



ST. EDWARD'S  
OXFORD

# SAFEGUARDING POLICY

JANUARY 2025

## Document History

<b>Owner:</b>	Director of Safeguarding
<b>Document Status:</b>	Approved
<b>Approved by:</b>	Warden, Governors
<b>This document is available on:</b>	School Website
<b>Review Cycle</b>	Annual
<b>Current version Adopted:</b>	February 2025
<b>Review Date:</b>	August 2025
<b>Related Policies:</b>	Low level concerns Pupil Behaviour Safer Recruitment
<b>Related External Documents:</b>	Key documents:  Keeping Children Safe in Education (KCSIE) September <a href="#">2024</a> Working Together to Safeguard Children <a href="#">2023</a> Equality Act 2010 <a href="#">guidance</a> Oxfordshire Safeguarding Children's Board ( <a href="#">OSCB</a> ) Prevent Duty 2023 <a href="#">guidance</a> Education Act 2002 <a href="#">Section 157</a> Independent Inquiry into Child Sexual Abuse 2022 ( <a href="#">IICSA</a> )  Other relevant website links are also provided within the policy

# If something does not seem right – say something

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The safety and well-being of all pupils at St Edward's School is our highest priority. Each pupil is treated as an individual and the School aims to provide a secure and caring environment so that pupils can learn and undertake educational activities in safety and free from harm.

A 'Speak Up' culture is at the heart of our safeguarding. No concern is considered too small as it could be vital in providing an early indication of a potential issue and in keeping a child safe.

We believe in an open culture in which raising concerns is the normal and right thing to do.

It is also essential that we work in partnership with the pupils. Pupils play a major role in keeping themselves and each other safe and are also encouraged to speak up, as well as being educated on how to stay safe and keep others safe.

In order to create the right culture, we emphasise that :

- Safeguarding is everyone's responsibility – and that includes all staff, volunteers, parents, pupils and visitors Listening to children and to all members of the community is fundamental to safeguarding and is in the best interest of the child;
- Everyone must have the attitude of 'it could happen here' regarding safeguarding;
- Sharing information is crucial in putting together the pieces of the jigsaw.

Staff (which includes Governors, temporary staff, part time staff and volunteers) are trained to take their safeguarding role very seriously. We endeavour to support them through open discussion and training so that they know what to do and can give the pupils an excellent education, in a safe environment which is very mindful of safeguarding, but not in any way hindered by the responsibility.

The School's **Designated Safeguarding Lead** is the Director of Safeguarding, **Vienna Osborne-Ricketts**:

- Tel 07715 990543
- E-mail [osbornerickettsv@stedwardsoxford.org](mailto:osbornerickettsv@stedwardsoxford.org)

If a child makes a disclosure, reassure the child and listen carefully to them

**Do not** investigate, judge or promise confidentiality.

**Do** make brief notes and contact Vienna Osborne-Ricketts or a Deputy: Sarah Turpin, Clare Hamilton, Jim Panton or Eve Singfield

# I. Main aims

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## I.1. Our main aims are to:

- I.1.1. Establish a safe environment in which pupils can learn and develop;
- I.1.2. Ensure the governance of safeguarding and promotion of welfare is fully embedded within the School;
- I.1.3. Raise awareness of child protection issues and ensure staff, volunteers and contractors working at the School are fully aware of presenting issues and how to act in the event of concerns being raised;
- I.1.4. Ensure staff recruitment practice is safe and fully accords with the requirements of Keeping Children Safe in Education (2024);
- I.1.5. Support pupils who are in need of protection or require additional help to achieve good outcomes.

# 2. The School's responsibility for Safeguarding

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- 2.1. Safeguarding and promoting the physical, mental and emotional welfare of children is everyone's responsibility. No single person can have a full picture of a child's needs and circumstances so everyone who comes into contact with children has a role to play in identifying concerns, sharing information and taking prompt action whether these be full time teachers, support staff, part time staff, or volunteers on school premises or away from the School on an activity, visit or other educational pursuit.
- 2.2. All staff must be aware of and, when necessary, follow the obligations laid upon them by the 1989 Children's Act and subsequent legislation and guidance, including The Independent Schools Standards Regulations 2015, Working Together to Safeguard Children 2023, Keeping Children Safe in Education (KCSIE) 2024, the Education Act 2002 Section 157 and PREVENT duty guidance (2023). This policy is also in accordance with the procedures of the Oxford Safeguarding Children Board (OSCB) which can be found online at What to do if you think a child is at risk of abuse or neglect - Oxfordshire Safeguarding Children Board ([oscb.org.uk](http://oscb.org.uk)) and also refers to <http://schools.oxfordshire.gov.uk/cms/content/safeguarding>
- 2.3. The governing body is accountable for ensuring that the school complies with its legal duties under relevant legislation. It has the responsibility of delegating to senior leaders, the implementation of the policies in practice, that policies are reviewed for their effectiveness at least annually and any deficiencies or weaknesses in child protection arrangements are remedied without delay. The governing body is aware of the local arrangements regarding safeguarding partners and the need to operate safeguarding procedures in line with locally agreed inter-agency procedures. The nominated Safeguarding Governor is Clare Robertson

- 2.4. Through the Warden, the governing body has appointed a member of the school's senior management team to the role of Designated Safeguarding Lead (DSL). This person is Vienna Osborne-Ricketts, Director of Safeguarding. Eve Singfield, (Deputy Head Pastoral), Clare Hamilton (Sub-Warden), Jim Panton (Deputy Head Welfare) and Sarah Turpin (Safeguarding Co-Ordinator) act as Deputy DSLs (although the lead responsibility lies with the DSL and is not delegated). The DSL role also includes oversight of on-line safety. The Warden will provide advice and support as necessary. A member of staff trained to DSL level is on site during term time and appropriate arrangements are made in the holiday to ensure adequate cover is provided. The job description of the DSL is detailed in Appendix 2, in accordance with KCSIE 2024, Annex C
- 2.5. The School aims to create an environment within which children feel comfortable and know how to discuss safeguarding matters within a culture of strong pastoral support. The Wellbeing curriculum, including RSE, will promote the welfare and safeguarding of children and this is delivered in lessons, via outside speakers and within the boarding houses as well as in Assemblies, Chapel and other gatherings.
- 2.6. Staff recruitment and vetting is part of our ongoing culture of vigilance surrounding safeguarding and the School has a separate Recruitment and Selection Policy and Procedure
- 2.7. Within the contract for any organisation using the School's premises outside of term time, the organisation is required to confirm they are working within the statutory framework of KCSIE (2024) and specifically that all staff undergo safer recruitment checks, receive safeguarding training, have a Designated Safeguarding Lead who is identified to the School. These details and a copy of the Safeguarding policy are confirmed with the Letting Manager in advance of the start of the Let. The letting organisation is also required to inform the school, within one working day of any safeguarding issue that lead to a referral to the Police or Children's Social Care.

### 3. Key Contact Details

Vienna Osborne-Ricketts Director of Safeguarding and DSL	07715 990543 or 07546 764592 (Mobile) 01865 319466 (Work) (0830 to 1700 Mon to Fri) <a href="mailto:osbornerickettsv@stedwardsoxford.org">osbornerickettsv@stedwardsoxford.org</a>
Sarah Turpin Safeguarding Co-ordinator and Deputy DSL	<a href="mailto:turpins@stedwardsoxford.org">turpins@stedwardsoxford.org</a>
Jim Panton Deputy Head Welfare and Deputy DSL	<a href="mailto:pantonj@stedwardsoxford.org">pantonj@stedwardsoxford.org</a>
Eve Singfield Deputy Head Pastoral and Deputy DSL	<a href="mailto:singfielde@stedwardsoxford.org">singfielde@stedwardsoxford.org</a>
Clare Hamilton Sub-Warden & Deputy DSL	07739 021 643 <a href="mailto:hamiltonc@stedwardsoxford.org">hamiltonc@stedwardsoxford.org</a>
Senior Nurse	01865 319 359 <a href="mailto:@stedwardsoxford.org">@stedwardsoxford.org</a>
Alastair Chirnside Warden	01865 319 323 <a href="mailto:warden@stedwardsoxford.org">warden@stedwardsoxford.org</a>
Clare Robertson Safeguarding Governor	07952 090 510 <a href="mailto:robertsonc@stedwardsoxford.org">robertsonc@stedwardsoxford.org</a>
Chris Jones Chair of Governors	c/o <a href="mailto:turnbulls@stedwardsoxford.org">turnbulls@stedwardsoxford.org</a> (Clerk to the Governors)
School Counsellors	<a href="mailto:SES-SchoolCounsellors@stedwardsoxford.org">SES-SchoolCounsellors@stedwardsoxford.org</a>
Rev Gavin Knight The Independent Listener	07833 251939

#### 3.1. Local External Contacts

LADO (Local Area Designated Officer) ESAT (Education Safeguarding Advisory Team )	01865 810 603 <a href="mailto:lado.safeguardingchildren@oxfordshire.gov.uk">lado.safeguardingchildren@oxfordshire.gov.uk</a>
MASH (Multi-Agency Safeguarding Hub) (use 999 for emergency)	0345 050 7666

Out of hours Emergency Duty Team (EDT)	0800 833 408
LCSS (Local & Community Support Service)	0345 241 2705
Children's Social Care	0345 050 7666 Office hours (8.30am-5pm, Monday to Thursday, 8.30am-4pm, Friday): (outside office hrs: 0800 833 408)
Kingfisher Team (re Child Sexual Exploitation)	01865 309 196

### 3.2. Other contacts

NSPCC Helpline	08456 404 045
Office of the Children's Commissioner	0800 528 0731
Childline	0800 1111
NSPCC Whistleblowing Helpline	0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Independent School Inspectorate (ISI)	08718 727 800
DBS	0345 609 0009
Teaching Regulation Agency	0207 593 5393

### 3.3. Websites:

Oxfordshire Safeguarding Children's Board ( <a href="#">OSCB</a> )
OSCB <a href="#">multi-agency toolkit and threshold of need document</a>
MASH ( <a href="#">reporting concerns</a> )
Keeping Children Safe in Education 2024 ( <a href="#">KCSIE 2024</a> )
Whistleblowing Guidance – <a href="#">Government</a> - <a href="#">NSPCC</a>

## 4. Induction, training and the promotion of welfare

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- 4.1. Before starting work all staff (which includes Governors, temporary staff, part time staff and volunteers), must sign that they have read and understood the following documents:

**4.1.1. Documents for all staff**

- a. The School's Child Protection and Safeguarding Policy
- b. The Code of Conduct • The Low Level Concerns Policy

**4.1.2. Additional documents for school leaders and those working directly with children**

- a. Part I of the KCSIE (2024) and Annex B
- b. The Pupil Behaviour Policy

**4.1.3. Additional documents for those NOT school leaders or working directly with children**

- a. Annex A of the KCSIE (2024)

- 4.2. On joining, staff will receive induction training on these policies and expectations for effective safeguarding. Staff will be introduced to the DSL (or a Deputy) and their role and given a 'safeguarding card' which outlines the procedure all staff must follow if a disclosure is made by a child. The DSL will emphasise the School's 'speak up' culture at this meeting, the whistleblowing policy (and self-referral process), aspects of the School's code of conduct and the importance and methods of raising low level concerns. Furthermore, the induction will include online safety and roles and responsibilities for monitoring and filtering the internet. Time is also allocated for discussion of any aspects of safeguarding which are not clear. Newly appointed Governors and volunteers are included in the induction process.
- 4.3. Staff (which includes Governors, temporary staff, part time staff and volunteers) will also receive Generalist Safeguarding Training in accordance with OSCB guidelines. The DSL (and a Deputy DSL) are trained by OSCB to deliver this training. This will include awareness of obligations under the PREVENT duty. Staff will also receive an annual safeguarding update in the September inset Programme which includes reminders from the induction process as well as any new information. Peripatetic staff also receive an annual safeguarding update in September. In addition, St Edward's operates a system of more regular updating via termly Inset, e-mail updates and reminders, common room announcements and regular agenda items on meetings in various departments. Staff Inset also includes quizzes and discussion of scenarios in order to facilitate understanding of safeguarding issues.
- 4.4. The DSLs, Warden and Sub-Warden, Housemasters and Housemistresses and their Assistants, all Matrons and nurses also undergo additional PREVENT training online and/or in person.

- 4.5. Senior Managers and other relevant staff receive Safer Recruitment Training at least every five years and every interview panel has a staff member trained in Safer Recruitment
- 4.6. Pupils develop an understanding of what safeguarding is and staff help them know how to be safe through the Wellbeing curriculum, the boarding houses, assemblies and through general awareness raising by staff. This will include a focus on: Relationships Education, Relationships and Sex Education and Health Education guidance ([publishing.service.gov.uk](https://publishing.service.gov.uk) and child on child sexual violence/harassment). A focus is also placed on e-safety <https://www.gov.uk/government/publications/teaching-online-safety-in-schools> and child on child bullying and cyber bullying. Staff also receive training on online safety
- 4.7. All Lower Sixth pupils receive formal child protection training from the DSL or DDSL in the Autumn term as part of Sixth Form Induction which includes how to contribute to the schools anti-bullying ethos and speak up culture.

## 5. Listening to Children

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- 5.1. It is essential that we listen to and hear the children in our care. We encourage all pupils to 'speak up' and report any concerns. The DSL gives this message in House Assembly at the start of each term and it is reinforced by the HMs regularly.
- 5.2. Pupils need to know that there are adults in the School whom they can approach if they are worried, such as house staff, school nurses, counsellors, chaplains and the independent listener. Tutors will also play a key role in listening to children, particularly in individual tutorials. School Prefects, Heads of Houses and Peer Listeners also actively make themselves known to pupils and are trained as listeners and in safeguarding. Posters in house and reminders to pupils throughout the year such as in House Assembly reinforce this message. Our aim is that all children have trusted adults or senior pupils with whom they can be open in a safe environment. This is particularly important for more vulnerable pupils. This vulnerability could be due to their sexuality, ethnicity, learning needs or other factors
- 5.3. Views of pupils are sought informally in Houses and more formally each term via the Head of Pupil Voice and Action with the help of the annual pupil survey (and other surveys through the year), House Councils, Year Group Forums, the pupil EDI committee, School Prefect Meetings with the Warden, Sub-Warden and Deputy Head Pastoral and Heads of House meetings with the Deputy Head Pastoral, Sub-Wardens and Warden. The School also uses the software 'Whisper' for anonymous reporting by pupils. Pupil views are followed up in SMT and HMs meetings to bring about improvements in pupils' well-being and safety.



## 6. Identifying abuse – What is abuse, neglect and exploitation?

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- 6.1. Pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. Staff should have a professional curiosity and speak to the DSL if they have concerns about a child.
- 6.2. Abuse is a form of maltreatment of a child and can be defined as having occurred when a child has suffered significant harm or impairment of health and development by reason of physical violence, sexual interference, emotional pressure or neglect. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.
- 6.3. Staff are trained that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap. Children may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others (e.g. via the internet). They may be abused by an adult/adults or a child/children
- 6.4. Details, in line with KCSIE, on definitions and indicators of abuse and neglect are shown in Appendix 3. Possible signs of child on child abuse including sexual violence and sexual harassment between pupils are shown in Appendix 4. Details about Online Safety are shown in Appendix 5. Details about specific safeguarding issues such as mental health, serious violence and upskirting, are available in Appendix 6.
- 6.5. The warning signs and symptoms of child abuse and neglect can vary from child to child. Disabled children and those with special educational needs may be especially vulnerable to abuse; additional barriers can exist when recognising abuse and neglect in this group of children. These can include: (a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; (b) children with SEN and disabilities can be more prone to peer group isolation or bullying (including prejudice-based bullying) - without outwardly showing any signs; and (c) communication barriers and difficulties in managing or reporting these challenges.
- 6.6. Behaviour and mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Similarly, behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk and any concerns should be raised with relevant staff
- 6.7. Through their day-to-day contact with pupils, staff are well placed to observe any signs that a child may be suffering or is likely to suffer significant harm or is in need of additional support to promote their welfare. As well as listening to children and encouraging them to speak up there are opportunities in the Wellbeing curriculum for pupils to develop the skills they need to keep

themselves safe from harm from other pupils, adults or the internet (the school internet has filters and is monitored by the DSL and others in the pastoral team, Deputy Head Pastoral and Sub-Warden and pupil access to and use of mobile technology is managed). Outside speakers, tutorials, chapel, house based pastoral discussions, House and School assemblies are also used as opportunities to teach children about safeguarding. In these different arenas we address broader safeguarding issues such as self-esteem, body image, healthy eating and exercise, pornography, online safety, sharing nude images, self-harm, drugs, alcohol and vaping/smoking.

- 6.8. Sharing nude and semi-nude images is a specific safeguarding issue. Any incident involving sharing nude and semi-nude images should be referred to the DSL as soon as possible. Separate guidelines on the school's response to sharing nude and semi-nude images are available via the DSL.

## 7. Reporting concerns

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- 7.1. If a member of staff (including supply staff and volunteers) has a concern that a child may be suffering significant harm, is likely to suffer significant harm or is in need of additional support, for example regarding a mental health issue, then they must liaise, immediately with the DSL, or a Deputy DSL, who will decide whether to make a referral to the MASH or LCSS in accordance with local protocols. Advice may also be sought from the ESAT (Education Safeguarding Advisory Team).

It is possible for ANY member of staff to refer concerns directly to children's social care, however, where a member of staff makes a referral directly, the DSL should be informed as soon as possible. Whilst the School will work closely with parents as far as possible, it reserves the right to contact Children's Social Care or the police without notifying parents if this is believed to be in the child's best interests. The starting point of the School is that parents should be informed but this will be subject to the advice of external agencies. Where a pupil is 18 years old, the School will still have informing parents as its starting point but the rights of the adult may mean this is not possible.

- 7.2. If, a child is in immediate danger or is at risk of harm a referral should be made immediately to children's social care at the MASH on 0345 050 7666 (080 0833 408 -out of hours) and/or the police (999) and the DSL informed, as soon as possible.
- 7.3. If a child is in need, it may be advised that an early help assessment is more appropriate than referral to children's social care. These children may need additional support. In this case a lead professional such as a teacher, SENCO, GP, Nurse or matron would identify what coordinated support would benefit the child. This early intervention may prevent the needs escalating to a point where a referral to children's social care is needed. Guidelines on who may benefit from early help are in Appendix I. The OSCB [multi-agency toolkit and threshold of need document](#) can be used to assist the safeguarding leads in deciding what support is needed for a pupil and what action to take.
- 7.4. Guidance in handling concerns raised by children:

7.4.1. Listen to the child

- 7.4.2. Limit any questioning to the minimum necessary to seek clarification. Avoid 'leading' the pupil or adult who has approached you. Do not make judgements or make suggestions or ask questions that introduce your own ideas about what may have happened.
- 7.4.3. Stop asking any more questions as soon as the pupil or adult has disclosed that he or she believes that something abusive has happened.
- 7.4.4. Point out to the informing pupil or adult that you will make sure that the appropriate people are brought in to follow the problem through and ask them if there any steps that they would like to be taken to protect them now that they have made the allegation - but be aware that what they want to happen may not be possible.
- 7.4.5. Do not promise confidentiality to a pupil who makes an allegation. Whilst acknowledging the need to create an environment conducive to speaking freely, the member of staff should make it clear to any pupil asking for confidentiality that he or she will need to pass on what has been told, to ensure the protection of the child concerned. Within that context, the child should then be assured that the matter will be disclosed only to people who need to know, and the child will be told by the DSL who these people are.
- 7.4.6. Make a written record as soon as possible of what they have been told and make a copy of this available to the DSL. A record of concern form (Appendix I) can be used or your own written account.
- 7.4.7. Refer the matter immediately, with all relevant details to the DSL.

It is crucial that pupils do not feel they are creating a problem by reporting abuse, sexual violence or sexual harassment. No pupil should ever be made to feel ashamed for making a report. Pupils should be reassured they are being taken seriously and will be supported and kept safe.

A fear of sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. If in doubt about recording requirements, please discuss this with the DSL.

## 8. Procedure in the event of an allegation against a pupil

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- 8.1. Children may be harmed by other children or young people. Children may abuse their peers physically, sexually (via sexual violence or harassment) and emotionally; this will not be tolerated or passed off as 'banter' or 'part of growing up'. Cases of bullying and cyber-bullying can be viewed as an allegation of child-on-child abuse and a bullying incident will be treated as a child protection concern where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer significant harm'. The school also has an anti-bullying policy and cyber-bullying policy (available on the school website) which cover forms of bullying including sexism, racism, and homophobia.
- 8.2. A pupil against whom an allegation of abuse or harm has been made may be excluded, without prejudice, from the School while there is an ongoing investigation and the Pupil Behaviour Policy will be followed. The School will take advice from the ESAT (Education Safeguarding Advisory Team) on such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved, including the pupil or pupils accused of abuse. It is not a requirement that parental consent is sought before allegations are reported to the Children's Services. However, the School will

normally seek to discuss any concerns about a child with their parents as soon as possible, subject to the advice of the ESAT.

- 8.3. If it is necessary for a pupil to be interviewed by the Children's Services or the police, the School will ensure that, subject to the advice of Children's Services or the police, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. If the pupil is over 18 years old the School will still request that the pupil is supported by an appropriate adult but this may be refused by an external agency. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate them if it is necessary to exclude them.
- 8.4. The management of children and young people with harmful behaviour (including sexually harmful behaviour) can be complex and the School will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator so that all children involved will be treated as being "at risk".

## 9. Procedure in the event of an allegation or concern about staff

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- 9.1. Where it is alleged that a member of staff or volunteer has behaved in a way that: has harmed a child; may pose a threat to children; indicates they may not be suitable to work with children or possibly committed a criminal offence against a child, the matter must be reported, without delay, to the Warden or DSL. If reported to the DSL, the DSL must inform the Warden. Where the Warden or DSL are not available, the information should be reported to a Deputy DSL. Allegations/concerns that do not meet the harms threshold will be dealt with as a "low level concern" as per the school's Low Level Concerns Policy, which is in line with KCSIE 2024 part four, section two. Where there is a conflict of interest in reporting the matter to the Warden, the LADO must be contacted directly.
- 9.2. If a child is in immediate danger or is at risk of harm a referral should be made to children's social care (MASH 0345 050 766) and/or the police (999) immediately. Remember, it is possible for ANY member of staff to refer concerns directly to children's social care. However, where a member of staff makes a referral directly, they should inform the DSL as soon as possible thereafter.
- 9.3. An allegation against the DSL should be notified to the Warden. An allegation against the Warden should be reported directly to the Safeguarding Governor or the Chair of Governors, without notifying the Warden first. An allegation against a Governor should be reported to the DSL, or the Safeguarding Governor or the Chair of Governors
- 9.4. For allegations which may meet the harms threshold, the Warden or the DSL will, as soon as possible and at least within one working day, contact the LADO to discuss the concerns. All allegations which may meet the harm threshold should be referred to the LADO for advice before any investigation takes place. In the case of serious harm the police will be informed from the outset.

- 9.5. The LADO, in conjunction with children's services and/or the police will then confirm the arrangements for investigating the issues raised in line with KCSIE 2024 part four, section one. The School will fully comply with these arrangements including maintaining appropriate levels of confidentiality.
- 9.6. It is not a requirement that parental consent is sought before allegations are reported to the LADO. However, the School will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and on these occasions the DSL will contact the parent to communicate a concern, suspicion or disclosure.
- 9.7. Pending a full investigation, the member of staff may be suspended from duty although in no way is this an admission of impropriety. In cases where a member of the boarding community is suspended pending a full investigation, alternative accommodation will be arranged away from children. Staff may also face disciplinary action where, after investigation, serious concerns remain, even though external agencies may have decided that they are not going to proceed any further with the case.
- 9.8. The School has a duty of care to all staff and volunteers and will act to manage and minimise the stress inherent in the allegations process. Support for the individual against whom the allegation is made will be provided as well as all others involved.
- 9.9. There is a legal requirement for employers to make a referral to the Disclosure and Barring Service (DBS) where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.
- 9.10. If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement agreement will not be used and a referral to the DBS will be made as soon as possible if the criteria are met, as per the guidance published by the DBS.
- 9.11. If the accused person resigns or ceases to provide his/her services, this will not prevent child protection allegations being followed up in accordance with this policy and the statutory guidance. The DBS has statutory authority to bar a person from working in regulated activity with children and/or vulnerable adults in the UK.
- 9.12. Where a teacher is dismissed (or would have been dismissed had he/she not resigned) for misconduct, separate consideration will be given as to whether to make a referral to the Teaching Regulation Agency (TRA), as per the guidance published by the TRA. The reasons for the TRA to consider whether a prohibition order might be appropriate are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.
- 9.13. There will be incidents where the School will need to refer to both the DBS and the TRA and their published guidance will be followed.
- 9.14. **Low level concerns.**
- 9.14.1. A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the School may have acted in a way that:

- a. is inconsistent with the school's Code of Conduct, and
- b. does not meet the allegations/harm threshold or is otherwise not considered serious enough to warrant a referral to the LADO

9.14.2. Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- a. having favourites;
- b. taking photographs of children on their mobile phone;
- c. engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- d. using inappropriate sexualised, intimidating or offensive language.

9.14.3. The Low Level Concerns policy embeds a culture of openness, trust and transparency in which the expected behaviour set out in the Staff Code of Conduct is lived, monitored and reinforced by all staff.

9.14.4. Low Level Concerns should be reported to the same persons as set out above in relation to concerns and allegations that meet the harms test. See Low Level Concerns policy for more details.

## 10. Whistleblowing

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10.1. All staff are required to report any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. Such reports should be made to the Warden or the DSL on the understanding that there will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. The School will take seriously all concerns raised. Where a staff member feels unable to raise an issue with the school or feels that their genuine concerns are not being addressed, they should make a direct referral to the Children's Services (0345 050 7666).

General advice on whistleblowing can be found at <https://www.gov.uk/whistleblowing> or the NSPCC helpline 0800 028 0285 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

The School also has a separate Whistleblowing Policy available on the intranet.

## 11. Safeguarding Specific to Boarding

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11.1. Children can be particularly vulnerable in residential settings and boarding staff should be alert to the potential for child-on-child abuse. There is also a danger of overfamiliarity and favouritism. Additional induction and refresher training is provided to boarding staff to ensure appropriate provision for responding to these issues.

- 11.2. The arrangements for boarding take full account of the National Minimum Standards for boarding which, along with boarding house risk assessments are reviewed by house staff and the Health and Safety office.
- 11.3. Particular care must be taken to ensure pupils are safe within their boarding house. The school has a separate policy on 'Supervision of ancillary, contract 'unchecked' staff and procedure for access to School site by visitors' as well as a notice displayed at the entrance for parents visiting boarding houses. Pupils are also educated on and reminded of their role in maintaining the safety of their house.
- 11.4. Particular vigilance is needed over international pupils who may be more vulnerable due to less parental contact, possibly being less able to communicate and possible concerns over guardian arrangements. HMs monitor these potential concerns and work with the Director of Organisation on the suitability of guardian arrangements.

## 12. Safeguarding specific to remote learning

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- 12.1. In the event of the school needing to teach pupils remotely, the same safeguarding standards apply. Furthermore, the School has additional policies in the event of a pupil, group of pupils or the whole school needing to be educated off site. These policies are found on the school intranet

During or after a period of remote learning additional support for all pupils, but especially those more vulnerable, may be needed. There may be pupils who:

- a. have anxieties related to the cause of the remote learning
- b. have found the period at home hard to manage
- c. may make safeguarding disclosures after returning to the School
- d. may struggle with transitioning into a new educational phase.

- 12.2. It is important that pupils are able to:

- a. develop coping skills and self-care techniques
- b. talk about their current feelings and experiences during the outbreak
- c. have one-to-one conversations with trusted adults, if needed.

## 13. Filtering and Monitoring of IT systems

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- 13.1. DfE guidelines require that schools should be doing all that they reasonably can to limit children's exposure to online risks from the school's IT system, whilst also being careful that "over blocking" does not lead to restriction which unreasonably impacts teaching and learning or prevents pupils from learning how to assess and manage risk themselves. Further details of the type of risks are in Appendix 5.



To help manage these risks, the school has filtering and monitoring systems in place and regularly reviews their effectiveness. The school uses the Fortinet filtering system and the Smoothwall monitoring system, a sophisticated tool which is able to identify exchanges or searches which require our attention. The system runs on the network to alert senior safeguarding staff when a concern is identified. In the holidays, our monitoring is limited to issues of emotional vulnerability. This filtering and monitoring is in addition to the digital wellbeing and literacy programme delivered via the Wellbeing Curriculum.

All staff are trained in their obligations with respect to monitoring pupil digital usage as part of the induction process and via annual updates. The school has a Filtering and Monitoring Committee comprising the DSL, Sub-Warden (Pastoral), Deputy Head Pastoral, Deputy Head Welfare, Deputy Head Academic and Head of IT. This group meets termly to review systems. An annual review is conducted with the Safeguarding Governor present, and this is then presented to the Governors Safeguarding and Pastoral Committee annually. In addition, filtering and monitoring is a standing item in weekly Pastoral Steering Group Meetings.

The DfE guidelines on meeting digital and technology standards in schools are set out here

## 14. Children who are lesbian, gay, bisexual, or gender questioning

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- 14.1. A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.
- 14.2. However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.
- 14.3. When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The DfE Guidance for Schools and Colleges in relation to Gender Questioning Children, provides guidance when deciding how to proceed.
- 14.4. Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.



## 15. Recruitment and Selection Policy and Procedure

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15.1. The aims of the School's recruitment policy are to ensure:

- 15.1.1. that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- 15.1.2. that all job applicants are considered equitably and consistently; to ensure that no job applicant is treated unfairly on any grounds including age, gender reassignment, sex or sexual orientation, marital or civil partner status, disability, race (including colour, nationality, ethnic or national origin), religion or belief;
- 15.1.3. compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the DfE, KCSIE (2024) and the code of practice published by the DBS and to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre- employment checks.

## Appendix I – Early Help

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines,
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit,
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation,
- is at risk of being radicalised or exploited,
- has a parent or carer in custody, or is affected by parental offending,
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse,
- is misusing alcohol and other drugs themselves,
- is at risk of so-called ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage,
- is a privately fostered child.

## Appendix 2 – Role of the Designated Safeguarding Lead (DSL) and Deputies (DDSL)

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The DSL is part of the Senior Leadership team. The areas of responsibility for the DSL are to: -

Refer all cases of suspected abuse and neglect to the local authority children's social care and:

- the ESAT/LADO for child protection concerns (all cases which concern a staff member);
- Disclosure and Barring Service (DBS) (cases where a person is dismissed or left due to risk/harm to a child); and/or Police (cases where a crime may have been committed).
- Liaise with the Warden to inform them about issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations,
- Liaise with staff on matters of safety and safeguarding and act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- refer cases to the Channel programme where there is a radicalisation concern (and give support to staff who make referrals)
- have overall responsibility for the filtering and monitoring of the school's IT platforms (as outlined in Appendix 5)

The DSL receives appropriate training carried out every two years (and in addition to the formal training set out above, their knowledge and skills should be updated at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role) so they:

- ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to, with the assistance of other members of the pastoral team, be alert to the need for the e-safety of pupils
- 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 (the DSL should also undertake Prevent awareness training)
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

## **Raising Awareness**

The DSL should:

- ensure the school's Safeguarding policy is known, understood and used appropriately;
- ensure the school's Safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this;
- ensure the Safeguarding policy is available publicly and that parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this
- link with the OSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

## **Deputy Designated Safeguarding Leads (DDSL)**

Deputies are trained to the same standard as the DSL and will be fully conversant with the role and expectations. The activities of the DSL can be delegated to deputies but the ultimate lead responsibility for child protection remains with the DSL and this lead responsibility is not delegated.

In the absence of the DSL, a DDSL will be responsible for dealing with all matters pertaining to safeguarding and will follow the school procedures accurately.

## Appendix 3 – Abuse, Neglect, & Exploitation: Definitions and Indicators

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

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

### Definitions and Indicators of abuse and neglect

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or tide marks
- Untreated injuries

- Recurrent injuries or burns
- Bald patches.

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

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

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

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

Link to OSCB guidance on physical abuse <https://www.oscb.org.uk/safeguarding-themes/physical-abuse/>

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

danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Indicators of emotional abuse**

#### **Developmental issues**

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

#### **Behaviour**

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

## Social issues

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

## Emotional responses

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

It should be noted that most harm is produced in low warmth, high criticism homes, not from single incidents.

Emotional abuse is difficult to define, identify/recognise and/or prove. Emotional abuse is chronic and cumulative and has a long-term impact.

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

Link to OSCB guidance on emotional abuse <https://www.oscb.org.uk/safeguarding-themes/emotional-abuse/>

Link to OSCB guidance on Domestic Abuse <https://www.oscb.org.uk/safeguarding-themes/domestic-abuse/>

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also



include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education see appendix

**Characteristics of child sexual abuse:**

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

**Indicators of sexual abuse****Physical observations**

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

**Behavioural observations**

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity. Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour

- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed

Link to OSCB guidance on sexual abuse <https://www.oscb.org.uk/safeguarding-themes/sexual-abuse/>

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

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (What to do if You're Worried a Child is Being Abused DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Link to the OSCB guidance on Neglect and toolkit : <http://www.oscb.org.uk/safeguarding-themes/neglect/>

Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL.

**Indicators of neglect**

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons.

**Physical indicators of neglect**

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

**Behavioural indicators of neglect**

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

All staff are trained to be familiar with signs of abuse and neglect and remember, Please speak up 'if you see something or sense something then you should say something'

Initial and minor concerns may be disclosed to the HM/AHM or Matron and may be along the lines of 'it may be nothing but I just noticed that...' Such information can be crucial in putting together the bigger picture around a child.

## Appendix 4: Child on child abuse

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All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse). This can happen inside of school, outside of school and online. All staff are advised to maintain an attitude of “it could happen here.” It is recognised that it is more likely that girls will be victims and boys’ perpetrators, but all child-on-child abuse is unacceptable. It is very important that all staff challenge abusive behaviour between peers. Child on child abuse is most likely to include, but may not be limited to:

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

St Edward’s has a zero-tolerance approach to child-on-child abuse. We will not down-play certain behaviours, e.g., dismissing sexual harassment as “just banter,” “having a laugh” “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

We recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and simply not being reported. Messages communicated to pupils, implicitly and explicitly, directly and indirectly, as part of our daily school life will always make absolutely clear that child on child abuse, in whatever form it may take, is not acceptable.

Pupils can report child on child abuse to any member of staff; their concerns will always be taken seriously and dealt with promptly, firmly and fairly. Pupils may not find it easy to tell staff about abuse verbally, but they can show signs or act in ways that they hope adults will notice and react to. In some cases, a friend may make a report, or a member of staff may overhear a conversation or observe a behaviour that indicates something is wrong.

If staff have any concerns regarding a child's welfare, including concerns about child-on-child abuse, they must report it to the DSL or member of the safeguarding team immediately. Allegations of child-on-child abuse will be recorded on CPOMS and will be followed up by the DSL or member of the safeguarding team, in liaison with external agencies as appropriate.

How allegations will be dealt with by the school:

- Where we have reason to suspect that a pupil may be suffering, or is likely to suffer, significant harm as a result of the actions of another pupil (or pupils), whether this be in or outside of school or in a boarding context, advice will be sought from children's social care as a matter of urgency, and a referral made as soon as possible thereafter if this is the advice received.
- Any possible abuse by one or more pupil against another pupil will be referred to children's social care, though we may start by making a no-names consultation in the first instance to help us determine the most appropriate course of action.
- All allegations and investigation notes will be kept on the school's recording system.
- When does bullying become a child protection issue?
- Under the Children Act 1989 a bullying incident should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. Where this is the case, then as a school we have a duty to report the concern to the local authority children's social care.

Signs that may indicate bullying:

- Behavioural changes such as reduced concentration, becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go to school, etc;
- A marked drop off in performance at school;
- Physical signs such as stomach aches, headaches, difficulties in sleeping, changes in eating habits;
- Appearing ill at ease in the school environment or in the company of peers, or a desire to remain with adults seeming upset, withdrawn or outraged after using phone/ tablet/ computer and unwilling to talk or secretive about online activities and mobile phone use.

### **Sexual violence and sexual harassment between children**

There is concern nationally relating to a culture of misogyny and sexual harassment in many schools and the DfE and Ofsted have reviewed school procedures. The Ofsted review of sexual abuse in school and colleges 2021 highlights the normalisation of sexual harassment. In the light of this report, the School is working with pupils through the Wellbeing curriculum and RSE lessons to develop a strong culture of

respect between boys and girls and to have a zero tolerance approach to sexual harassment and sexual violence.

St Edward's is fully aware of its duty to safeguard and promote pupils' welfare in relation to sexual harassment and abuse. The School does this by working hard to foster healthy and respectful relationships between boys and girls.

Within the Wellbeing curriculum, including RSE, the School discusses issues such as: healthy and respectful relationships; gender roles, stereotyping, equality; body confidence and self-esteem; that sexual violence and harassment is always wrong; and addressing cultures of sexual harassment. The School's RSE and PSHE policies are available on the school website and contain outlines of the material covered in lessons and other forums.

Part 5 of the statutory guidance in Keeping Children Safe in Education 2024 sets out how schools should manage reports of child-on-child sexual violence and harassment. This document is read and understood by the DSL and DDSLs and referred to as needed. Staff have been trained to manage a report of child-on-child sexual violence and sexual harassment.

If a report is made, the designated safeguarding lead will lead on how the report is dealt with, in liaison with the Warden. Where the DSL is unavailable, a Deputy DSL will lead. On a case-by-case basis, there will be consideration made as to the gender of the DSL or Deputy, so that the victim feels comfortable with how the investigation is managed.

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

Early help can be particularly useful to address non-violent Harmful Sexual Behaviour and may prevent escalation of sexual violence.

Where a report of rape, assault by penetration or sexual assault is made, children's social care and the police will be informed. Before doing so, this will be discussed with the victim and their parents/carers (unless it is decided, in conjunction with external agencies not to inform parents), explaining why it is important for other agencies to know and how these agencies will be able to support the victim. If the pupil is over 18 years old, whilst the school will encourage the pupil to inform parents, permission may not be obtained. Other allegations will be managed within the School and/or with support from children's social care providers.

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

A log is kept by the DSL of all incidents of harmful sexual behaviour so that potential patterns of concerning, problematic or inappropriate behaviour (or locations) can be identified, including whether there are wider cultural issues within the School. This information is then used to review policies, teaching and training to minimise the risk of it happening again.

## Appendix 5: Online Safety

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The use of technology presents serious challenges and risks to children and adults both inside and outside of school. The DSL has overall responsibility for online safeguarding within the School. Online Safety issues, as outlined in KCSIE 2024 can be broadly categorised into four areas of risk:

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

Pupils are taught how to keep themselves safe online and when accessing remote education, and regular updates and reminders are provided. As the E Safety policy states, an e-safety curriculum is provided as part of the Wellbeing Curriculum. This includes use of external speakers. Key e-safety messages are reinforced as part of School and House assemblies and tutor periods.

The School also acknowledges the importance of working with parents with respect to harmful online challenges so that we are working in partnership and parents are able to protect their children when away from school. The Director of Wellbeing provides information and advice to parents as part of our Wellbeing curriculum.

Specific risks can be posed by mobile phones and cameras and in accordance with KCSIE 2024, St Edward's has appropriate policies in place that are shared and understood by all members of the school community. The school rules relating to mobile phones are part of the "school rules briefing" given to all pupils by HMs every term. Pupils access to their phones is determined by the Mobile Phone policy.

The school has a filtering system for content on the internet. The DSL, Sub Warden (Pastoral), Deputy Head Pastoral, Deputy Head Welfare, Deputy Head Academic and Head of IT monitor and review this to keep children safe whilst being careful that 'over blocking' does not lead to unreasonable restrictions. The School's system for filtering and monitoring follows the Government Guidelines here

Further information about specific approaches relating to Online Safety can be found in the following policies on the school intranet: E-Safety; IT Acceptable Use; Pupil Behaviour Policy, Mobile Phone policy.

## Appendix 6: Specific safeguarding issues

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Annex B of KCSIE 2024 contains important additional information about specific forms of abuse and safeguarding issues. All staff should have an awareness of safeguarding issues which can put children at risk of harm.

### **Mental health**

We aim to promote positive mental health and wellbeing for our whole community and recognise how important mental health and emotional wellbeing is to our lives, in just the same way as physical health. We recognise that children and young people's mental health is a crucial factor in their overall wellbeing and can affect their learning and achievement. All children and young people will have varying mental health during their school career. However, some face significant life events which can seriously impact their emotional wellbeing and can include mental illness.

The Department for Education (DfE) recognises that: "Schools have a role to play in supporting the mental health and wellbeing of children" (Mental Health and Behaviour in Schools). Schools can be a place for all students to experience a nurturing and supportive environment that has the potential to develop self-esteem and give positive experiences for overcoming adversity and building resilience.

Schools are also a place of respite from difficult home lives and offers, positive role models and relationships, which are critical in promoting the wellbeing of all young people.

The role of the School is to ensure that students can manage times of change and stress, and that they are supported to reach their potential, or access help when they need it. The school also has a role to ensure that students learn about what they can do to maintain positive mental health, what affects their mental health, how they can help reduce the stigma surrounding mental health issues, and where they can go if they need help and support.

The School plays an important role in supporting the mental health and wellbeing of our pupils. The Deputy Head Pastoral, Deputy Head Welfare, Director of Wellbeing, Safeguarding Team, the Health Centre manager and nurses, the School Psychologist, the School Counsellor, Chaplains and the HMs and Matrons work closely to promote wellbeing, resilience and mental health as part of an integrated whole school approach to social and emotional wellbeing, tailored to the needs of our pupils. This is implemented through, for example, the Wellbeing curriculum, year group and whole school assemblies, House based discussions, one-to-one and group meetings with tutors and whole school initiatives.

Mental health problems can in some cases be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. Such abuse can impact on behaviour, education and mental health. Staff have an awareness of mental health problems and how, in some cases, these can be an indicator of the child being at risk of harm.

If a member of staff is concerned about the mental health of a student, they should record it via iSAMS so that it is escalated to the DSL and the safeguarding team. House staff can use CPOMS if it is a safeguarding concern. Where appropriate, support will then be offered in school (e.g., via the Health Centre or counselling service) or via referral to external support. If there is an immediate safeguarding concern, the



member of staff should take immediate action by following the Child Protection and Safeguarding policy and speaking to the DSL or another member of the Designated Safeguarding team.

The school also has a separate Mental Health Policy available on the school intranet.

### **Serious violence**

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

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement <https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence> and in its Criminal exploitation of children and vulnerable adults: county lines guidance <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

If you as a member of staff are concerned or have any evidence that a pupil is involved in any kind of serious crime, then do talk to the DSL or a senior member of staff.

### **Upskirting**

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence, and the perpetrator can face a sentence of up to two years in prison. Anyone of any gender can be a victim.

### **So-called 'honour-based' Abuse (including Female Genital Mutilation and Forced Marriage)**

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

### **Female Genital Mutilation**

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

Whilst all staff should speak to the designated safeguarding lead (or deputy) about any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### **Contextual safeguarding**

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

Link to OSCB guidance on [contextual safeguarding](#)

### **Children absent or missing from education**

Children missing from education particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Similarly, absence from school and regular patterns of absence could also act as warning sign. This may include abuse and neglect, which may involve sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Attendance at school and any permissions for leave from school are managed through the Pupil Attendance Policy (available on the school intranet and monitored by the Sub-Warden). We make every attempt to obtain more than one emergency contact number for each child registered at the school to ensure we can contact a responsible adult when a welfare and/or safeguarding concern is identified. We ensure that we inform the local authority when removing a child from the school role at non-standard transition points in line with the DfE guidance on Children Missing Education.

The School will inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child and can be committed by parents or other family members, people known to the victim, and by strangers. Community safety incidents are incidents in the vicinity of the School which raise concerns, e.g., people loitering nearby or unknown adults engaging children in conversation. We aim to build pupils' confidence and give them practical advice on how to keep themselves safe, including advice from the local police where appropriate.

## Children and the court system

Children are sometimes required to give evidence in criminal courts (either for crimes committed against them or for crimes they have witnessed). Making child arrangements via the family courts following separation can also be stressful for children. In both cases, we will support pupils and families as much as possible and refer to the age appropriate guides available for this purpose (see KCSIE, 2024).

## Child sexual exploitation (CSE) and child criminal exploitation (CCE)

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

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

Some of the following can be indicators of CCE:

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

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

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

Link to OSCB guidance [on CSE](#)

Link to OSCB guidance [on CCE](#)

Link to DfE [Child sexual exploitation: guide for practitioners](#)

## County lines

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

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

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

#### Domestic abuse

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

Further information can be found in KCSIE 2024 ANNEX B.

## Cybercrime

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

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

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

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

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead will raise concerns with the Local Housing Authority at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

## Further information on Preventing Radicalisation

Protecting children from the risk of radicalisation is part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel curriculum.

## Prevent

The School must pay 'due regard' (place an appropriate amount of weight on) the need to prevent people being drawn into terrorism. This duty is known as the Prevent duty. In line with government guidance, we see the Prevent Duty as being an integral part of our duty of care and of our safeguarding responsibilities towards our pupils. Just as we need to be vigilant about signs of possible physical, emotional, sexual and other types of abuse or neglect, so we need to be alert to signs of any of our pupils being at risk of being radicalised or drawn into extremism.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

The School will (separate to this policy) assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. A policy is in place for protecting children at risk of radicalisation. The School also has a policy on how to promote British Values as part of its Prevent strategy.

- The DSL will inform the Warden and governing body of arrangements in place and ensure that the school's safeguarding arrangements take into account the policies and procedures of the Oxfordshire Safeguarding Children Board (OSCBs).
- The Director of IT will ensure suitable filtering is in place and the Sub-Warden will have overall responsibility for monitoring internet usage. Prevent issues will also be part of the pupil's more general online safety training.

**Staff should treat Radicalisation as a safeguarding issue and report concerns to the DSL. In an emergency staff should contact the police on 999.**

## **Channel**

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

Further information around safeguarding issues can be found in KCSIE 2024 ANNEX B and on the OSCB website.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/> schools and colleges. Schools and colleges can also access broad government guidance via the GOV.UK website:

## **Bullying (including cyberbullying)**

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

## **Children missing from education (or from home or care)– see also below**

<https://www.gov.uk/government/publications/children-missing-education>

<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

## **Child sexual exploitation (CSE)**

<https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>

## **Child drug exploitation: county lines**

[Criminal Exploitation of Children](#)

## **Domestic violence**

<https://www.gov.uk/guidance/domestic-violence-and-abuse>

**Drugs** <https://www.gov.uk/government/publications/drugs-advice-for-schools>

**Faith abuse** <https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

## **Female genital mutilation (FGM)**

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

**Forced marriage**

<https://www.gov.uk/guidance/forced-marriage>

**Gangs and youth violence**

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

**Gender-based violence/violence against women and girls (VAWG)**

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

**Hate** <http://educateagainsthate.com/>

**Mental health**

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

**Missing children and adults strategy**

<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

**OSCB Oxfordshire Safeguarding Children Board Multi-Agency Toolkit**

<https://www.oscb.org.uk/practitioners-volunteers/multi-agency-guidance-tools/>

**Private fostering**

<https://www.gov.uk/government/publications/children-act-1989-private-fostering>

**Preventing radicalisation**

<https://www.gov.uk/government/publications/prevent-duty-guidance>

**Sharing nudes**

[Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#)

**Trafficking**

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

**Upskirting**

<https://www.gov.uk/government/news/upskirting-law-comes-into-force>






**Serious violence and gangs**

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>



# Safeguarding Contacts

February 2025

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