HEADINGTON RYE
OXFORD

# Safeguarding Policy

## Senior and Prep School (including EYFS)

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| Approved by Council: | 3rd September 2025 |
| Reviewed by: | Director of Safeguarding |
| Date of last Review | 21 August 2025 |
| Next Review Date: | In line with legislative updates |
| Meets: | ISI 7a,b and 8 a,b<br>NMS 8 and 19 |

## Safeguarding children is everyone's responsibility

If you are concerned about a child:

1. If it is an emergency, call 999 straight away
2. Tell the Designated Safeguarding Lead via CPOMS, emailing safeguarding@headingtonschool.com or calling 07849 087397
3. If you are still very worried, you can also tell the Multi-Agency Safeguarding Hub yourself

At Headington Rye Oxford, **all welfare concerns-no matter how small-must be logged either via CPOMS or safeguarding@headingtonschool.com**. This ensures that every concern is recorded, monitored, and addressed in line with our safeguarding responsibilities under KCSIE 2025.

If you are concerned about an adult's behaviour in or connected to school:

1. Tell either the Headmistress, Mrs Caroline Jordan, Head of Prep, Bertrand Leullier, Director of Safeguarding, Nic Roberts or Deputy Head Pastoral, Amanda Proctor
2. If you are concerned about the Headmistress, tell the Chair of Governors, Mrs Carol Oster Warriner
3. You can also tell the LADO, Jo Lloyd

| **Headline of key contacts** | |
|---|---|
| Nic Roberts<br>Director of Safeguarding<br>Designated Safeguarding Lead | nroberts@headingtonschool.com<br>**07849 087397** |
| Amanda Proctor<br>Deputy Head Pastoral<br>Deputy Designated Safeguarding Lead | aproctor@headingtonschool.com<br>**01865 759899** |
| Mary Rahmatallah<br>Head of Boarding<br>Deputy Designated Safeguarding Lead | mrahmatallah@headingtonschool.com |
| Caroline Jordan<br>Headmistress<br>Deputy Designated Safeguarding Lead | cjordan@headington.org |
| Bertrand Leullier<br>Head of Prep | bleullier@headingtonschool.com |

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| Deputy Designated Safeguarding Lead | |

| Senior School Safeguarding Team | |
|---|---|
| Di Bates-Brownsword | dbates-brownsword@headingtonschool.com |
| Megan Minton | mminton@headingtonschool.com |
| Alice Barrett | abarrett@headingtonschool.com |
| Jane Bellars | jbellars@headingtonschool.com |
| **Prep School Safeguarding Team** | |
| Tessa Davey | tdavey@headingtonschool.com |
| Monika Blackwell | mblackwell@headingtonschool.com |
| Jonathan Kitchin | jkitchin@headingtonschool.com |
| Alex Prockter | aprockter@headingtonschool.com |
| Ruth Sibly | rsibly@headingtonschool.com |
| **Governors** | |
| Carol Oster Warriner<br>Chair of Governors | cwarriner@headingtonschool.com |
| Richard Nicholson<br>Nominated Safeguarding Governor<br>(Senior School) | rjnicholson@headingtonschool.com |
| Claire Boyd<br>Nominated Safeguarding Governor<br>(Prep School) | cboyd@headingtonschool.com |

**General Safeguarding email - Any incidents or concerns can also be reported via safeguarding@headingtonschool.com**

| Local External Contacts | |
|---|---|
| Jo Lloyd<br><br>Local Authority Designated Officer (LADO) | LADO.safeguardingchildren@oxfordshire.gov.uk<br><br>01865 810603 |
| Multi-Agency Safeguarding Hub (MASH) | 0345 0507666<br><br>Online MASH referral<br><br>Use 999 for an emergency |
| Locality and Community Support<br><br>Service (LCSS) | 0345 2412705<br><br>(Mon-Thurs 0830-1700, Fri 0830-1600)<br>LCSS@oxfordshire.gov.uk |
| Out of hours Emergency Duty Team (EDT) | 0800 833 408 |
| Education Safeguarding Advisory Team (ESAT) | ESAT.safeguardingchildren@oxfordshire.gov.uk |
| Children's Social Care (CSC) | 0345 050 7666 Office hours 8.30am-5pm<br><br>0800 833 408 outside office hrs |
| Child and Adolescent Mental<br><br>Health Services (CAMHS) | 01865 902 515<br><br>OxonCAMHSSPA@oxfordhealth.nhs.uk |

| Other contacts | |
|---|---|
| NSPCC Helpline | 08456 404 045 |
| Office of the Children's Commissioner | 0800 528 0731 |
| Childline | 0800 1111 |
| NSPCC Whistleblowing Helpline | 0800 028 0285help@nspcc.org.uk |
| Independent School Inspectorate (ISI) | 08718 727 800 |
| Teaching Regulation Agency | 0207 593 5393 Teacher Regulation Agency |
| Disclosure and Barring Service | 0345 609 0009 Disclosure and Barring Service |

## Introduction

At Headington Rye Oxford School, the safety and welfare of every child is our highest priority. This Safeguarding and Child Protection Policy applies across all age groups, including EYFS, KS1–KS5, and is available on the School website, parent portals, and on request.

The School adheres to statutory and local safeguarding guidance, including

- **Keeping Children Safe in Education**
- **Working Together to Safeguard Children**
- **Working Together to Improve School Attendance**
- **Disqualification under the Childcare Act 2006**
- **Prevent Duty Guidance**
- **After-school Clubs and Out-of-School Settings Guidance**
- **Oxfordshire Safeguarding Children Partnership procedures**

We also consider non-statutory guidance including *What to Do if You're Worried a Child is Being Abused* (2015), *Information Sharing* (2024), *Gender Questioning Children* (2023), *Use of Social Media for Online Radicalisation* (2015), and the *Filtering and Monitoring Standards* (2024).

The School and all staff, including temporary, supply, and volunteer personnel, form part of the wider safeguarding system, as set out in *Working Together to Safeguard Children*. Safeguarding is everyone's responsibility. All those working with children, their families, and carers must adopt a **child-centred** approach, acting in the best interests of the child to ensure the best possible outcomes.

This policy should be read in conjunction with related policies:

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| Anti-Bullying | Mental Health and Wellbeing Policy |
| Smoking, Alcohol and Drug misuse policy | Mobile Phone and Digital Devices |
| Behaviour, Rewards and Sanctions | Online Safety |
| Boarding - Housestaff Handbook | Parents' Code of Conduct |
| Children Missing Education | Physical Restraint |
| Code of Conduct (Expectations of Pupils) | Provision for Pupils with Particular Religious, Dietary, Language or Cultural Needs |
| Cyber-Bullying | Recruitment |
| Data Protection | Relationships and Sex Education (RSE) / PSHE |
| Educational Trips and Visits | School Attendance |
| Filtering and Monitoring | Staff Code of Conduct |
| IT Acceptable Use | Visiting Speakers |
| Low-Level Concerns | Welfare Risk Assessment and Support |
| Managing Allegations Against Staff | Whistleblowing |

We recognise:

- All children have the right to be safe.
- Safeguarding includes early help for children in need as well as those at risk of harm.
- Everyone must have the attitude of 'it could happen here' regarding safeguarding.

This policy outlines our commitment to preventing harm, protecting children at risk, and supporting children's wellbeing, while creating a culture where staff feel confident to raise concerns and take appropriate action.

## Aims and Objectives

In line with KCSIE and Working Together to Safeguard Children, safeguarding means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing 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 set out in the children's Social Care National Framework.

Child protection refers to safeguarding actions for specific children at risk of or suffering significant harm.

**Safeguarding at Headington Rye Oxford focuses on three key areas:**

**Prevention** - We aim to prevent harm by:

- Clarifying standards of behaviour for staff and children
- Introducing appropriate work within the curriculum to equip children 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 child 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.

**Protection** - We protect children through:

- Including appropriate work within the curriculum
- Utilising a risk assessment based approach when considering the needs of the individual or groups of children and how we respond to the presenting need.
- Working in partnership with children, 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 children, on another site, to ensure compliance with Child Protection legislation.

**Support -** We support children by:

- Ensuring that the wellbeing of children is at the heart of School decision-making
- Identifying individual needs and communicating the needs of the individual child to those who work with them, and to their parents, so that these needs can be addressed
- Taking positive action and making reasonable adjustments, particularly for children with SEND or protected characteristics
- Working with internal teams (Pastoral, Counselling, Medical, SEND) and external agencies (e.g. OSCP, MASH, CAMHS)
- Providing an environment where child 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.

We are especially vigilant in supporting vulnerable groups, including those with SEND, LGBT+ children, and those who may struggle to recognise or disclose abuse. Staff are trained to maintain professional curiosity and build trusted relationships to facilitate effective support.

## The Organisation and Management of Safeguarding at Headington Rye Oxford

Everyone at Headington Rye Oxford who works with children, regardless of role, shares responsibility for keeping them safe and promoting their welfare. We aim to provide a secure environment where every child feels protected from harm, neglect, abuse, exploitation, and deterioration in mental health, and knows where to turn for help.

No single adult can hold a full picture of a pupil's circumstances. Effective safeguarding relies on collaboration, sharing knowledge and concerns to ensure timely and appropriate support. We do this as part of the wider safeguarding system, working in partnership with Children's Social Care, the Oxfordshire Safeguarding Children Partnership. health services, police, and other agencies.

The School has appointed Designated Safeguarding Leads (DSLs) with the authority to lead safeguarding work, allocate resources, and support staff. Within the governing body at least once member acts as Designated Governor for Safeguarding who oversees the School's safeguarding arrangements, liaises with external agencies where necessary, and regularly reviews practice with the DSLs.

## The Safeguarding Team

The Safeguarding Team is led by the Director of Safeguarding, who is the Designated Safeguarding Lead (DSL) and the School's Prevent Lead. She is supported by the Deputy DSL (DDSL), the Deputy Head Pastoral (or the Headmistress in her absence), and a team of trained DDSLs across both the Prep and Senior Schools.

Online safety is overseen by the Heads of Digital Strategy (designated as Online Safety Coordinators) in collaboration with the DSLs. Filtering and Monitoring is jointly managed by the DSL, Head of IT Operations (Whole School), and the Head of Digital Strategy (Prep School).

Staff can contact the DSLs during school hours to raise safeguarding concerns. Boarding staff have 24/7 emergency contact numbers for the DSLs.

For trips and out-of-hours activities, the Emergency Contact (First Deputy, Anne Marie Stanton-Ife) refers safeguarding concerns to the DSL or Deputy DSL as needed.

The DSL is available to any member of the School community or external agency to discuss safeguarding concerns at any time.

A dedicated safeguarding email is monitored daily:
safeguarding@headingtonschool.com

## Roles and Responsibilities of the Designated Safeguarding Lead (DSL)

### Strategic Leadership and Oversight

- Holds overall responsibility for safeguarding and child protection across Headington Rye Oxford
- Leads and supports the School's safeguarding team, including trained DSLs across the Prep and Senior Schools
- Maintains a culture where children feel safe, listened to, and supported
- Reviews all safeguarding policies annually and updates them as required
- Completes the annual Section 175/157 Safeguarding Audit for the local authority
- Reports regularly to the Governing Body, liaises with the Designated Safeguarding Governor, and responds to identified weaknesses
- Keeps up to date with national and local safeguarding developments

### Case Management and Referral Responsibilities

- Acts as the main point of contact for external safeguarding partners (e.g. Local Authority, LADO, Police, Channel)
- Coordinates safeguarding responses, including Early Help, Strengths and Needs Assessments, and TAC/TAF processes
- Makes timely referrals to:
    - Children's Social Care (via LCSS or MASH)
    - LADO (for concerns about staff)
    - Police (where a criminal offence is suspected)
    - Channel (for radicalisation concerns)
    - DBS (when someone poses a risk to children)
- Liaises with the Headmistress on ongoing investigations, unless the Head is the subject of concern
- Manages CPOMS to ensure secure, accurate, and timely recording of concerns
- Ensures child protection files are transferred securely when a child leaves the School
- Understands and applies data protection principles when sharing safeguarding information, prioritising child welfare
- Oversees implementation of the Low-Level Concerns Policy in liaison with the Headmistress and HR

### Training, Support and Culture

- Acts as a source of support, advice and expertise for all members of the School community
- Completes DSL training every two years and ensures annual updates
- Delivers safeguarding and Prevent training to staff
- Promotes safeguarding awareness across the School community
- Ensures new and part-time staff understand the School's safeguarding policies and procedures

### Online Safety and Digital Safeguarding

- Acts as the School's Prevent Lead, CEOP link, and key adult for Operation Encompass and Looked After Children
- Oversees online safety alongside the Heads of Digital Strategy (Online Safety Coordinators)
- Monitors and responds to alerts generated by filtering and monitoring systems, ensuring a timely and proportionate response
- Supports digital resilience and staff awareness through training and promoting responsible online behaviour
- Ensures parents are supported with resources and training on keeping children safe online

**Deputy Designated Safeguarding Leads (DDSLs)**

Deputy DSLs are trained to the same level as the DSL and support all aspects of safeguarding. While tasks may be delegated, the DSL retains overall responsibility.

Key responsibilities include:

- Acting in the DSL's place when required and managing safeguarding concerns effectively.
- Making appropriate referrals and working with external agencies.
- Supporting staff with safeguarding queries, providing advice and expertise.
- Monitoring online safety systems and collaborating with Online Safety Coordinators.
- Supporting children directly through pastoral roles and communicating concerns to relevant staff and parents.
- Ensuring all records and interventions are accurately logged in CPOMS.

**Filtering & Monitoring**

All students access the internet through a secure, filtered connection using industry-leading hardware and software. All school-issued iPads are routed through the School's filtering system, even when used off-site, ensuring consistent protection. Filters are regularly updated to address emerging risks, trends, and concerns.

The School's filtering and monitoring systems are fully compliant with the Filtering and Monitoring Standards. The Prep and Senior Schools use Lightspeed Filter**,** while Sophos continues to be used at the London Road site. DSLs monitor alerts and reports from these systems regularly, ensuring timely and proportionate responses to any concerns raised.
These systems help to:

- Prevent access to illegal, inappropriate, or harmful online content;
- Reduce the risk of harmful online interactions;
- Support safe and appropriate online behaviour.

Students may request for specific URLs to be unblocked. Each request is reviewed individually before access is granted.

The Online Safety Coordinators are CEOP-trained and provide regular updates to the DSLs and the Safeguarding Governor. They meet with the Governor periodically to review online safety practice and emerging issues.

Further details are set out in the School's Online Safety Policy**,** Mobile Phone and Digital Devices Policies, and Cyber-Bullying Policy, all of which are available through the Parent Portal and Staff Pages.

**Remote learning**

Remote learning at Headington Rye approach ensures safeguarding procedures are followed to keep children and staff safe while teaching and learning online, in line with DfE Safeguarding and Remote Education guidance.

**The Designated Governor for Safeguarding**

Richard Nicholson and Claire Boyd are the Designated Governors for safeguarding issues. The role of the Designated Governors is to take leadership responsibility for the School's safeguarding

arrangements and to liaise with the local authority on issues of child protection or in case of allegations against the Heads or governors, as well as:

Their responsibilities include:

- 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, they will not be involved in concerns about individual children
- 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 termly with the DSL to review safeguarding practice, ensuring they have adequate time, support, and resources to fulfil their responsibilities Meetings are minuted in sufficient detail to reflect the depth of scrutiny
- Monitoring delivery of safeguarding education to children, including online safety and radicalisation, through the curriculum and co-curricular activities
- Ensuring staff understand their responsibilities to safeguard all children, including those who are looked after
- Meeting periodically with Online Safety Coordinators to discuss issues including cyberbullying and filtering/monitoring procedures
- Checking the Single Central Record
- Completing Level 3 safeguarding training every two years and accessing relevant training
- Reporting safeguarding matters termly to the full Governing Body and the Risk & Compliance Committee

**The Role of the Governing Body**

The Governing Body (Council) holds strategic leadership responsibility for safeguarding at Headington Rye Oxford and ensures the School complies with its legal duties. It promotes a robust, whole-school safeguarding culture led by the DSL and senior leadership.

The Governing Body is responsible for:

- Reviewing the effectiveness of safeguarding arrangements and addressing any weaknesses without delay
- Ensuring that children's wellbeing is central to all decision-making
- Approving updates to policies and procedures in response to changes in regulation or best practice
- Ensuring the School has effective risk assessments to support children's health, safety, and wellbeing
- Monitoring online safety measures, including filtering and monitoring systems, at least annually, to meet national standards
- Overseeing the School's preventative education approach, including evidence-based RSHE and age-appropriate safeguarding teaching
- Ensuring safer recruitment procedures and appropriate vetting of all staff and volunteers
- Appointing a senior leader to act as the DSL
- Undertaking safeguarding training on appointment and annual update training thereafter. Governors with equivalent safeguarding responsibilities elsewhere may meet this requirement by confirming up-to-date external training
- Supporting inter-agency cooperation and ensuring policies align with OSCP/ESAT expectations
- Working with the LADO to improve safeguarding practices when there are substantial allegations against staff
- Including safeguarding as a standing item on the termly agenda, reviewing policy updates, staff training, external engagement, and safeguarding trends

In cases of serious safeguarding incidents, the Governing Body is also responsible for reporting to the Charity Commission, even where the matter has been referred to police or other regulators. The DSL and Bursar coordinate this reporting.

## Staff Responsibilities

Safeguarding is everyone's responsibility. All staff, including volunteers and supply staff, must know and follow this policy and have a duty to protect all children, including those in need or at risk of harm.

They must read and understand *Keeping Children Safe in Education 2025* (Part 1 and Annex B) and review it at least annually.

All staff must:

- Provide a safe environment for children to learn and thrive
- Be alert to signs of abuse, neglect, harmful behaviours, and mental ill health.
- Be aware when a child may benefit from Early Help and know how to support or refer them
- Know and follow the School's safeguarding procedures, including how to respond to and record disclosures or concerns whilst upholding confidentiality
- Challenge concerning behaviour and report concerns about adults (including self-referral) to the DSL or Headmistress
- Always act in the best interests of the child, recognising that some children may struggle to disclose harmful experiences and require time and support
- Ensure children reporting abuse, exploitation, or harassment are taken seriously, supported, and never blamed or made to feel ashamed
- Record concerns using CPOMS or a safeguarding referral form and submit them promptly to the DSL
- Help implement and monitor any individual care, education, or support plans.
- Maintain appropriate professional boundaries in line with the Staff Code of Conduct and safer working practices
- Staff must also be familiar with related School and Safeguarding policies

All staff and volunteers:

- Receive and must read *Keeping Children Safe in Education* (KCSIE, 2025) upon appointment and annually thereafter, confirming understanding via a safeguarding quiz.
- Complete safeguarding and Prevent (Channel Awareness) training at induction, with additional training at least every three years in line with OSCP/ESAT guidance.
- Receive regular updates on safeguarding topics during briefings, INSETs, or electronically.
- Are encouraged to seek clarification or further training in any safeguarding area as needed.
- Must read, attend, and acknowledge all safeguarding communications and updates. A record of training and acknowledgements is maintained via Google Forms or equivalent.

Safeguarding training and resources are available via the Staff Safeguarding Pages. Additional CPD is offered when specific issues arise.

The School recognises the emotional demands of child protection work and provides staff support via designated safeguarding leads or through the Health Assured Employee Assistance Programme**.**

## Safeguarding in a Boarding Context

As a boarding school, we recognise the additional safeguarding responsibilities set out in the National Minimum Standards for Boarding. This includes being alert to inappropriate relationships, initiation-type behaviours, and the increased potential for child-on-child abuse. We also carefully monitor boarders' experiences with guardians and remain vigilant for any arrangements that may constitute private fostering.

Safeguarding concerns often overlap and may manifest in various forms, including substance misuse, truancy, gender-based violence, and the sharing of nude or semi-nude images. As members of the Boarding Schools' Association (BSA), we adhere to the BSA Commitment to Care

Charter and report safeguarding concerns to the BSA's Director of Safeguarding where appropriate.

All staff are expected to adopt the mindset of *"it could happen here"* and remain alert to cumulative low-level concerns that may indicate broader safeguarding issues. Staff should also be aware of *contextual safeguarding*, the recognition that harm may occur outside the home, such as within friendship groups or in the local community. Extra-familial risks may include child sexual or criminal exploitation and serious youth violence.

All staff must be familiar with the signs of abuse, neglect, and exploitation to ensure early identification and appropriate action. Indicators and examples are outlined in Annex B of KCSIE 2025. Staff are encouraged to refer to additional guidance, including:

- What to Do If You're Worried a Child Is Being Abused (DfE, 2015)
- NSPCC resources on types of abuse and warning signs
- Promoting and supporting mental health and wellbeing in schools and colleges
- Promoting Children and Young People's Emotional Health and Wellbeing

Concerns, no matter how minor they may seem, must be recorded on CPOMS and shared with the Safeguarding Team. Staff should never delay reporting if they are unsure, speak to a Designated Safeguarding Lead immediately.

**Disqualification**

All staff, including volunteers and supply staff, must immediately inform the School if there is any reason they should not be working with children.

Under the *Childcare (Disqualification) Regulations 2018*, this applies to those involved in early years or later years childcare (up to age 8), including before and after school care, and those managing such provision. The School ensures the necessary checks are carried out in line with these regulations.

Staff must report to the HR Manager any circumstances that may affect their suitability to work with children, including:

- Convictions, cautions, court orders, reprimands or warnings
- Incidents outside of school that could pose a transferrable risk (KCSIE 2025)

Staff are encouraged to self-refer low-level concerns and report situations involving necessary but innocent breaches of the Staff Code of Conduct (e.g. out-of-school sports communication via WhatsApp). These should be reported via the online tool or to the DSL or Headmistress, as set out in the Low-Level Concerns Policy.

Disqualified staff may apply to Ofsted for a waiver but cannot work in the disqualified area until a waiver is granted. Speak to the Bursar for further information.

**Positions of Trust**

As a result of their knowledge, position and/or the authority invested in their role, all adults 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 child 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.

Staff should always avoid behaviour that could be misunderstood or misinterpreted, and must report and document any such incidents promptly. They should follow the School's Code of Conduct, the guidance on one-to-one meetings, and the Low-Level Concerns Policy.

**Use of Mobile Phones and Cameras**

In order to prevent allegations of inappropriate activities, staff may not store images of children 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 school is incorporated into the ICT Acceptable Use Agreements.

**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)

**Safer Recruitment Practices**

The School follows Government requirements and the Independent School Standards Regulations for safer recruitment, ensuring that all staff working with children are vetted in line with *Keeping Children Safe in Education.* Job adverts and descriptions include the School's safeguarding statement.

The HR Team, with oversight from the Designated Safeguarding Lead, are responsible for reducing the risk of individuals who may pose a danger working with children. HR conducts due diligence checks, including self-declarations and online searches, on shortlisted candidates and addresses any concerns during interviews. HR complete all required statutory checks, make proportionate additional checks where required, and ensure volunteers are properly supervised. Contractors and consultants must confirm that their staff are subject to the appropriate level of checks. A central register of appointments is maintained for review.

All teaching, non-teaching, part-time, temporary, supply, and visiting staff undergo identity verification, qualification checks, fitness to work, and right-to-work confirmation. Enhanced DBS checks with barred list information are obtained before or soon after appointment. The DBS Update Service may be used if candidates consent. Additional checks apply for those with overseas history.

Teaching staff must have prohibition and EEA sanctions checks; management roles require prohibition from management checks via the Teaching Regulation Agency. Governors, volunteers, and regular contractors are also subject to statutory DBS checks. The School verifies safeguarding checks for external staff working with children on or off site.

If concerns arise about existing staff suitability, the School rechecks as for new hires.

Staff involved in recruitment receive 'Safer Recruitment' training updated every five years. See the Recruitment Policy for full details.

## Raising Safeguarding Awareness Among Children

The School promotes children's safety and wellbeing through open communication, trusted adults, and a protective ethos. We support children's emotional health and address vulnerabilities such as radicalisation and extremist views by developing their skills, knowledge, and attitudes to promote physical and mental wellbeing.

Our curriculum and pastoral care foster children's spiritual, moral, social, and cultural growth. Teaching staff model positive behaviour and promote age-appropriate awareness on health, safety, and wellbeing. All staff enforce standards set out in the Behaviour, Rewards and Sanctions Policy, Code of Conduct, and Anti-Bullying policies.

PSHE lessons include statutory RSE content covering appropriate behaviour, healthy relationships, bullying, and respect. External experts, tutors, DSLs, and nurses address safeguarding topics like self-esteem, power, radicalisation, child-on-child abuse, and online safety. Messages are regularly reviewed for age-appropriateness and communicated to parents and Governors.

Children know they can approach a wide range of trusted adults, including counsellors, pastoral staff, and nurses, and are signposted to an Independent Person. Support includes:

- Clear guidance on where to seek advice, displayed publicly and online
- An informal mentoring scheme where older children support younger ones
- Leadership training for prefects and student leaders on child protection
- Regular e-safety education aligned with anti-bullying and online safety policies

Child views guide actions when safeguarding concerns arise. We prioritise the best interests of the child through ongoing consultation.

Children with social workers or designated as 'Children We Care For' receive tailored support via regular DSL contact and coordination with external agencies.

The School and Governors monitor attendance closely, maintaining contact and providing support to children and their families with frequent or prolonged absences.

Support plans and risk assessments are created for children affected by abuse, sexual violence, harassment, or mental/physical health issues, involving parents and external agencies as needed.

Staff remain vigilant to additional safeguarding challenges faced by children with SEND, neurodiversity, health issues, or who identify as LGBTQ+. The School fosters a supportive culture to reduce barriers and ensure all children feel safe to speak out.

## Involving Parents

The School recognises the vital role parents play in safeguarding and values open, honest communication. This policy is available on our website alongside related policies such as Anti-Bullying and Online Safety. Parents are encouraged to raise any concerns directly with the School.

Where safeguarding concerns arise, we aim to involve parents unless doing so would place the child at risk or compromise an investigation, in such cases, advice will be sought from MASH. While it is best practice to seek parental consent before making a referral to external agencies, consent is not required where doing so would place the child at further risk of harm.

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).

**Other Arrangements**
The School may arrange for children to stay with host families during trips and will ensure these arrangements are safe, including DBS or equivalent checks where appropriate.

If staff become aware of a private fostering arrangement (care by a non-relative for under-16s or under-18 if disabled) not organised by the School, they must inform the DSL, who will notify the local authority and, if necessary, the police.

For alternative education providers supporting children with specific needs, the DSL ensures appropriate checks and parental consent are in place. The school will follow DfE guidance on Alternative Educational Provision.

**Working with OSCP and Other Agencies**
The School collaborates closely with the Oxfordshire Safeguarding Children Partnership and other local agencies to safeguard children. OSCP coordinates local safeguarding efforts between councils, NHS, police, and others, following national guidance. Oxfordshire retains OSCP as its local safeguarding body, led by key partners accountable for safeguarding arrangements.

The School's safeguarding contacts and processes align with this multi-agency framework.

**Types and Signs of Abuse, Neglect and Other Safeguarding Risks**

In line with *Keeping Children Safe in Education 2025*, all staff must be aware of the four main categories of abuse: physical abuse, emotional abuse, sexual abuse**,** and neglect**.** Staff must also recognise other safeguarding risks, including:

- **Child-on-child abuse**, including sexual violence and harassment
- **Child sexual exploitation (CSE)** and **child criminal exploitation (CCE)**
- **Domestic abuse**
- **So-called 'honour'-based abuse**, including FGM and forced marriage
- **Radicalisation and extremism**
- **Online abuse**, including grooming, cyberbullying, and sexual extortion
- **Exposure to harmful content via social media or internet use**, including self-harm, pro-suicide, or misogynistic content
- **Mental health concerns**, particularly where linked to abuse, trauma or online harm

Children may be at risk from adults they know, such as family members, carers, or individuals in positions of trust, or from others online or in the wider community.

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).

**Early Help**

Early Help is the provision of timely and effective support to children and families as soon as emerging needs are identified. It aims to improve outcomes, build resilience, and reduce the likelihood of problems escalating. Evidence shows that Early Help is more effective in promoting children's welfare than reactive services provided at a later stage.

Where a child or family may benefit from coordinated support, either from within the School or in collaboration with other agencies, the School will work with the child and their family to complete a Strengths and Needs Assessment, which is submitted to the Locality and Community Support Service for review. This forms the basis for a shared action plan, agreed with the family, to ensure the right support is put in place at the right time.

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

- is disabled, or has certain 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
- 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

Where Early Help is not effective, or if the child's needs become more complex or urgent , for example, if there is risk of significant harm or serious concerns about health and development , a Children's Social Care assessment will be required. This assessment will determine whether the child is:

- A Child in Need under Section 17 of the Children Act 1989, or
- In need of Child Protection under Section 47 of the Children Act 1989.

In such cases, the DSL will make a referral to the Multi-Agency Safeguarding Hub (MASH). Other professionals may also escalate concerns to MASH if needed.

The DSL, or another nominated staff member who knows the child well, will act as the Lead Professional for the School. They will represent Headington Rye Oxford at strategy meetings, case reviews, and planning discussions, and contribute to the coordinated delivery of support.

Further guidance on identifying levels of need can be found in the OSCP's Threshold of Need Matrix.

## 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 Protection

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.

## Categories of 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.

### Indicators of Physical Abuse / Factors

### Physical signs:

- Multiple bruises or bruises and scratches, especially on the head and face
- Clusters of bruises, e.g., fingertip bruising from grasping
- Bruises around the neck and behind the ears (common abusive injury sites)
- Bruises on the back, chest, buttocks, or inside thighs
- Marks from instruments (e.g., linear bruising from sticks, parallel bruising from belts, buckle marks)

- Bite marks
- Deliberate burns showing patterns from objects (electric fire, cooker, cigarette)
- Scalds with upward splash or tide marks
- Untreated injuries
- Recurrent injuries or burns
- Bald patches

**Concerns about explanations or behaviour:**

- Explanation doesn't match the injury
- Explanation uses adult-like language not typical of the child
- No explanation given
- Child or parent/guardian is secretive or evasive
- Injury accompanied by allegations of abuse or assault

**Child's behaviour raising concern:**

- Reluctance to have parents/guardians contacted
- Running away or fear of going home
- Aggression toward self or others
- Flinching when approached or touched
- Reluctance to undress for sport
- Wearing long sleeves in hot weather
- Unnaturally compliant around parents/carers
- Fear of medical help or attention
- Admission of excessive punishment

Injuries must be accounted for; inconsistent, inadequate, or delayed explanations or treatment should increase 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.

## Indicators of Emotional Abuse

### Developmental issues

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

### Behavioural signs

- Acceptance of excessive punishment
- Over-reaction to mistakes
- Continual self-deprecation (e.g., "I'm stupid, worthless")
- Neurotic behaviours (rocking, hair-twisting, thumb-sucking)
- Self-mutilation and suicide attempts
- Drug or solvent abuse
- Running away from home
- Compulsive stealing or scavenging
- Acting out aggressively or destructively
- Poor trust in significant adults
- Regressive behaviours (e.g., bedwetting)
- Eating disorders
- Arriving early at school or leaving late

### Social issues

- Withdrawal from physical contact or social interaction
- Over-compliance or insecure, clinging behaviour
- Poor social relationships

### Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses (e.g., "I deserve this")
- Fear of parents being contacted
- Self-disgust and low self-esteem
- Unusual fearfulness around adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

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

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

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

**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.

**Characteristics of child sexual abuse:**

- It is often planned and systematic – sexual abuse is not accidental, though it can sometimes be opportunistic
- Grooming the child – abusers often target vulnerable children and build dependency over time
- Grooming the child's environment – abusers seek to lower the suspicions of adult protectors (such as parents or carers) to gain access and avoid detection

**Physical Observations**

- Damage to genitalia, anus, or mouth
- Sexually transmitted infections or diseases
- Unexpected pregnancy, especially in very young children
- Soreness in the genital area, anus, or mouth
- Chronic itching or other unexplained medical problems
- Recurrent urinary tract infections or abnormal discharges
- Unexplained abdominal pain

**Behavioural Observations**

- Sexual knowledge or language that is inappropriate for age
- Sexualised or overly affectionate behaviour
- Sexually provocative behaviour or promiscuity
- Hinting at sexual activity
- Sudden drop in academic performance
- Depression, insecurity, or clinging behaviour
- Poor concentration, restlessness, or aimlessness
- Social withdrawal or isolation

- Over-compliant or excessively passive behaviour
- Aggressive or “acting out” behaviour
- Fear of, or lack of trust in, significant adults
- Regressive behaviours (e.g., thumb sucking, bedwetting)
- Nightmares or sleep disturbances
- Frequent early arrival or late departure from school
- Running away from home
- Self-harm or suicide attempts
- Feelings of self-disgust
- Drawing sexually explicit images
- Eating disorders or compulsive eating
- Sudden concern about removing clothes in front of others

**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.

**Indicators of Neglect**

*Note: Indicators do not confirm abuse on their own. Each child should be considered in the context of their family, circumstances, and community. Concerns should be assessed by trained professionals.*

- Physical indicators:
- Constant hunger; stealing food
- Poor personal hygiene (unkempt, dirty, or smelly)
- Underweight
- Inappropriate clothing for the weather
- Clothing in poor condition
- Untreated illnesses or injuries
- Behavioural indicators:
- Persistent tiredness
- Frequent school absence or lateness
- Missing medical appointments
- Social isolation among peers
- Lack of supervision
- Stealing or scavenging, especially for food

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. The Neglect Strategy for Oxfordshire 2022-2024 sets out the partnership response to identify and tackle neglect Headington Rye Oxford will implement this standard and seek to provide early help and intervention when neglect is identified as a possible safeguarding issue.

**Child abduction and community safety incidents**

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

**Child Sexual Exploitation (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 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.

The Child Exploitation Screening Tool should be completed if a child is a risk of being exploited. This should be completed alongside a MASH referral and advise sought from the Youth Justice and Exploitation Team – Emerald Team. The Emerald Team also has a confidential helpline (01865 309196).

**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 a child's 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 Child Exploitation Screening Tool should be completed if a child is a risk of being exploited. This should be completed alongside a MASH referral and advise sought from the Youth Justice and Exploitation Team – Emerald Team. The Emerald Team also has a confidential helpline (01865 309196).

**Children and the court system**

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

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online Child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

**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.

**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).

**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.

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 children. If staff are concerned about a child 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 Sundial Centre for Education on Harmful Practices.

**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.

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 and Governors will monitor all children's 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. A child who is not brought to school regularly 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 to assist in identifying children who are missing education and may be at risk of harm or abuse, as per the School 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 with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## Supporting Mental Health and Wellbeing

At our school, we recognise that everyone has mental health and that mental wellbeing exists on a spectrum. At any given time, individuals may find themselves mentally healthy or unwell. We understand our responsibility to support and promote positive mental health and wellbeing within our school community.

We also recognise that mental health difficulties can be a significant safeguarding risk. Children experiencing mental ill health may be more vulnerable to harm, including abuse, neglect, and exploitation. As such, we have a duty not only to promote wellbeing but also to act where concerns arise. The school has put in place measures to identify concerns early**,** provide support for affected children, and reduce risk.

Among the mental health challenges we commonly identify are:

- Depression and low mood
- Anxiety
- Self-harm
- Disordered Eating
- Low-level psychosis
- Occasional suicidal ideation

While the diagnosis of mental ill health is the responsibility of qualified professionals, our staff are well placed to observe children on a day-to-day basis and to identify changes in behaviour that may signal a developing problem.

The School plays an important role in supporting the mental health and wellbeing of our children. The Deputy Head Pastoral, Safeguarding Team, the Health Centre Team, School Counsellors, The Wellbeing Hub alongside Chaplains and the Boarding Team work closely to promote wellbeing, resilience and mental health as part of an integrated whole school approach to social and emotional wellbeing, tailored to the needs of our children. This is implemented through, for example, the PSHE, year group and whole school assemblies, House based discussions, one-to-one and group meetings with tutors and whole school initiatives.

Both the Senior and Prep School Pastoral Deputy Heads are trained in Mental Health First Aid and lead our whole-school approach to mental wellbeing. They have trained a team of Mental Health First Aiders who act as ambassadors, promoting a positive culture around mental health and offering informal support to children in need.

Deputy Head Pastoral serves as the school's Designated Mental Health Lead. If a mental health concern also raises a safeguarding issue, staff must take immediate action by referring the matter to the DSL ensuring a coordinated approach to both safeguarding and mental health support.

To manage the contextual safeguarding risks linked to mental health difficulties, the school implements the following policies and procedures, including:

- Welfare Risk Assessment and Support
- Anti-Bullying Policy
- Mental Health and Wellbeing Policy
- Smoking, Alcohol and Drugs Policy
- Individual Bereavement Guidelines
- Relationships and Sex Education (RSE) / PSHE Policy
- Provision for Pupils with Particular Religious, Dietary, Language or Cultural Needs

These documents guide staff in recognising potential risks and responding appropriately and effectively to safeguard children's wellbeing.

**Child-on-Child Abuse**

The School recognises that children can abuse other children, and that such abuse may occur even if not reported. Abuse is abuse and must never be dismissed as "banter" or similar. At Headington Rye Oxford, all forms of child-on-child abuse are taken extremely seriously.

Child-on-child abuse can include:

- Bullying, including cyber and discriminatory bullying
- Abuse in intimate relationships (teenage relationship abuse)
- Physical abuse
- Sexual violence and harassment
- Consensual or non-consensual sharing of nude/semi-nude images (sexting/YPSI)
- Coercion into sexual activity
- Upskirting
- Initiation/hazing rituals

Technology may be used to facilitate or escalate abuse. Children with SEND may be more vulnerable and affected without showing obvious signs.

The School works proactively to reduce risk through:

- PSHE and curriculum education on peer abuse, bullying, and online safety
- Clear communication of the School's zero-tolerance approach
- Promoting a culture where children feel safe to speak up
- Effective site supervision and strong pastoral care
- Identifying vulnerable children and offering targeted support
- Working with IT and Online Safety staff to ensure robust systems and guidance

Staff are trained to recognise and respond to all forms of child-on-child abuse and must report any concerns to the DSL immediately via CPOMS.

Support is offered to victims, perpetrators (where appropriate), and any affected children. This may include counselling, external referrals, regular pastoral check-ins, or other tailored support. If a child may be at risk of significant harm, a referral will be made to MASH promptly.

If behaviour does not meet the threshold for a safeguarding referral, the School's Behaviour, Rewards and Sanctions policy will apply.

Staff recognise that a lack of reports does not mean abuse isn't occurring. All concerns must be taken seriously and referred to the DSL immediately 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 child 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 exists on a continuum from developmentally appropriate to inappropriate, abusive, or violent. Harmful Sexual Behaviour refers to behaviour that is developmentally inappropriate and potentially damaging. HSB may occur online, in person, or both.

At Headington Rye Oxford, HSB is addressed through age-appropriate PSHE education, helping children understand appropriate behaviour, stay safe, and seek help when needed.

All reports of HSB are taken seriously and managed by the DSLs, with support tailored to the needs of the child and the nature of the incident.

**Online Abuse**

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

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

Online safety is embedded into the curriculum to ensure children understand online risks. Staff receive regular training to help them safeguard children in an online environment.

The DSLs and Online Safety Coordinators provide online safety resources and offer training and updates to parents, helping them support their children's safe internet use at home.

The School recognises that the internet, particularly social media, can play a role in radicalisation. Staff training includes how online platforms are used to draw young people into extremism.

Staff are expected to play an active role in monitoring children's digital behaviour, enforce Acceptable Use Policies (AUPs), and be vigilant to signs of online risk. They are encouraged to support children in developing digital resilience by helping them gain the knowledge and awareness needed to use the internet safely and responsibly.

The Online Safety Coordinators are CEOP-trained and provide regular updates to the DSLs and the Safeguarding Governor. They meet with the Governor periodically to review online safety practice and emerging issues.

Further details are set out in the School's Online Safety Policy**,** Mobile Phone and Digital Devices Policies, and Cyber-Bullying Policy, all of which are available through the Parent Portal and Staff Pages.

**Cybercrime**

Headington Rye Oxford are aware that children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL will consider referring into the Cyber Choices programme.

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

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

Youth Produced Sexual Imagery (YPSI) refers to any nude or semi-nude images or videos shared by children under 18, either of themselves or others, whether consensually or not. This includes still images, videos, or live streams, and may occur via social media, chat apps, gaming platforms, AirDrop, or group messaging.

Under the Sexual Offences Act 2003, creating, possessing, or sharing such imagery is illegal. However, current guidance recommends treating incidents involving young people as safeguarding concerns rather than criminal offences, unless there is clear evidence of abuse, coercion, or exploitation.

At Headington Rye Oxford, online safety is taught through PSHE, and children are educated about the risks, legal implications, and consequences of sharing such imagery.

The School follows the Online Safety Policy and UKCIS 2024 guidance when responding to incidents. Staff will work closely with children and families, confiscate devices if needed, and involve the police where appropriate and in the best interests of the child.

If You Receive a YPSI Disclosure

- Do not view, copy, print, share, store, or save any image
- Do not ask the child to share, forward, or download the image
- If you accidentally view the image (e.g. the child shows it to you), report it to the DSL immediately
- In exceptional safeguarding circumstances**,** the DSL may decide to view the image to protect the child

Staff must always refer such incidents to the DSL**,** who will take appropriate action in line with legal and safeguarding procedures.

**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. 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.

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.

Early help is offered to address non-violent harmful sexual behaviour and prevent escalation. Serious offences like rape or assault by penetration require referral to children's social care and police, with appropriate communication to the victim and their parents unless it risks further harm. Other cases are managed internally, often with external support.

All teaching staff should read Part 5 of KCSIE 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. It is now a criminal offence, and the perpetrator can face a sentence of up to two years in prison.

**Homelessness**

Being homeless or at risk of homelessness poses a serious risk to a child's safety and welfare. Indicators may include household debt, rent arrears, domestic abuse, anti-social behaviour, or a family being asked to leave their home. Where there is concern that a child has been harmed or is at risk of harm due to homelessness or housing instability, a referral will be made to MASH in line with local safeguarding procedures.

**Preventing Radicalisation**

Headington Rye Oxford recognises its duty to safeguard children from radicalisation and extremist ideologies. Children may be vulnerable to exploitation, and the School provides a stable environment to help reduce risk. Staff remain vigilant to changes in behaviour or attitudes that may indicate a child is at risk.

The School follows the Prevent Duty, part of the UK Government's counter-terrorism strategy, which requires schools to help prevent people from becoming terrorists or supporting terrorism. This includes all forms of extremism, political, religious, or ideological and involves reducing environments where radicalisation might thrive.

Radicalisation is the process by which individuals come to support terrorism or extremist ideologies.

Extremism is any belief that seeks to undermine democratic values or promote hatred, violence, or intolerance.

Terrorism involves acts or threats of serious violence, damage, or disruption, intended to influence government or intimidate the public.

The DSL is the School's Prevent Lead, and all concerns must be referred to her. The DSL will assess the level of risk and make appropriate referrals, this could include Channel, a multi-agency support programme for those vulnerable to radicalisation.

The School:

- Carries out risk assessments in consultation with local partners (e.g. police) to ensure robust safeguarding measures
- Trains all teaching staff in Prevent and Channel awareness during their first term
- Provides training for non-teaching staff and regular updates
- Monitors internet filtering systems for concerning searches, which are logged and reviewed by the DSL and Online Safety Coordinator
- Works with families to provide support when a risk is identified
- Promotes resilience through PSHE, curriculum content, and a culture of mutual respect and inclusion
- Staff must report any concerns about radicalisation via the School's safeguarding procedures.

**Signs of concern** may include:

- Increased association with extremist individuals or groups
- Changes in appearance or behaviour linked to extremist ideology
- Withdrawal from friendships or interests
- Possession of extremist materials
- Attempts to recruit others or justify violence

**Indicators of intent to cause harm** include:

- Dehumanising or blaming others
- Expressing urgency to act
- Supporting or condoning violence

**Capability indicators** may include:

- History of violence or criminal activity
- Access to technical skills (e.g. IT, engineering, chemicals)
- Military-style training or knowledge

There is no single pathway to radicalisation, and staff are trained to assess each case individually.

The School follows Prevent Duty guidance and works with external agencies, including Channel and Children's Social Care, as required.

## Visiting Speakers

In line with the Prevent Duty, Headington Rye Oxford has a Visiting Speakers Policy to ensure all external speakers are appropriately vetted and supervised. A risk assessment is carried out before any visit, considering suitability and vetting requirements, which may include a DBS check where relevant.

Speakers must uphold British values, democracy, the rule of law, individual liberty, and mutual respect and must not promote views contrary to these. Presentations or materials may be requested in advance, and all speakers are supervised on site. Identification is required on arrival, and a register of all visiting speakers is maintained in accordance with the School's Data Protection Policy.

## What to do if you have concerns about a child

At Headington Rye Oxford, **all welfare concerns-no matter how small-must be logged either via CPOMS or safeguarding@headingtonschool.com**. This ensures that every concern is recorded, monitored, and addressed in line with our safeguarding responsibilities under KCSIE 2025.

Logging concerns:

- Builds a clear picture of a pupil's wellbeing over time
- Helps identify patterns and escalating risks
- Supports early intervention and joined-up pastoral care
- Ensures continuity when staff change or children move
- Provides an auditable record for safeguarding reviews and inspections

Staff must not wait for certainty before logging a concern -if you are worried, record it. All records will be uploaded onto CPOMS, which is the single recording tool, that allows the DSL team to assess risk and take appropriate action, including involving other staff or external agencies if needed.

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

The School treats the safeguarding of all children 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 child;
- 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 child or their family.

We recognise that not all children who require help will be suffering abuse. Where additional needs are identified, the DSL may seek support from external agencies such as Children's Social Care or Early Help, with or without parental consent as appropriate

### How to Handle an Allegation of Abuse

Allegations or disclosures can happen at any time, so all staff should be prepared to respond appropriately:

- Stop and listen immediately when someone wants to talk about abuse or suspicions, including abuse by another child.

- Do not promise confidentiality. Explain that you will need to share the information to keep them safe.
- Listen carefully without showing shock, disbelief, or judgment.
- Accept what the child says without asking leading or suggestive questions.
- Allow the child to speak freely and at their own pace.
- Reassure the child that they did the right thing by telling you.
- Avoid making promises you may not be able to keep.
- Make it clear that the abuse is not the child's fault.
- Do not criticise or speak negatively about the alleged perpetrator.
- Explain clearly what will happen next and who will be informed.

**Note-Taking During a Disclosure**

- Whenever possible, make brief notes of what the child is saying while they are speaking.
- Keep the original notes intact - do not destroy or alter them.
- If you cannot write at the time, record your notes as soon as possible afterward.
- Notes should be clear, precise, and factual, focusing on observations. When recording, be sure to:
    - Include the date, time, and place of the disclosure.
    - Note any noticeable non-verbal behaviour.
    - Use the child's exact words where possible.
    - Record statements and observations without adding interpretations or assumptions.
- Submit all records promptly to the DSL.
- Staff and volunteers should not keep personal copies of these records.
- Information can also be logged using CPOMS under the relevant safeguarding category.

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 0345 050 7666 and/or the Police 999 immediately. Anyone can make a referral. Parental consent is not required for a referral to be made, although it should usually be sought.

In the case of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer to the Safeguarding Adults Board.

If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.

The DSL will refer all allegations or suspicions of abuse, including those involving staff, or any case where a child may be suffering or at risk of significant harm, to MASH or the LADO within 24 hours. Borderline cases will be discussed first with LCSS, MASH, or the LADO to determine if the concern meets the threshold. These agencies will advise the school on next steps, which may include involving the Police.

If the School has concerns about the decisions or approach of external professionals, the DSL will follow OSCP's RESOLVE process. If no feedback is received after a referral, the School will follow up with Children's Social Care. Staff must raise concerns if a child's situation does not improve. The School is committed to challenging any 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.

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

All concerns and discussions about a child's welfare, the decisions made and the reasons for the decisions should be recorded in writing in CPOMS.

Dealing with a child's disclosure or a child protection case can be stressful. Staff are encouraged to seek support by discussing their feelings with the DSL. Additionally, all staff have access to the Employee Assistance Programme for further help.

## How to respond to an allegation or concern

## Record Keeping, Monitoring and Review

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

The School's child protection records are kept securely on CPOMS and are separate from routine pupil records. Access is restricted to the DSLs, the Headmistresses, and those authorised by them.

A summary of safeguarding concerns can be generated from CPOMS.

This information is shared termly with the designated Safeguarding Governors. The DSL regularly monitors cases to identify any concerning patterns of behaviour. If issues are identified, additional support will be put in place in consultation with the other DSLs and the Deputy Head Pastoral

The School's Safeguarding and Child Protection Policies are reviewed at least annually by the DSL, in consultation with the Full Council. Updates may be made sooner if needed. Any weaknesses in safeguarding arrangements will be addressed immediately. The policy is reviewed and approved by Council before publication each Autumn Term.

The DSLs complete an annual safeguarding review as required by the OSCP. This audit is shared with the Safeguarding Governors, reviewed and approved by Full Council during the Autumn Term, signed by the Chair of Governors, and submitted to the Local Authority Designated Officer.

## Concerns and Allegations about Staff including Supply staff, Volunteers and Contractors

Headington Rye Oxford 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.

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

This includes all cases that meet the harm threshold where a person is alleged to have:
• behaved in a way that has harmed, or may have harmed a child
• possibly committed a criminal offence against, or related to, a child
• behaved towards a child or children in a way that indicates they may pose a risk of harm to children
• behaved or may have behaved in a way that indicates they may not be suitable to work with children.

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

There are two levels of allegation/concern:

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

Headington Rye Oxford has a clear and robust Managing Allegations Against Staff policy, which sets out procedures for responding to concerns or allegations about adults working with children. This includes any allegation that may indicate a child has been harmed or is at risk of harm. The policy is fully compliant with Part 4 of Keeping Children Safe in Education and ensures that all allegations are handled promptly, fairly, and in accordance with statutory guidance.

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

## Low Level Concerns

The term 'low level concern' is any concern, no matter how small, that an adult working in or on behalf of Headington Rye Oxford may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO
-

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language
- Sharing personal mobile numbers with children
- Social media use
- Humiliating children

Headington Rye Oxford recognises the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

Low level concerns can be raised with the Headmistress, or DSL. Staff are encouraged to talk to the DSL for advice or to complete the Low Level Concern Form which can be found on the Staff Pages or via the Low Level Concerns Policy.

**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 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 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. Alternatively, they may use other whistleblowing channels outside of the school, such as the NSPCC whistleblowing helpline 0800 0280285 or email help@nspcc.org.uk

## Safeguarding Training at Heading Rye Oxford

### New Staff and Volunteers

- All new staff and volunteers complete Generalist Safeguarding Training produced by ESAT Oxfordshire delivered by the DSL.
- This training explains how to spot signs of abuse, such as neglect, exploitation, sexual violence or harassment, bullying, radicalisation, and children missing from education.
- It shows staff how to record and report concerns to the DSL, the Headmistress, local safeguarding partners, or the police if needed.
- All new teaching staff must complete the government's online Prevent training in their first term (staff are exempt if they have an in-date Prevent certificate). This training must be repeated every five years.

### Induction for all staff and volunteers also includes:

- Reading the school's key safeguarding policies: Staff Code of Conduct, Managing Allegations, Anti-Bullying, Behaviour Rewards and Sanctions, Children Missing from Education, Online Safety, and Whistleblowing.
- Access to electronic copies of all safeguarding documents on the school website and staff pages.

### Ongoing Staff Training

- All staff repeat Generalist Safeguarding Training from ESAT Oxfordshire every three years.
- Every year, all staff get training on updates to Keeping Children Safe in Education.
- Prevent Training is repeated every 5 years
- All staff and governors complete an annual quiz to show they understand KCSIE. Extra training is given if needed.

### Different Requirements by Role

- Staff who work directly with children (teachers, coaches, technicians, nurses, counsellors, boarding staff, pupil facing admin staff, and governors) must read and understand KCSIE Part 1 and Annex B. Teachers also read Part 5.
- Staff with less direct contact (catering, maintenance, housekeeping, bursary) read Annex A and can also access Annex B.
- Every member of staff has access to the full KCSIE document.
- DSLs complete Level 3 training every three years.
- Early Years staff receive extra guidance on recognising and responding to signs of abuse in younger children.
- Boarding staff, older boarders in leadership roles, and prefects get training on safeguarding, including what to do if a boarder goes missing or if there are allegations of abuse.

### Updates and Refreshers

- Staff get regular safeguarding updates through emails, staff meetings, INSET days, and morning briefings.

### Governors and Safer Recruitment

- New governors receive child protection training.
- Staff involved in recruitment complete safer recruitment training, which is updated every five years.

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