Olive Academies Independent School

OA-North View

Child Protection and Safeguarding Policy

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Updates/revisions included:	**Document control table** • Updated to reflect **Keeping Children Safe in Education 2026**, effective from 1 September 2026. • Updated to reflect **Working Together to Safeguard Children 2026**, including strengthened multi-agency safeguarding arrangements. • Amended safeguarding responsibilities to reflect the requirement that **all staff read Part One of KCSIE 2026**. • Strengthened references to **Family Help, Early Help and multi-agency working**. • Enhanced guidance relating to **mental health, emotional wellbeing and vulnerability factors**. • Expanded safeguarding content relating to **young carers, children with medical conditions and children experiencing multiple and overlapping harms**. • Updated online safety guidance to reflect emerging risks including **artificial intelligence (AI), deepfake imagery, misinformation, disinformation and harmful online influences**. • Strengthened expectations regarding **filtering and monitoring systems**, including annual review and governance oversight. • Enhanced references to **violence against women and girls (VAWG), misogyny and harmful online ideologies** within safeguarding practice. • Updated statutory references, terminology and safeguarding definitions to ensure compliance for the **2026-2027 academic year**. Additional Legislation and Guidance has been referenced in relation to the Independent School Standards.

	Appendix E has been updated to reflect the specific safeguarding context of an SEMH Independent School, ensuring that procedures, responsibilities and guidance are tailored to the needs of pupils while remaining compliant with KCSIE 2026.

If you have a safeguarding concern, contact the Designated Safeguarding Lead immediately. If they are unavailable, contact the Deputy DSL. If a child is at immediate risk, call 999 or if it is non-urgent, please call 101.

This policy applies to Olive Academies Independent School OA-North View and should be implemented consistently throughout the school. Proposed amendments should be referred to the Head of School/Executive Headteacher and OAISB for consideration.

In addition to following national statutory and departmental guidance and advice published by the DfE, we also follow Thurrock local authority's safeguarding procedures.

KEY CONTACTS OLIVE ACADEMIES INDEPENDENT SCHOOL – NORTH VIEW

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Designated Teacher for LAC and PLAC	Abbie Clarke	Abbie.clarke@oliveacademies.org.uk 01708 853781
Online Safety Coordinator	Abbie Clarke	Abbie.clarke@oliveacademies.org.uk 01708 853781
Chair of Olive Academies Independent Schools Board	Mark Whitby	Mark.Whitby@oliveacademies.org.uk
Local Authority Designated Officer (LADO)		LADO@Thurrock.gov.uk 07762406606
Referrals into Early Help and Social Care		Thurrock Child Protection Team 01375 652 802 Out of hours/weekends 01375372468
Olive Academies Safeguarding Lead	Sarah Coe	Sarah.Coe@oliveacademies.org.uk
Named Safeguarding Member on the OAISB	Catherine Kitchen	Cath.Kitchen@oliveacademies.org.uk
Channel Helpline		020 7340 7264 counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321

National Society for the Prevention of Cruelty to Children		• 0808 800 5000

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1. Introduction

The welfare of pupils is our paramount concern. OA-North View will ensure that we safeguard and promote the welfare of pupils and work together with other agencies to ensure that we have adequate arrangements to identify, assess and support those pupils who are suffering or likely to suffer harm.

OA-North View is a community and all those directly connected, staff members, parents, families, pupils, and other stakeholders have an essential role to play in making it safe and secure. We wish to facilitate a whole school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. All systems, processes and policies should operate in the best interests of the pupils. Where there is a safeguarding concern, The Olive Academies Independent Schools Board (OAISB, and leaders across the school should ensure that the pupils' wishes and feelings are considered when determining what action to take and what services to provide. Systems should be in place for pupils to express their views and give feedback.

As a specialist SEMH independent school which provides education to pupils with identified SEND and who have an Education, Health Care plan (EHCP), we recognise that pupils often have complex needs and that we remain aware of the additional risk of harm that pupils may be vulnerable to. We must take this into account.

Within this document, the term 'staff' should be broadly read as any adult working within the school whether directly employed, providing a contracted service, a one-off service such as a supply teacher or a volunteer.

2. Ethos and aims

OA-North View provides a caring, positive, safe and stimulating environment that promotes the welfare, social, physical and moral development of the individual pupils.

We recognise:

- the importance of providing an environment that will help children feel safe and respected
- the importance of enabling children to talk openly and to feel confident that they will be listened to and
- that all adults within the school, including permanent and temporary staff, volunteers and OAISB members, have a full and active part to play in protecting pupils from harm.

We will work with parents and carers to build an understanding of the school's responsibilities to ensure the welfare of all pupils, including the need for referrals to other agencies in some situations.

At OA-North View we aim to ensure that:

- appropriate action is taken in a timely manner to safeguard and promote children's welfare
- all staff are aware of their statutory responsibilities with respect to safeguarding and
- staff are professionally trained in recognising and reporting safeguarding issues.

3. Legislation and statutory guidance

This safeguarding policy is written with regard to, and in accordance with, the following statutory guidance, legislation, and regulatory requirements:

Statutory Guidance (Education Sector)

- Keeping Children Safe in Education (latest version)
- Working Together to Safeguard Children
- Working Together to Improve School Attendance
- Prevent Duty Guidance: Guidance for specified authorities in England and Wales
- Disqualification under the Childcare Act 2006
- HM Government (2020) Multi-agency statutory guidance on female genital mutilation
- HM Government (2025) Channel Duty Guidance: Protecting people susceptible to radicalisation
- Home Office & FCDO (2022) Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage

Independent School Regulatory Requirements (ISS & ISI)

- The Education (Independent School Standards) Regulations 2014 (as amended), including:
    - Part 3 – Welfare, health and safety of pupils
    - Part 4 – Suitability of staff, supply staff and proprietors
    - Part 8 – Quality of leadership and management
- ISI Commentary on the Regulatory Requirements (latest version)
- ISI Inspection Framework: Education Quality & Compliance

Additional Safeguarding Legislation

- Children Act 1989
- Children Act 2004
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR

Non-Statutory Guidance

- DfE (2015) What to do if you're worried a child is being abused
- DfE (2024) Information sharing
- DfE (2017) Child sexual exploitation
- DfE (2024) Recruit teachers from overseas
- DfE (2024) Sharing nudes and semi-nudes: advice for education settings working with children and young people
- DfE (2021) Teachers' Standards
- DfE (2025) Meeting digital and technology standards in schools and colleges
- DfE (2025) Filtering and monitoring standards for schools and colleges
- Department of Health & Social Care (2024) Virginity testing and hymenoplasty: multi-agency guidance
- Guidance for Safer Working Practice for those working with children and young people in education settings (Safer Recruitment Consortium)

Local Safeguarding Partnerships

This policy and its procedures follow the statutory arrangements and multi-agency safeguarding procedures of the local safeguarding partners in the local authority areas in which the school operates.

Proprietorial Body Compliance

This policy complies with the responsibilities placed upon the proprietor under the Independent School Standards, including ensuring:

- robust safer recruitment
- maintenance of the Single Central Record
- effective safeguarding oversight
- compliance with Parts 3, 4 and 8 of the ISS

4. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix B explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the children's health or development. Appendix B defines neglect in more detail.

Sharing of nudes and semi-nudes' images/videos also includes 'pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video' (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children include everyone under the age of 18.

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will decide to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the pupils involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrators(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

5. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- have special educational needs (SEN) or disabilities or health conditions
- are young carers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are looked after or previously looked after
- are missing from education
- and whose parent/carer has expressed an intention to remove them from school to be home educated.

6. Roles and responsibilities

Safeguarding children is **everyone's** responsibility. Everyone who encounters children and families has a role to play. This policy applies to all staff, volunteers and governance volunteers in the School and across the trust and is consistent with the procedures of the three safeguarding partners within each local authority region. OA-North View's policy and procedures also apply to extended school and off-site activities.

Schools play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/ misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by the following policies:

- behaviour policy
- pastoral support system
- planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - healthy and respectful relationships
    - boundaries and consent
    - stereotyping, prejudice and equality
    - body confidence and self-esteem
    - how to recognise an abusive relationship (including coercive and controlling behaviour)
    - the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
    - what constitutes sexual harassment and sexual violence and why they are always unacceptable

6.1 All staff

All staff will:

- read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- sign a declaration, via Usecure at the beginning of each academic year to say that they have read and understood the guidance

- reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online)
- and provide a safe space for pupils who are LGBT+ to speak out and share their concerns

All staff will be aware of:

- the systems which support safeguarding, including this pupils protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the online safety policy, as well as the safeguarding response to children who go missing from education
- the early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- what to do if they identify a safeguarding issue or a pupil tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as pupils-on-pupils abuse, pupils' sexual exploitation (CSE), pupils' criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalization and serious violence (including that linked to county lines).
- the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- the fact that children can be at risk of harm inside and outside of their home, at school and online
- the fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- what to look for to identify children who need help or protection

Section 16 and Appendix D of this policy outline in more detail how staff are trained and supported to do this.

6.2 The Designated Safeguarding Lead (DSL)

Details of the DSL and Deputy DSL are provided at the beginning of this policy - photos and contacts details are clearly displayed in safeguarding posters in the School. The DSL takes lead responsibility for pupils' protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of school hours they can be contacted using the email address indicated on the front of the policy. When the DSL is absent, the deputy DSL will act as cover. If the DSLs are not available, the Trust Safeguarding Lead will act as cover (for example, during out-of-hours/out-of-term activities): contact details are at beginning of this policy.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on pupils' welfare and pupils' protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

- Have a good understanding of harmful sexual behaviour.

The DSL will also:

- Liaise with local authority case managers and designated officers for pupils' protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Take lead responsibility for safeguarding and pupils protection, including online safety and understanding the filtering and monitoring systems and processes in place.

The full responsibilities of the DSL and DDSLs are set out in Keeping Children Safe in Education.

6.3 The Olive Academies Independent Schools Board (OAISB)

The OAISB holds ultimate legal accountability for the governance, systemic monitoring, and regulatory compliance of safeguarding across the school. The OAISB is responsible for:

- Policy Enforcement: Ensuring that a robust, effective Child Protection and Safeguarding Policy is fully implemented, published, and consistently reviewed across the school.
- Regulatory Compliance: Maintaining non-delegable legal accountability to ensure the school remains in absolute compliance with Part 3, Part 4, and Part 8 of the Independent School Standards.
- Resourcing Senior Leadership: Ensuring that the school appoints a Designated Safeguarding Lead from the Senior Leadership Team who is properly resourced, holds appropriate authority, and undergoes specialised training every two years.
- Mandatory Staff Training: Verifying that all school staff, including temporary, supply, and volunteer personnel, complete mandatory child protection induction and undergo annual safeguarding updates.
- Safer Recruitment Oversight: Ensuring the school maintains an airtight Single Central Record that satisfies all safer recruitment criteria before any individual commences work on-site.
- Digital Safety Standards: Accountable for verifying that web filtering and monitoring systems comply fully with national digital standards to block and track online risks effectively.
- Data Monitoring: Actively reviewing safeguarding data, including patterns of low-level concerns, child-on-child abuse, and serious incidents, to ensure structural risks are corrected swiftly.
- Allegations Management: Coordinating directly with the Local Authority Designated Officer within 24 hours in cases where allegations are made against senior leaders or the Head of School.
- Annual Governance Audits: Formally evaluating the application and effectiveness of all safeguarding mechanisms through objective annual audits to maintain a transparent, trauma-informed safety culture.

6.4. The School has a Designated Teacher who is appropriately trained and is responsible for promoting the educational achievement of children who are looked after. They will work closely with the DSL to address any specific safeguarding concerns and with the Virtual school head to agree how available funding can be best used to support the progress of looked after children and meet the needs identified in the pupil's personal education plan.

6.5. The case manager for dealing with allegations of abuse made against school staff members is the Head of School. The case manager for dealing with allegations against the Head of School is the Executive Headteacher or the Chief Executive Officer, who will also immediately report the matter to the designated safeguarding member on the Olive Academies Independent Schools Board. The exact procedure for managing allegations, including the mandatory twenty-four-hour notification threshold to the Local Authority Designated Officer, is detailed comprehensively in Appendix D.

6.6. The Head of School is responsible for the implementation of this policy within their School, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of the systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
  - Promote filtering and monitoring of online systems and procedures
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and pupils' protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix D)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL and OA central on this

6.7. All staff members, OAISB Members, volunteers and external providers should know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a pupil.

6.8. Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

7. Confidentiality and Consent

We recognise that all matters relating to pupils' protection are confidential. It is also essential that people working with children can confidently share information as part of their day-to-day work. This is necessary not only to safeguard and protect children from harm but also to work together to support families to improve outcomes for all.

The headteacher or the DSL will disclose any information about a pupil to other members of staff on a need-to-know basis, and in the best interests of the pupils. All staff members must be aware that they cannot promise a pupil to keep secrets which might compromise the pupil's safety or well-being.

All staff members have a professional responsibility to share information with other agencies to safeguard children in line with the procedures set out by the three safeguarding partners.

All staff members who meet children will be given appropriate training to understand the purpose of information sharing to safeguard and promote children's welfare.

We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.

The key points of **confidentiality** are summarised below:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a pupils at risk
- Staff should never promise a pupil that they will not tell anyone about a report of abuse, as this may not be in the pupil's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There are no easy or definitive answers when a victim makes this request and staff taking a report should never promise confidentiality. Even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a pupil is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, **all staff** will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information and will support staff who must make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).

Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in Appendix D.

The **following principles** guide the practice on consent and information sharing - we will **proactively seek out** information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support pupilss.

The School may have to **share information** about parents or carers, such as their medical history, disability or substance misuse issues, for investigations of pupil's abuse carried out by Children's Social Care.

The **Data Protection Act 2018 is not a barrier** to sharing information. It is there to ensure that personal information is managed in a sensible way and that a balance is struck between a person's privacy and public protection.
We should be **sharing any concerns we have with parents at an early stage**, unless this would put a pupil at greater risk or compromise an investigation. Parents need to know what our responsibilities are for safeguarding and protecting children and that this involves sharing information about them with other professionals.

Be **clear about the purpose** of sharing confidential information and only share as much as you need to achieve your purpose.

Try to **get consent** from parents (or the pupils, if they have sufficient understanding[1]) to share information, if possible. However, you do not need consent if you have serious concerns about a pupil's safety and well-being. If you decide to share information without consent, you should record this with a full explanation of your decision.

Consent should not be sought from parents or carers (or the pupils, if they have sufficient understanding**),** if:

- it would place a pupil at increased risk of harm; or
- it would place an adult at risk of serious harm; or
- it would prejudice a criminal investigation; or
- it would lead to unjustified delay in making enquiries about allegations of significant harm to a pupil; or
- required by law or a court order to share information.

Consent is not necessary in cases where Children's Social Care are making pupils protection enquiries under section 47 of the Children Act 1989. Information needs to be shared with Children's Social Care; staff members must make sure to record what information has been shared.

Consent is necessary for:

- Children's Social Care investigations or assessments of concerns under section 17 of the Children Act 1989. Children's Social Care will assume that we have obtained consent from the parents to share information unless we make them aware that there is a specific issue about consent. This must be discussed with a social worker in Children's Social Care.
- early help assessments. Assessments are undertaken with the agreement of the pupils and their parents or carers.

If you are in any doubt about the need for seeking consent, get advice from the DSL or from Children's Social Care.

Keep a record of your decision to share information, with or without consent, and the reasons for it. Remember also that it is just as important to keep a record of why you decided not to share information as why you did so.

8. Recognising abuse, neglect and exploitation and taking action

Staff, volunteers and governance volunteers must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

All staff working within the trust will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. The school will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

8.1 If a pupil is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a pupil is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly.

Referral procedures are provided in Appendix D – flow chart for raising concerns about a pupil.

If you have any doubt about how to report abuse to the local authority, you can use this link to get contact details: https://www.gov.uk/report-pupils-abuse-to-local-council

8.2 If a pupil makes a disclosure to you

If a pupil discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the pupils they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the pupil's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a pupil.

8.3 If you discover that FGM has taken place, or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of pupil abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupils may be at risk, are set out in Appendix E of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

must immediately **report this to the police**, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupilss. **Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow local safeguarding procedures.

8.4 If you have concerns about a pupil (as opposed to believing a pupil is suffering or likely to suffer from harm, or is in immediate danger)

Appendix E illustrates the procedure to follow if you have any concerns about a pupil's welfare. Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or the Trust safeguarding lead. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

8.5 Early help

Most parents can look after their children without the need of help other than from their family or friends. However, some parents may need additional help from the School or other services such as the NHS. Providing help early is more effective in promoting the welfare of pupils than reacting later. If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The School will work together with other agencies to provide a coordinated offer of early help, in line with *Working Together to Safeguard Children* and local guidance, to any pupils who needs it.

We will pool knowledge within the School and with other agencies about which families or pupils need additional support in a range of ways so that we can work out how best to help them. We will use the early help framework within Children's Social Care to identify what level of need the pupils or their family has.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

8.6 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see section 8.1), you must tell the DSL as soon as possible.

The local authority will decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the pupil's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the pupil's situation improves.

8.7 If you have concerns about extremism

If a pupil is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and OAISB members can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

8.8 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a pupil has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a pupils may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a pupil that is also a safeguarding concern, take immediate action by following the steps in section 8.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. Please also read the trust's mental health statement which outlines the support available for children and staff across the trust.

The Department for Education provides guidance on mental health and behaviour in schools and each School provides training and support to staff in supporting pupils with mental health concerns.

8.9 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the Executive Headteacher, Director of Education or CEO.

The headteacher or senior leader as outline above will then follow the procedures set out in Appendix D, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

8.10 Child-on-child abuse

The trust is aware that some children may be particularly vulnerable and have an increased risk of abuse. Each school within the trust will recognise that children with SEND or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The school will consider extra pastoral support for those children.

The trust understands that all pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability and will ensure that all schools within the trust give special consideration to, amongst others, children who:

- Have SEND
- Are vulnerable to being bullied
- Are looked after or living in unsupportive home situations

DSLs working in schools within the trust will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to the trust's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The trust's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the trust's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. The trust has a zero-tolerance approach.

We also recognise the gendered nature of pupils-on-pupils abuse. However, all pupils-on-pupils abuse is unacceptable and will be taken seriously. Most cases of pupils hurting other pupils will be dealt with under the behaviour policy, but this pupils protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the School at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See Appendix E for more information about pupils-on-pupils abuse.

8.11 Procedures for dealing with allegations of pupils-on-pupils abuse

If a pupil makes an allegation of abuse against another pupils:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the pupils(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

Creating a supportive environment in the School and minimising the risk of pupils-on-pupils abuse

We recognise the importance of taking proactive action to minimise the risk of pupils-on-pupils abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

Ensure the curriculum helps to educate pupils about appropriate behaviour and consent

Ensure pupils can easily and confidently report abuse using the reporting systems)

Ensure staff reassure victims that they are being taken seriously

Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a pupil's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A pupil's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the pupils is being abused themselves, and that this would fall under the scope of this policy
    - The important role they must play in preventing pupils-on-pupils abuse and responding where they believe a pupils may be at risk from it
    - That they should speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent the school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, considering whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach a view about what happened while an independent investigation is ongoing

8.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupils to delete it
- Ask the pupils(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupils(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupils(s) that they will receive support and help from the DSL.

Initial review meeting
Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
Whether there is an immediate risk to pupils(s)

- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupils in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL
If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate). If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers
The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupils at risk of harm.

Referring to the police
If it is necessary to refer an incident to the police, this will be done through calling the school's link police officer and completion of a MASH referral using the Multi Agency Framework (MAF) as appropriated.

Recording incidents
All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

Curriculum coverage
Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of relationships and sex education and online safety programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes School staff will follow in the event of an incident.

8.10 Reporting systems for pupils

Where there is a safeguarding concern, we will take the pupil's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure reporting systems are well promoted, easily understood and easily accessible for pupils – through posters, discussions with pupils and website information
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Use annual audit cycle to check with pupils about their confidence and knowledge about the reporting systems

9. Online safety and the use of Personal Electronic Devices

The trust recognises the importance of safeguarding children from potentially harmful and inappropriate online material and understand that technology is a significant component in many safeguarding and wellbeing issues. All staff and volunteers will adhere to the ICT and Online Safety Policy.

Through training, all staff within the trust will be made aware of the need to:

- Ensure an appropriate level of security protection procedures to safeguard systems, staff and pupils – these are reviewed to keep up with evolving cyber-crime technologies – these procedures are outlined in ICT and online safety policy
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The four key categories of risk
All staff training on online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet the aims and address the risks above we will:
- Educate pupils about online safety as part of the curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via the websites, communications sent directly to them and during parents' meetings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that staff:
    - are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and OAISB member aware that they are expected to sign an agreement regarding the acceptable use of the internet in the School, use of the School's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of the OA-North View policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the School's IT systems, in accordance with the filtering and monitoring standards published by the DfE.
- Limit pupils' exposure to the above risks from the School's IT system. Systems are regularly reviewed, and DSLs know how to escalate concerns when identified.

- Carry out an annual review of the OA-North View approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by the school community

10. Notifying parents or carers

Where appropriate, we will discuss any concerns about a pupil with the pupil's parents or carers. The DSL will normally do this in the event of suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the pupils, we will discuss this with the local authority's children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other pupils involved, and when. We will work with the police and/or local authority for children's social care to make sure the approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what is being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

11. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

To address these additional challenges the School will ensure that these children receive additional monitoring and pastoral support. This includes individual risk assessment and safety plans being put in place for each pupil, support with acquiring and maintaining EHCPs, 1:1 coaching and mentoring, provision of counselling as needed and multi-agency support as considered appropriate.

Any abuse involving pupilss with SEND will require close liaison with the DSL (or deputy) and the SENDCO.

12. Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them. In line with the School Attendance (Pupil Registration) (England) Regulations 2024, each school within the trust will ensure it informs their LA of all deletions from the admissions register when a pupil is taken off roll. Where a parent

has expressed their intention to remove a pupil from a school within the trust for EHE, the school, in collaboration with the trust, LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a pupils's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

13. Looked After Children (LAC) and Previously Looked After Children (PLAC)

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. OA-North View will ensure that:

- Appropriate staff have relevant information about a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

The **Designated Teacher** is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

14. Complaints and concerns about OA safeguarding procedures

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with procedures for dealing with allegations of abuse made against staff (see Appendix D).

14.2 Other complaints

We recognise that children cannot be expected to raise concerns in an environment where staff member fail to do so.

We have a clear reporting procedure for children, parents and other people to report concerns or complaints, including abusive or poor practice.

We will actively seek the views of children, parents and carers and staff members on child protection arrangements through surveys, questionnaires and other means.

Further information and support for staff is available in Appendix D on managing allegations, the code of conduct, and whistleblowing policy.

14.3 Whistleblowing

The whistleblowing policy provides details of how concerns can be raised about the trust's safeguarding practice – it is available on the School and trust websites.

15. Record keeping

Accurate and timely record keeping is an important part of the School's accountability to children and their families and will help us in meeting key responsibility to respond appropriately to welfare concerns about children. We will hold records in line with the records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each pupil.
Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a pupil for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil's file. To allow the new school/college to have support in place when the pupils arrive, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the pupils.

OA-North View use CPOMs for the secure storage and sharing of information related to safeguarding. If staff do not feel confident in the use of CPOMS they should ask for further training from the DSL.

All staff members, OAISB members, volunteers, contractors and activity providers should ensure that they record and report safeguarding concerns in line with guidance from the local multiagency procedures.

The DSL will ensure that records (be they on CPOMS or in paper format) are maintained appropriately and securely for children with safeguarding concerns and that stand-alone files are created and maintained in line with requirements of the above guidance.

In addition:

- Appendix C and the safer recruitment procedures set out the policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix D sets out the policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the School's safeguarding systems and their responsibilities, and can identify signs of possible abuse, neglect or exploitation.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the three safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

All new members of staff, including **early career teachers** and **teaching assistants**, will be given an induction which includes reference to:

- the safeguarding and child protection policy
- the behaviour policy
- staff code of conduct
- the policy/guidance which includes the safeguarding response to children who go missing from education
- the role of the DSL and share the identities of the DSL and all DDSLs
- Keeping Children Safe in Education

All new members of staff are expected to read the above-mentioned documents and to sign an acknowledgement of this.

They will be given full child protection and safeguarding training (including online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to cybersecurity, filtering and monitoring.)

The induction and CPD Programme for Staff will include but is not limited to:

- **Understanding Safeguarding Concerns:** Differentiate between a safeguarding concern and a pupil in immediate danger or at risk of significant harm.
- **Adopting a Vigilant Attitude:** Maintain an attitude of 'it could happen here' regarding safeguarding.
- **Responding to Welfare Concerns:** Know what to do when concerned about a pupil's welfare, always acting in the pupil's best interests.
- **Recognising Behavioural Signs:** Understand that poor behaviour may indicate a child is suffering harm or has been traumatised by abuse.

- **Supporting Children with Social Workers:** Recognise that children with social workers may face educational disadvantages and barriers to attendance, learning, behaviour, and mental health.
- **Monitoring Attendance:** Be aware that prolonged or repeated absences can signal safeguarding issues, including neglect, sexual exploitation, and criminal exploitation (e.g., county lines).
- **Addressing Mental Health Issues:** Recognise that mental health issues may indicate harm or abuse, and that known harm or abuse can impact a pupil's mental health, behaviour, and education.
- **Considering Extrafamilial Harms:** Understand that safeguarding incidents can occur outside school and between children outside these environments. Consider risks of abuse or exploitation in situations outside the family, including sexual exploitation, criminal exploitation, and serious youth violence.
- **Responding to Disclosures:** Learn how to respond appropriately to a pupil who discloses abuse or harm.
- **Seeking Guidance:** Always speak to the DSL or deputy DSL if unsure about any concerns.
- **Immediate Action on Concerns:** Act immediately on any concerns about a pupil's welfare. Do not assume another professional will take action.
- **Availability of DSL:** Ensure the DSL or a deputy is always available to discuss safeguarding concerns. If unavailable, speak to a senior leadership team member or take advice from the LADO. Share any actions taken with the DSL or deputy as soon as possible.
- **Prevent Training:** Receive training on the government's anti-radicalisation strategy, Prevent, to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will receive regular safeguarding and child protection updates, including on online safety and cyber-security, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Staff members who miss whole-School training will be required to undertake other relevant training to make up for it, e.g. by joining another School's whole-School training or having a 1:1 session. The DSL will be responsible for arranging this.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

The School will maintain accurate records of staff induction and training.

16.2 The DSL and Deputy DSLs

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

16.3 The Olive Academies Independent School Board (OAISB)

All members of the OAISB receive comprehensive training regarding child protection and safeguarding, incorporating specific modules on online safety and cyber security, during their induction process. This training framework is regularly updated to ensure that all members possess the specialised knowledge and insights required to effectively perform their governance functions and confidently deliver strategic challenge to the school leadership. This ongoing development ensures the OAISB can maintain robust assurance that local safeguarding policies and operational procedures are highly effective, seamlessly supporting the school to implement a comprehensive, trauma-informed, whole-school approach to child welfare.

Because the designated safeguarding OAISB Member may be required to formally act as the case manager in the exceptional event that an allegation of abuse is made against the Head of School or Executive Headteacher, they receive advanced, specialised training in managing allegations for this specific purpose, coordinating directly with the Local Authority Designated Officer in strict accordance with statutory frameworks.

16.4 Recruitment – interview panels

At least one person conducting any interview for any post at the trust will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. See Appendix C of this policy and the safer recruitment statement for more information about safer recruitment procedures.

16.5 Staff who have contact with pupilss and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Quality Assurance and monitoring of effectiveness

The trust will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This will include periodic audits of child protection files and records by the DSL

The trust will complete an annual programme of audits and reviews. This includes an internal audit visit from the trust lead for safeguarding, a review from the lead trustee for safeguarding and an externally commissioned audit. We will also participate in any reviews requested by the Local Safeguarding Children Partnership or Local Authority. Additionally, we will carry out regular internal audits.

Any concerns regarding the safeguarding practices at the trust will be raised with the School leadership group of the school, and the necessary whistleblowing procedures will be followed, as outlined in the trust's Whistleblowing Policy. If a staff member feels unable to raise an issue with their school's SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285

The School's senior leadership group and the trust board will ensure that action is taken to remedy without delay any deficiencies and weaknesses identified in child protection arrangements.

This policy will be reviewed annually by the Designated Safeguarding Leader and at every review, it will be approved by the OAISB.

18. Links with other policies

This policy links to the following policies which are linked to the School website or can be accessed via the staff intranet:

- Behaviour Policy
- Anti-bullying Policy
- Staff code of conduct
- Complaints Policy
- Searching, screening and confiscation policy
- Restrictive Intervention and de-escalation Policy
- First Aid and Administration of medicines
- Health and safety

- Attendance including Children missing education
- ICT and Online safety
- Social media
- Equality Information and Objectives policy
- Relationships, Sex and Health Education Policy
- PSHE
- Mental health Policy
- Privacy notices
- Whistleblowing

The following appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

APPENDIX A - The role of the Designated Safeguarding Lead (and deputy)

1. Managing Referrals

- Refer all cases of suspected abuse to local authority Children's Social Care and to the Police if a crime may have been committed.
- Liaise with the headteacher about safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding.
- Liaise with agencies providing early help services and coordinate referrals from the School to targeted early help services for children in need of support.
- Monitor any cases referred to early help and consider referral to children's services where the situation does not improve.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.

2. Working with others

The designated safeguarding lead is expected to:

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the three safeguarding partners
- Liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- As required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENDCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety):
    - when deciding whether to make a referral by liaising with relevant agencies and so that children's needs are considered holistically
- Liaise with the Senior Mental Health Lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances

- Promote educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and is therefore best placed to identify the impact that these issues might be having on children's attendance, engagement and achievement at school. Working with the headteacher and other staff, the designated safeguarding lead should take lead responsibility for:
    - ensuring that the school or college knows who its cohort of children who currently need a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
    - support teaching staff to feel confident to provide additional academic support or reasonable adjustments to help children who need or have needed a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

3. Information sharing and managing the child protection file

The DSL is responsible for ensuring that child protection files are kept up to date and stored securely. They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupils file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the pupils's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a pupils leaving in order to help them put in place the right support to safeguard this pupils and to help the pupils thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the pupils arrives.

4. Awareness Raising

- Review the safeguarding and child protection policy and procedures annually in partnership with OA central who will recommend the policy to the OAISB for approval.
- Make the safeguarding and child protection policy and procedures available publicly and raise awareness of parents that referrals about suspected abuse may be made and the role of the School in any investigations that ensue.
- Provide updates to the School on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews, at least annually.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. This could include ensuring that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

5. Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand relevant data protection legislation and regulations, including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college The DSL and DDSLs will keep abreast of emerging safeguarding risks associated with artificial intelligence, including AI-generated imagery, online exploitation and technology-facilitated abuse, and will ensure staff are supported in recognising and responding to these risks.
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

APPENDIX B - Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a pupils such as to cause severe and adverse effects on the pupil's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a pupils, although it may occur alone.
Emotional abuse may involve:

- Conveying to a pupil that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the pupils opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a pupil's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the pupils participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a pupils or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the pupils 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
- 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 pupil 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 is the persistent failure to meet a pupil's basic physical and/or psychological needs, likely to result in the serious impairment of the pupil's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.
Once a pupil 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 pupil from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate education, medical care or treatment
- It may also include neglect of, or unresponsiveness to, a pupil's basic emotional needs.

APPENDIX C - Safer Recruitment

(Links with the Safer Recruitment Policy that can be found in the policies folder on the shared drive)

Recruitment and selection process
The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education. The recruitment procedures and safer recruitment statement provide more detail about actions we take to ensure we recruit suitable people.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during the recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- The trust's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, the child protection and safeguarding policy and policy on the employment of ex-offenders
- Require personal details, current and former names, current address and national insurance number
- details of their present (or last) employment and reason for leaving
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
- Qualifications, the awarding body and date of award
- Details of referees/references and
- A statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

OA-North View will only accept copies of a curriculum vitae alongside an application form. A curriculum vitae on its own will not provide adequate information.

Shortlisting

The shortlisting process will aim to include three people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so they can share relevant information and discuss it at the interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true and that they will inform us should there be any subsequent change to the information.

We may also carry out an online search for shortlisted candidates to help identify any incidents or issues that are publicly available online. This will be completed by someone with no other involvement in the

recruitment process. If this is to occur, OA will inform shortlisted candidates that online searches may be done as part of due diligence checks.

Seeking references and checking employment history
We will make every effort to obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection
When interviewing candidates, we will:

- Take copies of Qualifications, the awarding body and date of award, as appropriate to the person specification. Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks
We will record all information on the checks carried out in the School's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff
All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, the appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could, where available, include:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter confirming they have not imposed any sanctions or restrictions, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

Management positions are most likely to include, but are not limited to, headteachers, deputy/assistant headteachers.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a pupils or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a pupils or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left
- Ensure that, where the school ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity

- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity, but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

Trainee/pupils teachers
Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain letters of assurance from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers
We will:
- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

OAISB
All OAISB members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the OAISB will undertake a suitability check by the DfE and an enhanced DBS check that will be conducted regardless of checks previously performed by other organisations or how recently these took place

All proprietors, will also have the following checks:
- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative education settings
Where we place a pupils with an alternative education provider, we obtain letters of assurance from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupilss on work experience
When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupils under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Single Central Record
Each School Office Manager and the HR Manager carry out the *operational task* of physically checking the SCR and making sure all the relevant employment checks are complete and that the document is up to date.

The Trust Safeguarding Lead and HR Manager will provide quality assurance, support and guidance on the SCR to ensure all aspects are complete.

SLG are responsible for ensuring that Mangers are keeping up with their statutory duties.
The safeguarding trustee ensures that the SCR is monitored by asking the right questions about how complete the record is, how frequently it is reviewed and how it is stored.

Appendix D - Managing allegations of abuse made against all staff including supply staff, volunteers and contractors

The aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at OA-North View. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made. (For more detailed information on this please see the Managing Allegations Policy)

Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. The general principles are outlined below and are based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education'.

OA has in place a central HR manager who will provide support and advice to School staff should there be an allegation against an adult.

Section 1: Allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a pupil, or may have harmed a pupil, and/or
- Possibly committed a criminal offence against or related to a pupil, and/or
- Behaved towards a pupils 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 – this includes behaviour taking place both inside and outside of school
- If there is any doubt as to whether a concern meets the harm threshold, the trust will consult the local authority designated officer (LADO).

The trust will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective pupils protection while also supporting the individual who is the subject of the allegation.

A ‘case manager’ will lead any investigation. This will be the head of School, the executive headteacher, Interim Director of Standards or CEO where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

OA-North View procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved
Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a pupils or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the School so that the individual does not have direct contact with the pupils or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the School so that they do not have unsupervised access to children
- Moving the pupils or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative School or other work for the trust

If in doubt, the case manager will seek views from the trust’s HR manager and the designated officer at the local authority, as well as the police and children’s social care where they have been involved.

Definitions for outcomes 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, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

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

Procedure for dealing with allegations
In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the designated officer at the local authority. It is important to ensure that local documentation is completed to the LADO this could include a LADO referral form and MAF. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the

designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the School is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate:

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the pupils/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable).
- The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the pupils/children involved informed of the progress of the case (only in relation to their pupils – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a pupil, or if the individual otherwise poses a risk of harm to a pupil.

If the School is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency. Where the police are involved, wherever possible the School will ask the police at the start of the investigation to obtain consent from the individuals involved to

share their statements and evidence for use in the trust's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff
If there are concerns or an allegation is made against someone not directly employed by the trust, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to standard procedures.

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome OA central HR will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the School, while the School carries out the investigation. We will involve the agency fully, but the School will take the lead in collecting the necessary information and providing it to the LADO as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary). When using an agency, we will inform them of the process for managing allegations, and keep them updated about policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales
We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution
The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated
If the allegation is substantiated and the individual is dismissed or the School ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the trust will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
If the individual concerned is a member of teaching staff, the School will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension
If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the pupils or children who made the allegation, if they are still attending the School.

Unsubstantiated, unfounded, false or malicious reports
If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the pupils and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate. If shown to be deliberately invented, or malicious, the trust will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false or malicious allegations
If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the pupils and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate. If shown to be deliberately invented, or malicious, the School will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing
The School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a pupils/ children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping
The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the School will provide a copy to the individual, in agreement with children's social care or the police as appropriate. Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Pupils Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References
When providing employer references, we will not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious. Substantiated allegations will be included provided that the information is factual and does not include opinions.

Managing the situation and exit arrangements

The School has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a pupils, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at OA-North View, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or OA HR. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety and welfare of children, including any in which the person refuses to cooperate with the process.

'Settlement agreements' (sometimes known as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

Learning lessons
After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the trust's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations
Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a pupil to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Where an adult makes an allegation to the School that they were abused as a pupil, we will advise the individual to report the allegation to the police.

Section 2: Concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

It also applies to organisations or individuals using School premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, we would follow safeguarding procedures, including informing the LADO.

Concerns may arise through, for example:

- Suspicion

- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a pupils, parent or other adult within or outside the School
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns
The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the trust 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 designated officer at the local authority.

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a pupil on a one-to-one basis where they cannot easily be seen
- Humiliating pupils

Sharing low-level concerns
We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any patterns, clusters or concerns in the School's safeguarding system

Responding to low-level concerns
If the concern is raised via a third party, the headteacher will appoint an incident assessor who will collect evidence where necessary by speaking directly to the person who raised the concern, unless it has been raised anonymously and to the individual involved and any witnesses.

The incident assessor will follow the guidance set out in the trust's 'Incident Toolkit' and collate the relevant information using the templates within that tool kit. They will give this to the headteacher who will use the information collected to categorise the type of behaviour and determine any further action, in line with the trust's staff code of conduct and where, relevant in consultation with their line manager.

Further information about responding to low-level concerns is provided in this DfE recommended report: Developing and implementing a low-level concerns policy: A guide for organisations which work with children

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the School

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix D – Flowchart Managing Allegations of Abuse against staff

The flow chart below summarises the procedures to be followed when dealing with an allegation made against an individual who works with children:

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

- Behaved in a way that may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates they are unsuitable to work with children, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

↓

The child and/or alleged abuser SHOULD NOT be questioned, but a detailed, contemporaneous written record must be made immediately of what has been reported.

↓

Report immediately to the **Head of School**. If the allegation concerns the Head of School, report directly to the **Executive Headteacher** (or in their absence, the OA Director of Education). Unless there is definitive immediate evidence to prove the allegation is incorrect, the case manager will proceed immediately to external referral.

↓ ↓

Report to the Local Authority Designated Officer (LADO) within 24 hours of notification. Ensure all local safeguarding children board procedures are meticulously followed.

Take immediate, ongoing professional advice from Human Resources regarding staff management, potential suspension with contractual pay, and duty of care considerations.

↓

The Local Authority Designated Officer (LADO) will:

1. Consider the relevant facts, thresholds, and safeguarding risks regarding the adult and the child, incorporating any historical contextual data.
2. Formally determine the immediate course of action—typically straight away, or following urgent consultation with key multi-agency partners.

↓ ↓

If official child protection thresholds are not met, the LADO will agree an appropriate localised response with the school. This typically involves the school undertaking internal management enquiries, routing through the Low-Level Concerns framework, or applying internal disciplinary procedures.

If formal statutory procedures are to be followed, a multi-agency strategy meeting will be convened immediately by phone or in person. This will normally involve the Head of School, LADO, HR, police, and social care professionals. Information is shared, child safety risks are assessed, and formal action is agreed, which may encompass Section 47 Children Act child protection enquiries, targeted school enquiries, or criminal proceedings. A formal record of the meeting will be made, and review meetings will be held regularly every 4 weeks until a definitive conclusion is agreed.

Note: This document serves as an operational procedure guide. For exhaustive step-by-step procedural requirements and statutory thresholds, please refer to the current edition of Keeping Children Safe in Education statutory guidance.

APPENDIX E - Specific Safeguarding issues

This appendix is based on the guidance in Keeping Children Safe in Education 2026, particularly Annex A: Further Information, which outlines a wide range of specific safeguarding issues. All staff must read Annex A in full as part of their safeguarding training and induction.

As an SEMH Independent School, our pupils often present with complex needs, vulnerabilities and experiences that place them at significantly higher risk of harm. Many of the safeguarding issues described in Annex A are not occasional or exceptional within our context; they are common, overlapping and often interconnected. Staff must therefore maintain heightened professional curiosity, assume elevated baseline risk, and respond swiftly to any emerging concerns.

1. Children Potentially at Greater Risk of Harm (SEMH Context)
National guidance identifies several groups of children who are more vulnerable to safeguarding risks. In our setting, the majority of pupils fall into multiple high-risk categories simultaneously, including:

- Children with SEND
- Children requiring mental health support
- Young carers
- Children with medical conditions
- Children with family members in prison
- Children with disrupted or alternative provision histories
- Children in boarding/residential arrangements (where applicable)
- Children who are LGBT or gender-questioning

These vulnerabilities are core characteristics of our cohort, not exceptions. Staff must:

- recognise that risk is heightened for every pupil
- avoid attributing concerning behaviour solely to SEMH needs
- remain alert to subtle changes in presentation
- understand how trauma, adversity and unmet needs can mask or mimic abuse
- report concerns immediately to the DSL

Safeguarding in an SEMH setting requires proactive, relational and trauma-informed practice at all times.

2. Children Missing from Education
Pupils who go missing from education, particularly repeatedly, may be experiencing abuse, exploitation or neglect. In an SEMH context, missing episodes may also be linked to:

- mental health crises
- family instability
- coercion or exploitation
- substance misuse
- radicalisation
- FGM or forced marriage

Certain groups are at increased risk, including children who:

- are at risk of harm or neglect
- are young carers
- come from Gypsy, Roma or Traveller communities
- come from families of service personnel
- go missing from home or care

- are supervised by the youth justice system
- have experienced disrupted schooling
- are from new migrant families

We follow statutory procedures for unauthorised absence and children missing from education, including notifying the local authority when a pupil leaves without a named destination school. Staff are trained to recognise triggers associated with missing episodes and must report concerns immediately.

3. Child Criminal Exploitation (CCE)
CCE occurs when individuals or groups exploit a child for criminal activity. Pupils with SEMH needs may be particularly vulnerable due to:

- social isolation
- low self-esteem
- unmet emotional needs
- disrupted relationships
- online vulnerability

CCE may involve:

- county lines
- drug distribution
- serious violence
- financial exploitation
- online coercion or blackmail

Indicators include unexplained money or possessions, missing episodes, association with older peers, fearfulness, or sudden behavioural changes. Staff must report concerns immediately.

4. Child Sexual Exploitation (CSE)
CSE is a form of sexual abuse involving coercion, manipulation or deception. Pupilss with SEMH needs may be targeted due to emotional vulnerability, relationship difficulties or online risk.

Indicators include:

- secretive behaviour
- relationships with older individuals
- unexplained gifts
- trauma symptoms
- sexualised behaviour
- online grooming

Concerns must be reported immediately.

5. County Lines
County lines involves organised criminal networks exploiting children to move or sell drugs. SEMH pupils may be targeted due to vulnerability, isolation or previous missing episodes.

Indicators include:

- travel to unfamiliar areas
- association with gangs
- unexplained possessions

- fear or anxiety
- being found far from home

We work closely with police and safeguarding partners where county lines activity is suspected.

6. Modern Slavery and Human Trafficking

Modern slavery includes trafficking, forced labour and criminal exploitation. Indicators include poor living conditions, fearfulness, limited freedom of movement, or signs of physical abuse.

Staff must report concerns immediately.

7. Cybercrime and Online Harms

Pupilss with SEMH needs may be more vulnerable to online risks, including:

- grooming
- coercion or blackmail
- sharing nudes or semi-nudes
- cyberbullying
- harmful online communities
- extremist content
- AI-generated abuse (deepfakes, nudification apps)
- online radicalisation

Staff must remain alert to changes in online behaviour and report concerns immediately.

8. Harmful Sexual Behaviour (HSB)

HSB includes developmentally inappropriate, harmful or abusive sexual behaviour. It may occur online or in person. Indicators include sexualised language, coercion, sharing sexual images, or sexual harassment.

Staff must report concerns immediately.

9. Domestic Abuse

Pupils may experience domestic abuse directly or indirectly. Exposure to domestic abuse is always a safeguarding concern. Indicators include fearfulness, aggression, withdrawal, poor attendance or emotional distress.

10. Radicalisation and Extremism

Pupils may be vulnerable to extremist ideologies, including misogynistic online communities, incel groups, or violent extremist content. Indicators include sudden behavioural changes, isolation, extremist language or accessing harmful online material. Staff must follow Prevent Duty guidance and Channel processes.

11. Forced Marriage and Honour-Based Abuse

Forced marriage and honour-based abuse involve coercion, control or violence. Indicators include fear of family expectations, sudden restrictions on freedom, concerns about travel abroad, or signs of physical or emotional abuse.

12. Female Genital Mutilation (FGM)

FGM is illegal and constitutes child abuse. Staff have a mandatory duty to report known cases involving under-18s to the police. Indicators include concerns about travel, talk of “special procedures”, difficulty walking or sitting, or withdrawal.

13. Fabricated or Induced Illness

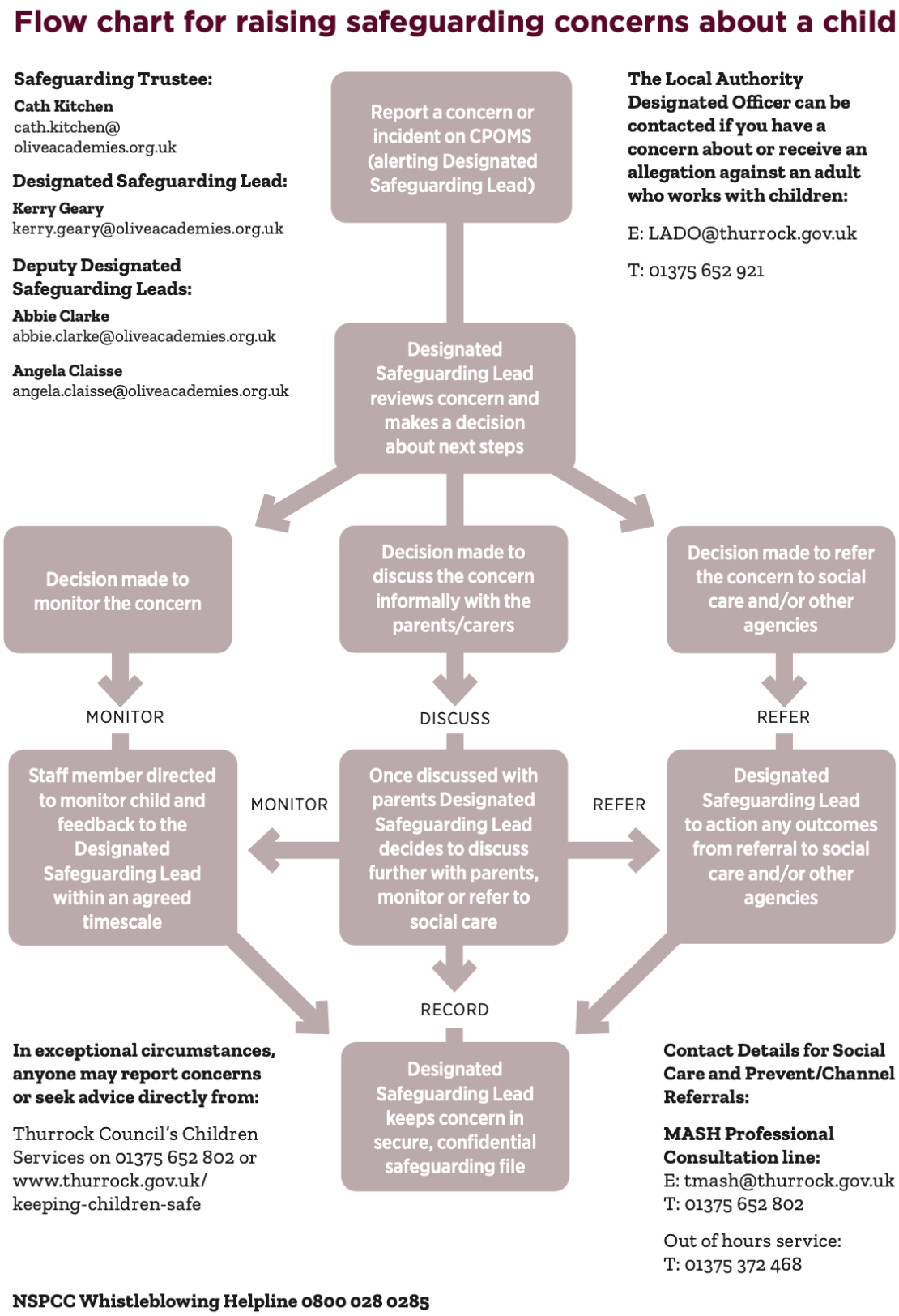
This involves a parent or carer exaggerating or inducing illness in a child. Staff must report concerns immediately.

14. Private Fostering
A private fostering arrangement occurs when a child under 16 (or under 18 if disabled) is cared for by someone who is not a parent or close relative for 28 days or more. Staff must notify the DSL, who will inform the local authority.

15. Substance Misuse
Pupils may misuse drugs, alcohol or other substances. Staff must report concerns immediately.

16. Bullying, Including Prejudice-Based Bullying
Bullying may be physical, verbal, online or relational. Prejudice-based bullying may relate to protected characteristics. Staff must report concerns immediately.

APPENDIX F – Flow chart for raising concerns about a child



Appendix G - FURTHER INFORMATION

For a full list of additional advice and support please refer to KCSIE and the school website.

Thurrock Local Safeguarding Children Partnership: https://www.thurrocklscp.org.uk/lscp
Thurrock SET Procedures: https://www.thurrocklscp.org.uk/lscp/professionals/procedures
Thurrock Child Missing Education guidance: https://www.thurrock.gov.uk/children-missing education/overview
Thurrock Child Sexual Exploitation Guidance: www.thurrock.gov.uk/child-sexual-exploitation/form-of-child-abuse
Sharing nudes and semi-nudes guidance: https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
DfE Guidance: Safeguarding practitioners: information sharing advice:
https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice
DfE Statutory guidance: Working together to safeguard children:
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
DfE Statutory guidance: Keeping children safe in education
www.gov.uk/government/publications/keeping-children-safe-in-education--2
DfE guidance: Sexual violence and sexual harassment between children in schools and colleges:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf
DfE: Advice what to do if you are worried that a child is being abused 2015:
https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2
Guidance on e-security – National Education Network
Cyber security standards for schools and colleges
LGfL online safety policies: lgfl.net
The Prevent duty – guidance for schools and childcare providers:
https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

APPENDIX G – Acronyms

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act 2018.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
[New] EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.

FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	The UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-School trust	A trust established to undertake strategic collaboration and provide education across a number of schools.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the UK and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in LA care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.

PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENDCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs and disabilities (SEND) policy and provision of education to pupils with SEND.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads oversee promoting the educational achievement of all the children looked after by the LA they work for, and all children who currently have, or previously had, a social worker.