive matters. Staff must use their professional judgement to ensure that they are not drawn into areas inappropriate to their duties or their relationship with the pupils concerned.

(d) In responding to individual students' distress staff will need to consider carefully whether they should offer advice, sympathy or counselling if a discussion enters a sensitive area or, alternatively, refer them to a colleague or agency who is better placed to offer appropriate advice.

(e) The use of sarcastic, demeaning or insensitive comments towards pupils is unprofessional and may also be regarded as a form of abuse. Such comment must always be avoided.

One to one meetings and teaching sessions

(a) One to one meetings or teaching can provide opportunities for pupils to make malicious allegations. Staff and others must therefore be aware this possibility.

(b) It is advisable to avoid remote areas of the school and to ensure that wherever possible the door is left open or visual contact with others is maintained.

(c) Where it is not possible to meet in the circumstances referred to above, another member of staff should be told of the meeting beforehand. Steps to prevent others entering a room by the use of 'Meeting in Progress' signs or similar actions are especially likely to be open to misinterpretation. In many cases it will be advisable for another pupil or adult to be present or in a position to minimise risk during the interview.

(d) Where a teacher is conducting an individual lesson with a pupil, including individual music lessons, a room with a window in the door should be used. In any other circumstances where there is not a door with a window, the door should be left open.

(e) Access by boys to Boarding House private staff accommodation is prohibited except on special occasions when a group of senior boys is invited, never singularly and with the knowledge of the other adult on duty.

Entering and supervising boarders' accommodation

(a) When entering boarders' accommodation, members of staff should always knock first. They should wait for a response from within. If none can be heard, then they should knock once more and only then enter.

(b) If there is only one pupil in the room then the member of staff should remain by the door, holding it open so that actions cannot be misinterpreted.

(c) If the boys in the room are changing then the member of staff should be sensitive to what is occurring and if anyone feels uncomfortable, should leave.

(d) It is obvious that members of staff, when ensuring that people are getting ready for bed, will need to engage in a degree of supervision but they should always be aware of the sensitivities of the boys who are being supervised.

Supervising changing rooms and showers

It is important that the changing rooms are supervised to ensure that behaviour is appropriate, that boys get changed as speedily as possible and that pupils have showers. Nonetheless the following guidelines should be followed:

1.) Staff should, whenever possible, supervise in pairs
2.) Staff should knock before entering changing rooms in order to warn pupils of their approach

3.) If supervising showers, the member of staff should stand by the wall at the entrance to the shower room and should not look into any of the individual cubicles.

Technological devices, phones and cameras in school (including in the EYFS)

(a) The word 'camera' includes all devices capable of recording images e.g. mobile phones, iPads etc.

(b) Staff must not take video footage or photographs of pupils except for school purposes. Cameras may be used to record:
- Whole school events
- Class events
- Sports
- Outings
- Pupils' progress
- Displays etc.

(c) Staff should use school devices for these purposes. If they use their own cameras or mobile phones, they should let a member of the SMT know that they have done so and should not keep images of children on their devices any longer than is necessary to ensure that they are transferred to the school's database.

(d) Any photographic material involving the School, its staff or pupils may only be used within school (e.g. in displays) or in school publications; newsletters, the prospectus, the School magazine, cards, the School's website, or in press advertisements and articles.

(e) At the time of their children joining the school, parents are asked to agree that photographs of their children may appear on the website using only the child's first name, and in all other internal publications. Specific permission must always be sought if a photograph is to be submitted to the local press since non-attributed photographs are unacceptable.

(f) No photographic material relating to the school, its staff or its pupils may be published or circulated by staff in any other way such as through social networking sites.

(g) Photographs must not be taken in situations liable to misinterpretation. Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may offend or cause upset. No photos should, therefore, be taken in the Changing Room or in the Boarding House, unless, in the case of the latter, for publicity purposes.

(h) Staff must not make or receive personal phone calls or messages during lessons or during contact time with pupils and mobile phones should not be visible in the classroom when pupils are present.

It is particularly important that these procedures are observed when dealing with EYFS pupils.

The receiving of gifts and hospitality

(a) It is of course only natural that many parents will wish to give staff presents to thank them for looking after their children, particularly at the end of terms.

(b) The receiving of gifts and hospitality by members of staff is acceptable if there is no possibility that the gift might be misinterpreted or that it is being given or received with the intention of gaining advantage for the giver or the receiver.

(c) The gift should be of an appropriate value and type for the circumstances and so, as a guideline a member of staff might well be given a bottle of wine or chocolates by grateful parents or be asked to attend a social event.

(d) If the gift is obviously worth in excess of £50 the member of staff should seek permission from the Headmaster to receive the gift. A note will be made of the decision.

(e) It is essential that all staff should not put themselves in a position where their acceptance of a gift could lead to misinterpretation.

Respecting confidentiality

(a) Staff should be very careful to respect the confidentiality of staff, parents and pupils. Anything which they have heard in school about staff, pupils or parents must not be shared with others outside of school.

(b) Staff must be particularly careful about not discussing school business in public in local settings such as cafes or pubs where information may be overheard.

(c) The school understands that staff will need to share information amongst themselves but data protection legislation restricts the sharing of information to those who need to know professionally.

Out of school and afterschool activities

(a) Colleagues should take particular care when supervising pupils in the less formal atmosphere of a residential setting or after-school activity. The more relaxed relationships that may promote successful activities can be misinterpreted by young people.

(b) It is important to emphasise that the standards of professional conduct and behaviour expected of staff in these situations should be no different from those which apply within school.

Transporting pupils

(a) A teacher should never give a lift in a car to a pupil alone, unless in an emergency in which case the Headmaster should be informed.

(b) Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort.

(c) If there are exceptional circumstances that make unaccompanied transportation of pupils unavoidable, the journey should be made known to a senior member of staff.

Pupils with special needs

(a) If pupils require assistance with going to the toilet staff should consider whether it would be possible to arrange for the presence of another adult in the vicinity.

(b) Where this is not possible employees should discuss with the Headmaster what arrangements will be reasonable in all the circumstances.

First aid

(a) The existence of any life threatening or serious condition will determine the suitability and necessity of physical contact.

(b) In the absence of such justification, employees who administer first aid should ensure that, wherever possible, another adult or pupil can be present if there is any doubt over the possibility of any physical contact being misconstrued.

Teaching materials

(a) The use of books, videos, films and other teaching materials of a sensitive nature, particularly in relation to Relationships and Sex Education must be given careful consideration to ensure that their selection is appropriate for the age and maturity of the pupils and that they are relevant to the schemes of work for pupils.

(b) In case of doubt, staff should consult the Headmaster before using such resources.

(c) Staff wishing to show video resources, such as DVDs, which have a rating classification (U, PG, 12, 15, 18) must ensure that only pupils who fall into the correct classification have access to the content.

(d) There should always, therefore, be a clear link with the targets of the teacher's programme.

Corporal punishment

(a) Any form of physical punishment is prohibited under disciplinary procedures and potentially actionable in law. This also applies to any form of physical response to misbehaviour.

(b) In addition, for all pupils, including EYFS pupils, the threat of using corporal punishment is also prohibited.

(c) **Reporting incidents**

(a) Staff should record and report to the DSL all events and/or situations which have the potential to be misconstrued or misinterpreted by others.

(b) This may be a report of an individual's own actions or where they are at all concerned about the behaviour of another.

(c) The purpose of reporting in this way is to protect both pupils and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.

(d) This report should be made to the Headmaster as soon as possible after the incident and should include as an immediate follow-up the preparation of a written note of the incident, a copy of which should be given to him.

(e) The member of staff may also wish to seek advice from his/her professional association.

(f) Whilst reporting of incidents is always advisable it is particularly important to ensure that a contemporary written record is made if any form of restraint has been used against a pupil or whenever a pupil, parent or third party has complained about an action or expressed an intention to complain.

APPENDIX 4
WHISTLEBLOWING POLICY

The School has adopted this policy to enable members of staff to raise concerns internally and in a confidential fashion about fraud, bribery, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations or unethical conduct.

The policy also provides if necessary, for such concerns to be raised outside the organisation, including with Ofsted where these concerns relate to safeguarding of pupils.

The policy reflects the fact that the school has a culture of safety and of raising concerns and all staff are reminded of these priorities in training and in appropriate staff meetings.
The School values its staff and this policy is evidence that it is a place which is open to self-reflection.

(a) The School's policy on whistleblowing is intended to demonstrate that the School :-
- Will not tolerate malpractice;
- Will provide a clear and simple procedure for raising genuine concerns, without fear of reprisal which is accessible to all members of staff.
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will invoke the School's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations;

(b) Everyone working in the school is in a position to identify unsafe or inappropriate practice, to spot where things could be improved and identify any mistakes made. The School has adopted this policy to enable members of staff to raise concerns internally and in a confidential fashion without any fear of reprisal, any action which he/she reasonably considers to be:

- Potentially or actually unlawful, or
- Involves a miscarriage of justice, or
- Compromises an individual's health and safety, or
- Might cause environmental damage, or
- Contravenes any school or relevant local authority policy, or
- Might be considered improper, or
- Falls below the normal standards of conduct in the school
- Involves potential fraud, corruption or financial irregularity
- Involves actual or potential abuse of children
- or any deliberate concealment of such actions

(c) The aim is to provide an opportunity for the head and/or governing body to respond, rather than staff ignoring a concern or immediately raising concerns externally.

(d) The policy also provides if necessary, for such concerns to be raised outside the organisation.

(e) It sets out what staff should do if they have a concern relating to the school which they wish to report and how the school will respond. Its purpose is to ensure that members of staff can follow simple procedures, and to reassure everyone in the school that their concerns will be taken seriously.

Procedure

(a) This procedure is separate from the School's adopted procedures regarding grievances. Employees should not use the whistleblowing procedure to raise grievances about their personal employment situation.

(b) This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School, including concerns about poor or unsafe practice and potential failures in the school's safeguarding regime without fear of reprisal.

(c) The school will act with transparency if this policy is invoked.

(d) A member of staff will be at liberty to express their concern to the Head or Deputy Head or the Bursar.

(e) The member of staff may be asked to put his/her concern in writing.

(f) Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued.

(g) The member of staff making the allegation will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the Resolution.

(h) A member of staff who is not satisfied that their concern is being properly dealt with by the Head or Deputy Head or the Bursar will have the right to raise it in confidence with the Governors (via the Vice Chairman of Governors).

(i) The Vice Chairman of Governors will also provide mediation where necessary and will, if the occasion demands, attempt to resolve disputes.

Confidentiality

(a) Employees who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of the malpractice without their prior approval.

(b) It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible.

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

Support

The school will provide training and support for staff in terms of their rights in respect of this policy and will also provide appropriate help for members of staff who make use of the policy.

External reporting

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body (such as Ofsted) where the employee reasonably believes :-
- That exceptionally serious circumstances justify it;
- That the School would conceal or destroy the relevant evidence;
- Where they believe they would be victimised by the School;
- Where the Secretary of State has ordered it

It may be appropriate for the whistleblower to notify a relevant and appropriate body outside the school, for example one of the following bodies:

- Health and Safety Executive
- Environment Agency
- Information Commissioner
- Department for Education
- Teaching Regulation Agency
- Police
- Oxfordshire Children's Services Department
- Oxfordshire Local Authority Designated Person (LADO)
- National Society for the Prevention of Cruelty to Children (NSPCC)

It will rarely, if ever, be appropriate to alert the media.

Malicious accusations

False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure. In such circumstances the whistleblower's conduct could lead to disciplinary action against him/her, up to and including summary dismissal.

Protection from reprisal and victimisation

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

(b) The school is likely to take disciplinary action (up to and including dismissal) against any member of staff who victimises a whistleblower.

Helpline

The NSPCC whistleblowing helpline is available to staff who do not feel able to raise concerns about Child protection failures internally. The helpline advisors would encourage professionals to raise any concerns about a child to their own employer in the first instance. However, the advice line offers an alternative route if whistleblowing internally is difficult or professionals have concerns around how matters are being handled. Staff can call 0800 028 0285 (lines open 8am – 8pm Monday to Friday) or e mail help@nspcc.org.uk

APPENDIX 5

PHYSICAL RESTRAINT AND USE OF REASONABLE FORCE POLICY

Introduction

(a) CCCS fully recognises the responsibility it has under section 157 of the Education Act 2002 to have arrangements in place to safeguard and promote the welfare of children.

(b) This policy is a whole school policy and applies to all pupils, including those in the EYFS

(c) This policy has been written using advice taken from Use of Reasonable Force, Advice for Head teachers, staff and Governing Bodies (DfE 2013)

(d) The school acknowledges its legal duty to make reasonable adjustments for disabled children and children with special educational needs (SEND). Equality Act 2010, SEN and Disability Code of Practice 0-25 years 2014

For the Purposes of this Policy Document

(a) Reasonable force is defined as using no more force than is needed in the circumstances

(b) Physical restraint is defined as the positive application of force in order to protect/prevent a pupil from causing injury to themselves or others or seriously damaging property. It is necessary in more extreme cases, for example to stop a physical fight.

(c) Injury means 'significant injury'; this would include actual or grievous bodily harm, physical or sexual abuse, risking the lives of, or injury to, themselves or others, by wilful or reckless behaviour.

Who can use Reasonable Force?

- All members of school staff have a legal power to use reasonable force
- This power applies to any member of staff at the school.
- It can also apply to people whom the Head has temporarily put in charge of pupils such as unpaid volunteers or parents accompanying students on a school organised visit.

The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances.

When can Reasonable Force be used?

Reasonable force can be used:
- To prevent pupils from hurting themselves or others, from damaging property, or from causing disorder.
- To control pupils or to restrain them if the consequences of not doing so would be seriously detrimental to themselves or others
- To prevent a pupil leaving the classroom where allowing the pupil to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- To prevent a pupil from attacking a member of staff or another pupil, or to stop a fight in the playground
- To restrain a pupil at risk of harming themselves through physical outbursts

When can Reasonable Force NOT be used?

Reasonable force can never be used as a form of punishment.

GUIDELINES FOR THE USE OF PHYSICAL RESTRAINT

Professional judgement should be used in circumstances where the use of physical restraint and reasonable force is needed.

- Staff should not hesitate to act in an emergency provided they follow the guidelines in this policy.
- Staff should always satisfy themselves that the action they take would be considered justifiable by a wider audience of professional colleagues.
- In any application of physical restraint, the minimum reasonable force should be used to calm down the situation.
- Help should be summoned from colleagues; pupils should never be involved in restraint.

What to do in circumstances when the use of physical restraint and reasonable force is needed

- Approach the pupil calmly but firmly.
- Where possible, the consequences of refusing to stop the behaviour should be explained and it should be communicated to the pupil that physical contact or restraint will stop as soon as it ceases to be necessary.
- A calm and measured approach is required by staff throughout.

Method of Restraint

The method of restraint employed must use the minimum force for the minimum time and must observe the following:

Restraint must not:
- Involve hurting the pupil
- Involve deliberately inflicting pain on the pupil

- Restrict the pupil's breathing
- Involve contact with sexually sensitive areas
- Involve locking the pupil in a room

During any incident the person restraining should:
- Offer verbal reassurance to the pupil
- Cause the minimum level of restriction of movement
- Reduce the danger of any accidental injury
- Cease the restraint if there are any signs of physical distress in the pupil such as sudden change in colour, difficulty breathing or vomiting

Physical restraint can be:
- Partial – restricting and preventing particular movements
- Total – as in the case of immobilisation

Physical intervention can take several forms and may involve staff:
- Physically interposing between pupils
- Blocking a pupil's path
- Holding
- Pushing
- Pulling
- Leading a pupil by the hand or arm
- Shepherding a pupil away by placing a hand in the centre of the back or in extreme circumstances using more restrictive holds

Do:
- Summon help immediately. A pupil can be sent to get another adult.
- Ensure a free passage of air through airways
- Be aware of any feelings of anger
- Continue to talk to the pupil in a calm way
- Provide a soft surface if possible
- Be aware of any accessories worn by you or the pupil that could cause injury
- Monitor the pupil's respiration, circulation and state of consciousness

Don't:
- Try to manage on your own
- Stop talking, even if the pupil does not reply
- Straddle the pupil
- Push their arms up their back
- Touch the pupil near the throat or head
- Put pressure on joints or on arterial pressure points (inside of upper arm, groin, neck)
- Use facedown holds

Recording incidents

- Minor or everyday use of reasonable force does not need to be recorded. For example very young children running off in the playground and being guided back to the line by the teacher or assistant. Nonetheless if a member of staff is in any doubt about a physical interaction or about how the child or parents might react, it may well be sensible to record the incident with senior member of staff e.g. Head of Nursery, Head of Pre-prep or Headmaster.

- All more serious incidents involving the use of physical restraint must be reported to the Headmaster or the Deputy Head or Head of Pre - prep as soon as possible after the incident. These must be recorded on Engage and will be then included in the report on the Record of the Use of Physical Restraint.

Telling parents when force has been used on their child

- In a serious incident where a member of staff has had to physically restrain a pupil, the parent will be informed on the day or as soon thereafter as is practical.

What happens when a pupil complains that force has been used upon them?

- All complaints about the use of force should be thoroughly, speedily and appropriately investigated.
- Where a member of staff has acted within the law – that is, they have used reasonable force in order to prevent injury, damage to property or disorder – this will provide a defence to any criminal prosecution or other civil or public law action.
- When a complaint is made the onus is on the person making the complaint to prove that his/her allegations are true – it is not for the member of staff to show that he/she has acted reasonably.
- If an allegation of abuse is made against a member of staff, the procedures set out in the Safeguarding and Child Protection Policy will be followed.

APPENDIX 6

SEARCHING AND CONFISCATION POLICY

(a) This policy has been written using advice taken from searching, Screening and Confiscation: Advice for Head teachers, School Staff and Governing Bodies DfE 2014. The School acknowledges its legal duty to make reasonable adjustments for disabled pupils and Pupils with Special Educational needs in accordance with the Equality Act of 2010.

(b) School staff can search a pupil for any item if the pupil agrees.

(c) The ability to give consent may be influenced by the child's age or other factors.

(d) It is enough for the teacher to ask the pupil to turn out his or her pockets or if the teacher can look in the pupil's bag or locker and for the pupil to agree. They do not need written consent from the child.

(e) A pupil refusing to co-operate with such a search raises the same kind of issues as where a pupil to stop any other unacceptable behaviour when instructed by a member of staff – in such circumstances, schools can apply an appropriate sanction

(f) The Headmaster, and staff authorised by him, have a statutory power to search pupils or their possessions, without consent, where they have reasonable grounds for suspecting that the pupil may have a prohibited item. Prohibited items are:
- knives or weapons
- alcohol
- illegal drugs
- stolen items
- tobacco and cigarette papers
- fireworks
- pornographic images

(g) Any article that the member of staff reasonably suspects has been, or is likely to be, used to commit an offence, or to cause personal injury to, or damage to the property of, any person (including the pupil) may be confiscated.

(h) The Headmaster and authorised staff can also search for any item which has been prohibited.

(i) There must be a witness to the search who is a member of staff unless and only where the staff member reasonably believes that there is a risk that serious harm will be caused to a person if they do not conduct the search immediately and where it is not reasonably practicable to summon another member of staff.

(j) The power to search without consent enables a personal search, involving removal of outer clothing and searching of pockets; but not an intimate search going further than that, which only a person with more extensive powers (e.g. a police officer) can do.

Establishing grounds for a search

(a) Staff can only undertake a search without consent if they have reasonable grounds for suspecting that a pupil may have in his or her possession a prohibited or a stolen item. The teacher must decide in each particular case what constitutes reasonable grounds for suspicion. For example, they may have heard other pupils talking about the item or they might notice a pupil behaving in a way that causes them to be suspicious.

(b) In the exceptional circumstances when it is necessary to conduct a search in the absence of a witness, the member of staff conducting the search should bear in mind that a pupil's expectation of privacy increases as they get older.

(c) The powers allow school staff to search regardless of whether the pupil is found after the search to have that item. This includes circumstances where staff suspect a pupil of having items such as illegal drugs or stolen property, which are later found not to be illegal or stolen.

(d) School staff can view CCTV footage in order to make a decision as to whether to conduct a search for an item.

(e) Searches without consent can only be carried out on the school premises or, if elsewhere, where the member of staff has lawful control or charge of the pupil, for example on school trips in England or in training settings.

Confiscation

School staff can seize any prohibited item found as a result of a search. They can also seize any item, however found, which they consider harmful or detrimental to school discipline.

When deciding what to do with the confiscated items, staff will follow the guidelines set out in Searching, Screening and Confiscation: Advice for Head teachers, school staff and governing bodies DfE 2014.

Dealing with electronic devices

(a) Where the person conducting the search finds an electronic device they may examine any data or files on the device if they think there is a good reason to do so. Following an examination, if the person has decided to return the device to the owner, or to retain or dispose of it, they may erase any data or files, if they think there is a good reason to do so.

(b) The member of staff must have regard to the following guidance issued by the Secretary of State when determining what is a "good reason" for examining or erasing the contents of an electronic device:

(c) In determining a 'good reason' to examine or erase the data or files the staff member must reasonably suspect that the data or file on the device in question has been, or could be, used to cause harm, to disrupt teaching or break the school rules.

(d) **If inappropriate sexual material is found on a device or material which has been used to bully or cause harm to another pupil it must not be deleted.** The device involved should be confiscated.

(e) Staff **must not** view images, look for further images, copy or print any images or forward images by email or any other electronic means. This must be reported to the DSL immediately.

(f) The device will be retained as evidence of a criminal offence or a breach of school discipline and the DSL will determine whether the material is of such seriousness that it requires the involvement of the police.

Lockers and desks

Under common law powers, schools are able to search lockers for any item provided the pupil agrees. Schools can also make it a condition of having a locker that the pupil consents to have these searched for any item whether or not the pupil is present.

If a pupil does not consent to a search (or withdraws consent having agreed) then it is possible to conduct a search without consent but only for the "prohibited items" or for something stolen.

Informing Parents

There is no requirement for the school to inform parents before a search
Parents will be informed if the matter is sufficiently serious or could be potentially harmful to the pupil or the school.
If a parent makes a complaint, the normal procedures for dealing with a complaint should be followed.

Recording

There is no legal requirement for the school to keep records of searches or confiscation. However as part of our normal procedures any such event will be recorded on MyConcern.