



HEADINGTON RYE
OXFORD

Safeguarding Policy
Senior and Prep School
(including EYFS)

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Safeguarding and Child Protection at Headington Rye Oxford School

Safeguarding children is everyone's responsibility.

If you are worried about a child:

1. If it is an emergency phone 999
2. Whether an emergency or not, inform the Designated Safeguarding Lead (DSL) or one of the Safeguarding Team (see contacts below)
3. Alternatively, if you have significant concerns you can contact the Multi-Agency Safeguarding Hub (MASH) directly yourself (see below).

If you have concerns about an adult's behaviour in or linked to school:

1. Inform the Headmistress Mrs Caroline Jordan or either of the DSLs (Amanda Proctor or Jane Crouch) immediately (see contacts below)
2. Or if your concerns are about the Headmistress, contact the Chair of Governors Mrs Carol Oster Warriner (see contacts below)
3. Alternatively, you can contact the LADO, Jo Lloyd, directly (see below)

Key Contacts:

Amanda Proctor is the Designated Safeguarding Lead (DSL) with whole school responsibility. *The DSL is contactable at all times; she acts as the emergency point of contact outside of school hours, at evenings, weekends and during the holidays.*

Governors	Chair of Governors Carol Oster Warriner cwarriner@headingtonschool.com Nominated Safeguarding Governor Richard Nicholson rnicholson@headingtonschool.com Additionally from January 2025 – Prep School focused Claire Boyd cboyd@headingtonschool.com
Designated Safeguarding Lead (Also Prevent Lead and Designated Teacher for Looked After Children)	Amanda Proctor aproctor@headingtonschool.com 01865 759899 / 07702 802951
Prep School Designated Safeguarding Lead (Also Prep School Prevent Lead)	Jane Crouch jcrouch@headingtonschool.com 01865 759410 – during working hours
EYFS Designated Safeguarding Lead (works closely with Mrs Crouch)	Ruth Sibly rsibly@headingtonschool.com
Deputy Designated Safeguarding Lead	Mary Rahmatallah mrahmatallah@headingtonschool.com 07918 742434 – term time only (excluding Mon 1800 – Weds 0700)
Senior School Safeguarding Team	Jo Creber (Deputy Head Pupil Experience) jcreber@headingtonschool.com 01865 759108

	<p>Di Bates-Brownsword (Lower School) 01865 759292 dbates-brownsword@headingtonschool.com</p> <p>Megan Minton (Middle School) 01865 759293 mminton@headingtonschool.com (on maternity leave)</p> <p>Lindsey Stuart (Middle School) 01865 759293 lstuart@headingtonschool.com (Maternity Cover)</p> <p>Hannah Leigh (Sixth Form) 01865 759162 hleigh@headingtonschool.com</p> <p>Additionally the following staff are L3 trained:</p> <p>Rebecca Hawkes (Middle School) 01865 759199 rhawkes@headingtonschool.com</p> <p>Alice Barrett (Sixth Form) 01865 759186 abarrett@headingtonschool.com</p> <p>Jane Bellars (Counselling/Wellbeing) 01865 759871 jbellar@headingtonschool.com</p> <p>Simon Hawkes (First Deputy) 01865 759139 shawkes@headingtonschool.com</p> <p>Anne Marie Stanton-Ife (Academic Deputy) 01865 759888 astanton-ife@headingtonschool.com</p>
Prep School Safeguarding Team	<p>Tessa Davey (Deputy Head Pastoral) tdavey@headingtonschool.com</p> <p>Edwina West (Deputy Head Operations) ewest@headingtonschool.com</p> <p>Rachel Ford (Year 1 Teacher) rford@headingtonschool.com</p> <p>Monika Blackwell (Head of Learning Development) mblackwell@headingtonschool.com</p> <p>Jonathan Kitchin (Assistant Head Digital Strategy) jkitchin@headingtonschool.com</p> <p>Alex Prockter (Deputy Head Boys and Pre-Prep) aprockter@headingtonschool.com</p> <p>All can be contacted via 01865 759400</p>
Headmistress	<p>Caroline Jordan cjordan@headington.org 01865 759111 / 759112</p>
General Email	<p>Any incidents or concerns can also be reported via safeguarding@headingtonschool.com</p>
CPOMS (staff use)	<p>Staff can (and should) log concerns about a child using the confidential CPOMS platform (accessed via the staff pages link)</p>

External Contacts:

Local Authority Designated Officer (LADO)	<p>Jo Lloyd 01865 810603 LADO.safeguardingchildren@oxfordshire.gov.uk</p>
Additional LADO Team Members	<p>Sandra Barratt, Amie Pilcher, Becky Langstone, Sophie Kendall</p>
Multi-Agency Safeguarding Hub (MASH)	<p>Remember <u>anyone</u> can refer into the MASH. 0345 0507666</p>

<p>[MASH is the front door to Children's Social Care for all child protection and immediate safeguarding concerns. MASH provides a link between universal services such as schools and GPs and statutory services such as police and social care.]</p>	<p>(Out of Hours Emergency Duty Team 0800 833408)</p> <p>mash-childrens@oxfordshire.gcsx.gov.uk (secure email address)</p> <p>Access the MASH portal for safeguarding referrals via: https://www2.oxfordshire.gov.uk/cms/content/childrens-social-care-request-service-form</p>
<p>Locality and Community Support Service (LCSS)</p> <p>Headington Rye Oxford accesses the Central Team</p>	<p>For emerging concerns that do not require an immediate safeguarding response, for support with Strengths and Needs assessments and Early Help work.</p> <p>LCSS 0345 2412705 (Mon-Thurs 0830-1700, Fri 0830-1600) LCSS@oxfordshire.gov.uk</p> <p>The named support worker for Headington Rye Oxford is Nicola Francis Nicola.Francis@oxfordshire.gov.uk</p>
<p>Thames Valley Police</p>	<p>101 or in an emergency 999</p>
<p>Oxfordshire Safeguarding Children Board (OSCB)</p>	<p>01865 815843 (out of hours emergency team 0800 833408)</p> <p>oscb@oxfordshire.gov.uk</p> <p>Website and links: www.oscb.org.uk</p>
<p>Education Safeguarding Advisory Team (ESAT)</p>	<p>The team provide advice and support to educational settings to embed their safeguarding practices.</p> <p>01865 810603</p> <p>ESAT.safeguardingchildren@oxfordshire.gov.uk</p>
<p>Children's Social Care (CSC)</p>	<p>Tel: 0345 050 7666</p> <p>Oxford City Social Care Team 01865 328563</p>
<p>Child and Adolescent Mental Health Services (CAMHS)</p>	<p>Providing a range of mental health services for children and young people and community services.</p> <p>Website: www.oxfordhealth.nhs.uk</p> <p>01865 902 515</p> <p>OxonCAMHSSPA@oxfordhealth.nhs.uk</p>
<p>NSPCC Whistleblowing Advice Line</p>	<p>Weston House, 42 Curtain Road, London EC2A 3NH</p> <p>0800 028 0285</p> <p>Email: help@nspcc.org.uk</p>
<p>NSPCC Report Abuse in Education Advice Line</p>	<p>0800 136 663</p> <p>Email: help@nspcc.org.uk</p>
<p>Support and Advice About Extremism</p>	<p>Department for Education dedicated helpline for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk</p> <p>Local Channel Police Practitioner: preventreferrals@thamesvalley.pnn.police.uk</p> <p>Police: 0800 011 3764</p> <p>Anti-terrorist Hotline: 0800 789321</p> <p>Thames Valley Police Information Website: https://www.thamesvalley.police.uk/advice/advice-and-information/t/prevent/prevent/</p> <p>Local Authority – report via MASH 0345 050 7666 https://www.oscb.org.uk/safeguarding-themes/prevent/</p>
<p>Children's Commissioner</p>	<p>Dame Rachel De Souza</p> <p>0800 528 0731</p> <p>Website: https://www.childrenscommissioner.gov.uk/</p>

Disclosure and Barring Service	DBS Customer Services, PO Box 3961, Royal Wootton Bassett, SN4 4HF 03000 200190 customerservices@dbb.gov.uk
Teaching Regulation Agency	Teacher Misconduct, Ground Floor South. Cheylesmore House, 5 Quinton Road, Coventry, CV1 2WT 0207 593 5393 misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children and Whistleblowing	0300 123 4666 (Monday to Friday from 8am to 5pm) CIE@ofsted.gov.uk 08456 404046 (Monday to Friday from 8am to 6pm) Whistleblowing@ofsted.gov.uk
Independent Schools Inspectorate	0207 6000100 concerns@isi.net

Further reminders about the expectations on staff, visitors and volunteers to keep our pupils (and children more generally) safe from abuse, neglect, exploitation and harm can be found here:

[What to do if you think a child is at risk of abuse or neglect - Oxfordshire Safeguarding Children Board \(OSCB\)](#)

Section A

Introduction

The safety and welfare of all pupils at Headington Rye Oxford School ('the School') is our highest priority. This Policy applies equally to EYFS, KS1, KS2, KS3, KS4 and KS5. It can be found on the School website and parent portals and is available to parents on request.

In all matters relating to safeguarding and child protection the School will follow the procedures laid down by our own (or where appropriate the relevant child's) Local Safeguarding Children Board (LSCB) or Safeguarding Partners which in our case is Oxfordshire Safeguarding Children Board (OSCB) together with DfE Guidance *Working Together to Safeguard Children (2023) (WTTSC)*, *Keeping Children Safe in Education (September 2024) (known as KCSIE)*, *Disqualification under the Children Act 2006 (August 2018)* and *Prevent Duty Guidance; for England and Wales (2023)*. We have also noted the guidance contained within *After-school clubs, Community activities, and tuition: Safeguarding Guidance For Providers (September 2023)* [sometimes referred to as *Keeping Children Safe in Out-Of-School Settings*].

Regard has also been had to non-statutory guidance *What to do if You're Worried a Child is being Abused (March 2015)*; *Information Sharing (May 2024)*; *The Prevent duty: An Introduction for Those With Safeguarding Responsibilities (September 2023)* and *The Use of Social Media for On-line Radicalisation (July 2015)*. The School has also given due consideration to the DfE's *Filtering and Monitoring Standards (Updated May 2024)* and is mindful of the non-statutory draft guidance contained within *Gender Questioning Children (December 2023)*.

The School and our staff (including temporary supply staff and volunteers) form part of the wider safeguarding system for children. This system is described in statutory guidance '*Working Together to Safeguard Children*'. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all practitioners must make sure their approach is child-centred. This means that they must consider, at all times, what is in the **best interests** of the child and take action to enable all children to have the best outcomes.

We are aware that child protection and safeguarding are fundamental to the welfare of all pupils in our care. This policy, therefore, should be read in conjunction with the wider safeguarding policies in School, for example, Anti-bullying, Online Safety, Children Missing From Education, Behaviour and Rewards and Sanctions policies, and also our Staff Code of Conduct and Low Level Concerns Policy.

We recognise that we have a unique and important role to play in safeguarding and child protection. In particular we believe that:

- All children have the right to be protected from harm
- Children in need require support which matches their individual needs including those who may be experiencing abuse or neglect or anything that will significantly impair their health (physical and mental) or development (physically, intellectually, emotionally, social or behavioural development)
- Safeguarding is concerned with children in need as well as children at risk of harm.
- All staff must remain vigilant and retain an '**it could happen here**' attitude to all aspects of safeguarding.

Through the guidance, procedures and expectations outlined in this policy the School is committed to acting in the best interests of any child and creating an environment where staff and volunteers feel able to raise concerns, and where they feel supported in their safeguarding role. This policy provides the basis for good practice within the School for all Safeguarding work.

Aims and Objectives

Safeguarding and promoting the welfare of children is defined¹ as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable children to have the best outcomes.

Child Protection is part of safeguarding and promoting welfare. It includes any activity undertaken to protect specific children who are suspected to be suffering or at risk of suffering significant harm.

In line with these definitions this policy focuses on the three key areas of prevention, protection and support.

We contribute to the **prevention** of abusive experiences and poor mental health by:

- Clarifying standards of behaviour for staff and pupils
- Introducing appropriate work within the curriculum to equip pupils with the skills needed to keep themselves safe from abuse and exploitation (online and offline) and encourage positive mental health
- Developing staff awareness of the causes of abuse, neglect, exploitation and mental ill-health
- Encouraging pupils' and parental participation in practice
- Addressing concerns at the earliest possible stage
- Ensuring that acceptable use policies (AUPs) and filtering and monitoring systems are fit for purpose so as to reduce the risks associated with online technology
- Establishing a safe and nurturing environment where children can learn and develop, and feel confident and supported in reporting abuse to staff.

We contribute to the **protection** of our pupils in the following ways:

- Including appropriate work within the curriculum
- Utilising a risk assessment based approach² when considering the needs of the individual or groups of children and how we respond to the presenting need(s)

¹ Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2024).

² See Headington Rye Oxford's Welfare Risk Assessment and Support Policy

- Working in partnership with pupils, parents and agencies
- Implementing child protection policies and procedures which are reviewed annually by the governing body
- Promoting a safeguarding culture within Headington Rye Oxford whereby everyone understands 'it could happen here'.
- Ensuring that all staff and volunteers receive appropriate training enabling them to spot the signs of children at risk of harm and to know and understand how to respond to facilitate the most effective support
- Having clear procedures in place for addressing and minimizing the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence and sexual harassment (which could take place on or off-line, in school or off-site)
- Providing a process by which allegations of abuse or low level concerns against members of staff, including the Heads, or volunteers will be handled
- Ensuring that any deficiencies in the procedures are remedied without delay and there is regular review of procedures, including reflections and consideration of 'lessons learnt' in relation to individual incidents
- Adopting safer practices of staff recruitment and selection
- Ensuring confirmation is obtained that appropriate checks and procedures have been carried out by any other organisation working with our pupils, on another site, to ensure compliance with Child Protection legislation (see Educational Trips and Visits Policy).

We contribute to **supporting** our pupils in the following ways:

- Ensuring that the wellbeing of children is at the heart of School decision-making
- Identifying individual needs, where possible and communicating the needs of the individual pupil to those who work with them (and to their parents) so that these needs can be addressed
- Taking positive action, where it can be shown that it is proportionate and it is practicable to do so, and to make reasonable adjustments to deal with disadvantages affecting pupils with certain protected characteristics in order to meet their specific need(s) including those with SEND
- Liaising with specialist support staff both internally (e.g. School Counsellors, Nursing team, Learning Development Team) and externally (e.g. through OSCB/ESAT or MASH/CAMHS) to ensure the best outcomes for individuals
- Providing an environment where pupil voice is valued and staff listen to the views of young people, encouraging children or groups of children to feel able to express their thoughts and feelings when they have concerns about matters inside or outside the School.

The School recognises that children with special educational needs, disabilities, those who identify as LGBT+, and those with protected characteristics can face additional safeguarding challenges. They may struggle to communicate the problems, they may be disproportionately affected by the issues and it may be more difficult to spot the indicators of possible abuse etc. Equally, some young people may not recognise they have been subjected to abuse or harmful behaviours, or may not feel ready or know how to tell someone they are experiencing abuse, exploitation or neglect or have been abused, exploited or neglected in the past. Staff are supported by the SEND, Pastoral and Health and Wellbeing teams in supporting such children accordingly, seeking to maintain a professional curiosity as well as building trusted relationships with these young people to enable better communication and subsequent support.

Section B

- The Organisation and Management of Safeguarding at Headington Rye Oxford

Everyone who comes into contact with pupils has a role to play in keeping them safe and promoting their welfare. Whatever an individual's role in the School, we all share the responsibility for ensuring that we provide and maintain a safe environment in which pupils can live and learn. We want every pupil at Headington Rye Oxford to feel safe and protected from neglect, abuse and exploitation and to know that there is someone they can turn to if they are being neglected, abused and/or exploited, their mental health is deteriorating, or they feel that they are at risk of harm. No single adult can have a full picture of a pupil's needs or circumstances; everyone who comes into contact with a child will be aware of different aspects of their circumstances and needs. Therefore we need to pool our knowledge and expertise to ensure that all pupils receive the right help at the right time. We do not do this in isolation; Headington Rye Oxford is part of the wider safeguarding system (known as Safeguarding Partner Arrangements) which includes Children's Social Care, the Oxfordshire Safeguarding Children's Board, the local health services and the police, alongside other specialist agencies.

In order to safeguard our pupils effectively specific members of staff and the governing body have particular responsibilities relating to safeguarding and child protection. The School's governing body has designated appropriate senior members of staff to take lead responsibility for child protection; the **Designated Safeguarding Leads** (DSLs). These individuals have the status and authority within the School to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. Within the governing body at least one member acts as a Designated Governor, taking leadership responsibility for the School's safeguarding arrangements and liaising with the local authority (as required) on issues of child protection or in case of allegations against the Heads or governors, and meeting regularly with the DSLs to review policy and practice.

(1) The Safeguarding Team

The Safeguarding Team is led by the Designated Safeguarding Lead (DSL), the Deputy Head Pastoral in the Senior School, and the Headmistress in the Prep School. They also act as the Prevent Leads in School. The DSL is assisted in her role by the Deputy Designated Safeguarding Lead³, the Head of Boarding in the Senior School (and in her absence this role is undertaken by the Headmistress). Both the Prep and Senior Schools have additional trained DSLs. Online safety is overseen and managed by the Heads of Digital Strategy (working in collaboration with DSLs), who in this document are referred to as the Online Safety Coordinators, as safeguarding responsibilities form one aspect of their role in each School. Filtering and Monitoring is overseen by the DSL, working closely with the Head of IT Operations (Whole School) and the Head of Digital Strategy in the Prep School.

The DSLs can be contacted at any time (during school hours) for staff in School to raise or discuss any safeguarding concerns. Boarding staff have an emergency contact telephone number for the DSLs in all boarding houses. Outside of normal school hours during term-time, the Head of Boarding is the first point of contact in the boarding

³ Given that the Deputy DSL is there to step in should the DSL be absent, where this policy refers to the DSL this could also be the Deputy DSL.

community, except between 6pm on Monday and 7am on Wednesday, when the Deputy Head Pastoral covers this role. For school trips and out of hours activities, the Emergency Contact (Simon Hawkes, First Deputy) will refer safeguarding concerns to the main DSL or their Deputy as appropriate. **The Deputy Head Pastoral who acts as the Designated Safeguarding Lead can be contacted at any time by any member of the School Community or external agencies who need to discuss a concern.**

(2) The DSLs and How to Contact Them:

Contact details can be found on the reverse of Staff ID cards. (See also page 3-4.)

Designated Safeguarding Lead (Whole School) is:

Deputy Head Pastoral, Miss Amanda Proctor (01865 759899 / 07702 802951)
The DSL is contactable at all times, and acts as the emergency point of contact outside of school hours, at evenings, weekends and during the holidays.

In the Prep School the Designated Safeguarding Lead is:

Head of Prep School, Mrs Jane Crouch (01865 759410 – during school working hours)

Deputy Designated Safeguarding Lead is:

Head of Boarding – Mrs Mary Rahmatallah (07918 742434 – term time only)

In the EYFS the Designated Safeguarding Leads working closely with Mrs Crouch are:

Reception Teacher – Miss Ruth Sibly (01865 759400)

Key staff in the Prep School, Heads of Section and SLT in the Senior School are also trained as DSLs *:

Deputy Head Pastoral (Prep)	Mrs Tessa Davey (01865 759400)
Deputy Head Operations (Prep)	Mrs Edwina West (01865 759400)
Deputy Head Boys / Pre-Prep (Prep)	Mrs Alex Prockter (01865 759400)
Head of Learning Development (Prep)	Mrs Monika Blackwell (01865 759400)
Assistant Head Digital Strategy (Prep)	Mr Jonathan Kitchin (01865 759400)
Year 1 Teacher (Prep)	Ms Rachel Ford (01865 759400)

Lower School	Mrs Dianne Bates-Brownsword (01865 759292)
Middle School	Mrs Megan Minton (01865 759293) (maternity leave)
	Mrs Lindsey Stuart (01865 759293) (maternity cover)
	Mrs Rebecca Hawkes (01865 759199)
Sixth Form	Ms Hannah Leigh (01865 759162)
	Mrs Alice Barrett (01865 759186)
Boarding	Mrs Mary Rahmatallah (01865 759161)
Counselling/Wellbeing	Mrs Jane Bellars (01865 759871)
First Deputy	Mr Simon Hawkes (01865 759139)
Academic Deputy	Dr Anne Marie Stanton-Ife (01865 759888)
Deputy Head Pupil Experience	Mrs Jo Creber (01865 759108)
Headmistress	Mrs Caroline Jordan (01865 759111 / 759112)

**All of these named staff are contactable on the numbers provided during the school day.*

There is also a dedicated safeguarding email address that is checked daily by the DSL:

safeguarding@headingtonschool.com .

(3) The Role of the DSL

The Deputy Head Pastoral as the lead for the Safeguarding Team in School has overall responsibility for the other DSLs in the School. The Headmistress of the Prep School oversees the DSLs in her area. In their absence they will ensure that the Deputy DSL or another DSL is in school to deal with any safeguarding matters. Key aspects of this role mirror Annex C in KCSIE 2024 and include:

- Acting as a source of support, advice and expertise for all members of the School community
- Acting as a point of contact with the safeguarding partners locally (and with other local authorities as necessary) and working effectively in a multi-agency context in order to seek the best outcomes for Headington Rye pupils and their families
- Managing referrals to appropriate agencies in a timely manner
- Managing CPOMS (the School's child protection management system) and ensuring information relating to child protection and safeguarding is kept securely and confidentially and records are shared and transferred appropriately as required
- Drafting and reviewing (at least annually) all safeguarding related policies and procedures
- Raising awareness of safeguarding related issues within the school community (staff, parents and pupils) and ensuring staff understand Headington Rye's policies and procedures, and parents know how to access these policy documents
- Keeping their own knowledge and skills up to date by engaging in regular training and in turn delivering training at Headington Rye to ensure all staff receive regular, up-to-date, effective and informative training around safeguarding and child protection
- Encouraging a culture at Headington Rye where children feel listened to, supported, heard and understood
- Overseeing the implementation of the Low Level Concerns policy and liaising with the Headmistress and HR Manager and external agencies as appropriate when managing and responding to concerns
- Ensuring that Filtering and Monitoring processes are robust and keep pupils safe online, managing the Lightspeed alerts and responding to concerns that these may raise about pupil safety and online behaviours
- Acting as the Prevent Lead
- Acting as the key adult for Operation Encompass and the designated person for Looked After Children
- Completing the annual 175/157 Safeguarding Audit for the local authority
- Providing regular reports (and where necessary training) to the Governing Body (Council), regularly reviewing safeguarding arrangements (in conjunction with the Safeguarding Governor), and remedying any deficiencies/weaknesses identified

See Appendix 4 for a full description of the role of the DSL.

All of the DSLs have job descriptions for their safeguarding roles and their broad areas of responsibility include:

Managing referrals

The DSLs will make prompt contact with children's social care (via LCSS or MASH) where there are concerns that a child may be in need of help or is at risk of harm. The DSL will also make prompt contact with the Local Authority Designated Officer (LADO) in relation to allegations against someone working at the School and/or the police if a criminal offence is suspected.

The DSLs will liaise with the local authority when necessary and work with other agencies in line with *Working Together to Safeguard Children* and attend strategy meetings. The DSLs will work with partner agencies to seek advice, support and guidance, drawing on multi agency expertise, knowledge and experience to support pupils at risk of harm including harm via social media and otherwise online.

The DSLs and the School's focus is also to support children in need through seeking early help and/or inter agency working, including using the Team Around the Child (or Family) Approach (TAC/TAF) and/or the Strengths and Needs Assessment to identify Early Help. The DSLs will liaise with the relevant Headmistress on issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations (except where they involve the Head). See also Appendix 6.

Training

The DSLs have been fully trained for the demands of the role in child protection and inter-agency working in accordance with the locally agreed procedures and required by *Keeping Children Safe in Education*.

All of the DSLs undergo training (delivered by OSCB) at least every two years in order to provide them with the knowledge and skills to carry out their role. This includes understanding the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as the strengths and needs approach and having a working knowledge of how local authorities conduct child protection case conferences and review conferences so that they are able to attend and contribute to these effectively when required to do so. The Pastoral PA holds a record of all such training.

The DSLs all also attend refresher training updated at regular intervals, as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their roles.

The DSLs undertake Prevent awareness training to enable them to provide advice and support to staff on protecting children from the risk of radicalisation.

Providing Support and Sharing Information

The majority of the DSLs work closely with pupils in their roles within the School e.g. as Head of Section in the Senior School. They will provide a listening ear and support and monitor any children who require additional help. They will communicate the needs of the child to other staff as appropriate and will liaise as necessary with parents and guardians.

The DSLs are responsible for ensuring that where children leave the school their child protection file from CPOMS and/or any historic paper records are securely transferred to

the new school or college as soon as possible (and transferred separately from the main pupil file) and confirmation of receipt is obtained from the new school or college. This process is managed centrally with the assistance of the Pastoral PA.

The DSLs understand their obligations in relation to GDPR and safeguarding, and have due regard to the data protection principles which allow them to share or withhold personal information as appropriate, with or without consent in order to safeguard a child who may be at risk. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

(4) Online Safety

The School has a designated e-safety officer in both the Prep and Senior School – they are referred to in this document as the Online Safety Coordinators. The School will ensure that appropriate filters and monitoring systems⁴ are in place to keep children safe online.

- All students browse the Internet through a secure and filtered internet connection. Market leading hardware and software is used to ensure we comply to best practice and safeguarding regulations. All filters are continuously updated to reflect current trends, current issues and any new areas of concern. All school issued iPads, regardless of location or wireless network (including when children are at home), are routed through the schools filtering system to maintain safe and secure access both inside and outside of the school environment. We offer students the ability to request URL's to be unblocked/ unfiltered. These requests are managed on an individual basis and fully reviewed prior to access being granted.
- The School's filtering and monitoring systems are compliant with Government expectations as outlined in the Filtering and Monitoring Standards (2024). Both the Senior and Prep School utilise **Lightspeed Filter** whilst **Sophos** continues to be deployed on our London Road site. DSLs review reports / real time alerts / dashboard information regularly. There is a timely and proportionate response to any alerts generated by these systems.
- Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.
- Staff are aware of their role in the 'physical' monitoring of student activities, enforcing AUPs and being vigilant. Staff are also encouraged to consider the vulnerabilities of students accessing specific content and to work with pupils to develop their digital resilience, helping them to gain the knowledge and awareness they need to navigate the digital landscape responsibly.
- Children are taught about safeguarding, including online safety issues; and
- Staff are equipped with the knowledge to safeguard children online by attending online safety training.
- The DSLs and Online Safety Coordinators make resources available to parents and offer training and updates as appropriate to ensure our parent body also have sufficient awareness to keep their children safe whilst online at home.

⁴ For further information on Headington Rye Oxford's approach refer to the Filtering and Monitoring Policy

- The School recognises that IT has a part to play in the risks associated with radicalisation. Training for staff includes an understanding of how the internet, in particular social media, is used to draw young people into extremism.
- The Online Safety Coordinators are CEOP trained and work closely with the DSLs to highlight current issues and promote good practice.
- The Online Safety Coordinators provide information for the DSLs to share with the Designated Governor to review practice and discuss issues and will meet with the Governor themselves periodically.

The School's Mobile Phone and Digital Devices Policies, the Online Safety Policy and the Cyber-Bullying Policy (Senior School) also set out the School's approach to online safety and these can be accessed through the Parent Portal and Staff Pages.

Specific safeguarding considerations have been included in the School's procedures for remote teaching and learning.

(5) The Designated Governor

Richard Nicholson is the **Designated Governor** for safeguarding issues. The role of the Designated Governor is to take leadership responsibility for the School's safeguarding arrangements and to liaise with the local authority (as required) on issues of child protection or in case of allegations against the Heads or governors, as well as:

- Liaising with the Headmistress of the Senior School/Head of the Prep School/DSL over all matters regarding child protection. The role is strategic rather than operational, he will not be involved in concerns about individual pupils
- Liaising with the Headmistress of the Senior School/Head of the Prep School and DSL(s) to produce a formal termly report for the governors
- Meeting with the DSL(s) each term to review child protection in School. He will support as appropriate the DSL(s) so that they have sufficient time, funding, supervision and support to fulfill their safeguarding responsibilities effectively; this review will allow reflection and discussion on the effectiveness of working practices. Minutes of these meetings, and the annual review of this policy at governor level, should be sufficiently detailed to demonstrate the depth of the review
- Checking that pupils are taught about safeguarding, including online safety and radicalisation, through for example the curriculum, PSHE, assemblies, ICT lessons
- Ensuring that all staff have the skills, knowledge and understanding necessary to keep safe children including those who are looked after by a local authority
- Meeting with the online safety coordinators periodically to discuss any issues relating to the use of technology, including online safety and cyber-bullying
- Discussing any issues pertaining to filtering and monitoring and reviewing School procedures in relation to this
- Checking the Single Central Register
- Accessing training delivered by the OSCB/ESAT team or equivalent to support his understanding of the DSL's roles and responsibilities – the Safeguarding Governor will complete Level 3 training every two years mirroring the expectation of DSL training

- Reporting to meetings of the Governing Body (known as Council) and to the Risk and Compliance Committee on a termly basis.

(6) The Role of the Governing Body

The governing body (Council) has a strategic leadership responsibility for safeguarding arrangements at Headington Rye Oxford School and is accountable for ensuring that the School complies with its legal duties under the relevant legislation and delivers a robust whole school approach to safeguarding, underpinned by a well-established safeguarding ethos known and understood by all staff (including supply staff) and volunteers. The **Governors**, in conjunction with the Designated Safeguarding Lead (DSL), carry out an annual review of the School's safeguarding policy and procedures with day-to-day issues being delegated to the DSL and Headmistress. The governors are responsible for:

- reviewing the procedures for, and the efficiency with which, the safeguarding duties have been discharged
- ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay
- ensuring that children's wellbeing is central to decision-making at all levels
- ensuring that appropriate risk assessments are in place to ensure the health, safety and wellbeing of pupils
- approving amendments to safeguarding arrangements in the light of changing regulations or recommended best practice
- ensuring the School takes all reasonable action to limit children's exposure to the risks that might be associated with access to IT systems, via the implementation of appropriate filtering and monitoring systems, with a regular (at least annually) review of the effectiveness of these systems in line with national guidance expectations
- Ensuring that children are taught about how to keep themselves and others safe (including online), via a preventative education approach which prepares pupils for life in modern Britain, complimented with a well-planned, fully inclusive and age-appropriate programme of evidence based RSHE
- ensuring the School operates safer recruitment procedures and carries out appropriate vetting checks on all new staff (including volunteers)
- ensuring the School has at least one senior member of the School's leadership team designated to take the lead on child protection
- undertaking training to equip them with the knowledge and understanding that enables them to provide strategic challenge in relation to safeguarding practice. Governors receive safeguarding training on their appointment as part of their induction programme. All governors also undertake annual safeguarding update training either internally or externally through an approved online course for Governors. Governors who have educational safeguarding responsibilities outside school and have undertaken similar updated safeguarding training in that capacity satisfy this requirement once they confirm this training has been completed.
- ensuring the School contributes to inter-agency working with local agencies and that policies and procedures are in place that are consistent with OSCB/ESAT's expectations

- working with the LADO to determine whether any improvements can be made to the School's procedures and practices, where there is a substantial allegation against a member of staff and ensuring the School reports concerns appropriately to external agencies if a member of staff were found guilty of misconduct
- ensuring that an item is placed on the governors' termly agenda to review and report on changes to this policy and procedures; the training undertaken by the DSL(s) and all staff; engagement with external agencies and safeguarding trends within the school population; and how safeguarding and child protection is being incorporated into the school curriculum.

The Governing Body is also required to report actual or suspected serious incidents to the Charity Commission – an allegation relating to safeguarding could constitute a serious incident as it could result in or risk significant harm to the charity's work, beneficiaries or reputation. Even if an incident has been reported to the police or another regulator, it should also be reported to the Charity Commission (<https://register-of-charities.charitycommission.gov.uk/report-a-serious-incident>). The DSL works with the Bursar to ensure such reporting is completed as required.

(7) Staff Responsibilities

All members of staff (including volunteers and supply staff) have a duty to safeguard pupils' welfare and must therefore familiarise themselves and comply at all times with this policy; safeguarding and promoting the welfare of children is everyone's responsibility. This includes a duty both to children in need and to children at risk of harm. All staff must therefore:

- Provide a safe environment in which pupils can live and learn
- Be familiar with this policy including issues of confidentiality
- Be aware of the School's safer working practices when working with children (see Section E and Appendix 1)
- Be alert to signs which might indicate some form of abuse, neglect, harmful behaviours or mental ill health (see Sections C and E)
- Be alert to when a pupil may benefit from Early Help and the part they can play in supporting a child who may benefit from such support (see Section D and Appendix 6)
- Question behaviours if something seems unusual; ask for help or refer a pupil to the Safeguarding Team, and share concerns around the behaviour of an adult working or volunteering with children (including self-referrals) with the Headmistress or DSL (see sections C, D, E and F)
- Take action to protect a pupil who is suffering significant harm, or is likely to do so (see Sections C and D)
- Accept that some children do not recognise they have experienced harmful behaviours and may need time and support to be able to disclose and share their experiences to a trusted adult
- Ensure children reporting abuse, neglect, exploitation, sexual violence or sexual harassment are taken seriously, kept safe and supported. A child should never be made to feel ashamed or like they are creating a problem by talking about their experiences

- Make a written record of concerns using CPOMS or a safeguarding referral form and pass them to the DSL in a timely manner
- Manage a disclosure of abuse, neglect or exploitation in accordance with the procedures set out in this policy (see Sections D and F and Appendix 2)
- Take responsibility for ongoing monitoring and recording to support the implementation of individual education or care plans and risk assessments/support plans and/or interagency child protection and child support plans, as appropriate (see Section G).
- Always act in the interests of the pupil when concerned about their welfare.

This policy forms part of a group of policies relating to safeguarding and child protection and should be read in conjunction with the Anti-Bullying and Cyber-Bullying Policies, The Online Safety Policy, The Filtering and Monitoring Policy, The Behaviour, Rewards and Sanctions Policy, The Children Missing From Education Policy, The Physical Restraint Policy, The Welfare Risk Assessment and Support Policy. These policies are in turn supported by a Staff Code of Conduct and Low Level Concerns Policy, a Code of Conduct setting out expectations of pupils, the Whistleblowing Policy and the Recruitment Policy. Boarding Staff should also refer to the Housestaff Handbook.

All staff and volunteers are sent a copy of Keeping Children Safe in Education (2024) as part of the appointment procedure, and then annually when it is updated, which they must read and acknowledge they have done so and understand the content. A quiz is completed to confirm staff understand the content. Individual or group safeguarding induction briefings are given to all new staff and volunteers. Induction training also covers a range of other related policies and procedures such as Staff Code of Conduct, Anti-Bullying, Behaviour, Rewards and Sanctions, Online Safety, Whistleblowing, Data Protection, Pupils Missing from Education etc. All staff complete Channel Awareness online training to ensure they are aware of and understand the Prevent responsibility they have within School. All staff receive training and updates on a regular basis usually via staff meetings, staff INSET meetings or morning briefings. Staff are briefed about any topics of safeguarding concern which arise during the course of a year; such topics could include but are not limited to online safety issues, one-to-one contact, Equality, Diversity and Inclusion (EDI) awareness (including LGBT+ and anti-racism training), appropriate physical contact etc. Where appropriate, update documents are circulated electronically or are available for perusal on staff area notice boards. Full safeguarding training is given to all staff (Generalist level) at least every three years following guidance and materials provided by OSCB/ESAT. A record is kept of Safeguarding and Prevent training, as well as induction attendance. (See also Appendix 7)

Recordings and training resources are made available for reference via the Staff Safeguarding Pages. Staff can ask for further training in particular safeguarding areas to ensure their practices are kept up to date and for continuing professional development. Additional training may be provided for specific staff as the need arises. All staff are invited and encouraged to ask for further explanation if there is any element of the safeguarding training they have not understood. It is the responsibility of individual members of staff to ensure they attend briefings and read and acknowledge safeguarding information when asked to do so. Google forms or an equivalent survey method are used to collate an acknowledgement from staff (and Governors where appropriate) that this has been done.

We recognise the stressful and traumatic nature of child protection work. Support is available for any member of staff from a designated person or via the Health Assured Employee Assistance Programme.

Disqualification

All staff (including volunteers and supply staff) in our School are required to notify the School immediately if there are any reasons why they should not be working with children.

The Childcare (Disqualification) Regulations 2018 apply to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare. The School will ensure that the appropriate checks are carried out to ensure that individuals are not disqualified under these regulations.

The School takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the HR manager immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Similarly, if a member of staff is involved in an incident outside of school which did not involve children but which could have an impact on their suitability to work with children, this should also be reported so that the school can consider the transferrable risk (KCSIE 2024).

We encourage staff to 'self refer' and be transparent around low level concerns, and to report situations where there may be a necessary (and entirely innocent) breach of the staff code of conduct e.g. where a member of staff participates in a sports team out of school which includes pupils and the team communicates via whatsapp requiring personal contact details to be shared for a specific purpose. Staff should use the online reporting tool for this purpose or speak to the DSL or Headmistress as outlined in the Low Level Concerns Policy. (See also Appendix 1, Appendix 3 and Sections E and F)

Staff who are disqualified from childcare or registration, may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Bursar for more details.

Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults (including adult volunteers and supply staff) working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals; there is potential for exploitation and harm of vulnerable young people and all staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Under the Sexual Offences Act 2003, it is also an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential. Staff should refer to the School's Code of Conduct and the code of practice on 1:1 meetings and the Low Level Concerns Policy. (See also Section E and Appendix 1)

Use of Mobile Phones and Cameras

Neither staff nor children may use their own mobile phones to take photographs within the School's EYFS setting: nursery and up to Reception year. [Please see the School's Data Protection Policy for the School's policy on taking photographs of pupils outside of these year groups.] See Appendix 1 for further information.

Site Security

All staff members have a responsibility to ensure our buildings and grounds are safe, and this includes ensuring the safety of any visitors into School. Visitors should sign in at the relevant School reception on arrival. Lanyards should be worn at all times. Any adults on site without a lanyard should be challenged and taken to the relevant Reception. External doors should not be left open – please report any issues promptly. Door codes and access cards should not be shared.

Headington Rye Oxford will not accept the behaviour of any individual (staff, parent, visitor) that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the School sites. (Refer also to the Parents' Code of Conduct Policy)

(8) Safer Recruitment Practices

The School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations. All advertisements and job descriptions contain the school's statement on Safeguarding and all staff are recruited according to the guidance in KCSIE. A self-declaration form is requested and online searches will be completed by the HR team as part of the due diligence checks on shortlisted candidates and any material of concern will be addressed during the interview process. A consolidated central register of appointments is maintained and is available for review by the appropriate bodies. (Please also see the School's recruitment, selection and disclosures policy and procedure, recruitment pack, the policy on induction of new staff, governors and volunteers in child protection and staff code of conduct policy.)

In line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (2024), the governing body prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Organisations providing contractors or consultants working on site are asked for assurances that where relevant and required, their staff have been suitably vetted in line with legal requirements.

As part of carrying out safer recruitment procedures under KCSIE, members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work. We seek to verify identity via document checks, seek proof of qualifications, verify the candidate's mental and physical fitness to work, and their right to work within the UK. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment.

Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service. For those who have lived or worked outside the UK further checks and documentation is required.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Further checks will also include a check for information about any teacher sanction or restrictions that an EEA professional regulating authority has imposed. Those undertaking management posts will be subject to prohibition from management of independent schools checks, and contact made with the Teaching Regulation Agency (TRA).

All governors, volunteers and contractors working regularly during term-time (such as contract catering staff) are also subject to the statutory DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils at School or on another site.

Should the School develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff.

The School will ensure that staff regularly involved in recruitment will receive appropriate training in 'Safer Recruitment'. This training is updated every five years.

Please also refer to the School's Recruitment Policy for further details.

(9) Raising Awareness of Safeguarding Amongst Our Pupils

We recognise that the School plays a significant part in the prevention of harm to pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role the School plays in recognising and protecting our pupils who may be vulnerable to, for example, radicalisation or extremist views. We will identify and provide opportunities for children to develop skills, concepts, attitudes and knowledge to promote their safety, physical and mental health and overall well-being.

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all the teaching staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including support staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our Behaviour, Rewards and Sanctions Policy, in the Code of Conduct (Expectations Staff Should Have of Pupils), and in enforcing our Anti-Bullying and Cyber-Bullying Policies.

Time is allocated in PSHE (where the statutory RSE curriculum is delivered) to discussions of what constitutes appropriate behaviour and healthy relationships and on why bullying and lack of respect for others is never right. A range of expert speakers, as

well as form tutors, Heads of Year, the DSLs and school nurses tackle a variety of safeguarding related issues. For example, friendships, self-esteem, emotional literacy, assertiveness, power, radicalisation, child on child abuse, sex and relationship education, bullying, staying safe online, etc. Across the curriculum, in prayers and assemblies, in form time, through drama and on activities and trips we promote tolerance and mutual respect and understanding. DSLs are aware of the messages and content being disseminated and review this regularly to ensure that the correct messages are being given throughout the School, in a timely and age-appropriate manner, and through appropriate media. Topics covered are communicated to parents (fortnightly in the Senior School) and reported to Council on a termly basis.

All pupils know that there are adults to whom they can turn to if they are worried, including the School Counsellors and Health and Wellbeing Assistant/Pastoral Support Supervisor, Teachers and Form Tutors, their Heads of Year and Heads of Section, Housemasters/mistresses, the Pastoral PA, Chaplains, and the School Nurses. We also signpost pupils to an Independent Person. Our support to pupils includes the following:

- Every child has access to guidance on where to turn for advice.
- Notices in public spaces and in toilets provide advice on where pupils can seek help. Reminders are available on the Pupil Pages via their iPads.
- We operate an informal mentoring scheme whereby older pupils in leadership or prefect roles are encouraged to offer advice and support to younger pupils.
- Leadership training is provided to our prefects and selected Student Leaders which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.
- We provide regular lessons to pupils on E-safety and ensure that all pupils understand and adhere to the School's guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection. For more details on cyber-bullying and e-safety please refer to the School's Anti-Bullying, Cyber-bullying and Online-Safety Policies.

Where there is a safeguarding concern the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. The School manages this by regular consultation with the pupil concerned. The School will operate processes with the best interests of the pupil at their heart.

We recognise that children with an allocated social worker and 'Looked After Children' (known in Oxfordshire as 'Children We Care For' or CWCF) are potentially at greater risk of harm, may be less likely to achieve their full potential without intervention, and may have specific needs. A DSL will meet regularly with these children and be the main point of contact with the social worker and family or care provider, disseminating information that will help the wider staff body to support the child's needs effectively. Headington Rye Oxford does not currently have any CWCF or Care Leavers but the DSLs act as the Lead Professionals in School and would liaise with the appropriate local bodies e.g. the Virtual School in Abingdon were this to change.

Similarly children who are absent from education may also be vulnerable to a range of safeguarding issues. The School is mindful of the advice and guidance contained within *Working Together to Improve School Attendance (2024)*. Where children are absent

regularly or for prolonged periods the DSLs and Heads of Year will maintain contact (either online meetings or in person home visits or school meetings) with the child and the parents and work to identify the barriers to attending school so that appropriate support can be provided and any safeguarding issues can be identified and dealt with appropriately.

We will offer appropriate support to individual children who have experienced abuse or who have abused others, to those who have been the victim of sexual violence or sexual harassment, and to those who are struggling with mental or physical ill-health or disability. An individual risk assessment/support plan will be devised, implemented and reviewed regularly for these children. This plan will detail areas of support, and who will be involved. We will ensure the School works in partnership with parents/carers and other agencies as appropriate.

We also recognise that children with SEND, neurodiverse young people and those with health issues can face additional safeguarding challenges. Staff are encouraged not to make any assumptions and to be vigilant to the needs of such pupils and to the relationships and interactions they have with their peers. Where there are concerns the DSLs and SENCO will liaise and work with the pupil (and their parents where appropriate) to consider and make arrangements for additional pastoral support and staff will be made aware of these adjustments as necessary.

Children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can sometimes be targeted by other children and can feel vulnerable. Staff will endeavour to identify the individual's needs and work with the child and their parents to agree a way forward. The School is keen to do all it can to reduce the additional barriers faced by these children and create a supportive culture where pupils feel able to speak out and share concerns with trusted adults.

(10) Involving parents

Parents have an important role to play in supporting the School. A copy of this policy is on our website alongside our other policies relating to issues of child protection (such as the Anti-Bullying and Online Safety policies) and we hope that parents will always feel able to take up any issues or worries that they may have with the School. Any allegations of child abuse or concerns reported to the School about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential.

In general, we believe that parents should be informed about any safeguarding concerns regarding their children. However, it may not always be appropriate to inform parents of safeguarding concerns immediately as that action could prejudice any investigation or place the child at further risk. In such cases, advice will be sought from MASH. Parental consent is not required before a referral to external agencies is made although in most cases it is good practice to seek such consent.

No information held on a child must ever be disclosed to a parent if it would put the child at risk of significant harm.

Where a child is questioning their gender or makes a direct request relating to a 'social transition' (e.g. change of preferred name or pronouns) a conversation will always be had with parents before any changes are made (unless to do so would place the child at risk of harm). Further information can be found on page 45.

(11) Other Arrangements

The School may make arrangements for pupils to stay with a **host family**, during a foreign exchange trip or sports tour, for example. In such circumstances the School will, in accordance with Annex D of KCSIE (2024), ensure, as far as reasonably possible, that hosting arrangements are safe which may entail undertaking DBS checks (or similar checks if abroad) where appropriate.

Where the School has not been involved in making the arrangement but staff become aware that a pupil may be in a **private fostering** arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home, the member of staff should raise this in the first instance with the DSL. The DSL will notify the local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child. The School will also inform the Police if they have any reason to believe that the third party is failing to undertake a statutory duty.

Where the School needs to work with **alternative providers** to deliver education to pupils with specific identified needs the DSL will ensure the appropriate checks are in place and the provision is able to meet the needs of the child. All such arrangements will be made with explicit parental agreement.

(12) Working with OSCB and Other Agencies

In order to provide the best standards of care for our pupils we recognise the need to engage with external agencies. When dealing with disclosures, concerns, suspicions and allegations, the Safeguarding Team work in a multi-agency setting with the Oxfordshire Safeguarding Children Board (OSCB). The OSCB is the means by which organisations in Oxfordshire come together to agree on how they will cooperate with one another to safeguard and promote the welfare of children. OSCB scrutinise and monitor this process, ensuring that local agencies, including Headington Rye Oxford School, work well to achieve this. OSCB brings together the County, City and District Councils, the local NHS providers, Thames Valley Police, CAF/CASS and other local agencies. All organisations involved in children's care work in line with the guidance given in Working Together to Safeguard Children (2023).

The Children and Social Work Act (2017) and Working Together (2018) gave the option for Local Safeguarding Children's Boards to be replaced with flexible local arrangements. Oxfordshire have chosen to retain the OSCB with three safeguarding partners (The County Council, Integrated Care Boards {previously known as the Clinical Commissioning Group} and Thames Valley Police) working together under an Independent Chair, and this arrangement has continued since the publications of Working Together (2023) requiring Lead Safeguarding Partners from these agencies to be accountable for the local arrangements. Anyone can contact OSCB or any of the other agencies involved in safeguarding children. The School's points of contact for children who are the focus of concern are set out on page 4 and 5 of this policy.

Section C

- Types and Signs of Abuse and Neglect and Other Safeguarding Risks

Child abuse, deteriorating mental health and other safeguarding issues of all kinds: physical, sexual, emotional, neglect, 'honour'-based abuse, child sexual and criminal exploitation, domestic abuse, child on child abuse (including sexual violence and sexual harassment) has been increasingly detected and brought to the attention of the general public in recent years. An additional dimension involves the use of the internet, other electronic media and social networking sites, where pupils can be made vulnerable through misuse, by themselves and/or others, and can become victims of cybercrime.

Many child abusers are known to the victim either as relatives or as friends of the family or as part of an institutional or community setting. Some, children meet in other contexts e.g. via the internet. A small minority of these may gain access to children in schools as teachers, ancillary workers, and volunteers or through their employment in some capacity relating to school activities.

Staff must take care to help safeguard and promote the welfare of children and young people who may be living in particularly stressful circumstances, recognising that this may increase their vulnerability. These include families:

- living in poverty;
- where there is domestic violence;
- where a parent/carer or the child has a mental health need;
- where a parent/carer or the child is misusing drugs or alcohol;
- where a parent/carer is in custody or a child is affected by parental offending;
- where a child/sibling is being drawn into anti-social or criminal behaviour;
- where there is a risk of exploitation, radicalisation or 'honour'-based abuse;
- where a parent/carer or the child/a sibling has a learning disability;
- where a parent/carer or a sibling has a physical disability;
- where a child has a physical disability or a specific health condition;
- where a child is questioning their sexuality or gender identity (LGBT+);
- where neurodiversity is an issue;
- where a child is frequently absent or missing from education, or has experienced multiple suspensions or exclusions from school;
- with caring responsibilities;
- that face racism and other forms of social isolation;
- living in areas with a lot of crime, poor housing and high unemployment; and
- that include looked after children (known as Children We Care For – CWCF).

The School has specifically identified that mental health issues present a risk to its pupils and has put in place a number of safeguards to protect pupils from such risks and to provide support to them should any issues arise. Other safeguarding issues may relate to bullying, drugs, fabricated or induced illness, forced marriage, gangs and youth violence, gender based violence, hate and relationship abuse. The School has policies in place to specifically address many of these issues (see policies relating to Welfare Risk Assessment and Support, Anti-Bullying, Self-Harm, Eating Disorders, Alcohol, Bereavement Guidelines, Anti-Smoking, Anti-Drug and Substance Abuse, RSE/PSHE, Provision for Pupils with particular Religious, Dietary, Language or Cultural Needs etc).

As a boarding school there are additional factors to consider with regards to safeguarding set out in the National Minimum Standards. For example, the School will be alert to inappropriate pupil relationships, initiation type behaviours and the potential for child on child abuse. We will also monitor carefully the experience boarders have with their guardians and be mindful of any arrangements that are indicative of private fostering. The School is also aware that safeguarding issues can manifest themselves in many ways and can often overlap with one another. Some behaviours linked to drug taking, alcohol abuse, truanting, gender based violence and sexting/sharing 'nudes' also put children in danger. As a member School of the Boarding Schools' Association, the School abides by the BSA [Commitment to Care Charter](#) and will report concerns to the BSA's Director of Safeguarding.

The departmental advice: [What to do if you are worried a child is being abused – Advice for Practitioners \(2015\)](#) should be referred to by all staff in raising their awareness of and helping them to identify the signs of child abuse. The [NSPCC website](#) also provides helpful information on types of abuse and what to look out for which staff are encouraged to refer to. Other useful advice relating to mental health and safeguarding can be found in the departmental guidance on [Mental Health and Behaviour in Schools](#) (2018) and PHE's guidance [Promoting Children and Young People's Emotional Health and Wellbeing](#) (2015 and updated February 2021).

Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. Staff should also be aware that abuse, neglect, exploitation and safeguarding issues may not always be standalone events. In some cases, multiple issues will overlap with one another. Several low level concerns could be signs of something bigger – it is always advisable to share any concerns you have with one of the Safeguarding Team, by logging any and all observations on CPOMS.

Staff should be aware of the importance of contextual safeguarding – the sense that safeguarding incidents or behaviours can be associated with factors outside of School and sometimes outside of their families but in situations that develop within the local community. Such extra-familial harms may include sexual and criminal exploitation and serious youth violence.

All staff must be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of children who may be in need of help or protection. Indicators of abuse and neglect, and examples of safeguarding issues are described in the following paragraphs. Additional information is also available in Annex B of KCSIE. Knowing what to look for is vital if we are to identify issues and concerns at an early stage. If staff are unsure they should always speak to the DSL.

Early Help:

Any child may benefit from early help⁵ – this means providing support as soon as a problem emerges, at any point in a child's life. Staff should be particularly aware of the needs of a child who:

- is disabled, or has certain mental or physical health conditions and has specific additional needs
- has special educational needs or a mental health need
- is a young carer or a privately fostered child

⁵ More information on Early Help can be found within Working Together to Safeguard Children (2023) – Chapter 3 – section 1.

- identifies as LGBT+
- 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, care or from home
- has experienced multiple suspensions or is at risk of being permanently excluded from education
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking, 'honour' based abuse, radicalisation or exploitation
- is in a family circumstance presenting challenges for the child, e.g. substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- has a family member in custody/prison or is affected by parental offending
- is a privately fostered child
- is showing early signs of abuse and/or neglect

Early help means providing support for children of all ages in order to improve the child and their family's resilience and outcomes, and to reduce the chance of a problem getting worse. Providing early help has been proven to be more effective in promoting the welfare of children than reacting later.

Where a child or family would benefit from coordinated support either internally (managed solely by the School) or externally with input from multiple agencies an evidence based assessment (Strengths and Needs) will be completed with the agreement of the child and their family. (See also Appendix 6)

Child in Need:

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services. A child who is disabled is also defined as a child in need. In order to provide appropriate support a child in need may be assessed under section 17 of the Children Act 1989 and social workers are then likely to be involved in their care.

Child suffering or likely to suffer significant harm:

If there is cause to suspect a child is suffering or is likely to suffer significant harm a referral is needed so that enquiries can be made and an assessment under section 47 of the Children Act 1989 can be made. The DSL (or any other member of staff) will refer to Children's Social Care (MASH) immediately (and may also need to notify the police). There may be a need for agencies to instigate immediate protection measures whilst these enquiries are carried out.

Abuse:

Abuse is 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 the impact of witnessing ill treatment of others, and can take place both online and offline. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out by both men, women and children.

Staff should recognise that children with SEND are more vulnerable to abuse of all kinds, and in any case different forms of abuse may be factors simultaneously.

In all cases it is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused. It is very important that staff must report all of their concerns in accordance with this policy, however minor or insignificant they may think they are – they do not need ‘absolute proof’ that the child is at risk.

Physical abuse:

Physical abuse is the causing of physical harm to a child. It can lead directly to neurological damage, physical injury and disability. Some physical abuse is reactive; some may be premeditated with the intent to cause harm. Types of physical abuse include: hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child. It can also be caused when a parent or carer fabricates symptoms of or deliberately induces illness in a child.

Most children will collect cuts and bruises as part of the rough and tumble of everyday life; injuries must always be interpreted in light of the child’s medical and social history, developmental stage and the explanation given. Most accidental bruising will be seen on the ‘bony’ parts of the body e.g. elbows, knees. Important indicators of physical abuse are bruises and injuries that are either unexplained or inconsistent with the explanation given, or which are visible on the ‘soft’ parts of the body where accidental injuries are unlikely e.g. cheeks, abdomen, back, buttocks.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Fear of parents being approached for an explanation
- Flinching when approached or touched

Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations, or a delay in seeking treatment should signal concern.

Emotional abuse:

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It has an important impact on a developing child’s mental health, behaviour and self-esteem. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including

cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection
- Neurotic behaviour e.g. sulking, hair twisting, rocking
- Development delay in terms of emotional progress

Sexual Abuse:

Sexual abuse is the forcing or enticing of a child 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. Its adverse effects may endure into adulthood and affect the ability to build and maintain effective adult relationships.

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse 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. A child sexually abusing another child is a form of child on child abuse.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and school performance
- Displays of affection which are sexual and age inappropriate
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults. Anxiety of being left with relatives, a child minder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease

- Bedwetting
- Fire setting
- Pain or itching in the vaginal area or bruising or bleeding nearby
- Vaginal discharge or infection
- Discomfort when walking or sitting down

Child Sexual Exploitation (CSE):

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. It occurs when an individual or group takes advantage of the imbalance of power to coerce, manipulate or deceive a young person into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. It can be a one-off occurrence or a series of incidents over time and can range from opportunistic to complex organised abuse. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE can affect any child who has been coerced into engaging in sexual activities – including 16 and 17 year olds who can legally consent to have sex.

CSE can take place in person or via technology, or a combination of both. It may occur without the young person's immediate knowledge (e.g. through others copying videos or images they have created and posting on social media).

Grooming and sexual exploitation can be very difficult to identify but the following signs and symptoms may be identifiable:

- Inappropriate sexual or sexualised behaviour
- Repeat STIs, pregnancy, abortion, miscarriage (sometimes repeatedly)
- Having unaffordable new things (clothes, mobile technology) or expensive habits (alcohol, drugs) or unexplained gifts
- Increasing levels of secrecy
- Staying out overnight or going 'missing' (from school, home or care)
- Going to hotels or other unusual locations to meet 'friends'
- Getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends
- Losing contact with friends and family of their own age
- Disengagement, opting out of education, truancy
- Getting involved in crime
- Misusing drugs and alcohol
- Injuries from physical assault, physical restraint, sexual assault
- Changes in emotional wellbeing

The School recognises that children who are victims of child sexual exploitation may go missing from education. School staff will be alert to possible indicators of child sexual exploitation and any concerns will be managed in accordance with this policy.

Oxfordshire has its own specialist service who work on the identification of potential perpetrators, victim awareness and general education about CSE. **The Kingfisher Team** comprises Police, NHS, members of the county council and children and adult social care. When CSE is suspected the DSL will utilise the Kingfisher CSE Screening Tool and Risk Assessment in making a referral. The Kingfisher Team also has a confidential helpline (01865 309196).

Staff may find it useful to refer to [Child Sexual Exploitation: Guide for Practitioners](#) for further information.

Child Criminal Exploitation (CCE) and County Lines:

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (this may include transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, or forcible vehicle crime or threatening/committing serious violence to others). Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity (where drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns, often using dedicated mobile phone lines to manage such movements). It is increasingly recognised as a problem in Oxfordshire, particularly for gangs moving materials between London and Birmingham or the south west. Such exploitation:

- Can affect any child or young person under the age of 18
- Can affect vulnerable adults over 18
- Can still be exploitation even if the activity appears consensual
- May not always involve physical contact; it can occur through the use of technology
- Can involve force and / or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- Can be perpetrated by individuals or groups, males or females, and young people or adults
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

The indicators that children are at risk from, or are involved in county lines, or 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.

Children can be targeted and recruited into county lines in a number of locations including schools, but also increasingly are recruited online using social media. Children are known to be exposed to techniques such as 'plugging' (the internal concealment of drugs to avoid detection) and can be trapped by this type of exploitation as the gangs create drug debts and can threaten serious violence and kidnap if they attempt to leave the network. Where

pupil absence as a result of county lines is identified the DSL will consider a referral to the National Referral Mechanism as the child may be being trafficked. Support is available locally for the victims of county lines exploitation and referrals will tap into this external specialist network of support.

Some children can be more vulnerable to criminal exploitation due to factors including sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. The experiences of boys and girls who are criminally exploited can be very different and those who are exploited may be at higher risk of sexual exploitation in the future.

The DSL will report any concerns relating to child criminal exploitation to MASH and seek support from the Oxfordshire Youth Justice and Exploitation Service if appropriate. Further advice for staff can be found in two documents published by the Home Office:

[Preventing Youth Violence and Gang Involvement \(2015\)](#)

[Criminal Exploitation of Children and Vulnerable Adults: County Lines \(Updated 2023\)](#)

Neglect:

Neglect is the persistent failure to meet a child's basic physical, emotional and/or psychological needs, likely to result in the serious impairment of the child's health or development as well as creating long term difficulties with social functioning, relationships and educational progress. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs, and indeed educational neglect. The [NSPCC](#) has some helpful resources around neglect.

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Unkempt
- Inadequate clothing
- Frequent lateness or non attendance at School
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Listlessness, apathy and generally unresponsive
- Running away
- Loss of weight or being constantly underweight
- Low self esteem
- Being left alone or unsupervised
- Thrives away from the home environment but not in it

In Oxfordshire, neglect is the most common reason for children becoming the subject of a Child Protection Plan. It is important that the School seeks to understand and act upon the child's lived experience and the cumulative harm that builds when they are suffering

as a result of neglectful circumstances. OSCB have created a Neglect Safeguarding Standard and Headington Rye will implement this standard and seek to provide early help and intervention when neglect is identified as a possible safeguarding issue.

Domestic Abuse

Domestic violence and abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners of family members. Such abuse can be psychological, physical, sexual, financial and emotional. The Domestic Abuse Act 2021 recognises that all children can witness (see, hear or experience the effects of abuse) and be adversely affected by domestic abuse in the context of their home life where such abuse occurs between family members. They can also suffer domestic abuse in their own intimate relationships (teenage relationship abuse). We should remember that children can be both victims and perpetrators of such abuse and exposure can have serious, long lasting emotional psychological impacts. A child may blame themselves for the abuse or may have to leave the family home as a result of the abuse. The School has signed up to Operation Encompass and the DSL is the contact for the police. In situations where police have been called to an incident of domestic abuse and children were in the household, the DSL will be notified before the child returns to school, and appropriate support can be put in place as necessary. KCSIE provides further information about the National Domestic Abuse Helpline (0808 2000 247) and advice for school staff in dealing with such safeguarding cases. The [NSPCC](#) has some helpful resources too.

So-Called 'Honour Based' Abuse ('HBA')

So-called HBA encompasses incidents or crimes which have been committed to protect or defend the 'honour' of the family and/or community, and can include forced marriage, Female Genital Mutilation ('FGM') and other practices. This type of abuse often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse. School staff should be alert to possible indicators of HBA and report their concerns to the DSL. Guidance on the warning signs of HBA can be found in the [Multi-agency statutory guidance on FGM \(2020\)](#) and in the [Multi-agency guidelines: Handling case of forced marriage \(Updated 2023\)](#). Further detail can be found in Annex B of KCSIE.

Female Genital Mutilation (FGM)

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother, and/or death. The age at which FGM is carried out varies enormously according to the specific community. The procedure may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy. It is illegal in the UK.

Staff should be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM (UK communities most at risk include Kenyans, Somalis, Sudanese, Egyptians and Nigerians, but it is also practised in some Middle Eastern and Asian countries – Yemeni, Kurdish, Indonesian and Pakistani girls may be vulnerable). Staff should note that girls at risk of FGM may not yet be aware

of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Warning signs that FGM may be about to take place, or may have already taken place, include:

- Anxiety leading up to holidays, particularly in the summer
- Talk of a 'special ceremony' or a 'special procedure' often connected with 'becoming a woman'
- Requests for an extended absence from School with an unconvincing explanation for this absence
- Extended absence from school and a change in behaviour on return
- Depression, anxiety, low self-esteem afterwards
- Bladder problems including spending longer than normal in the bathroom or toilet
- Complaints of pain or discomfort when sitting still
- Reluctance to undergo normal medical examinations
- Asking for help, but may not be explicit about the problem due to embarrassment or fear.

Since October 2015, all teachers (along with social workers and healthcare professionals) have had a statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. If staff are concerned about a pupil and FGM they should discuss their concerns with the DSL who will involve children's social care as appropriate and will assist with the report to the police. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation: procedural information](#) (2020).

As Oxford is recognised as a 'hot spot' of FGM we are fortunate to be able to call upon the expertise of the Oxford Rose Clinic and the Oxford Against Cutting Group⁶:

Oxford Rose Clinic – specialist support for FGM survivors
 Women's Centre, John Radcliffe Hospital, Oxford OX3 9DU
oxfordrose.clinic@nhs.net
 07767 671406

Oxford Against Cutting - www.oxfordagainstcutting.org oxfordagainstcutting@gmail.com

The [NSPCC](#) also runs a helpline – 0800 0283550

Forced Marriage:

A forced marriage is a marriage in which one or both spouses do not fully and freely consent to the marriage and duress is involved. Forcing a person into marriage is a crime. Duress can include physical, psychological, financial, sexual and emotional pressure. Whilst this is an unlikely form of abuse in our context at Headington Rye Oxford, it is worth being aware of as some parents do raise concerns about what they perceive as the 'westernisation' of their daughters. Further advice and information can be obtained from the Forced Marriage Unit (Tel: 020 7008 0151 Email: fm@fcdo.gov.uk)

⁶ Oxford Against Cutting will soon be rebranding to become known as the Sundial Centre for Education on Harmful Practices

Staff should remember that since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used – this applies to non-binding ‘unofficial’ marriages as well as legal marriages.

Children Absent from Education and Children Missing from Education (CME):

A child absent from education, particularly on repeat occasions or for prolonged periods, is a potential indicator of abuse or neglect including that a child may be at risk of exploitation, radicalisation, FGM or forced marriage and therefore at risk of becoming a child missing from education. Unauthorised absences from school will be managed in accordance with the School’s Missing From Education and Attendance Policies. Staff are made aware of these policies during their induction to the School.

The School will monitor all pupil absences from school and promptly address concerns about irregular attendance or persistent absence with the parent/carer. Headington Rye Oxford has a designated Attendance Champion and follows the statutory guidance *Working Together to Improve School Attendance* (2024). A pupil who fails to attend school regularly⁷ or has been absent from school without the School’s permission for a continuous period of 10 school days, or who are defined as being persistently or severely absent will be reported to the local authority. The School will comply with its reporting duties to the local authority in accordance with The School Attendance (Pupil Registration) (England) Regulations 2024 to assist in identifying children who are missing education and may be at risk of harm or abuse. For further details on when the School has a duty to report to the local authority and how we manage the monitoring and reporting process, please see the Attendance Policy. Where a child with a social worker is absent the DSL will contact the other professional to advise of the absence and minimise the safeguarding risk.

Children Requiring Mental Health Support:

We all have mental health. Individuals move along a spectrum and at any point in time could find themselves mentally healthy or mentally unwell. We recognise that we have an important role to play in supporting and promoting positive mental health and wellbeing. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Typical mental health problems that we identify at School include depression and low mood, anxiety, self-harm, eating disorders, low level psychosis, and occasional suicidal ideation. Whilst we acknowledge that only appropriately trained professionals should attempt to make a diagnosis of mental ill health, staff are well placed to observe children day-to-day and can identify those whose behaviour suggests that they may be experiencing mental ill health or be at risk of developing a mental health problem. The Deputy Head Pastoral in both the Senior and Prep Schools have been trained to lead on Mental Health First Aid. They provide training which has allowed us to build a team of mental health first aiders who act as ambassadors promoting positive mental health and offering support to those pupils identified as needing it. Where a mental health concern becomes a safeguarding concern, staff should take immediate action and refer on to a DSL. The DSL is also the schools Designated Mental Health lead.

⁷ At such intervals as are agreed between the School and the local authority.

Other Forms of Abuse:

KCSIE (2024) includes information about other forms of abuse not covered in detail here in this policy. Staff should be aware that issues such as domestic violence, drugs, alcohol, faith abuse, modern slavery, cybercrime, hate, gangs, mental health and relationship abuse, homelessness, all fall under the safeguarding umbrella. Similarly the online world presents a range of challenges, be it access to inappropriate material, pornography, fake news, hoax material, online challenges, privacy infringements and risks in oversharing online, in addition to the potential for young people to be groomed remotely, coerced into harmful behaviours and exposed to online bullying. Where staff are concerned that such issues may be affecting a pupil they must discuss their concerns with the DSL and log their observations on CPOMS.

Child on Child Abuse:

The School recognises that children are capable of abusing their peers and that this child on child abuse can take many forms. Even if not reported it will be happening. However, abuse is abuse and should never be tolerated or passed off as 'banter' or similar. Child on child abuse is viewed extremely seriously at Headington Rye Oxford. All staff should be aware that 'child on child abuse' can take many forms. It is most likely to include bullying, cyber-bullying, prejudice-based or discriminatory bullying, abuse in intimate personal relationships (known as teenage relationship abuse), physical abuse, sexual violence and sexual harassment, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery or YPSI), causing someone to engage in sexual activity without consent (e.g. forcing someone to strip or to touch themselves sexually), upskirting, and initiation type rituals. In each example technology may be utilised remotely to facilitate, threaten or encourage the abuse. Pupils with SEN or disabilities could be more vulnerable to child on child abuse and be disproportionately impacted by it, without necessarily showing any outward signs.

The School minimises the risk of child on child abuse by educating children about the nature and prevalence of child on child abuse via PSHE and in the wider curriculum, covering topics such as bullying and cyber bullying. Pupils are frequently told what to do if they witness or experience such abuse, the effect it can have on those who experience it and the possible reasons for it. They are informed of the School's zero-tolerance approach towards all forms of child on child abuse; such behaviour is not tolerated. Staff are aware of the various forms that child on child abuse can take and are vigilant. The School cultivates an open culture to safeguarding whereby all members of the school community are encouraged to feel able to share concerns and experiences. Effective supervision exists and the School site is seen as a safe space by the pupils. We recognise that abuse of this nature may take place beyond the school boundaries. The pastoral team identify and are aware of individual pupils who may be more vulnerable to child on child abuse. We signpost a range of support networks both within and beyond school to our pupils. We recognise that information technology presents a potential risk to our pupils. The DSL works closely with the IT team and the Online Safety Coordinators to ensure that our acceptable use policies and our filtering and monitoring systems are fit for purpose, and guidance is provided through the curriculum and PSHE.

The anti-bullying, behavioural and online safety policies, as well as this policy, outline procedures that staff should follow. It is recognised that there always exists the potential for extreme forms of child on child abuse to occur. Whilst the needs of the victim must be paramount and their safety a priority, further consideration must be given also to the needs

of the perpetrator and to what extent their behaviour might be indicative of further child protection issues. Through the pastoral systems support will be provided to victims of child on child abuse, and to the perpetrator, as deemed necessary. This support may include, but is not limited to, counselling, referral to external agencies for specialised support and advice, regular meetings with a designated teacher in School. Support will be made available to those experiencing the abuse, and those responsible for it, and to any other child who has been affected, as deemed necessary. The support programme will take into account the specific needs of the individual. The School will make a referral via MASH in the same way and within the same timescale as other referrals.

Where the behaviour does not reach the threshold of causing or being likely to cause significant harm, staff will follow the Behaviour, Rewards and Sanctions policy in responding to the issue. Where there is reasonable cause to suspect that a pupil is suffering or likely to suffer significant harm from the behaviour to which they have been subjected, the procedures outlined in Section D of this Policy will be followed.

Staff understand that even if such incidents are not reported, it does not mean it is not happening, it may just be the case that it is not being reported. Any and all reports of such behaviour must be taken seriously and referred immediately to the DSL via CPOMS.

Bullying:

All child on child abuse will be managed in accordance with this policy 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 is likely to suffer, significant harm which warrants a response under these procedures rather than the School's Behaviour Policy.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from ESAT on the investigation of such allegations and will take all appropriate action to ensure the safety of the child(ren) during the interview by having an appropriate adult present and providing support until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from MASH or police as appropriate.

Victims and perpetrators of child on child abuse will be offered support by the School, as appropriate – this may include support from the school counsellor, Health Centre Team, Heads of Section or Boarding Housemistresses/masters as appropriate.

Harmful Sexual Behaviour (HSB):

Children's sexual behaviour can be seen to exist on a continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. The latter is developmentally inappropriate and may cause developmental damage – it can be described as harmful sexual behaviour (HSB). HSB can occur online and/or face-to-face and can also occur simultaneously between the two.

HSB is a topic covered in an age appropriate manner through the PSHE programme at Headington Rye Oxford. We believe that by raising awareness this preventative education enables pupils to understand what is appropriate/inappropriate and to know what to do in order to keep themselves safe and how to report concerns and seek support should they need to do so. The DSLs will respond to any reports of HSB, taking into account the needs of the child and the nature of the abuse or trauma they have experienced or perpetrated.

Sharing of nude/semi-nude imagery or video / Youth Produced Sexual Imagery (YPSI):

Youth produced sexual imagery (YPSI) is a distinct element of what is often termed 'sexting' (the writing and sharing of explicit messages with people they know), and now more commonly referred to as the consensual and non-consensual sharing of nudes and semi-nude images and/or videos or livestreams. It involves a child or young person under the age of 18 sharing images that they, or another child(ren), have created of themselves, and can include still photos, moving videos or live streamed material. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which can work offline. It can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts. Under the Sexual Offences Act 2003 it is an offence to possess, distribute, show and make indecent images of children. Therefore pupils who are involved in youth produced sexual imagery may be committing an illegal act. Indecent images would include those that show a naked young person, a topless girl, that displays genitals or sexual acts including masturbation. It can also include overtly sexual images of young people in their underwear. Children may refer to nudes and semi-nudes as 'dick pics' or 'pics'. Sometimes reference will be made to 'deep fakes' and 'deep nudes' when referring to digitally manipulated and AI-generated nudes and semi-nudes.

The most recent guidance recommends that in incidents where a child creates and shares sexual imagery of themselves with a peer who is also under 18, or where a child shares sexual imagery created by another child under 18 or an adult, or where a child is in possession of sexual imagery created by another child, this should be treated as a safeguarding issue rather than criminalising the child or children involved. Where a young person has engaged in consensual image sharing it may not be abusive but the child will be reminded that it is illegal.

The School's approach to this issue is outlined in the Online Safety Policy. Online identities and discussion of e-safety are part of the school's ongoing PSHE work. Where a case is suspected the school will discuss the issue with the child(ren) involved and work closely with the families of those concerned. Phones involved are confiscated if necessary and where the law requires or if it is deemed in the best interests of the child the police are notified. [Advice for staff is also available from the UK Council for Child Internet Safety: *UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (Updated 2024)*, and the protocols in this advice are followed by the school.]

If you receive a YPSI disclosure remember you should never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download the imagery as this is illegal (in exceptional circumstances the DSL may take the decision to view an image in order to safeguard the child). If you have already viewed the imagery by accident (e.g. if a child showed it to you before you could ask them not to), report this to the DSL immediately. You should be mindful of the following advice:

1. Searching the device
 - a. Do not search a device unless there is an immediate problem as this is likely to cause significant embarrassment/additional stress to the victim
 - b. Do not print out any material as evidence or move any material from one storage device to another e.g. by asking a pupil to forward the image to you
2. What to do and not to do with the image

- a. Do confiscate and secure the device and bring it to one of the Safeguarding Team and pass on the disclosure
 - b. Do not view, copy, print, share, store or save the image unless there is a clear reason to do so as this is illegal
 - c. Do not ask the pupil to send, share, move or save the image and do not delete the image
 - d. Do block access to the image and prevent its distribution if possible
3. Inform the Safeguarding Team immediately and alert the Online Safety Coordinator to the issue.
 4. Do not share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents/carers.
 5. Do not say or do anything to blame or shame any of the young people involved but ensure you have explained to them that you need to report the incident and reassure them that they will receive help and support from the DSL. Ensure the pupil feels comfortable and that any questions you choose to ask are appropriate and sensitive and do not cause any further distress or trauma.

What happens next?

- The DSL will review the issue with appropriate staff
- Consideration will be given as to whether an offence has been committed and whether a referral to MASH and/or the police is necessary; it may be necessary for the DSL to contact another education setting to discuss the incident
- The young people involved will be interviewed if this is appropriate
- Support for the victim will be put in place
- Parents will be informed at an early stage unless there is good reason to believe that involving the parents would put the young person at risk of harm
- A decision will be made on whether to inform the police and consideration will be given on the need to secure the device for the police
- If the police are not to be informed, consideration must be given to the searching, viewing and deleting of images – this should be done in the presence of another member of staff, ideally another DSL or the Online Safety Coordinator
- Other agencies will be contacted as necessary and appropriate and consideration given as to whether requests can be made to online providers or mobile phone companies to report and block users/material to prevent further circulation of material or contact with the child. If a child has uploaded material themselves they may need help to remove material
- A strategy will be employed to contain the incident as far as possible and manage any pupil reaction and welfare of all pupils involved including the alleged victim and perpetrator
- If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of MASH, parents are informed as soon as possible and that the pupils involved are supported
- If it is determined that a pupil has shared nudes or semi-nudes of another young person the DSL will seek to establish if this was done with the young person's consent, what the motivations for the actions were and what can be learnt to ensure the actions are not repeated
- Parents and carers may find it difficult to manage their feelings around such incidents and may need help understanding what has happened and what actions need to follow. The DSL will support parents and carers and provide support as detailed in the UKCIS guidance.

NB: all adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and will require an immediate referral to the police and MASH. Staff may need to consider whether incidents might be sexually motivated with grooming and coercion involved, or whether they may represent sextortion (financially motivated).

Sexual Violence and Sexual Harassment:

Sexual violence and sexual harassment can occur between two or more children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline. Children who are victims will find the experience stressful and distressing. Sexual violence and sexual harassment exist on a continuum and may overlap.

This sort of behaviour is never acceptable and will not be tolerated. Staff must challenge any behaviours that they observe or are made aware of, even if they appear to have been committed in fun e.g. grabbing bottoms/breasts/genitalia, flicking bras, lifting skirts.

Sexual violence includes rape, assault by penetration, sexual assault and the issue of consent is key in all of these examples. It may also include causing someone to engage in sexual activity without consent (e.g. forcing someone to strip or touch themselves sexually). Sexual violence includes offences defined under the Sexual Offences Act (2003). In each case the engagement in the sexual activity occurs without consent. Consent is about having the freedom and capacity to choose – it can be withdrawn at any time. NB a child under 13 can never consent to any sexual activity.

Sexual harassment involves any 'unwanted conduct of a sexual nature'. It is likely to impact a child's dignity, make them feel degraded, intimidated, humiliated, and creates a hostile, offensive and sexualised environment. It can include sexual or lewd comments, sexual jokes or taunts, physical behaviour, displaying pictures/photos/drawings of a sexual nature, and it may be online including the non-consensual sharing of sexual images or videos, sexualised online bullying, unwanted sexual comments and messages e.g. on social media, and sexual exploitation via coercion and threats. It may include upskirting. Evidence shows that girls, children with SEND and LGBT children are at greater risk.

Any disclosure of this nature must be treated as a safeguarding matter and passed to the DSL as a matter of urgency. Staff must reassure the victim that they will be supported, kept safe and taken seriously. They should not be ashamed for speaking out. The action that will be taken following such a disclosure is found in Section D of this policy.

When sexual violence and sexual harassment occur online the situation becomes more complex. It can include widespread abuse or harm across a number of social media platforms and this can lead to repeat victimisation.

All teaching staff should read Part 5 of KCSIE 2024 which now incorporates the previous Department for Education advice: Sexual violence and sexual harassment between children in schools and colleges.

Upskirting:

Upskirting typically involves taking a picture under a person's clothing without them knowing or giving consent, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Since 2019 and the implementation of the Voyeurism (Offences) Act, upskirting is a criminal offence. Any reports of such instances must be passed to the DSL who will notify the police.

Preventing Radicalisation

We recognise that it is a key role of the School to support children and that School may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and susceptible to being exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination. A key part of the UK government's counter-terrorism approach is Prevent; the Prevent Duty requires all schools to "help prevent the risk of people becoming terrorists or supporting terrorism" which includes safeguarding learners from extremist ideologies and radicalisation. The duty covers all types of extremism, whether political, religious or ideological, and the updated guidance also emphasises the role schools play in reducing permissive environments that enable young people to be exposed to radicalising influences.

Staff acknowledge the need for a culture of vigilance to be present in the School to support safeguarding. This includes awareness and sensitivity to attitudinal or behavioural changes in pupils which may indicate they are at risk of radicalisation and may need help or protection. However, staff acknowledge that there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology and family, friends and online influences can all play a major factor in the radicalisation of young people, and extremist or terrorist groups may appear to provide an answer to an individual's needs.

Radicalisation refers to the process by which a person comes to legitimise and support terrorism and forms of extremism. **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to negate or destroy the fundamental rights and freedoms of others, or to undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights or intentionally create a permissive environment for others to achieve these results. Historically extremism eschewed vocal or active opposition to Fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs and called for the death of members of our armed forces, whether in this country or overseas. **Terrorism** is an action that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Alongside the 'Prevent Duty' the Counter-Terrorism and Security Act (2015) also places a duty on local authorities to ensure Channel panels are in place to assess Prevent Referrals. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who have been identified as being susceptible to being drawn into terrorism, the aim being to rehabilitate and reduce risk. The panel has a multi-agency membership and will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. The Act requires partners of Channel panels to cooperate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate. Schools are listed in the Act as partners of the panel. Where required the DSL or another member of staff may attend a Channel panel to help with the assessment of a pupil we have referred to the programme.

The DSL is the Prevent Lead in School and all concerns should be passed to her. The School, in recognition that pupils may be at risk of being drawn into terrorism, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Headmistresses, DSLs and governor responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised. If concerns are raised that a pupil is vulnerable to radicalisation, the DSL will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care.

E-learning courses are available to raise awareness of the Channel Process and Prevent Duty. Further details of the available options can be accessed via [this link](#) . All teaching staff are asked to complete Prevent and Channel Awareness training within their first term at the school. Non-teaching staff are trained by the Prevent Lead with updates as necessary or given access to the online training package. The school Internet filters are monitored and any searches that might cause concern are logged and reported to the school's DSL and the Online Safety Coordinator.

If a member of staff, pupil or parent has any concerns about the potential radicalisation of a pupil, they must follow the school's usual safeguarding procedures as laid out in this policy. The School will work closely with parents to support them when a risk of radicalisation is identified. Through the curriculum, PSHE programmes and wider extra-curricular provision the School works hard to build resilience in its pupils to radicalisation, and to encourage an atmosphere of mutual respect where diversity is celebrated. The DSLs will work together to ensure that all aspects of the School's education support pupils in developing the ability to resist pressure and make safer choices, knowing where to seek help if necessary.

Those at risk of radicalisation or being drawn into extremism are likely to have a range of vulnerabilities, often related to negative perceptions of their belonging, purpose or self-worth.

Factors which might suggest **engagement**:

- Spending increasing time in the company of suspected extremists
- Changing their style of dress or personal appearance to fit with the group
- Day to day behaviour becomes increasingly centred around extremist ideology
- Loss of interest in friends and activities
- Possession of materials or symbols associated with an extremist cause
- Attempts to recruit others to the cause

Indicators that someone may have an **intention** to cause harm, use violence etc:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social/political ills
- Using insulting or derogatory names or labels
- Speaking about the imminence of harm and the need to act now
- Condoning or supporting violence
- Plotting or conspiring

Indicators that an individual is **capable** of causing harm or contributing to an act of terrorism either directly or indirectly include:

- Having a history of violence

- Being criminally versatile – using criminal networks to support extremist goals
- Having occupational skills that can enable acts of terrorism (e.g. civil engineering, construction, pharmacology)
- Having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills)

There is no single route to terrorism nor is there a simple profile of those who become involved. Further details can be found at Appendix 5.

See also the Home Office statutory [Prevent Duty Guidance](#) (2023) and the Department for Education [Prevent Duty Advice](#) (2023). Channel guidance (2023) can be found [here](#). Another useful source of information and resources is the government website [Educate Against Hate](#) .

Visiting Speakers

The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to our pupils is to ensure that they can critically assess the information that they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that where appropriate their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, Visiting Speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The School keeps a formal register of visiting speakers retained in line with its Data Protection Policy.

Vulnerable Children (LAC, SEND, LGBT+ and Gender Questioning Pupils)

The School recognises that some children are more vulnerable to abuse and neglect than others as mentioned earlier in this policy in relation to Early Help. For example, those with SEND, who are young carers or Looked After by the local authority. Some individual children may well have complex mental health and psychosocial needs, perhaps with neurodiverse diagnoses. Our priority is always to seek to build relationships with our pupils and by doing so to begin to understand their needs and work to address them appropriately.

All staff members are alerted to the particular potential vulnerabilities of Looked After Children. The DSLs are responsible for liaising with virtual school heads for Looked After Children in the School and are responsible for promoting the educational achievement of children who are Looked After. The School promotes the educational achievement of all

pupils including those who are Looked After and will ensure that all staff have the skills, knowledge and understanding necessary to keep Looked After/Previously Looked After children safe.

Children who need a social worker may have experienced adversity or trauma and be more vulnerable to harm, as well as facing additional barriers which may impact their attendance, learning, behaviour and mental health. The DSL will make staff aware of the additional needs of these pupils as necessary and appropriate.

All staff need to be alert to the specific needs of those pupils with SEND. Those with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse, neglect and exploitation. Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, logging their observations on CPOMS and discussing this with a DSL as appropriate.

Pupils who are questioning their sexuality or identity, those who identify or are perceived to identify as LGBT+ could also be vulnerable. The Senior School has an LGBT + club (Pride Club), overseen by a member of staff who is happy to be a trusted adult for those who have questions and to be an advocate for those who need support. In some cases, a pupil who is perceived by their peers as LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Headington Rye Oxford is mindful of the draft non-statutory guidance *Gender Questioning Children (2023)* and seeks to follow the five general principles set out in the document:

1. We will safeguard and promote the welfare of all children, ensuring any agreed action is in the best interests of the individual pupil and their peers.
2. Headington Rye Oxford is a respectful and tolerant place where bullying is not tolerated and the whole community treats each other with compassion, consideration and respect.
3. We work in partnership with parents and will engage with them in any decision-making process. They will be included in any discussion relating to social transition and staff will seek to support the child in enabling these conversations to occur. Only in exceptional circumstances where there is deemed to be a risk of harm to the child from the parents would such conversations be discouraged.
4. We are mindful of the legislation that exists around a child's legal and biological sex.
5. The decision on whether to allow a child to 'social transition' is at the discretion of the school and a cautious approach, considering all outcomes and needs will be taken, ensuring the school remains compliant with its statutory responsibilities to keep children safe.

When a decision is made to allow a pupil to use a preferred name and/or pronoun(s) written confirmation will be gathered from parents and staff will be informed. The pastoral team will seek to support the pupil (and where necessary their peers) in the appropriate way.

Section D

What to do if you have concerns about a child

There are many levels of concern about pupils, some of which require immediate action and collaboration with external agencies, while others are at a much lower level and can be dealt with within the normal internal school structures.

If you have a general concern about the welfare of a pupil, you must let someone know – the pupil's form tutor, their Head of Year, Head of Section, Housemaster/mistress, or the Deputy Head Pastoral are all people you could share your concerns with. You can pass information on verbally or in writing, in hard copy or electronic format. Ideally all such concerns should be logged using CPOMS. An assessment can then be made about how to help the pupil. Only by sharing information can effective support be put in place. Staff should feel able to report a concern even if they do not have proof that their concern is justified – any form of help is better than waiting to see if concerns are confirmed and eventually potentially escalate. Identifying a need for early help and addressing the issue by putting support in place enables us to provide a more positive outcome for the child. The DSL will seek support from other agencies as required.

Procedures for dealing with concerns or reports of abuse, neglect or exploitation

The School treats the safeguarding of all pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk.

Safeguarding concerns may take a number of forms including:

- a disclosure from a pupil;
- concern that a child may have suffered serious harm;
- concern that a child may be at risk of serious harm;
- concern that a child is in need and early help may be required to support the pupil or their family.

The School recognises that there may be children who, whilst not suffering harm or at immediate risk, require additional support from external agencies. Where appropriate, the School may consult with the child concerned and their parents regarding a referral to external agencies (such as Children's Social Care). Parents do not have to give consent before a referral is made. This may lead to a written plan to support a child in need being drawn up or a strengths and needs assessment being carried out. In either case, the School will liaise and take advice from external agencies as appropriate.

If a member of staff is made aware of any allegation of abuse, neglect or exploitation, or if knowledge of possible abuse, neglect or exploitation comes to their attention, it is their duty to listen to the child, to provide re-assurance and to record the child's statements, but not to probe or put words into the child's mouth. On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people. Please refer to Appendix 2 for further advice.

Any information received by staff must be recorded in written form either contemporaneously or as quickly as possible after a disclosure was made. **Notes should be signed and dated and passed to the DSL/uploaded to CPOMS as soon as possible.**

Every member of staff, including part-time, temporary or supply, visiting, contract and volunteer staff working in School must report any concerns (including those where a pupil may benefit from early help or where it includes alleged abuse by one or more pupils against another pupil) to the DSL and submit an accurate written record of the disclosure or concerns. However, **any staff member can make a direct referral to Children's Social Care or other external services** such as early help services in accordance with the referral threshold set out by OCSB. Parental consent is not required for a referral to be made, although it should usually be sought.

Where staff have concerns that a child is in immediate danger or is at risk of harm a referral must be made to Children's Social Care via the MASH and/or the Police immediately. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff must share information with Children's Social Care and/or the Police where there are any concerns that a child may be at risk of harm, neglect or exploitation. All contact details can be found on pages 4-5 of this policy.

If staff members are unsure about whether or not a referral should be made, they must speak to the DSL. The DSL will contact the LCSS, MASH or LADO for advice, where necessary.

The DSL will refer all allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to MASH or to the LADO within 24 hours. Borderline cases will be discussed with LCSS or MASH or the LADO in the first instance and, following discussions advice will be taken on whether or not an allegation or concern meets the relevant threshold. The LCSS or MASH worker or the LADO will help the school to decide in the circumstances what further steps should be taken. This could involve calling the Police.

Where the outcome of a referral to MASH or the LADO is not reported back to the referring member of staff or DSL, the School will follow this up with the Children's Social Care. Any member of staff who has concerns that a child's situation does not appear to be improving should press for re-consideration. The School is committed to challenging inaction.

The School will not do anything that may jeopardise any external investigation. Once the matter has been referred, all further responsibility for gathering information and deciding what happens next will rest with Social Services and the Police.

Where the School has concerns around the approach taken, or decisions reached, by external professionals to whom they have referred the DSL will follow the guidance provided by OSCB through their RESOLVE⁸ process.

With regard to the Prevent duty, the School will co-operate with Channel panels and the Police when assessments are being undertaken. Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a pupil, staff must firstly raise this with

⁸ Details of the OSCB Resolve guidance can be found [here](#) (2023 version).

the DSL without delay. The DSL will consult with external agencies, as appropriate in accordance with this policy. Where the level of risk is such that there is an immediate risk of harm or staff have a genuine concern that there is an immediate risk of harm, any member of staff may, and indeed should make a referral directly to Children's Social Care or the Police. The School will not discuss any concerns in relation to possible radicalisation without first agreeing with Children's Social Care or the Police what information can be disclosed.

The DSL will report safeguarding concerns to the Headmistress (provided they do not concern the Headmistress).

Dealing with Child on Child Abuse:

When an issue relating to child on child abuse is reported, discovered or disclosed staff should consider the severity of the abuse. Where the behaviour does not reach the threshold of causing or being likely to cause significant harm, staff will follow the Behaviour, Rewards and Sanctions policy in responding to the issue. Where there is reasonable cause to suspect that a pupil is suffering or likely to suffer significant harm from the behaviour to which they have been subjected, the procedures outlined below will be followed.

Staff should be aware that children with special educational needs and disabilities, and children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) or gender questioning are more likely to be targeted by their peers.

How allegations will be dealt with:

Where a pupil has been abused by one or more pupils, and there is reasonable cause to suspect they are suffering or likely to suffer harm, the usual safeguarding procedures should be followed and a report made to the DSL and logged on CPOMS who will refer on to MASH and/or the police.

In such an event, all pupils involved, whether perpetrators or victims, will be treated as being 'at risk' and supported internally by staff (Tutor, Head of Year, Head of Section, Housemaster/mistress, Nurse, School Counsellor, etc). There may also be a need for external specialist support. Issues are often complex.

Where an allegation has been made against a Headington pupil a thorough risk and needs assessment of the situation will be carried out by the DSL (with the help of the ESAT team where appropriate) with a view to ensuring the safety of all pupils. This risk and needs assessment might include a consideration of whether a pupil should be removed from school, a boarding house or from certain classes for a period of time, whether sleeping arrangements in a boarding house need to be changed, whether contact with certain individuals needs to be managed. Any action that follows should be taken in the best interests of the victim and the perpetrator, and should not be perceived as a judgement on the guilt of the alleged perpetrator. As far as possible the wishes of the victim should guide the proceedings and as much contextual information should be sought as is practicable. A plan will be drawn up in these circumstances for pupils affected by or involved in abuse outlining the expectations in terms of pupil behaviour and measures put in place to manage the situation. Support (such as counselling, referral to external agencies, or regular meetings with a designated teacher) will be available for both the victim and the perpetrator. Where the incident involves sexual violence a referral to MASH

must be made urgently so that external support can be utilised in completing assessments.

Every report of child on child abuse will be considered on a case by case basis.

- Some may be managed internally and all decisions will be documented
- The child(ren) may benefit from early help in order to address for example non-violent harmful sexual behaviour and to prevent escalation of sexual violence
- A referral to MASH may be essential and the DSL will then collaborate with the agencies who become involved
- The incident may be so serious that alongside a referral to social care a report is passed to the police (e.g. rape, assault by penetration or sexual assault). Even if the child is under 10, and therefore under the age of criminal responsibility, the police should be informed. Parents will usually be told and guidance will be sought from the police on what can be disclosed to other parties, and how those concerned can be protected and remain anonymous. A police investigation will then follow.
- Where a criminal investigation occurs the school will work closely with the police and social care to support all those involved as fairly as possible and to manage any pupil absence or an adapted school routine. The school will not take any actions that would jeopardise the police investigation.
- If a child is convicted or receives a caution for a sexual offence the School will update its risk and needs assessment and consider any further disciplinary action in line with the Behaviour, Rewards and Sanctions policy. Where a not guilty verdict is applied or where no further action is taken support will be offered to both parties for as long as it is needed. Staff should remember that if an allegation cannot be substantiated it does not necessarily mean that it was unfounded.
- Once a case is closed the DSL will review the details and consider with the wider safeguarding team what lessons can be learned. It may be appropriate to make amendments to the PSHE or tutor programme to tackle any issues raised.

How victims will be supported:

Victims of child on child abuse will be supported and a plan drawn up by the DSL in consultation with the victim and their parents. The school will ensure access is available to the health centre and our nursing team, to counselling and the Wellbeing Hub, and will signpost the family to other appropriate external services if they are appropriate. CAMHS, Horizon, Rape Crisis Centres, the Internet Watch Foundation may be helpful sources of support.

Victims may not disclose the whole picture immediately – the DSL or member of staff working with the victim should encourage an open dialogue.

Victims of sexual violence may struggle in a normal classroom environment – the DSLs will work with the victim to manage their timetable and activities in order to provide appropriate support.

How perpetrators will be supported:

Any child will experience stress as a result of being the subject of allegations and/or negative responses from their peers. Advice will be taken from social care and/or the police in determining how best to support the perpetrator, accessing internal and external support as appropriate. Support and sanctions will be considered on a case by case basis dependent on the outcome of any investigation.

In each case the School will reflect the approach set out in Part 5 of KCSIE (2024).

Section E

Advice to Staff – Managing Their Own Behaviour

Appendix 1 gives advice and provides guidance to staff, which if followed, will enable them to work safely and professionally in School. Staff should also refer to the Code of Conduct.

Members of staff should ensure that their behaviour and/or actions do not place pupils or themselves at risk of harm or of allegations of harm towards a pupil. One-to-one tuition, one-to-one online learning sessions, tutorials, coaching, escorting pupils to appointments are just some of the situations that present potentially difficult situations which need careful managing. Electronic communications also present a potential area of difficulty, as does staff access to boarding accommodation. Further guidance is available on all of these aspects of school life.

It contravenes the professional expectations of members of staff for them to have any form of sexual relationship with a pupil of any age. Members of staff should be aware that:

- It is an offence to have a sexual relationship with a pupil of any age, even those over 16, as all staff are in a position of trust in respect of pupils. Such a relationship would constitute an abuse of trust under the Sexual Offences Act 2003 (amended 2007).
- They must not incite one pupil to have sex with another, and must not watch a sexual act either live or via media such as the internet.
- They must not engage in sexual activity in front of a pupil.
- Talking about a pupil in a suggestive or sexual manner or about their appearance is inappropriate.

Grooming Behaviours:

Staff should be alert to the behaviour of others around pupils to spot grooming and to prevent abuse happening. Grooming is the process by which an individual prepares a child, significant adults, and the environment for abuse of a child. The process of grooming typically involves a gradual move from attention giving, through non sexual touching, then to more intrusive and intimate behaviours.

Perpetrators manipulate their victims over a period of time – sometimes years – gradually gaining the person's trust, desensitising and sexualising them for the purposes of abuse. Victims are taught to respect, trust and sometimes love their perpetrator and the betrayal of trust can result in severe long term trauma.

Whilst there are not always signs of grooming, staff should be aware of adults who show any of the signs listed below. This is a very rough guide of what might be considered a concern. It is by no means exhaustive. The issues listed are in no particular order of significance.

- Comments that safeguarding is taken too seriously
- Giving children personal notes or gifts
- Unusual degree of familiarity or favouritism shown by adult
- Regular physical contact between staff and pupils
- Spending significant amounts of free time with pupils
- Seeing children outside the workplace and/or in the holidays
- Wanting to transport children outside of normal structures and alone
- Comments about the physical appearance of pupils

- Making sexually suggestive remarks to pupils
- Giving out personal telephone numbers
- Photographs of children on an adult phone
- Phoning pupils without due cause

If a member of staff has any concerns that relate to grooming they must discuss their concerns with the DSL or the Headmistress.

Duty to Report Concerns

Staff are reminded that:

- If staff (including staff, governors, volunteers, visitors, supply staff or contractors) have safeguarding concerns, or an allegation is made about another member of staff (including governors, volunteers, visitors, supply staff or contractors) posing a risk of harm to children, then a referral must be made to either the DSL, the Headmistress or the Chair of Governors immediately.
- A failure to report internally by staff must be investigated by the School and, if justified, appropriate action taken (this could range from disciplinary proceedings, a referral to the Teaching Regulation Authority (TRA) or a referral to the Disclosure and Barring Service (DBS)).

Where it is discovered that the School has subsequently failed to report concerns to the relevant authority, this should be investigated by the local authority, and should a failure to report be proven, action will be taken according to the legal framework available.

Staff should also refer to the Low Level Concerns Policy and consider the scenarios where a self-referral might be advisable.

Section F and Appendix 3 provide further details about the allegations management process.

Section F

What to do if you have a concern about a member of staff

Concerns about the Behaviour of Staff, Volunteers or Governors

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in School to abuse children.

The School encourages staff, volunteers, and Governors to share any concerns, no matter how small, about their colleagues', or their own, behaviour with the Designated Safeguarding Lead (the Deputy Head Pastoral). This includes any 'low level' concerns that do not meet the threshold of an allegation of abuse (Refer to Low Level Concern policy for further guidance). In self-referring staff may be worried that something could be reported incorrectly or taken out of context, at a later stage. All information provided will be recorded and dealt with appropriately. The aim of having a reporting procedure to identify 'low level' concerns is to enable the safeguarding team to identify concerning behaviour early, thus minimising the risk of abuse arising, and to ensure that adults working within the organisation are clear about their professional boundaries, understand the behaviours that are expected of them and act within them. Low level concerns will not be included in references unless they have met the threshold for referral to the LADO.

Procedures in the event of an allegation against a member of staff, volunteer temporary staff or Heads

Where there are grounds to suspect that abuse has occurred or is occurring and the perpetrator is an adult associated with the School a report will be made immediately. The School will follow the procedures laid down by OSCB/ESAT in any case of allegation against a member of staff, volunteer, trainee, PGCE pupil, temporary member of staff (e.g. a supply teacher), Headmistress of the Senior School or Head of the Prep School, working with our pupils.

The School's procedures for dealing with allegations against any staff member (and volunteers who work with children) aims to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from allegations. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

The DSL or a member of the Safeguarding Team will be directed to provide support to the child whilst any investigation is taking place.

The School will designate a 'case manager' (usually the DSL, occasionally the Director of HR or another member of the SLT) who will liaise with the LADO, Police and Social Services as to managing confidentiality as appropriate. The School's procedures for managing allegations against staff (including the Headmistress) and volunteers follows Departmental guidance and OCSB arrangements and apply when staff, including volunteers, have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates that they may pose a risk of harm if they were to work regularly or closely with children; or

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

An allegation (including historical allegations) made against teachers and other staff (including supply staff and the volunteers who work with children) must be reported immediately to the Headmistress of the Senior School or Head of the Prep School as appropriate. Staff may first consider discussing concerns with the DSL. Should the initial allegation first be made to any other member of staff then that member of staff must either request the person raising the allegation to report it to the Headmistress of the Senior School or Head of the Prep School or if that is not possible to pass details of the allegation to the relevant Head immediately. The Head has a responsibility to pass on information immediately (within 24 hours of receipt of the information) to the LADO. She may also inform the Police. If the Head is not available allegations should be reported to the DSL who will inform the Head and contact the LADO. Should the allegation be against a Head or a School Governor the report must be made to the Chair of Governors (without the relevant Head or School Governor being informed first). It will be the Chair's responsibility to contact the LADO. Should the allegation of abuse concern the DSL, the report must be made to the Headmistress without informing the DSL.

The LADO will be informed of all allegations which appear to meet the above criteria. In Oxfordshire the LADO team require the completion of a referral form – the 'case manager' will liaise with the Director of HR to gather personal information required to complete the referral form. Once the form has been submitted the LADO will respond within 24 hours. A copy of the completed referral form and the response from the LADO should be forwarded to the DSL and the Director of HR once a case concludes. The School will act in accordance with advice given by the LADO and will not investigate allegations or inform any individuals without the LADO's consent. The DSL will work with the Head to ensure allegations are referred on and any recommendations made by the LADO are followed and documented. Where the allegations involve supply staff the agency involved in their appointment will be informed and involved in any enquiries and outcomes.

Where a member of staff (including supply staff) accused of a safeguarding matter has left the School and is no longer teaching, or where allegations are historic, they will be referred directly to the Police.

An initial discussion around the referral may determine that no further action is required – the LADO and case manager will agree this decision and determine what information will be held on record by the school and what information will be communicated to the member of staff.

Where an investigation is required into an allegation the outcome of this will record whether it is substantiated (sufficient evidence either to prove or disprove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive) or unfounded (there is no evidence or proper basis which supports the allegation being made). If it is established that the allegation is malicious or unfounded, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a written record will be made of the decision and retained (with the initial referral documents) on the individual's personnel file in accordance with DfE advice. A copy will only be provided to the individual concerned following consultation with appropriate agencies and agreement has been reached as to

what information can be disclosed. Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references.

If the LADO or any of the statutory child protection authorities decide to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them.

The School recognises it has a duty of care to staff but may take action in the event of allegations against staff in accordance with its disciplinary procedures. The School will ensure support is in place for individuals facing an allegation and a representative will be appointed to keep the individual informed of the likely course of action and progress of the case and to consider what other support is available and appropriate for the individual.

The School will keep a clear and comprehensive written record of any allegations made, how it was followed up, how it was resolved, a note of any action taken and decisions reached. These documents and those held within personnel files should be kept until the accused has reached normal pensionable age, or for a period of ten years from the date of the allegation, if that is longer.

During the course of the investigation the School, in consultation with the LADO, will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in KCSIE (2024) relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

Any pupils who are involved will receive appropriate support.

Staff should have regard to the Staff Code of Conduct to minimise the risk of allegations being made.

Also see Appendix 3 (Further Guidance on Allegations Management), Part 4 of KCSIE (2024) and the expectations set out by OSCB⁹.

Following the outcome of any investigation a full review will be undertaken to determine any lessons learnt and if appropriate changes need to be implemented.

NB: the same procedures will be followed if an allegation is received relating to an incident that has happened on the school site when another organisation or individual was using the school premises to run an activity.

Whistleblowing in a Safeguarding Context

If staff and volunteers have concerns about poor or unsafe practices or potential failures in the School's safeguarding regime, these should be raised in accordance with the School's Whistleblowing Policy.

Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems to escalate a

⁹ The OSCB Procedures Manual can be found [here](#).

concern. There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns in good faith.

Concerns regarding the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm should be dealt with in accordance with the School's Managing Allegations of Abuse against Staff procedure. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, and no/insufficient action has been taken, they may wish to contact the LADO directly using the contact details in this policy (see page 56). Alternatively they may use other whistleblowing channels outside of the school, such as the NSPCC whistleblowing helpline (telephone: 0800 0280285 or email: help@nspcc.org.uk).

External Referrals

The School follows Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to involvement of the LADO, schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Referral will also be made where a person has been cautioned or convicted of a relevant offence.

The School will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a pupil) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer (including PCGE placement and Initial Teacher Training), no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

Furthermore, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School will consider making a referral to the Teaching Regulation Agency (TRA) as required by sections 141D and 141E of the Education Act 2002 and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). The Secretary of State may investigate the case, and if she/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

In relation to the early years provision, if there is an allegation of serious harm or abuse by any person living, working or looking after children at the premises or elsewhere, a report will be made to OFSTED within 14 days.

Any historical allegations of child abuse made against a member of staff who is no longer at the School will be reported to the Police. All allegations of historical abuse must also be referred to the Headmistress straightaway.

Relevant External Agency Contact Information

Educating Safeguarding Advisory Team (ESAT) and Local Authority Designated Officer (LADO)

LADO: Jo Lloyd

Team Tel: 01865 810603 Email: LADO.safeguardingchildren@oxfordshire.gov.uk

Police

Tel: 0845 8 505 505

Out of office hours contact numbers: 0800 833 408

Police Emergency – 999 Police Non-Emergency – 101

OFSTED Safeguarding Children

08456 404046 (Monday to Friday from 8am to 6pm)

Whistleblowing@ofsted.gov.uk

Disclosure and Barring Service

PO Box 3961, Royal Wootton Bassett, SN4 4HF

Tel: 03000 200190

Teaching Regulation Agency

Ground Floor, South Cheylesmore House, 5 Quinton Road, Coventry, CV1 2WT

Tel: 0207 5935393 Email: misconduct.teacher@education.gov.uk

Section G

Record Keeping, Monitoring and Review

All concerns, discussions and decisions (with reasons) made in accordance with this policy will be recorded in writing, usually on CPOMS or in centrally held logs.

The School's records on child protection are kept securely in the DSL's office. They are thus separated from routine pupil records. Access is restricted to the DSLs, the Headmistresses and those authorised by the DSLs and Headmistresses.

In October 2022 the School moved to an online platform – CPOMS - enabling more sensitive information to be held securely on a digital platform. Paper files will vary a little whilst we embed this system. Access to the data held on CPOMS is strictly controlled and restricted to the DSLs and Headmistress.

A summary of safeguarding concerns (whether or not they are referred) can be pulled from CPOMS and kept securely by the Deputy Head Pastoral / Head of Prep School. The information is shared with the designated Safeguarding Governor on a termly basis. The DSL will review cases from time to time in order to establish if there are any concerning patterns of behaviour. If issues are identified additional support will be put in place in consultation with the other DSLs.

The School's Safeguarding and Child Protection Policies will be reviewed annually (and earlier as required e.g. by the introduction of revised statute or statutory guidance and/or the introduction of a change in practice) by the Deputy Head Pastoral and Head of Prep School and in consultation with Mr Nicholson, the Governor with designated responsibility for safeguarding. Should any deficiencies or weaknesses in child protection arrangements occur, they will be remedied without delay as and when they become apparent.

The Headington Rye Oxford Safeguarding Policy is scrutinised by Council prior to approval and publication at the start of the Autumn Term each academic year.

The DSLs complete an annual review of safeguarding practice in the Prep and Senior Schools as required by OSCB. This audit document is shared with Mr Nicholson, reviewed and agreed by Full Council during the Autumn Term, signed off by the Chair of Governors, and submitted to the LADO.

All staff should feel able to raise concerns about safeguarding practices within the School. Staff have a responsibility to speak up if they have a concern. Staff should talk to any member of the Safeguarding Team about their concerns or use the School's Whistleblowing policy.

Appendix 1

Guidance on Safer Working Practice

The purpose of this guidance is to provide clear advice on appropriate and safe behaviours for all adults working with children in paid or unpaid capacities, in all settings and in all contexts. It aims to:

- keep children safe by clarifying which behaviours constitute safe practice and which should be avoided
- assist adults working with children to do so safely and responsibly, and to monitor their own standards and practice
- support managers and employers in setting clear expectations of behaviour and codes of practice
- support safer recruitment practice
- minimise the risk of misplaced or malicious allegations made against adults who work with children
- reduce the incidence of positions of trust being abused or misused.

The guidance below is taken from the DfE guidance for all those working with children and young people. It should be read in conjunction with the staff Code of Conduct.

Background

The vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment which secures the wellbeing and very best outcomes for children and young people in their care. However, it is recognised that in this area of work tensions and misunderstandings can occur. It is here that the behaviour of adults can give rise to allegations of abuse being made against them. Allegations may be malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned. Equally, it must be recognised that some allegations will be genuine and there are adults who will deliberately seek out, create or exploit opportunities to abuse children. It is therefore essential that all possible steps are taken to safeguard children and young people and ensure that the adults working with them are safe to do so. Some concerns have been raised about the potential vulnerability of adults in this area of work; this document has been produced in response to these concerns.

What to do if you are worried a child is being abused

All staff and volunteers should be familiar with the School's procedures and protocols for safeguarding the welfare of children and young people. They have a duty to report any child protection or welfare concerns via CPOMS to designated members of staff as indicated in these procedures.

Underpinning Principles

- The welfare of the child is paramount.
- It is the responsibility of all adults to safeguard and promote the welfare of children and young people.

- Adults are responsible for their own actions and behaviour and must avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Adults should work and be seen to work, in an open and transparent way.
- The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.
- Adults should continually monitor and review their practice and ensure they follow the guidance contained in this document.

Guidance for safer working practice

General principles

- All adults who work with children and young people have a crucial role to play in shaping their lives. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help staff and volunteers establish safe and responsive environments which safeguard young people and reduce the risk of adults being unjustly accused of improper or unprofessional conduct.
- This means avoiding any conduct which would lead **any reasonable person** to question the motivation and intentions
- Staff should remember that their behaviour has a significant impact on the pupils in their care and they must therefore adopt a professional approach to all aspects of their work; this includes dress, communication and social contact.
- If in doubt staff and/or volunteers should discuss any uncertainties or confusion with their line manager or a DSL.
- Similarly, if adults feel that an incident could be misinterpreted they must document it and report immediately to the DSL.

Specific Guidance

- **Confidentiality:** Staff may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances they may have access to or be given highly sensitive or private information. These details must be kept confidential at all times and only shared on a needs to know basis and only when it is in the best interests of the child to do so i.e. when sharing information with social services or the police. Such information must never be used to intimidate, humiliate, or embarrass the child or young person concerned. If there is any doubt about whether to share information or keep it confidential staff should seek guidance from a DSL or relevant Head of school. Information given to a member of staff by a pupil must be passed to a DSL if there is any issue of child protection; confidentiality must not be promised.
- **The use of email for communication** is an increasingly used technology and one which pupils will need to use beyond school; however such communication should be through school email addresses (not staff personal emails), be for factual information, instructions etc and should not lapse into the casual. Similarly staff should not give out personal **mobile phone numbers** except where necessary for emergency contact, for example on a visit and texting/telephoning should be used in emergencies only. Pupils should not be accepted as 'friends' on **social media or networking sites**
- **Social activities:** Many staff arrange social activities, and these are much enjoyed by the pupils but they should always be group activities, be organised transparently

(e.g. noted on the school calendar) and whilst staff behaviour may be relaxed it should always remain professional.

- **Physical contact.** Headington Rye Oxford is not a school which bars physical contact; there are activities which require it e.g. PE or music and there may be circumstances where a distressed child may need comfort. Such contact must always remain appropriate for the task and staff should stop immediately if it is apparent that it causes the child discomfort. Such contact should always be open and take place in an environment which could not be regarded as secret; offices have glazed panels to ensure that neither pupils nor staff feel that actions could be misinterpreted. It goes without saying that these panels should not be covered. If there has been a need to reassure a distressed child then this must be appropriate to the age and any vulnerabilities the young person may have (such as SEND) and should be documented on CPOMS.
- **One to one situations** should only take place in rooms which are in public areas of the School; most rooms have glazed panels and these rooms should always be used in these circumstances. (see also Code of Practice 1:1) Specific guidance and expectations are in place for the remote delivery of 1:1 online teaching and learning or pastoral support.
- **Driving pupils in your own car.** Legally a child can be restrained with just an adult seat belt once they have reached **either** 135cm in height **or** their 12th birthday, whichever one of the two comes first. Driving pupils in your own car, except in an emergency, should always be with parental consent. Staff are always advised to carry two or more pupils and to ensure that if dropping children off they are not left with one child for an extended period of time.
- **Photographs and videos of activities** are often taken but care should be taken that children cannot easily be identified and that they are taken of groups rather than individuals. Where individuals are photographed e.g. sport or drama then the focus should obviously be the activity rather than the child. Most parents have consented to photographs been used for publicity purposes as long as the child cannot be identified; a list of those who have refused permission is held online on staff pages - staff should be aware of these. Individual permission is required where the pupil's name is published. Staff can check with the Marketing Team for further guidance.
- **Use of mobile phones and cameras.** In order to prevent allegations of inappropriate activities, staff may not store images of pupils on any personal device. Any images inadvertently taken on personal devices must be downloaded to School systems as soon as reasonably possible and the personal copy permanently removed. Only School owned cameras and School owned portable devices are used in EYFS, and these devices are locked away when not in use. The School's policy on the use of mobile phones and cameras in the setting is incorporated into the ICT Acceptable Use Agreements.

If any member of staff has a concern that their actions have been or could be misinterpreted or misconstrued they can self-refer to the DSL using the low level concerns reporting form or use CPOMS to note their interactions with a specific child(ren).

See also Low Level Concerns Policy and Staff Code of Conduct.

Appendix 2

Procedure for dealing with disclosures (the 6 R's – what to do if):

1. Receive

- Listen to what is being said without displaying shock or disbelief
- Take what is said seriously
- Note down what has been said
- Try to understand what the wishes and feelings of the child are

2. Reassure

- Reassure the pupil that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep e.g. "It will be alright now"
- **Do not promise confidentiality**; you have a duty to refer
- Reassure and alleviate guilt, if the pupil refers to it e.g. "you're not to blame"
- Reassure the child that information will only be shared with those who need to know

3. React

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; "Did he/she....?" This can invalidate evidence.
- **Do** ask open questions; "Anything else you want to say?" "Tell me ..." "Explain to me ..." "Describe to me ..."
- Do not criticise the perpetrator; the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible. It is important that any notes **provide an accurate, factual record** and contain specific details (outlined below)
- Do not destroy your original notes – they should be passed to the DSL immediately
- Record the **date, time, place**, any **non-verbal behaviour** and the **words used by the child**. Ensure that as far as possible you have recorded the actual words used by the child. Note any **questions that you asked** the child, together with their response. If the child had any injuries make a note and consider capturing any visible injuries as photographic evidence (with the child's consent)
- Record statements and observable things rather than your interpretations or assumptions
- Include **what action was taken** or reasons for decisions that were made
- **Sign and date** your notes – or if entering notes onto CPOMS directly ensure a time, date and name is included

5. Remember

- Contact the DSL quickly and pass on any notes you have made
- The DSL may be required to make appropriate records, including your initial notes, available to other agencies e.g. the police
- In the absence of any of the DSLs staff should refer directly to MASH and the police if appropriate if there is a significant concern (see pages 5-6 for contact details)

6. Relax – consider whether it would help to debrief and seek support for yourself

Appendix 3

Further Guidance on Allegation Management

Everyone within Headington Rye Oxford School has a responsibility for safeguarding and promoting the welfare of children and young people and for ensuring that they are protected from harm.

We are committed to robust recruitment and selection procedures to ensure that all staff and volunteers have been appropriately screened prior to appointment, and to the provision of appropriate guidance about safer working practices, boundaries and propriety.

We ensure child protection training is provided to all new staff and volunteers through induction programmes and within continuing training and development opportunities.

We have a confidential reporting policy in place to enable concerns emerging about the conduct of an adult to be appropriately addressed. The Low Level Concerns Policy provides additional detail about this.

All staff and volunteers have a duty to ensure that children are safe and protected and we all have a duty to ensure that if there are any concerns relating to the welfare or safety of a child the Local Safeguarding Children Board procedures are followed.

In any conflict between the needs of the child or young person and those of others, the needs of the young person must come first. Any allegation which may indicate that an adult behaved in a way that has

- harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- or, behaved towards a child or children in a way that indicates s/he may pose a risk of harm to children.
- brought into question their suitability to work with children

will be reported to the Local Authority Designated Officer and the appropriate procedures followed as set out in this policy.

Confidentiality will be upheld **as far as possible** at all times

Context

Allegations may be made in a number of ways including but not restricted to:

- Direct disclosure by young people
- Indirect disclosure; i.e. through written work or art work
- Complaints to the School/a member of staff from parents
- Complaints to Social Care from parents
- Complaints to Police from parents
- Reports by other colleagues or agencies

The context in which an incident occurs is crucial to understanding the incident and the definition to be ascribed to it.

In order to differentiate between incidents which are of a child protection nature, those that are better categorised and dealt with as 'low level concerns', those which are more properly dealt with as conduct or competency issues or to identify those allegations which are vexatious, the allegation must be considered in light of the following:

- normal function, environment, expectations and standards applied to the practitioner and with regard to the activity and circumstances in which the alleged incident occurred.

Any physical contact with children and young people could be open to misinterpretation. Perceptions and language again can present very different views of the same incident, particularly where there is or has been earlier disagreement or challenge between the child and the member of staff concerned.

There may be up to 4 strands in the consideration of an allegation:

- a police investigation of a possible criminal offence;
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by the organisation of disciplinary action in respect of the individual.
- action required to investigate and take appropriate action to address low level concerns and subsequent monitoring to ensure an appropriate response

The fact that a person tenders his or her resignation, or ceases to provide their services, must not prevent an allegation being followed up in accordance with these procedures

Guiding Protocol

We believe that all members of the School community are entitled to receive care and protection from harm. We will not accept inappropriate behaviour towards children, staff or volunteers and will ensure that any concerns or allegations of impropriety are dealt with quickly, fairly and sensitively.

In the event that an allegation of abuse is made against a member of staff or volunteer, the procedures for managing allegations of abuse as set out in this policy will be followed.

Any staff disclosing information regarding inappropriate behaviour by colleagues will be listened to and supported.

Parents of a child allegedly abused by a member of staff or other adult will be kept informed of the progress and outcome of any investigation.

Any member of staff facing investigation into an allegation of abuse will be offered appropriate access to professional and personal support networks, and will be kept informed of the progress and outcome of any investigation as appropriate.

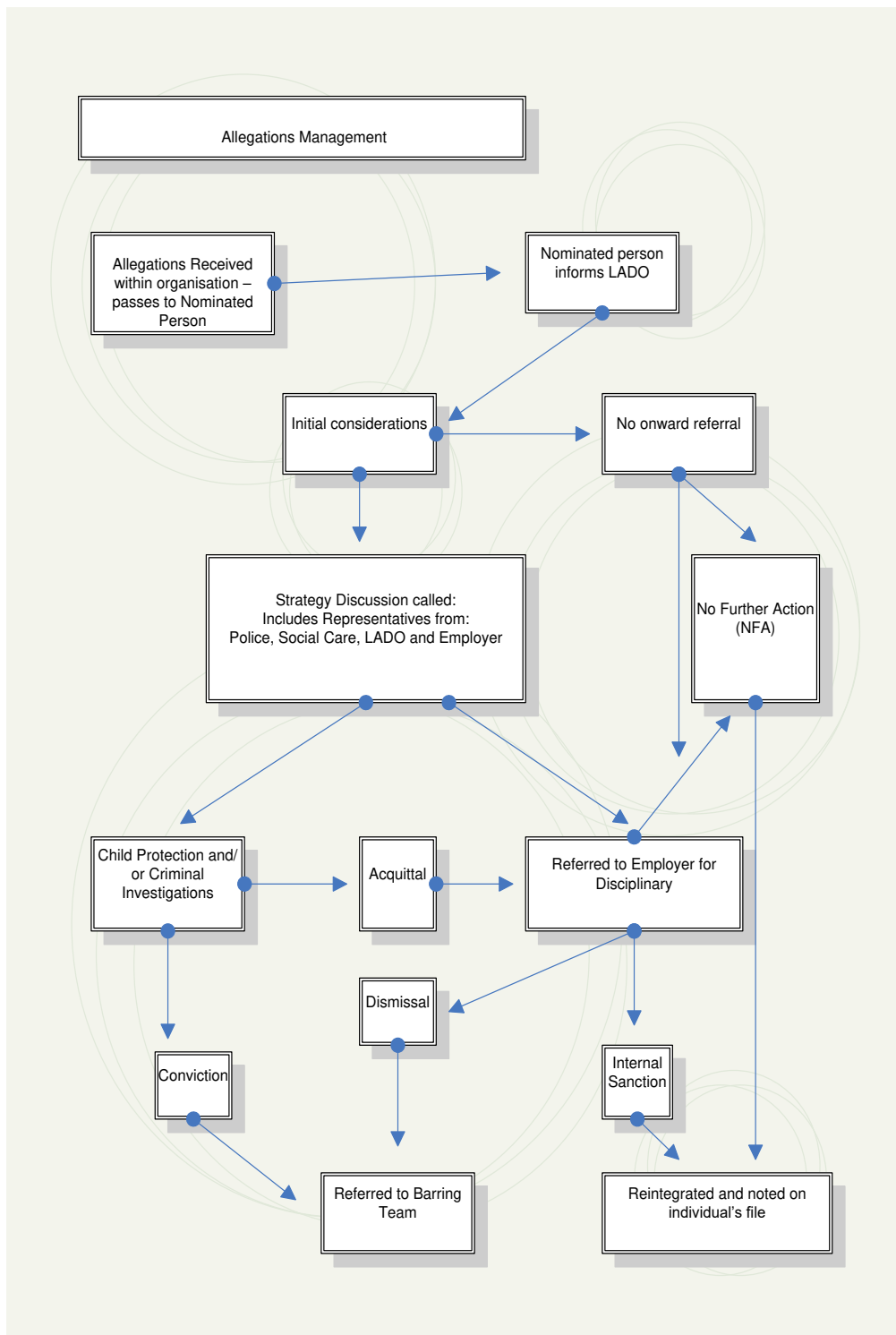
Learning Lessons

At the conclusion of a case, those involved in the investigation will be debriefed and the School will review the circumstances of the case to determine whether there are any improvements to be made, either to the School's procedures or practice to help prevent similar events in the future.

Consideration will be given to any policy or practice areas which require greater exploration. This may include additional commitment to training, a more robust induction for all new staff, the use of codes of conduct, guidance for managing particularly vulnerable groups and dealing with parents.

This policy will be a live document and will be updated as new legislation and guidance is produced or in response to research and via review of lessons learned.

Concerns that meet the threshold for referral to the LADO will be dealt with as follows:



Information guide for staff (including volunteers/supply staff) facing allegations that meet the threshold for referral –

The aim of this information guide is to explain the processes involved, and the support and guidance available, if it is alleged that that you have:

- harmed a child or put a child at risk of harm, or
- committed a criminal act toward a child, or
- behaved in a way that raises concern about your suitability to work with children

Initial Action

When the allegation is made the School will consult the Local Authority Designated Officer (LADO) to consider the next action, taking advice from Social Care and Police as needed. An electronic referral form will be completed and submitted to the LADO initially. Police may advise that you are not told about the allegation immediately. In a case of serious harm, the police will be informed from the outset.

The initial action taken may be one or a number of the following:

- a) The child/young person is alleged to have suffered, or is likely to suffer significant harm – which requires immediate referral to Social Care
- b) A criminal offence is alleged – which requires referral to Social Care and Police
- c) The allegation represents poor or inappropriate behaviour – which will be considered under disciplinary and/or capability procedures, including referral if appropriate to TRA or appropriate medical college.
- d) The allegation is clearly and demonstrably without foundation and no further action will be taken

If the conclusion of the initial discussions are a) or b) a Strategy Discussion will take place involving Police, Social Care, the designated person (DSL), LADO and possibly an HR representative from School. You will not be invited. The discussion will focus on the needs of the child/ren who may be at risk. It will determine what action should be taken regarding further investigation, but it is not part of any disciplinary procedures.

If the initial discussions conclude the situation is as outlined in c): an investigation will be initiated under the School's disciplinary and/or capability procedures.

If the conclusion is as outlined in d) you will be told orally and in writing that the allegation is without foundation, and that no further action will be taken.

Types of Possible Investigation

- Child protection enquiries by Social Care
- Criminal Investigation by Police
- Disciplinary/capability investigation

A disciplinary investigation is usually held in abeyance until external agency investigations are complete, unless prior agreement is reached. Whilst these investigations should be conducted as speedily as possible, they should also be balanced against the need to be thorough and fair, in line with natural justice. Statements taken in external investigations could be used in subsequent disciplinary proceedings.

Suspension

The School will consult with the LADO and Human Resources (HR) and consider recommendations from the strategy meeting, if appropriate, before any decision to suspend is taken.

Suspension is a neutral act, and should not be automatic. Where possible, the decision to suspend should be informed by the Strategy Discussion, and should only occur when the known facts relating to the allegation indicate:

- a child or young person may be at risk
- the allegations are so serious that dismissal for gross misconduct is possible
- suspension is necessary to allow the conduct of the investigation to proceed unimpeded

Alternatives should always be considered e.g. leave of absence, transfer duties, additional supervision.

Where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children will be made.

Where suspension is being considered, an interview will normally be arranged. You have the right to be accompanied by a Trade Union representative or a friend. You are advised to seek the assistance of your Union representative. If you are suspended, one of his/her roles will be to promote your interests and raise issues that may be of concern to you.

The interview is not an examination of the evidence, but an opportunity for you to make representations concerning possible suspension.

People, including other staff, should only be told about the allegation on a 'need to know basis'. Notification may be delayed if Police think this could prejudice an investigation.

Those who will be told of the allegation and likely course of action include you, the child or young person concerned and their parent/carer, the person making the allegation, the DSL, HR, the LADO and the investigating agencies as above.

If you are suspended, those persons likely to be on a disciplinary panel if convened will be given limited information so any future disciplinary process is not prejudiced.

Support

You should expect to be:

- advised to contact your Union representative
- given a Support contact within the organisation (usually in HR) who should keep you up-to-date with progress of your case

- if you are suspended, the DSL will update you about normal school activities. Social contact with colleagues should not be precluded, unless detrimental to the investigation. The type of information and frequency of contact should be agreed, but colleagues should not comment on or discuss the investigation
- offered Staff Counselling Service and/or Occupational Health support if available

This may be a stressful time, so in addition to contacting your Union representative, you are advised to see your GP if you think your health may be affected.

Return to work

If you have been suspended and it is decided you should return to work, your Union rep can assist in negotiating and planning this return.

Further information can be found in Part 4 of KCSIE (2024).

Appendix 4

The Role of the Designated Safeguarding Lead at Headington Rye Oxford

The DSL is a member of the School's Senior Leadership Team and takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) across the School. The DSL is available at all times to offer advice and to support other staff on child welfare, safeguarding and child protection matters. They are the primary contact for local safeguarding partners and will participate in strategy discussions and inter-agency meetings (or will delegate and support other staff to do so where more appropriate) thereby contributing to the assessment of children, the aim being to promote their welfare and seek positive outcomes.

As outlined in Section B part 3, the DSL role mirrors the responsibilities described in Annex C of KCSIE (2024):

General

- Raising awareness of safeguarding, including publicising details of policies to the whole school community (staff, parents and pupils).
- Ensuring that each member of staff has access to and is aware of and understands the School's safeguarding policy and procedures.
- Acting as a source of advice, support and expertise for staff and parents/families.
- Encouraging a culture of listening to children and being alert to the specific support required for children in need (as specified in section 17 of the Children Act 1989) , those with SEND, young carers, those who are privately fostered, susceptible to exploitation, radicalisation and subject to seeing, listening or hearing domestic abuse.
- Working with and supporting staff in carrying out their safeguarding duties, particularly when there are ongoing concerns about a pupil.

Managing Referrals and Multi-Agency Working

- Ensuring open channels of communication with local statutory agencies including the management of referrals to social care/MASH/ESAT or mental health concerns to CAMHS, pupil absences to the Oxford Attendance Team (in liaison with the Attendance Champion), through Channel if radicalisation is suspected, to the police if a crime may have been committed, for Early Help via the LCSS/MASH, referring to the LADO where allegations involve employees or adults working with children, and to the Disclosure and Barring Service where a person is dismissed or has left the School due to risk/harm to a child.
- Supporting staff who make referrals to any of the agencies named above.
- Taking on the role of 'appropriate adult' where necessary and acting as an advocate for the child, particularly in relation to section 47 or police investigations.
- Having an awareness and understanding of the PACE Code C 2019 when handling searches.
- Acting as a point of contact with the three safeguarding partners.
- Understanding the assessment process for providing early help (known as Strengths and Needs in Oxfordshire) and statutory intervention, how the child protection case conference and review conferences operate, and be able to effectively contribute and attend these when required to do so.
- Liaising with the Headmistress and other key parties when deciding to make a referral and after a referral has been made, and ensuring the Headmistress is updated with reference to ongoing section 47 enquiries and police investigations.

- Work with the Headmistress, 'Case Manager' and LADO as appropriate on child protection concerns involving a member of staff.
- Manage the log of Low Level Concerns and staff self-referrals, and investigate and take action against such concerns as appropriate and required, as directed by the Headmistress.
- Engaging with OSCB and the ESAT (Education Safeguarding Advisory Team), attending the termly Safeguarding Forum meetings, updating training regularly, and sharing local policies and updates as appropriate.

Record Keeping and Information Sharing

- Managing the School's CPOMS account and ensuring staff share concerns in a timely manner, and that the safeguarding team takes appropriate action to support individual pupils and their families.
- Keeping accurate, detailed and secure written and electronic records of concerns and referrals (including discussion and decision making around welfare or safeguarding concerns and the rationale behind decision taking) and ensuring such records are transferred securely and in a timely manner (within the expected 5 day window) when a pupil moves to another school.
- Keeping a log of pupils with (or who have had) social workers and promoting their educational outcomes with the wider body of staff.
- Remaining cognisant of the relevant legislation and regulations that apply to and have some impact upon the holding, using and sharing of sensitive information and data, the requirement to be mindful and protective of an individual's human rights, and to give due consideration to the implications of the Equality Act and the requirement to make reasonable adjustments and avoid discrimination on the basis of protected characteristics, raising awareness of the heightened vulnerabilities of some pupils.

Training

- Leading the induction and training of staff on safeguarding related matters, and ensuring the DSLs have training updates as required and relevant to their roles.
- Keeping an accurate record of staff training and being proactive in addressing gaps in staff knowledge.
- Developing a good working knowledge of current developments in safeguarding and child protection, attending training and sharing knowledge and skills with the DSL team and the school community more widely.
- Engage with training/updates delivered by the local safeguarding partners (e.g. Serious Organised Crime Briefings, Thames Valley VAWG Conference, Oxfordshire CAMHS briefings/conferences).

Online Safety and Filtering and Monitoring

- Understanding the risks associated with online safety, sharing information with the Online Safety Coordinators and working with them (and the IT support team when necessary) to monitor the online safety of pupils whilst they are online at School, putting training in place for staff and pupils as necessary.
- Working together with the IT support team to overseeing Filtering and Monitoring arrangements including risk assessments and regular testing, and responding to alerts or concerns as required. Ensure parents are aware of the processes the School follows around managing such alerts. Reporting on these processes to the Safeguarding Governor and the Risk and Compliance Committee.
- Ensuring staff have a good working knowledge and understanding of current online safety issues, can respond appropriately to disclosures or reports made by pupils

relating to online behaviours, and understand their responsibilities and the school's approach to filtering and monitoring.

Quality Assurance

- Maintaining an overview of safeguarding and child protection in the School and monitoring the effectiveness of policies and procedures in practice.
- Writing policies and procedures including reviewing policies annually or in line with legislative changes.
- Ensuring the safeguarding policy is available publicly (via the school website and parent portal) and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this process.
- Meeting regularly (at least termly) with the Safeguarding Governor to review safeguarding and child protection issues. Providing a formal report to Governors each term and discussing pertinent issues at Council, and/or at Risk and Compliance or Education Committees as appropriate.
- Compiling the online annual safeguarding report (Section 175/157 audit) for OSCB and ensuring identified actions are implemented and monitored.
- Auditing safeguarding arrangements of organisations who make use of the School's facilities ensuring that Lettings are compliant with KCSIE requirements

Other

- Working closely with the other DSLs and the Online Safety Coordinators.
- Working closely with the school nurses, counsellors, wellbeing support supervisor and those staff trained to provide mental health first aid to ensure safeguarding concerns linked to mental health are addressed effectively. The DSL in the Senior School also acts as the designated mental health lead for the Senior School.
- Liaison with the SENCO to ensure pupil needs are considered holistically and appropriate support is provided and risks identified and addressed.
- Acting as the Prevent Lead for the School and updating the Prevent Risk Assessment annually.
- Acting as the named person for Operation Encompass and disseminating any information received from the police in relation to domestic abuse and any related incidents.
- Providing support to those working with vulnerable pupils and their families, enabling those staff to discuss openly and honestly any concerns they may have, and to reflect on their involvement with the child's case without judgement. Where necessary to signpost additional counselling or 'supervision' options to staff.

Appendix 5

Prevent Strategy

Headington Rye Oxford School, working with other local partners, families and communities, seeks to play a key role in ensuring that the children and young people who attend the school settings or use its services are safe from the threat of terrorism and/or extremism. Prevent is part of the School's wider responsibility for Safeguarding.

The Prevent Strategy identifies that young people are more likely to be vulnerable to violent extremist or terrorist narratives, including non-violent extremism which can create an atmosphere conducive to radicalisation and can popularise views, particularly certain divisive or intolerant narratives, which terrorists exploit.

We believe the School should be a safe place where children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of the terrorist ideology, and learn how to challenge such ideas.

In order to fulfil our Prevent Duty, we undertake to do the following:

- Build resilience through our curriculum and actively promote Fundamental British Values, including mutual respect, tolerance and democratic participation, as part of our wider PSHE programmes as well as within other subject areas and Prayers;
- Respect learner and staff diversity, encouraging freedom and openness;
- Provide a safe environment for debating controversial issues and helping pupils to understand how they can influence and participate in decision making within society;
- Assess the risk of children in our schools/settings/activities being drawn in to terrorism;
- Maintain robust safeguarding policies which take in to account the policies and procedures set out by Oxfordshire Safeguarding Children Board and identify extremism/radicalisation as issues to be reported promptly to the Designated Safeguarding Lead – The Deputy Head Pastoral. In their absence, any of the trained DSLs.
- Train staff so that they have the knowledge and confidence to identify children at risk of being radicalised and/or drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism;
- Conduct due diligence checks on groups/individuals seeking to hire or use school premises;
- Conduct due diligence checks on visitors to school, particularly visiting speakers, whether invited by children or staff;
- Conduct due diligence checks on contractors working on the school sites;
- Ensure children are safe from terrorist and extremist material when accessing the internet in School or via school provided devices;
- Make sure that all staff have completed online or in person Prevent Training
- Review our policies and risk assessment annually.

Possible Indicators of Risk

- Racist graffiti/ symbols/ comments made in School;
- Strong opinions, criticism of government policies increasingly evident;
- Speaking out or writing in favour of extremist ideas in school work;

- Extreme comments shared on social media;
- Distribution of extreme or terrorist propaganda among other pupils – e.g. leaflets, magazines, stickers, publicising vlogs/podcasts, fake news etc;
- An obsession with massacres, extreme or mass violence, weaponry and explosives e.g. school shootings;
- Interest shown in conspiracy theories which can act as a gateway to radicalised thinking (e.g. around misogyny, religious or ethnic superiority, antisemitism, anti-establishment or anti-LGBT grievances);
- Targeting of ‘perceived others’ (perhaps based on gender or another protected characteristic e.g. incels) and talking about ‘us’ and ‘them’;
- Vulnerable pupils being influenced by others (although we are aware of a need to avoid over-simplified assessments of who might be ‘vulnerable’), because of the existence of one or more factors, which may include:
 - An identity crisis, involving an individual’s distance from their cultural/religious heritage, including peer/ family/ faith group rejection;
 - A personal crisis, including family tension/ social isolation/ friendship issues;
 - Personal circumstances, such as migration, experience of racism;
 - Unmet aspirations;
 - Criminality;
 - Experience of poverty, disadvantage, discrimination or social exclusion;
 - Exposure to extremist, terrorist or other violent activity in overseas settings;
- Association with those known to be involved in extremism (including via the internet/online communities);
- A significant shift in the child/young person’s behaviour or outward appearance (e.g. choice of clothing), particularly involving conflict with his/her family and/or faith group;
- Travel for extended periods of time to international locations known to be associated with extremism;
- Disguising of a child’s identity, e.g. in documentation;
- A simplistic or flawed understanding of religious/political/global issues;
- A significant adult or other in the child/ young person’s life who has extremist views or sympathies;
- Critical risk factors, being:
 - Contact with extremist recruiters and/or seeking to recruit others;
 - Articulation of support for extremist causes/ leaders;
 - The possession of extremist literature;
 - Using extremist narratives and a global ideology to explain personal disadvantage;
 - Justifying the use of violence to solve societal issues;
 - Membership of extremist organisations and participation in proscribed groups;
 - Having a ‘kill list’ or detailed plan to carry out mass violence.

There is no single way of identifying whether an individual is likely to be susceptible to radicalisation into terrorism – we need to be alert for signs.

How to Respond

- If you have a concern about a member of the school community that is Prevent related speak to the Prevent Lead (the DSL)
- Log your concerns and observations on CPOMS

- The DSL will review the potential risk and consider an individual's behaviour in the context of wider influencing factors and vulnerabilities
- If a pupil appears to be about to put themselves or others in immediate danger or appears to be involved in planning to carry out a criminal offence then the police will be notified and asked for advice
- Unless advised not to do so, a conversation will be had with the individual, and also with their parents/carers
- An assessment will be documented based on the outcome of these conversations
- Consideration will be given to a Prevent Referral and advice may be sought from Prevent partners
- The DSL or another nominated member of staff who has a good relationship with the individual will follow the advice and guidance contained in the DfE document *Managing Risk of Radicalisation in Your Education Setting* (Sept 23) when speaking to the individual by:
 - Creating a safe space to discuss views and build resilience by challenging extremist narratives
 - Focusing on the individual
 - Being responsive and inclusive, asking open and specific questions
 - Being proactive – clarity on next steps
 - Building a rapport and getting them talking using TED
 - Avoiding direct confrontation of opinions or attitudes
 - Redirecting conversations where necessary
 - Raising concerns about their behaviour, not their beliefs
 - Observing and commenting on their emotional or behavioural state
 - Avoiding leading questions but being prepared to question views
 - Getting the individual to think about what they are saying and seeking clarification
 - Finding ways to understand the concerns the individual has
- If an individual does not consent to a Prevent Referral or is unwilling to engage with Channel a more comprehensive risk assessment will be completed by the DSL and additional measures may need to be considered to ensure the safety of the individual and the wider school community.

Supportive Interventions Beyond School

- Channel is the multi-agency approach to protect people at risk from radicalisation and aims to: identify individuals at risk of being drawn into terrorism; assess the nature and extent of that risk; develop the most appropriate support plan for the individuals concerned.
- Should concerns require support from other agencies, the following are ways in which terrorism and extremism can be reported:
 - Referrals about a child are reported to MASH: 0345 0507666
 - Referrals about an adult go via the Social and Health Care Team: 0345 0507666 (option 1).
 - Thames Valley Police manage the Prevent National Referral Form Pathway for the Oxfordshire area: preventreferrals@thamesvalley.pnn.police.uk

General enquiries can be directed to the Prevent Gateway Team
01865 555618 Preventgateway@thamesvalley.pnn.police.uk

- Additional information can be found at the [Safer Oxfordshire Partnership](#).
 - Anti terrorist hotline: 0800 789 321
 - Crime stoppers: 0800 555 111
 - Relevant police force: 101
 - www.gov.uk/report-suspicious-activity-to-mi5
- To report any online terrorist-related material: www.gov.uk/report-terrorism
 - The DfE dedicated telephone helpline and mailbox for non-emergency advice: 020 7340 7264 counter-extremism@education.gsi.gov.uk
 - Helene Morris is the DfE SE Prevent Coordinator Helene.morris@education.gov.uk

Appendix 6

Determining the Level of Need – local criteria for Early Help / Social Care Assessment

Working Together to Safeguard Children (2023) highlights the fact that all families can face challenges that make parenting difficult. Often families are able to overcome challenges themselves or with the help of relatives, friends and services such as schools, youth services, health providers or other organisations. But sometimes individual children and/or their families will have more significant needs that require more intensive help and support.

OSCB produce a 'Threshold of Need' handbook that is designed to assist safeguarding partners in understanding the criteria for different levels of assessment that determine the provision of support services or interventions. It is critical that the right help is delivered at the right time. The 'windscreen' below is used to determine the level of need and the action that the DSLs need to take should additional help and support be required that Headington Rye Oxford cannot provide in isolation.



Early Help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered locally in a multi-agency approach that provides both universal services and targeted early help. This is a voluntary approach that requires the family's consent and engagement in order to receive support.

Where staff become aware of circumstances that suggest early help might be appropriate they should discuss the circumstances with one of the DSLs. **All staff should be alert to those pupils who may benefit from Early Help.** Once a pupil in these circumstances has been identified, it may be that the member of staff is identified as the appropriate professional to represent the child's needs going forward. The DSL will support the

member of staff in this role, or help determine whether another colleague is identified as most appropriate (in most cases this is likely to be the Head of Section).

The School will approach the child and their family to discuss a strengths and needs approach to identifying areas of concern. In Oxfordshire the Early Help Assessment has been replaced by a strengths and needs document which will be completed and submitted to LCSS for review. DSLs are encouraged to attend ESAT/OSCB training on how to conduct and manage a strengths and needs assessment. This can be booked through the OSCB training portal.

Any such assessment relies on the agreement and engagement of the pupil and the family. It will include presenting needs as well as any underlying issues and is designed to be factual, exploring and building on strengths, clearly identifying what help a child and family may need to prevent their needs escalating. The strengths and needs document can provide the basis for any future assessment should issues worsen and more complex or critical needs emerge. In Oxfordshire the expectation from social care is that where concerns around a pupil and their family are present a strengths and needs assessment should be completed ideally prior to any referral to MASH.

Where a multi-agency approach to early help is provided a Team Around the Family (TAF) approach will be instigated so that all involved can meet to review the effectiveness of any support or interventions and there is a shared responsibility for the (hopefully positive) outcomes.

Child in Need/Child Protection

If early help fails to deliver positive improvements or the needs of the child or family become more complex or critical and there is a feeling that a child is at risk of harm, or their health and development are being compromised or impaired, it is likely that a social care assessment will be required to determine whether a Child in Need (section 17 of the Children Act 1989) or a Child Protection (section 47 of the Children Act 1989) is required.

A MASH referral will be completed by the DSL in these circumstances, or multi-agency professionals may escalate a case to enable further assessment and intervention to take place. The DSL or a nominated member of staff who knows the child and family well will act as the Lead Professional in School and represent the child and Headington Rye Oxford in any strategy or review meetings, contributing to the planning and delivery of support as is practicable.

Further information on the **OSCB Threshold of Needs Matrix** that should be used to determine a child's level of need can be accessed here: [Threshold of Need \(Updated Sept 2022\)](#)

Appendix 7 – Training Overview

Training

Every new member of staff, including part-timers, temporary, visiting, volunteers and contract staff working in the School, receives appropriate induction training on their responsibilities in being alert to the signs of all types of abuse including exploitation and neglect, sexual violence and sexual harassment, bullying or children at risk of radicalisation and of being missing from education, and on the procedures for recording and referring any concerns to the DSL or the Headmistress and, if required, to the local agency partners or, in certain circumstances, the police. Child Protection training is also given to new governors and volunteers. All new teaching staff are required to undertake online Prevent training within their first term at the school or provide proof that they have undertaken this training in a previous school. All staff renew their Prevent training at least every five years.

Training in child protection and safeguarding is an important part of the induction process. Induction training includes:

- a review of the School's safeguarding policy including the Staff Code of Conduct, the Anti-bullying policy, the Behaviour Rewards and Sanctions policy, the Children Missing From Education Policy, the Online Safety Policy and the School's whistle-blowing policy; and
- the identity of the DSL and how to pass on concerns to the DSL and the wider Safeguarding Team.

Copies of the above documents are provided electronically - staff are directed to their location on the school website and staff pages during their induction.

Training for all staff (including existing staff) also promotes staff awareness of a range of safeguarding issues as identified in KCSIE 2024. Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action *without delay* if such a practice is suspected.

Training on the early help process and process for making a referral to children's social care and for statutory assessment that may follow a referral (including what role they may be expected to play in such an assessment) will also be provided to selected staff together with the importance of maintaining an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.

Until 2021 all new staff have been required to read and sign to confirm that they have read Part 1 of KCSIE. Temporary staff and volunteers have also been supplied with KCSIE and asked to read it, as well as undergoing a slightly abridged induction. We work closely with agencies to ensure that all agency staff have completed necessary checks, and they are asked to read KCSIE (2024)¹⁰. Volunteers complete all checks as required under ISI regulations and they are asked to read KCSIE (2024). All staff and Governors complete a short questionnaire quiz to enable the DSL to establish that they have understood KCSIE. A log is kept of the scores and additional training and guidance is provided where necessary.

¹⁰ School proprietors should take a proportionate risk based approach to the level of information provided to temporary staff and volunteers. In practice, this will involve the school staff who manage the lettings liaising with the DSL and Deputy DSL and Head to agree on the level of information appropriate.

We continue to believe that it is essential that everyone working at Headington Rye Oxford understands their safeguarding responsibilities. We recognise that some staff have far less direct contact with our pupils. From September 2021 we have differentiated between those who work directly with children and those whose roles require less contact. Teaching staff, sports and dance coaches, peripatetic music staff, IT support team, Theatre and Music technicians, nurses, counsellors, boarding matrons and graduate assistants, and pupil facing administrative staff based in main school and Prep School (Reception, Attendance, SLT PA's and admin support, Headmistress's EA) as well as Governors will continue to be required to read and understand KCSIE Part 1 and Annex B. Teaching staff should also read Part 5. We recommend that Governors read the entire document to be clear on their governance responsibilities. Members of the SLT should be familiar with the entire document. All other non-teaching support staff (Catering, Maintenance, Housekeeping, Bursary) will be required to read and understand the condensed version of KCSIE found in Annex A. They will be given access to Annex B too. All staff will continue to be signposted to full copies of KCSIE should they wish to read more than the stipulated sections. All staff will complete the annual questionnaire quiz circulated by the DSL to assess that everyone has understood KCSIE.

The Heads and all staff receive appropriate safeguarding and child protection training (including on on-line safety) which is regularly updated in line with advice from the OSCB, which requires Generalist safeguarding training to be refreshed every three years. Training for existing staff also includes Part One and Annex B or Annex A of KCSIE (2024) as set out above as and when it is updated by the DfE. In addition, the Heads and all staff receive safeguarding and child protection updates as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively. These further updates will be provided regularly throughout the year, via e-mail, during staff meetings and as part of INSET, as well as in morning briefings as appropriate.

Safeguarding training for staff in the EYFS will include guidance on identifying signs of possible abuse and neglect (such as significant changes in a pupil's behavior, deterioration in well-being, physical indications, or comments which give cause for concern) and on how to respond in a timely and appropriate way to such signs or to inappropriate behavior in other members of staff or any other person working with children.

As a boarding school this policy will also be made known to all staff, adults working in the School and older boarders in positions of responsibility in accordance with National Minimum Standards for Boarding Schools. The School's policy for searching for and, if necessary, reporting any boarder missing from School will also be known to staff. Any senior pupils in positions of responsibility will also be briefed on appropriate action to take should they receive any allegations of abuse (the DSL in the Senior School is responsible for training school prefects to an appropriate level of expertise in child protection). This Prefect training takes place during the summer term shortly after their appointment to their role.

The designated Governor will aim to have attended specific training on their role.

Staff, in addition to the Headmistress of the Senior School and Head of the Prep School, who are regularly involved in recruitment will receive appropriate training in safer recruitment practices. This is refreshed every five years.

All training completed will be recorded by the School. Records are held by the DSL and Pastoral PA. The Safeguarding Governor will review these records regularly.