OUNDLE School

Laxton Junior School OUNDLE

Safeguarding Policy

This policy details Safeguarding procedures at Oundle School (OS) and Laxton Junior School (LJS) including the Early Years Foundation Stage. It should be read in conjunction with the key documents identified in Appendix 8. References to Staff in this policy include all Staff and volunteers and everyone working for and on behalf of the School.

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1. SAFEGUARDING INFORMATION FOR ALL OS AND LJS STAFF AND OS SENIOR PUPILS

Safeguarding Information *for All Staff*

The Safeguarding Team - who to talk to

Oundle School and Laxton Junior School are dedicated to promoting and safeguarding the welfare of all children in their care. Safeguarding is everyone's responsibility and Staff are expected to be vigilant, show professional curiosity and maintain an attitude of 'it could happen here'.

Advice and guidance relating to Safeguarding issues can be sought at any time from the Safeguarding Team who will deal with your query/any referrals with sensitivity and due regard for the feelings of the child.

All Staff are required to be familiar with the School's Safeguarding Policy and to keep up to date with their Safeguarding training. They must also have read Keeping Children Safe in Education Part 1.

The Governor with specific responsibility for Safeguarding is Ms Suzanna D'Oyly.

Designated Safeguarding Leads (DSLs) for Oundle School and Laxton Junior School:



Deputy Head Pastoral & Safeguarding / DSL OS
Robin Banerjee
07731 022409
01832 277113
rb@oundleschool.org.uk



Assistant Head Safeguarding Deputy DSL OS
Louise Banerjee
07595 200222
01832 277331
jlb@oundleschool.org.uk



Director of Safeguarding Deputy DSL OS
Ben Raudnitz
01832 277284
br@oundleschool.org.uk



Deputy Head DSL LJS
Stacey Crump
01832 277308
smc@oundleschool.org.uk



Deputy DSL LJS
Fraser Harper
01832 277275
fh@oundleschool.org.uk

Designated Child Protection Officers (CPOs) for Oundle School:



CPO
Rebecca Lowndes
rll@oundleschool.org.uk



Proctor / CPO
Chris Quiddington
cjq@oundleschool.org.uk

Sports Centre and Enterprise Safeguarding Team:



Sports Centre Manager & DSL
Ed Tate
etate@oundleschool.org.uk



Operations Manager & Deputy DSL
Chris Quick
cquick@oundleschool.org.uk



Fitness Manager & CPO
Nichola Crowley
ncrowley@oundleschool.org.uk



Sales & Marketing Manager & CPO
Carly Eppler
ceppler@oundleschool.org.uk



Sports & Duty Supervisor & CPO
Ben Nelson-Coles
bnelson-coles@oundleschool.org.uk

Director Commercial
Susie Raby sr@oundleschool.org.uk

Enterprise Operations Manager
Oliver Rees orees@oundleschool.org.uk

September 2025

Safeguarding Information *for All Staff*

Your Safeguarding Training - key things to remember

Be Aware of the latest developments in Safeguarding

Early Intervention

Early intervention: the best way to deal with issues and pre-empt them from turning into bigger problems.

If Staff have any concerns about a child's welfare, they should act on them immediately. Early information sharing is vital for effective identification, assessment and allocation of appropriate support. If Staff are unsure they should always speak to the Designated Safeguarding Lead and the Deputy DSLs, and follow the School's Safeguarding policy and procedures as soon as possible.

All Staff should know about the Northamptonshire Safeguarding Children Partnership (NSCP) Thresholds Guidance document which is available from the Safeguarding Team if they feel a child is in need of early help.

Link: https://nctrust.co.uk/wp-content/uploads/2025/10/Thresholds-Document-Oct-2025.pdf

Current Issues

All Staff are required to show professional curiosity and look out for the kinds of issues which give rise to Safeguarding concerns. These include:

- Initiation/hazing-type violence and abuse
- Misogyny, sexism and inappropriate sexualised behaviour
- Mental health issues
- Online safety concerns, including cyberbullying, online grooming, exploitation, exposure to harmful content and AI-generated abuse
- Sharing of nude, semi-nude or sexual images and/or videos
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE), including county lines Radicalisation and extremism Domestic abuse, teenage relationship abuse and serious violence
- Honour-based abuse, including Female Genital Mutilation (FGM) and forced marriage
- Modern slavery and trafficking
- Children who are missing education/Private fostering

Further details are available in the School's Safeguarding Policy and in Keeping Children Safe in Education Part 1.

Be Alert to possible Safeguarding Concerns

Categories of Significant Harm

- Neglect
- Physical Abuse
- Sexual Abuse
- Emotional Abuse

Possible Indicators of Abuse

- Changes in normal behaviour/attitude
- Social withdrawal
- Restlessness and aimlessness
- Sleeping and eating disturbance
- Unexplained change in work ethos
- Recurrent stomach/headaches
- Any unexplained bruising
- Self-harming

Remember your training

Receiving a Disclosure from a Child

- **Do not** promise confidentiality
- **Explain** that the disclosure will only be shared with those who are necessary
- **Listen** carefully, reflecting back, using the child's language
- **Be non-judgmental and clear** about what the next steps will be
- **Do not ask leading questions:** prompt only where necessary with open questions
- **You *may* ask** a child if they have been harmed and what the nature of that harm was
- **Make notes** asap quoting the child's words as far as possible
- **Do not** include your personal opinion, investigate or tell the person about whom the child has complained
- **Refer** to a member of Safeguarding Team on the same day

How to Refer:

Concerns about a child

- Report the same day to member of Safeguarding Team
- Do not inform person about whom the complaint is made
- If a child is in immediate danger or left alone call police (03000 111222 or 999) and/or ambulance (999) if needed

Concerns about another staff member (whistleblowing)

- Report directly to Head of OS/LJS (or DSL in their absence)
- If concern is about the Head, straight to Chair of Governors
- You may consider discussing concerns with one of the DSLs and may make any report through them
- Observe confidentiality rules (see below)

Direct Referrals

Staff may also refer directly to the Northamptonshire Safeguarding Children Partnership.

- Contact details for Early Help support, the Multi-Agency Safeguarding Hub (MASH) and the Designated Officers are accessible via this link

  https://nctrust.co.uk/report-a-concern-or-request-support

- If you have an urgent concern outside normal working hours, you can contact the MASH emergency duty team on 0300 126 7000

Remember to inform the DSL as soon as possible so that an appropriate course of action can be agreed.

Confidentiality

- Adults must not publicly speculate about any allegation of (or hint of) criminal offence against an employee.
- Staff must not respond to any request from the media, pupils, parents or the public for statements, either written or verbal. Any such requests must be directed to the Deputy Head Admissions who will agree the wording with the Head or Bursar.

September 2026

Oundle School Safeguarding Information *for Senior Pupils*

Oundle School is dedicated to promoting and safeguarding the welfare of all pupils. Safeguarding is everyone's responsibility and senior pupils are asked to be vigilant and to play their part in the provision of timely and appropriate care. Advice and guidance relating to Safeguarding issues can be sought at any time from the Safeguarding Team who will deal with your query/any referrals with sensitivity and due regard for the feelings of the pupil concerned.

The Governor with specific responsibility for Safeguarding is Ms Suzanna D'Oyly.

The Designated Staff for Oundle School are below. You can contact them on email or via Teams.

Designated Safeguarding Leads (DSLs)



Deputy Head Safeguarding / DSL OS
Mr Banerjee
07731 022409
01832 277113
rb@oundleschool.org.uk



Assistant Head Safeguarding Deputy DSL OS
Mrs Banerjee
07595 200222
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Director of Safeguarding Deputy DSL OS
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01832 277284
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Designated Child Protection Officers (CPOs)



CPO
Mrs Lowndes
rll@oundleschool.org.uk



Proctor / CPO
Dr Quiddington
cjq@oundleschool.org.uk

Safeguarding training is provided by Hsms at the start of the Lower Sixth and again in preparation for leadership in your final year. All Senior Pupils are expected to be familiar with the information on this sheet.

Be Aware of the latest developments in Safeguarding	**Early Intervention** Early intervention is the best way to deal with issues and pre-empt them from turning into bigger problems. Senior pupils should know about the importance of accessing help by referring concerns to Hsms or a member of the Safeguarding Team for advice as soon as possible.	**Current Issues** The School is required to look out for the kinds of issues which give rise to Safeguarding concerns. These include: • Child-on-child abuse, including bullying (incl. online bullying), prejudice-based abuse, physical abuse, sexual harassment/violence, harmful sexual behaviour (HSB), initiation/hazing-type violence and abuse • Misogyny, sexism and inappropriate sexualised behaviour • Mental health issues • Online safety concerns, including cyberbullying, online grooming, exploitation, exposure to harmful content and AI-generated abuse • Sharing of nude, semi-nude or sexual images and/or videos • Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE), including county lines Radicalisation and extremism Domestic abuse, teenage relationship abuse and serious violence • Honour-based abuse, including Female Genital Mutilation (FGM) and forced marriage • Modern slavery and trafficking • Children who are missing education/Private fostering
Be Alert to possible Safeguarding Concerns	**Categories of Significant Harm** Any cases of significant harm should be reported to a member of the Safeguarding Team. Significant harm includes: • Neglect • Physical Abuse • Sexual Abuse • Emotional Abuse	**Possible Indicators of Abuse** • Changes in normal behaviour/attitude • Sleeping and eating disturbance • Unexplained change in work ethos • Recurrent stomach/headaches • Social withdrawal • Restlessness and aimlessness • Any unexplained bruising • Self-harming
Remember your training	**Receiving a Disclosure from a Pupil** • **Do not** promise confidentiality • **Explain** that the disclosure will only be shared with those who are necessary • **Listen** carefully, reflecting back, using the child's language • **Be non-judgmental and clear** about what the next steps will be • **Do not ask leading questions:** prompt only where necessary with open questions • **You *may* ask** a child if they have been harmed and what the nature of that harm was • **Make notes** asap quoting the child's words as far as possible • **Do not** include your personal opinion, investigate or tell the person about whom the child has complained • **Refer** to a member of Safeguarding Team on the same day • **You may consider** discussing concerns with a member of Staff and may make any report through them	

2. SCHOOL ETHOS

Safeguarding is integrated into the Oundle School and Laxton Junior School ('the School') ethos and the School is committed to safeguarding the welfare of all those who come into contact with it and with whom it interacts. This includes children (a child includes anyone under the age of 18) and adults. The School will follow up on all safeguarding concerns appropriately in the interests of ensuring a culture of safety, equality and protection.

The School is dedicated to safeguarding and promoting the welfare of its boarding and day pupils, having regard to the protected characteristics defined in the Equality Act 2010 and considering at all times what is in the best interests of the child. The aim is to prevent safeguarding concerns from arising wherever possible. Boarding schools have additional factors to consider with regard to safeguarding, and the School is alert to signs of abuse in this setting (e.g. inappropriate pupil relationships and the potential for child-on-child abuse), working with the local authority if necessary to address any concerns. The School has regard to the National Minimum Standards for Boarding Schools (updated in May 2026) in this context.

Staff are trained to follow Safeguarding procedures and to recognise the importance of early intervention when there are welfare concerns. The School makes provision for teaching children to keep themselves safe, including online. The development of appropriate support structures for children who are struggling is key to ensuring that children receive the right help at the right time, with appropriate risk management where necessary. Robust systems for ongoing monitoring and review are essential to ensuring that there is continuity of care and a flexible approach where necessary, with the best interests of the child remaining firmly at the centre of our thinking. Our approach is founded on the Team around the Child (TAC) model, so as to ensure that information is shared appropriately between all who need to know.

Appropriate arrangements are in place to keep children safe where the School's facilities/premises are hired out to other organisations, including a requirement that such organisations have appropriate safeguarding policies and procedures in place. Any concerns are followed up robustly, in accordance with the School's own safeguarding procedures.

3. NATIONAL AND LOCAL FRAMEWORK

Safeguarding is a statutory responsibility. The School follows guidance in 'Keeping Children Safe in Education' (KCSIE) (Dept. for Education 2026) and is committed to working together in accordance with the guidance published in 'Working Together to Safeguard Children' (HM Government 2026). The School observes the Independent Schools Standards, the Boarding Schools National Minimum Standards (May 2026) and the requirements of the Early Years Foundation Stage.

As a 'relevant agency' working with the three statutory 'safeguarding partners' (Northamptonshire County Council, Northamptonshire Constabulary and NHS Integrated Care Northamptonshire) in response to 'Working Together to Safeguard Children 2026', the School is engaged in and contributes to multi-agency working, following local procedures published by the Northamptonshire Safeguarding Children Partnership: see Northamptonshire Children's Trust - A continuum of need.

4. THRESHOLDS FOR REFERRAL

If Staff have any concerns about a child's welfare, they should act on them immediately, following this Safeguarding Policy and referring to a member of the Safeguarding Team. The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care referring to Northamptonshire Children's Trust - A continuum of need.

Click on Contact details for Early Help support, the Multi-Agency Safeguarding Hub (MASH) and the Designated Officer at Northamptonshire Safeguarding Children Partnership. This information is published on the Safeguarding Guidance Posters for Staff which are displayed around the School and can be found at the start of this policy.

The LADOs can be contacted via LADOConsultations@NCTrust.co.uk
Andy Smith - 07850 854309 / Sian Edwards - 07738 636449 / Francesca Hamilton - 07443 348415

- LADO Referrals Indicator Matrix can be used to assess thresholds for LADO referrals/consultation.

- Concerns about children who have suffered or are likely to suffer significant harm are reported to Children's Services (or, if more appropriate, the Channel programme) immediately in accordance with the procedures outlined in this policy.

- Concerns about children who are in need of additional support from one or more agencies are dealt with via inter-agency assessment using local processes, including use of the Family Help Assessment (FHA) and Team around the Child (TAC) approaches. The School is committed to working with children and parents to ensure that early help and Family Help is accessed where necessary. Children and families will normally be involved in decisions about Family Help and the School will only engage voluntary services with their agreement. Consent to receive a service is separate from the School's responsibility to share relevant safeguarding and welfare information. While the School will always strive to work together with parents and pupils, where the statutory Information Sharing Duty applies, parental or pupil consent is not required for relevant information to be shared.

If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence ego obtaining forensic evidence. All concerns, discussions and decisions will be recorded in writing. Informing parents does not require seeking their consent to share the information with professionals who need to know.

The DSL will provide guidance on the appropriate action. Options will include:

- Managing any support for the child internally via the school's own pastoral support processes
- A Family Assessment or
- A referral for statutory services e.g. the child is or might be in need or suffering or likely to suffer significant harm

Family Help - If Family Help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Children 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; or a child who is disabled. The Local Authority is required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the *Children Act 1989*.

Children suffering or likely to suffer significant harm - Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the *Children Act 1989* if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital

mutilation or other so-called honour-based abuse, and extra-familial threats like radicalisation and sexual exploitation.

5. SAFEGUARDING GUIDANCE

All Staff, including those who do not work directly with children, are responsible for promoting and safeguarding the welfare of children and are expected to read Part 1 of 'Keeping Children Safe in Education' (Dept. for Education 2026).). Staff working directly with children should also read Annex A of 'Keeping Children Safe in Education' (Dept. for Education 2026).

All Staff are expected to be alert to the types of abuse and neglect defined in KCSIE Part 1, including physical abuse, emotional abuse and sexual abuse and exploitation; the signs and forms of abuse; and what to do if they have a concern. Further details are available in Sections 6 and 10 of this policy and on the Safeguarding Guidance Posters for Staff and Senior Pupils which can be found at the start of this policy and are displayed around the School. Further information can be found in 'What to do if you're worried a child is being abused: Advice for practitioners' (HM Government March 2015).

In addition to this Safeguarding Policy, the School issues guidelines to all Staff on the prevention of abuse through its Safeguarding Training Programme, Staff Code of Conduct, Pupil Behaviour Policy and the policies in the Safeguarding section of the Staff Handbook. Those Staff taking trips are required to take note of the School's Trips Policy and Procedures.

Guidance covers:

- The need for all Staff to be vigilant in spotting and reporting clear suspicions that abuse may be occurring.
- Avoidance of inappropriate physical contact between Staff and pupils (including where children are engaged in close one-to-one teaching, particularly in specialist music and sports provision).
- Avoidance of inappropriately spending time alone with individual pupils.
- Staff supervision of high-risk situations.

6. KCSIE 2026 - KEY INFORMATION ON ABUSE, NEGLECT AND SAFEGUARDING ISSUES

All Staff must be confident of the indicators of abuse and neglect, and the safeguarding issues that put children at risk of harm, as defined in Keeping Children Safe in Education (KCSIE 2026).

- **Core KCSIE Part 1 information is copied below.**
- **Further information on specific safeguarding issues is available in KCSIE 2026 Annex A.**
- **Details of selected specific safeguarding issues and the School's procedures for dealing with them are available in Section 10a of this Safeguarding Policy.**

Abuse and neglect and exploitation

21. All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

22. All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

23. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

24.~~.~~ All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non consensual making or sharing of nudes or semi-nudes, especially around 12 chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

25. ***In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or deputy.***

Indicators of abuse and neglect

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

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

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

29. Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, 13 including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a

specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

Safeguarding issues

31. ***All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:***

- ***drug taking and/or alcohol misuse***
- ***unexplainable and/or persistent absences from education***
- ***serious violence, criminal exploitation (including that linked to county lines), radicalisation, and***
- ***consensual and non-consensual making or sharing of nudes or semi nudes.***

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal – whilst non-consensual is illegal and abusive. UKCIS *provides detailed advice about sharing nudes and semi-nudes.*

Below are some safeguarding issues all staff should be aware of. ***Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex A.***

Child-on-child abuse

32. All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

33. All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse (whether these concerns are thought to have taken place on or off-site) they should speak to their designated safeguarding lead (or a deputy). As part of this, schools should also try to be alert to when children might be at highest risk around the school day (for example immediately after school).

34. It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

As well as knowing how to respond to concerns, all staff should know that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, staff should know that timely, evidence based support can be key to preventing children from going on to commit abuse or violence.

*35. **Child-on-child abuse** is most likely to include, but may not be limited to:*

• bullying (including cyberbullying, prejudice-based and discriminatory bullying),
• abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse'),
• physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),
• serious physical assault and harm, or the threat of harm with a weapon,
• sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence),
• sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse,
• causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
• consensual and non-consensual making or sharing of nudes and semi nudes, (UKCIS guidance: Sharing nudes and semi-nudes advice for education settings)
• upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
• initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

36. Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Child Criminal Exploitation (CCE)

37. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

38. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.

39. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

40. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

41. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media.

42. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network (the latter characterised by two or more individuals known/associated with one another and known to be involved in or facilitating the sexual abuse/exploitation). Most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Domestic Abuse

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

Female Genital Mutilation (FGM)

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

Mental Health

45. All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

46. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

- *significant changes in behaviour,*
- *ongoing difficulty sleeping*
- *withdrawing from social situation*
- *not wanting to do things they usually like, and*
- *physical signs of self-harm or neglecting themselves.*

47. Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. Schools and colleges should ensure that any interventions they offer are evidenced as safe and effective and appropriate for the need and phase of education.

48. If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow their child protection policy and speak to their designated safeguarding lead or deputy. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Serious violence

49. Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy). The designated safeguarding lead should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

50. Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff should be alert to signs that 19 a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be alert to when children might be at highest risk around the school day (for example, immediately after school). Further information on indicators, risk factors, and protective actions relating to serious violence is provided in Keeping Children Safe in Education Annex A.

51. Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support (practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) (the "what works" centre for preventing violence).

52. Designated safeguarding leads can find further guidance on referrals and when to contact the police in Annex B (Manage Referrals).

Additional information and support

53. Departmental advice What to do if you're worried a child is being abused: advice for practitioners provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect

are highlighted throughout that advice and will be particularly helpful for school and college staff. The NSPCC website also provides useful additional information on abuse and neglect and what to look out for.

54. Annex A contains important additional information about specific forms of abuse, exploitation, and safeguarding issues. School and college leaders and those staff who work directly with children should read Annex A.

It is School policy that all Staff read must read Part 1 and those staff working directly with children should also read Annex A of KCSIE.

7. SAFEGUARDING ROLES AND RESPONSIBILITIES

Governing Body

The Chairman of the Governors and the Governing Body are responsible for overseeing all aspects of Safeguarding in the School. The **Governor with specific responsibility for Safeguarding** is Suzanna D'Oyly. The Governing Body undertakes an annual review of the School's Safeguarding policies and procedures and of the efficiency with which the related duties have been discharged. Any deficiencies or weaknesses in child protection arrangements are remedied without delay.

Designated Staff

In addition to the Head, the following people have designated responsibility for Safeguarding at the School. The Designated Safeguarding Leads should always be available to discuss safeguarding concerns including, so far as is possible, in the holidays. In the exceptional circumstances that they are not available, Staff should not delay in taking appropriate action and should consider speaking to a member of the Leadership Team and/or take advice from Children's Services. Any action taken should be shared with the DSL as soon as possible.

- **Designated Safeguarding Leads (DSLs)**
  Robin Banerjee, Deputy Head Pastoral and Safeguarding at Oundle School
  Stacey Crump, Deputy Head at Laxton Junior School and DSL for the Early Years Foundation Stage

- **Deputy Designated Safeguarding Leads (DDSLs)**
  Louise Banerjee, Assistant Head Safeguarding at Oundle School
  Ben Raudnitz, Director of Safeguarding at Oundle School
  Fraser Harper, Deputy DSL at Laxton Junior School

- **Designated Staff at OS**
  Child Protection Officer: Rebecca Lowndes
  Proctor: Chris Quiddington

The Sports Centre has its own Safeguarding Team, led by the Sports Centre Manager Ed Tate who is trained to DSL level. He reports to the OS Director of Safeguarding and is accountable to the OS and LJS DSLs for:

- the development and operation of Safeguarding policy and procedures in the Sports Centre in accordance with School's Safeguarding Policy/ethos
- keeping DSLs and DDSLs fully informed/liaising as required to ensure a whole school approach to safeguarding matters
- notifying the Director of Safeguarding of all matters arising, and referring any pupil issues to the OS Safeguarding Team/ LJS DSL

The Sports Centre Deputy Managers (Sports and Courses Manager, Fitness Manager and Sales and Marketing Manager) are trained to CPO level.

Susie Raby acts as Designated Safeguarding Lead for **Oundle School Enterprises Ltd**. She works with the OS Designated Safeguarding Lead to ensure that the OSEL Safeguarding Charter and procedures are in line with School policy and information is shared where appropriate. Oliver Rees acts as the OSEL Deputy Designated Safeguarding Lead.

The School is committed to succession planning to ensure continuity for all Safeguarding roles.

Staff

All members of Staff, both teaching and support, have a duty to exercise professional curiosity and play an active role in ensuring the safety and promoting the welfare of the children in the School's care, teaching them to keep themselves safe, including online. This includes reporting 'low level' concerns. It is the duty of the IT Staff to ensure that internet access and electronic communication are as safe as possible through appropriate filtering and monitoring. Online safety is taught formally in Learning for Life and informally via tutorials and other interactions with Staff.

- See Appendix 1 for Designated Roles – Further Information
- See Appendix 2 for Safeguarding in the Early Years Foundation Stage
- See Appendix 5 for 'Low Level' Concerns

8. SAFER RECRUITMENT

The School operates safer recruitment procedures and, wherever possible, one member of the recruitment panel will be safer recruitment trained. Pre-appointment checks are carried out for all Staff working for or on behalf of the School (including volunteers, supply agency staff, contractors and organisations that support its pupils). This extends to ensuring that written confirmation is received that appropriate child protection checks and procedures have been carried out by the contractor/organisation providing personnel to the School. The School maintains a Single Central Record which is regularly inspected by the Heads of Oundle School and Laxton Junior School, the Bursar and the Governor with specific responsibility for Safeguarding.

Further information can be found in the School's Recruitment and Compliance Checks Policy and procedures.

9. SAFEGUARDING TRAINING

Designated Staff for Safeguarding

The Designated Staff receive training at a level appropriate to their role, which is refreshed every two years, and informal updates as necessary. Two yearly training for the DSLs and DDSLs is inter-agency training.

Staff, Volunteers, Contractors and Family Members of Staff Resident in Boarding Houses

All Staff working for and on behalf of the School (including temporary Staff and regular volunteers) need to have an awareness which is in keeping with their role of:

a. The kinds of issues which give rise to safeguarding concerns
b. The importance of identifying children who may need early help
c. The guidance for identifying child abuse

d. Their duty to report concerns and the referrals process
e. What to do if a child or adult makes an allegation of child abuse
f. The rules about confidentiality

All personnel under this heading, including the Head, receive training at a level appropriate to their role to ensure that they are aware of, understand and follow the School's Safeguarding procedures:

- **On Appointment**

  All Staff working for and on behalf of the School (including temporary Staff and regular volunteers) are directed to the following documents and required to read them:

1. Part 1 of 'Keeping Children Safe in Education' (Dept. for Education 2026). Those staff working directly with children should also read Annex A of 'Keeping Children Safe in Education' (Dept. for Education 2026).
2. Safeguarding Policy, which includes information about the identity and role of the DSLs and Deputy DSLs
3. Whistleblowing Policy
4. Staff Behaviour Policies
   - Staff Code of Conduct (and Contractors' Code of Conduct, where appropriate)
   - Technology Policy for Staff and Acceptable Use Policy for all Staff

5. Pupil Behaviour Policies
   - OS Promotion of Good Behaviour and Behaviour Management, and Countering Bullying and Cyberbullying Policy
   - LJS Behaviour Policy, and Countering Bullying and Cyberbullying Policy
   - OS Technology Policy for Pupils and Digital Rules (including Acceptable Use Policy) for Pupils
   - LJS Online Safety Policy, Bring your own Device Policy and Pupil Online Safety Charter

  Contractors, who are identified by the engaging department as requiring them, are issued with the above as appropriate to the site requirements and pupil contact level (with updates as appropriate).

  For Staff who are unable to access the material as a result of reading difficulties or because language is a barrier, steps are taken to ensure that they understand key information.

  Family members of Staff resident in Boarding Houses are required to sign an agreement confirming the nature of their role, in accordance with the requirements of the National Minimum Boarding Standards May 2026.

- **Induction**

  All Staff are required to pass an online training course prior to starting work (those whose roles involve pupil responsibility), or at the beginning of their employment (those whose roles do not involve pupil responsibility), with support from line managers and the Safeguarding team where necessary. This course includes Online Safety, Children Missing Education and Prevent.

  Face to face induction on arrival includes a safeguarding element tailored to individuals' roles to enable policies and procedures to be explained in context with the help of the OS and LJS Safeguarding Training Handbook. At Oundle School, the Academic Staff receive a face-to-face briefing from the Safeguarding team in their first two weeks, including a scenario-based training session designed to allow them to think

about how they will need to put their induction training into practice. Support Staff are briefed by their Line Managers with assistance from the Safeguarding Team where appropriate.

Induction training for Governors includes a face to face session with a DSL and a requirement to complete the September Update and Test which is set for the year in which they join the Governing Body. They also have the option to do the online course which is completed by the Staff if they wish.

Induction training for all Staff and Governors, includes a focus on online safety which, amongst other things, provides an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

Volunteers, contractors with and without pupil responsibility and non-employed family members of Staff resident in Boarding Houses also receive safeguarding induction training appropriate to their roles via induction materials and a test, with updates and refresher training as required in line with the training schedule for all Staff and Governors.

- **Updates and Refresher Training**

  Thereafter, all groups receive safeguarding (including online safety, with reference to filtering and monitoring) updates appropriate to their roles (by email and/or at meetings as required and at least annually) and three yearly refresher training. Their understanding is checked via online tests the results of which are logged.

- **Further Support**

  All Staff are encouraged to raise any queries and concerns with a member of the Safeguarding Team so that appropriate advice can be given and appropriate action taken.
  The Government's advice 'What to do if you're worried a child is being abused: Advice for practitioners' March 2015 and Northamptonshire Children's Trust - A continuum of need are also available.

Pupils

A list of contact details is published to all Oundle School pupils in case of problems or distress (including appropriate helplines outside the School). Senior pupils receive guidelines on Safeguarding procedures as part of Prefect Training. Oundle School has a well-established Countering Bullying Policy and Cyberbullying Policy which is to be read in conjunction with this policy.

- See Appendix 3 for contact details published to Oundle School pupils.

10. WHAT ALL STAFF NEED TO KNOW

All Staff must have regard to the indicators of abuse and neglect, and the safeguarding issues that put children at risk of harm, as defined in Keeping Children Safe in Education (KCSIE 2026).

- **Core KCSIE information is provided in Section 6 of this policy (in italics).**
- **Further information on specific safeguarding issues is available in KCSIE 202A Annex A.**
- **Details of selected specific safeguarding issues and the School's procedures for dealing with them are available in Section 10a below.**

(a) The kinds of issues which give rise to safeguarding concerns

Safeguarding concerns can arise for children and adults alike. Staff should recognise the vulnerability of children with SEN and disabilities, including to peer group isolation and child-on-child abuse. Staff should be alert to the fact that safeguarding incidents and/or behaviours can occur between children outside of the school environment. They can also be associated with factors outside the school and outside pupils' family environments. Please refer to Appendix 7 for guidance with regard to safeguarding adults.

If Staff have any concerns about a child's welfare, they should act on them immediately. They should not assume a colleague or other professional will take action. Staff should always share information as it could be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate support. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purpose of keeping children safe. Information sharing is not limited to cases where a child is suffering, or is likely to suffer, significant harm. Relevant information may also need to be shared to identify emerging needs, provide early support or promote a child's welfare. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. Queries about information sharing should be addressed to the Head of IT and Information Management, Lucy Waide. If in any doubt, Staff should speak to the Designated Safeguarding Lead and/or a Deputy DSL, and follow the School's Safeguarding policy and procedures.

Early Intervention

Any children may benefit from extra pastoral support but Staff should be particularly alert to the potential need, as identified in 'Keeping Children Safe in Education' (Dept. for Education 2026), for early intervention or **Family Help** for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

Information about specific safeguarding issues is included in 'Keeping Children Safe in Education' (Dept. for Education 2026) Part 1 which all staff are required to read and in Annex A which staff directly

involved with pupils should read. In particular, Staff at Oundle are advised to be aware of and alert to these issues and to report concerns promptly so that they can be followed up appropriately. Further information is available from the Safeguarding Team.

Guidance for Staff

Information on a wide range of safeguarding issues can be found in Keeping Children Safe in Education (Dept. for Education 2026) including, but not limited to:

- **Child-on-Child Abuse (including sexual violence and sexual harassment between children)**

  The following systems are in place to help minimise the risk of child-on-child abuse:
  - close monitoring of children's wellbeing
  - professional curiosity and vigilance from all Staff
  - developmentally appropriate PSHE and RSE curriculum which develops pupils' understanding of acceptable behaviour and keeping themselves safe
  - robust risk assessments where appropriate
  - linked policies in place

  The pastoral network encourages the building of trusting relationships between Staff and pupils in order to encourage children to raise concerns promptly. The School seeks feedback from pupils on any locations or times of day where they may feel vulnerable. This feedback is sought formally and informally on an ongoing basis so as to inform assessment of risk and planning for the protection of all children in School and beyond, both on- and off-line.

  All child-on-child abuse is unacceptable and will be taken seriously. It can be motivated by sexual, racial, gender or other discrimination, and staff should recognise that it is more likely that girls will be victims and boys perpetrators. Whatever form it takes, there is a zero-tolerance approach to child-on-child abuse which must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. It is most likely to include, but may not be limited to:

  - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  - abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
  - serious physical assault and harm, or the threat of harm with a weapon
  - sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
  - sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
  - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - consensual and non-consensual making or sharing of nudes and semi nudes
  - upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

The threshold for dealing with any issue of pupil behaviour under the Safeguarding Policy is when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. The key issues identifying the problem as abuse (rather than an isolated instance of bullying or 'adolescent experimentation' which would be anticipated to be within normal bounds in the school community) are:

a. The frequency, nature and severity of the incident(s)
b. The ages and relative ages of the pupils involved
c. Whether the victim was coerced by physical force, fear or by a pupil or group of pupils significantly older than him or her, or having power or authority over him or her
d. Whether the incident involved a potentially criminal act, and whether if the same incident (or injury) had occurred to a member of Staff or other adult, it would have been regarded as assault or otherwise actionable.

All allegations and disclosures of child-on-child abuse are received, recorded, investigated and dealt with in accordance with the School's Safeguarding, Countering-Bullying and Disciplinary Policies, and other relevant national and local guidance. Appropriate support is provided for victims, perpetrators and peers via the Pastoral Team, Emotional Wellbeing Team, with priority placed on the voice of the child and risk assessments undertaken where necessary as part of this process. Where there is an online element, a key consideration is for Staff not to view or forward illegal images of a child. The School's Searching and Confiscation Policy provides further advice on this issue.

Listening to the voice of the child is an important factor when considering the School's response to incidents of child-on-child abuse, but confidentiality cannot be promised if a crime has been committed or there is reason to believe that a crime might have been committed. In these situations the School may be required to report to external authorities in line with safeguarding guidance.

Discriminatory Attitudes and Behaviour

Awareness raising regarding the equality and diversity agenda is a priority aim at OS and LJS. The issues identified by the Black Lives Matter and Everyone's Invited movements in society have highlighted the need for these things to be talked about so that all members of the community are aware of the unacceptability of discriminatory attitudes and behaviour and of their own unconscious bias. A whole school approach is vital to allow all involved to feel secure and able to participate in the dialogue.

Sexual Violence and Sexual Harassment

Reports of sexual violence, sexual harassment and harmful sexual behaviour (HSB) are dealt with by the DSLs in the best interests of the child. HSB may include the use of sexually explicit words and phrases, inappropriate touching, using sexual violence or threats and any other harmful sexual activity. The starting point is that there is zero-tolerance for sexual violence and sexual harassment and that they will not be tolerated.

Reports are dealt with in in accordance with Department for Education guidance and local procedures. National guidance includes:

- Keeping Children Safe in Education (2026) Part 5 'Child-on-child sexual harassment and sexual violence' which includes detailed definitions and examples for reference when dealing with cases
- UKCIS guidance on Sharing nudes and semi-nudes: how to respond to an incident (also included at Appendix 4)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (also linked in Appendix 8)
- When to call the Police Guidance for Schools and Colleges (National Police Chiefs' Council).

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them. All Staff are trained to maintain an attitude of 'it could happen here'.

The School will consult with the Police and other agencies as necessary to establish reporting thresholds, adopting a no names approach initially in situations where a discussion is needed. Options for managing reports include:

a. management internally e.g. through behaviour and bullying policies with the provision of pastoral support
b. offering early intervention or Family Help to prevent escalation of harmful behaviours into sexual violence (this can be provided via a multi-agency approach)
c. offering early intervention or Family Help to provide support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.
d. referral to children's social care (where a child has been harmed or is at risk of harm or in immediate danger)
e. reporting to the police in parallel with a referral to children's social care (where a report of rape, assault by penetration or sexual assault is made)

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

- **Mental Health Concerns**

Mental health concerns can be indicators that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. The School's Director of Health and Emotional Wellbeing and/or the Lead Counsellor advise staff on how best to support children when concerns are identified: Staff are not expected to be mental health experts nor are they responsible for diagnosing concerns. The School sees mental health concerns (e.g. anxiety, low mood, eating disorders, self-harm) as safeguarding issues, and support is provided through the OS Pastoral Support Committee and Child Protection and Welfare Group process and the LJS pastoral framework. This work is conducted in liaison with the Emotional Wellbeing Team and external agencies as appropriate.

- **Online Safety**

KCSIE 2026 confirms that:

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk (known as the '4 Cs'):

- ***content:*** *being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories, In*
- ***contact:*** *being subjected to harmful online interaction with other users or generative AI applications that simulate this; 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, including those generated using AI and online bullying, and*
- ***commerce:*** *risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).*

The School's online safety policy is set out in its Technology Policies and Acceptable Use Policies for Staff and Pupils which are to be read in conjunction with the Staff Code of Conduct and pupil behaviour policies. The School's approach to online safety is co-ordinated by the Online Safety Groups at Oundle School and Laxton Junior School. The Pupil Pastoral Forum Digital Ambassadors are members of the OS Online Safety Group and the LJS Digital Leaders work alongside the LJS Online Safety Lead. Filtering and monitoring systems are in place on the School network and these are overseen by the Digital Strategy Committee and subject to regular review. In addition, a review is carried out annually by the member of LT with responsibility for filtering and monitoring (DSL) with support of IT staff. This review includes checks that filtering is working appropriately on all sanctioned internet connected devices in all relevant locations and a record is kept of these checks. Online safety is included in the curriculum at all levels and information is provided to parents/carers. Mechanisms are in place to identify, intervene in, and escalate any incident where appropriate. All Staff are expected to be aware of the School's online safety policies, in particular the arrangements for filtering and monitoring on the School network, and what to do if they have concerns/where to go for further help. Pupils' understanding and experience is monitored informally in discussion with pupils and more formally via

- the Learning for Life programme and the Oundle Survey (OS)
- PSHE and Computing lessons, and PASS and Online Safety Surveys (LJS)

Further information can be found at:
Internet matters – information for parents – https://internetmatters.org
Childline - for support - https://www.childline.org.uk/get-support/
UK Safer Internet Centre - to report or remove harmful content - https://reportharmfulcontent.com/
CEOP – advice on making a report about online abuse - https://www.ceop.police.uk/safety-centre

The use and management of devices including mobile phones can be found within the School's Digital Rules.

- **Sharing nudes and semi-nudes**

Incidents involving the sharing of nudes and semi-nudes are dealt with in accordance with national guidance and local procedures.

In the latest **advice for schools and colleges** (UKCIS, 2024), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This

could be via social media, gaming platforms, chat apps or forums and could involve AI generated imagery, deep fakes, impersonations and AI facilitated abuse. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year-olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention:

Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately.

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

➢ See Appendix 4 for Sharing nudes and semi-nudes: how to respond to an incident; and Appendix 8 for Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS)

- **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity or criminal activity. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

Staff are expected to be vigilant to any signs that children might be suffering from CSE or CCE and to report any concerns to the DSL. Further information about these forms of abuse is available in 'Keeping Children Safe in Education' (Dept. for Education 2026).

- **Radicalisation/Extremism**

The School assesses the risk of pupils being susceptible to radicalisation or drawn into terrorism or other extremist activity on an ongoing basis, training Staff and educating pupils in order to identify individual children who may be at risk and protect them. The DSLs oversee and coordinate the School's implementation of the Prevent Duty, which is fully integrated into the School's recruitment procedures.

Further information can be found in the School's Prevent Duty Policy, including the procedure for dealing with any concerns, whether these are handled internally or reach the threshold for an external

referral to Children's Services or the Channel programme.

- **FGM Duty to Report**

  All Staff are made aware of the mandatory duty effective from 31 October 2015 for teachers and regulated health and social care professionals to report **known** cases of FGM (Female Genital Mutilation) in under 18s which they identify in the course of their professional work to the police. 'Known' cases are those where either a girl informs the person that an act of FGM – however described - has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

  All Staff should report any concerns immediately to the Designated Safeguarding Lead who will follow the procedures set out in the Home Office document 'Mandatory Reporting of Female Genital Mutilation – procedural information' (October 2015). The Designated Safeguarding Lead will also have regard to the HM Government document 'Multi-agency statutory guidance on female genital mutilation' (July 2020) and the Department of Health document 'Female Genital Mutilation Risk and Safeguarding – Guidance for Professionals' (May 2016).

  Alternatively, Staff may report direct to the police and, if appropriate, to Children's Services, informing the DSL immediately if they follow this route. **Suspected** or **at risk** cases or cases relating to girls aged 18 or over should be discussed with the DSL who will follow the School's normal Safeguarding procedures and involve Children's Services as appropriate.

- **Children Missing Education (CME)**

  The School follows the procedures laid out in 'Keeping Children Safe in Education' (Dept. for Education 2026) and 'Children Missing Education' (Dept. for Education statutory guidance for local authorities September 2025), following OS and LJS protocols for passing on information to the Local Authority and other schools where necessary with regard to all leavers. In accordance with the requirements of KCSIE 2026, where reasonably possible the school holds more than one emergency contact number for each pupil.

  The School is vigilant to the possibility that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation – particularly county lines. An early response to this issue can help to identify these issues and prevent a child from becoming a child missing education in the future.

- **Looked After Children (LAC)**

  The School is committed to meeting the needs of Looked After Children, including ensuring that Staff are appropriately trained to fulfil their responsibilities and keep them safe. A previously looked after child potentially remains vulnerable, and the School will work with other agencies as necessary to ensure that prompt action is taken when necessary to safeguard their welfare.

- **Private Fostering**

  The School is required to notify any local authority in whose area a child is residing of any private fostering arrangements. Private fostering happens when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made by a parent and a carer for 28 days or more. Close relatives are defined as step-

parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity).

- **Domestic Abuse**

  The School is committed to working in partnership with Northamptonshire County Council and Northamptonshire Police to identify and provide appropriate support for pupils who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass. In order to achieve this, Northamptonshire County Council will share with the Designated Safeguarding Lead(s), police information relating to domestic incidents where one of the School's pupils has been affected. On receipt of any information, the Designated Safeguarding Lead(s) will decide on the appropriate support the child requires.

  All information sharing and resulting actions will be undertaken in accordance with the Northamptonshire Safeguarding Children Partnership protocols at https://www.northnorthants.gov.uk/attendance-behaviour-and-home-schooling/domestic-abuse-and-young-missing-persons-notifications. The School will make an appropriate record and store this information in accordance with the record keeping procedures outlined in this policy.

- **Further Safeguarding Issues**

  Other areas in which the School is required to be vigilant include (but are not limited to) cases of neglect, serious violence including involvement with criminal networks or gangs and county lines activity, so-called 'honour-based' abuse and all other issues identified in 'Keeping Children Safe in Education' (Dept. for Education 2026) and/or which may result in harm for a child.

  Honour-based abuse includes FGM (see above) and forced marriage. 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.

  Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure, and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

  Staff are expected to be familiar with the specific forms of abuse and safeguarding issues identified in 'Keeping Children Safe in Education' (Dept. for Education 2026) Part 1 under Safeguarding Issues with further information available in Annex A.

(b) The importance of identifying children who may need early intervention

Staff are advised to contact a member of the Safeguarding Team if they have concerns about children who may be in need of early intervention so that support can be provided and issues addressed. A pre-emptive approach is desirable to prevent smaller issues turning into bigger problems.

Information on early intervention , prevention and statutory services for everyone working with children is available in Northamptonshire Children's Trust - A continuum of need.

Staff should always bear in mind that additional barriers can exist when recognising abuse and neglect in pupils with special educational needs (SEN) and disabilities. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviour in schools or colleges or the consequences of doing so
- The school is also alert to the needs of children who are gay, lesbian, bisexual or gender questioning

The School takes account of individuals' particular needs in the development of its support structures for these children. Any reports of abuse involving such children will therefore require close liaison with the DSL (or deputies) and the SENCO.

(c) The guidance for identifying child abuse

Significant harm can take a variety of forms. It could be physical, emotional or sexual abuse, or it could also manifest as neglect (e.g. failing to act to prevent harm to a child). Sometimes a number of issues may present at the same time. Examples may include:

- Abuse by an adult or adults
- Abuse by another child or children (child-on-child abuse)
- Abuse by people known to or not known to the child
- Real world settings – in a family, institution or community
- Virtual world settings – e.g. via gaming platforms or social media sites

(d) Staff's duty to report concerns and the referrals process

The School has a duty to refer information to Children's Services if it is believed or suspected that a child is suffering or is likely to suffer significant harm. Any such referral must be made as soon as possible when any concern of significant harm becomes known, and the greater the level of perceived risk, the more urgent the action should be. The suspicion or allegation may be based on information which comes from different sources. It may relate to a single incident or an accumulation of lower level concerns. When in doubt, concerns must be shared.

The procedures for reporting concerns are set out below:

Concerns about a child

Staff (including volunteers) working for or on behalf of the School are required to report any concerns about a child suffering or being at risk of suffering significant harm (whether in or outside the School) to a member of the Safeguarding Team **on the same day**.

<table>
<tr><th></th><th>Oundle School</th><th>Laxton Junior School</th></tr>
<tr><td rowspan="2">Concerns about a child (incl. Child-on-child abuse)</td><td>Refer to a member of the Safeguarding Team at OS or, in their absence, to the DSL or DDSL at LJS</td><td>Refer to DSL or DDSL or, in their absence, to a member of the Safeguarding Team at OS</td></tr>
<tr><td colspan="2">If the concern relates to harm perpetrated by someone else, do not inform that person</td></tr>
</table>

The DSL will assess the situation and make a decision about whether to take advice/make a referral to Children's Services, or specialist services or early help services in accordance with the thresholds set by the Northamptonshire Safeguarding Children Partnership. If the DSL or a Deputy DSL is not available, Staff should not delay taking appropriate action and should consider speaking to a member of the Leadership Team and/or taking advice from Children's Services. Any member of Staff can make a referral direct to Children's Services, but they should inform the DSL as soon as possible so that an appropriate course of action can be agreed. Staff must not agree confidentiality with the child and must always act in the best interests of the child.

The School will always take into account the child's wishes and feelings when determining what action to take and what services to provide to protect individual children, through ensuring that there are appropriate systems in place for children to express their views and give appropriate feedback. If, following a referral, a child's situation does not appear to be improving, the DSL (or the person who made the referral) should press for re-consideration to ensure that the concerns have been addressed, and, most importantly, that the child's situation improves.

If a child is **in immediate danger or left alone**, the police should be contacted directly (999) and/or an ambulance called (999) where there is need of medical assistance. If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Services (0300 126 7000) and/or the police immediately. Anyone can **make a referral.** Parental consent is not required for referrals to statutory agencies.

The DSLs at Oundle School and Laxton Junior School keep confidential records of all concerns, discussions, decisions and reasons for those decisions made with regard to safeguarding issues. These records are reviewed regularly so that concerning patterns of behaviour can be identified.

Concerns about another Staff member

Staff working for or on behalf of the School (including volunteers and trainee teachers) are required to report any concerns about other Staff members as follows. A concern about a member of Staff is defined as follows:

- if there is a concern that the behaviour of a member of Staff has or may put a child at risk of significant harm; or
- if there has been a breach, or a suspected breach of School policy which relates to the safeguarding of children; or
- if it is reported to a member of Staff that there has been a breach of School policy which relates to the safeguarding of children.
- This includes low-level concerns (see Appendix 5).

Further information is in the School's Whistleblowing Policy.

	Oundle School	**Laxton Junior School**
Concerns about a member of Staff (incl.	Report directly to Head of OS or in his absence to the DSL (DDSL if it is about DSL)	Report directly to Head of LJS or in her absence to DSL (DDSL if it about DSL)
	Do not inform the person about whom the concern has been raised	

DSL) or Volunteer	Head of OS will inform Chairman of Governors, Suzanna D'Oyly, Governor with specific responsibility for Safeguarding and contact Designated Officer at the Northamptonshire Safeguarding Children Partnership immediately to discuss, consider and agree a course of action. https://northamptonshirescp.org.uk/working-with-children-professionals/designated-officer-lado Andy Smith - 07850 854309 / Sian Edwards - 07738 636449 / Francesca Hamilton - 07443 348415	Head of LJS will inform Head of OS who will follow the procedure to the left
Concerns about the Head of OS/LJS	Report directly to Chairman of Governors	
	Do not inform Head of OS or LJS	
	Chairman of Governors will inform Governor with specific responsibility for Safeguarding and Designated Officer at Northamptonshire Safeguarding Children Partnership (see above)	
Note	Staff may consider discussing any concerns with the DSL and may make any report via them.	

- See Appendix 5 for further information about 'Low Level' Concerns
- See Appendix 6 for information on Referrals Procedure and the School's Duty to Report

(e) What to do if a child or adult makes an allegation of child abuse

- Staff receiving an allegation of child abuse should:
    - Limit any questioning to the minimum necessary to seek clarification only
    - Stop asking any more questions as soon as the pupil or adult has disclosed that he or she believes that something abusive has happened to him or her, or to someone else
    - Strictly avoid 'leading' the pupil or adult who has approached them
    - Only ask questions of the 'Tell me what has happened' type
    - **Not** make suggestions or introduce their own ideas about what may have happened
    - **Not** ask questions like 'Did s/he do x to you?'

- Staff should then:
    - Tell the informing pupil or adult that they will now make sure that the appropriate people are brought in to follow up the problem
    - Ask them what steps they would like to be taken to protect them now that they have made an allegation, assuring them that the School will do their best to follow their wishes
    - Make a written record as soon as possible of what you have been told, using the child's words as far as possible
    - Refer the matter the same day, with all relevant details, to a member of the Safeguarding Team, the Head or the Governor with specific responsibility for Safeguarding in accordance with the procedures in section 5(d)

- If this cannot be done, contact Children Services direct

Contact details for Family Help support, the Multi-Agency Safeguarding Hub (MASH) and the Designated Officer at Northamptonshire Safeguarding Children Partnership are at: Contact Details

(f) The rules about confidentiality

Staff must never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something serious. They should however guarantee that:

- They will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem
- They will never tell anyone who does not have a clear 'need to know. Information will only be shared with those who require it for a safeguarding or welfare purpose. Only information that is relevant, necessary and proportionate will be shared.
- They will take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made

Staff must not publicly speculate about any allegation of (or hint of) criminal offence against an employee and must not respond to any request from the media, pupils, parents or the public for statements, either written or verbal. Any such requests must be directed to the Deputy Head Admissions who will agree the wording of any statement with the Head or Bursar.

(g) Avoiding poor practice

It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and Child Safeguarding Practice Reviews (formerly serious case reviews) have repeatedly shown the dangers of failing to take effective action. Examples of poor practice include

- Failing to act on and refer the early signs of abuse and neglect
- Poor record keeping
- Failing to listen to the views of the child
- Failing to re-assess concerns when situations do not improve
- Not sharing information with the right people within and between agencies
- Sharing information too slowly
- A lack of challenge to those who appear not to be taking action

11. ALLEGATIONS: PROCEDURES

Members of the School do not investigate serious allegations of child abuse themselves:

- These are always reported to Children Services and, if necessary, the police, and externally managed.
- Alleged victims, perpetrators, those reporting abuse and others involved will not be interviewed by members of Staff beyond the point at which it is clear that there is an allegation of abuse.
- The interviewing of children and adults involved will be carried out by specially trained Staff only, following procedures in line with government requirements and in the light of the recommendations of past inquiries into the handling of child abuse issues.
- When a serious allegation is made against a member of Staff then the School will report it, and any findings following investigation, to the Disclosure and Barring Service (DBS) and, if appropriate, the Teaching Regulation Agency even if the School has ceased to use that person's services.

Allegations against other children are dealt with in accordance with the School's Safeguarding policy and procedures:

- The School takes whatever steps are necessary to safeguard the welfare of all pupils in these circumstances, with an awareness of the specific needs of pupils in the boarding environment.
- Consideration is given to whether the personal circumstances of the alleged perpetrator or any outside influences may have had an impact on their behaviour.
- Advice is sought from Children's Services if necessary and outcomes effected internally or by referral to external bodies as required.
- Appropriate support, tailored to the needs of the children involved, is put in place for both victims and perpetrators of child-on-child abuse.

In the event of an allegation against a child:

- The parents of the alleged perpetrator(s) should be told about the allegation as soon as possible if they do not already know of it.
- However, where a strategy discussion is required, or police or Children's Services need to be involved, they should not be informed until those agencies have been consulted and have agreed what information can be disclosed.
- Parents or carers should be kept informed about the progress of the case, including the outcome of any disciplinary process, in all cases where there is not a criminal prosecution. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed.
- Parents and carers should also be made aware of the prohibition on reporting or publishing allegations against teachers. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be advised to seek legal advice.

Reviewer – Oundle	RB
Reviewer – LJS	SMC
Post of Reviewer (s)	DSLs
Review Date	31 August 2026
Reviewed and filed with both Schools	1 September 2026
Next Review (1 year)	31 August 2027

Appendix 1 Designated Roles – Further Information

Governing Body Responsibilities

Governing Body responsibilities are set out in full in KCSIE 2026 Part 2 – The Management of Safeguarding.

In summary, these responsibilities include:

- **Legislation and the law**
  - Governors must have regard to the relevant guidance, ensuring policies, procedures and training are effective and comply with the law at all time
  - Governors should have a senior board level (or equivalent) person to take leadership responsibility for their school's safeguarding arrangements
  - Governors should ensure that **all** governors receive appropriate safeguarding training at induction, with regular updates, to equip them with the knowledge to provide strategic challenge to test and assure themselves that policies and procedures are effective and support the delivery of a robust whole school safeguarding approach.
  - Governors should be aware of their obligations under the Human Rights Act 1998 (explained in KCSIE), the Equality Act 2010 (including the Public Sector Equality Duty) (explained in KCSIE), and their local multi-agency safeguarding arrangements.

- **Whole school approach to safeguarding**
  - This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
  - All systems, processes and policies should operate with the best interests of the child at their heart
  - Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide
  - Systems should be in place for children to express their views and give feedback

- **Safeguarding policies and procedures**
  - Governors should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare
  - This includes (but is not limited to)
    - An effective child protection policy, which meets the requirements set out in KCSIE, is reviewed annually (as a minimum) and is available on the school website
    - A behaviour policy which includes measures to prevent bullying (including cyberbullying)
    - A staff behaviour policy which should include acceptable use of technologies, staff/pupil relationships and the use of social media
    - Appropriate safeguarding arrangements to respond to children who go missing from education
    - The provision of these policies to all staff on induction
    - The taking of a risk-based approach to the level of information that is provided to temporary staff and volunteers
    - Ensuring that:
      - child protection files are maintained in accordance with the guidance in KCSIE Annex B
      - appropriate safer recruitment procedures in accordance with Part 3 of KCSIE are in place, embedded and effective
      - where reasonably possible that schools hold more than one emergency contact number for each pupil

- **The Designated Safeguarding Lead**
  - Governors should ensure an appropriate senior member of the School Leadership Team is appointed to this role
  - This person should take lead responsibility for safeguarding and child protection (including online safety – including taking the lead on understanding the filtering and monitoring systems and processes in place in the school)
  - Responsibilities and requirements for training and availability are defined in KCSIE Annex B

- **Multi-agency working**
  - Governors should ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2026, and liaising with the three safeguarding partners and other agencies in line with Working Together to Safeguard Children 2026
  - They should understand the local criteria for action and the local protocol for assessment and be prepared to supply information as requested by the three safeguarding partners

- **Information sharing**
  - Schools have clear statutory duty, under section 16LA of the Children Act 2004 to share, hold and use information to identify and tackle all forms of abuse and neglect, and promote children's welfare, including their educational outcomes
  - Governors should recognise the importance of information sharing between practitioners and local agencies, and ensure that relevant staff have due regard to the relevant data protection principles which allow them to share (and withhold) personal information as provided for in the Data Protection Act 2018 and the GDPR
  - This legislation does not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children
  - The requirement to share information includes the transfer of any child protection file in accordance with the criteria in KCSIE to support children's transition should they leave the school

- **Staff training**
  - Governors should ensure that all staff undergo safeguarding training (including an understanding of online safety expectations, roles and responsibilities around filtering and monitoring systems) at induction and via regular updates (at least annually) as part of a whole school approach
  - Training should be in line with advice from the three local safeguarding partners and integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning
  - Staff should be provided with the opportunity to contribute to and shape safeguarding arrangements and the child protection policy

- **Opportunities to teach safeguarding**
  - Governors should ensure that children are taught to keep themselves and others safe, including online, with education tailored to the specific needs and vulnerabilities of individual children
  - This links with the mandatory requirement for schools to teach Relationships Education (primary) and Relationships and Sex Education (secondary)
  - Governors should ensure that there is a whole-school approach to preventative education, with clear values and standards underpinned by the School's behaviour policy, pastoral support system and a planned and inclusive programme of Relationships Sex and Health Education which tackles at age-appropriate stages issues such as:
    - healthy and respectful relationships
    - boundaries and consent
    - stereotyping, prejudice and equality

        - body confidence and self-esteem
        - an understanding of gender questioning
        - how to recognise an abusive relationship, including coercive and controlling behaviour
        - the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and what constitutes harmful sexual behaviour, sexual harassment and sexual violence, including sexism and misogyny, why these behaviours are always unacceptable, and the importance of early identification and intervention to prevent escalation

- **Online Safety**
    - There should be a whole school approach to online safety, to protect and educate pupils and staff in their use of technology and establish mechanisms to identify, intervene in and escalate concerns where appropriate
    - Online safety policy and education should consider the four areas of risk defined in KCSIE: content, contact, conduct and commerce
    - There should be a clear policy on the use of mobile and smart technology and appropriate communications with parents when children are accessing remote education so that parents are aware of what their children are being asked to do online
    - Governors should ensure that their school has appropriate filtering and monitoring systems in place to limit children's exposure to risk on the school's system and regularly review their effectiveness.
        - They should ensure that the Leadership Team and relevant Staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
        - They should consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.
        - They should review the Department for Education's filtering and monitoring standards and discuss with the IT Staff and service provider what needs to be done to support the School in meeting the standards
    - The School should have the appropriate level of security protection procedures in place to safeguard their systems, staff and pupils and review the effectiveness of these procedures annually by relevant Leadership Team staff to keep up with evolving cyber-crime technologies, including the safe use of generative artificial intelligence. The Department for Education has published: Generative AI: product safety expectations, to support this.

The Governor with specific responsibility for Safeguarding is Suzanna D'Oyly (07866 475657)**. She is responsible for:**

- Meeting with the Designated Safeguarding Leads at Oundle School and Laxton Junior School regularly (at least once a year)
- Receiving updates on Safeguarding matters and discussing matters arising
- Ensuring that Governors are kept informed of issues and developments in an appropriate manner to enable them to fulfil their Safeguarding responsibilities
- Keeping up to date through training at least every two years

The Governing Body undertakes an annual review of the School's Safeguarding policies and procedures and of the efficiency with which the related duties have been discharged including swift remediation of any deficiencies.

School Responsibilities

Head

The Head is responsible for ensuring that the policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by Staff.

Role Descriptions for Designated and Deputy Designated Safeguarding Leads

The role of the DSLs for Oundle School and LJS is defined in Annex B of 'Keeping Children Safe in Education' (Dept. for Educ. 2026).

The DSLs are expected to undergo training to help them understand the risks associated with online safety. They are expected to take the lead on understanding the filtering and monitoring systems and process in place in the School. They should recognise the additional risks children with SEN and disabilities can face online. They should also understand relevant data protection legislation and regulations and the importance of information sharing, both within school and with other agencies, organisations and practitioners.

The DSL is required to keep detailed, accurate, secure written records of all concerns, discussions and decisions make including the rationale for those decisions. This should include instances where referrals were or were not make to another agency such as LA children's social care or the Prevent program.

The DSL at Oundle School manages the work of the Assistant Head Safeguarding and the Director of Safeguarding, OS DDSLs and liaises with the School's Leadership Team, Director of Health and Emotional Wellbeing, Director of Human Resources, DSL at LJS and Governor with specific responsibility for Safeguarding to ensure that the School's Safeguarding responsibilities are discharged. This includes leadership of the School's Online Safety Group as outlined in Annex B of the School's Technology Policy for All Staff and liaison with the DSL for Oundle School Enterprises Limited as required.

The DSL at Laxton Junior School manages the work of the LJS DDSL and liaises with Oundle School team and the Governor with specific responsibility for Safeguarding to ensure that the School's Safeguarding responsibilities are discharged.

The DSLs at Oundle School and Laxton Junior School will have regard to the Information Sharing Duty when considering if information to be shared. This will include consideration as to whether the information is relevant to safeguard or promote the child's welfare, would help another organisation assess a child's need/risk, provide support or assist in decision making for support of a child.

Role Description for OS Assistant Head Safeguarding and DDSL

Responsible to: Deputy Head Pastoral and Safeguarding (Designated Safeguarding Lead)
Responsible for: Director of Safeguarding (DDSL)

Job Purpose

The Assistant Head Safeguarding (DDSL) provides operational leadership for safeguarding within the strategic framework established by the Deputy Head Pastoral and Safeguarding (DSL). This includes overseeing safeguarding systems, procedures, and training to ensure the practice is robust, consistent, and reflects current statutory guidance. The AHS is responsible for providing line management and quality assurance for safeguarding delivery across the School, ensuring that safeguarding practice is effective and timely.

The Assistant Head Safeguarding (DDSL) plays a central role in assessing thresholds for pupil casework, determining appropriate levels of intervention, and directing action plans. They maintain oversight of these plans, ensuring that they are monitored and regularly reviewed.

As a member of the Leadership Team, the postholder will report to the Deputy Head Pastoral and Safeguarding (DSL) and work closely with the Assistant Head Pastoral (AHP). As a Deputy DSL, they will also line manage the Director of Safeguarding. The postholder will work more broadly with the Senior Deputy Head (DDSL), the Proctor, the IT Technical Design & Project Lead (DSL (level 3) trained) and designated Staff at LJS and in the School's Enterprises and Sports Centre Safeguarding Teams.

Duties and Responsibilities

Safeguarding Leadership and Compliance

- Support the Designated Safeguarding Lead (DSL) in leading and embedding a strong safeguarding culture across the School.
- Monitor, review and develop safeguarding systems, procedures and policies to ensure compliance with statutory requirements and best practice.
- Support governance arrangements through regular liaison with Safeguarding Governors and contribution to safeguarding reports and policy reviews.
- Work collaboratively with senior leaders and operational teams to ensure a coordinated approach to pupil welfare and safeguarding.
- Assist with safeguarding aspects of inspections and regulatory compliance.
- Line manage designated safeguarding staff and support their professional development.

Casework, Child Protection and Early Intervention

- Lead on safeguarding casework, ensuring timely assessment, intervention, monitoring and review of concerns.
- Coordinate a Team Around the Child approach to support vulnerable pupils.
- Consult with the DSL regarding referrals and act as the primary liaison with external agencies, including Children's Social Care and the Police, where appropriate.
- Undertake and review risk assessments, safety plans and support arrangements for vulnerable pupils.
- Provide safeguarding advice and guidance to parents and carers where required.

Training, Awareness and Safeguarding Culture

- Promote a culture in which pupil voice, professional curiosity and the reporting of concerns are encouraged.
- Support staff to understand and fulfil their safeguarding responsibilities.
- Coordinate and monitor safeguarding training programmes for staff, governors, volunteers, contractors and other relevant adults.
- Ensure safeguarding training requirements, including induction, refresher and role-specific training, are met.
- Deliver safeguarding training as required and maintain accurate training records.
- Contribute to pupil safeguarding education and awareness programmes.
- Gather and evaluate feedback from pupils and staff to support continuous improvement of safeguarding practice.

Record Keeping, Monitoring and Online Safety

- Oversee safeguarding recording systems to ensure records are accurate, secure, timely and compliant with data protection requirements.
- Monitor online safety systems, including filtering and monitoring reports, identifying risks and coordinating appropriate follow-up actions.
- Analyse safeguarding data to identify trends, patterns and emerging concerns.
- Ensure the secure transfer of safeguarding records when pupils join or leave the School and fulfil relevant notification requirements.

Partnership Working and External Liaison

- Work effectively with staff, parents, carers and external agencies to coordinate support for vulnerable pupils.
- Ensure safeguarding considerations are embedded across educational, co-curricular, boarding, admissions and partnership activities.
- Collaborate with DSLs and DDSLs across the School to promote consistent safeguarding practice and shared learning.
- Maintain effective relationships with safeguarding partners, local networks and other schools.
- Ensure compliance with data protection legislation and School policies relating to information sharing and record management.

Role Description for OS Director of Safeguarding and DDSL

Responsible to: Deputy Head Pastoral and Safeguarding (Designated Safeguarding Lead)
and the Assistant Head Safeguarding
Responsible for: Child Protection Officer

Job Purpose

The Director of Safeguarding works under the Designated Safeguarding Lead (DSL) to manage safeguarding practice and procedures at Oundle School (OS). He or she acts as a Deputy Designated Safeguarding Lead for OS and works with the DSLs at OS and LJS and the Sports Centre to ensure that safeguarding policies and procedures are operated and aligned in all areas of the School.

Duties and Responsibilities

Leadership and Management

- working closely with the OS DSL to ensure that safeguarding policy and procedures are properly discharged, regularly reviewed and compliant with regulatory requirements
- line-managing the work of the Child Protection Officer, providing training and guidance in relation to the management of their casework
- working with the Sports Centre DSL on the evolution of safeguarding policy and procedures in the Sports Centre, to ensure that this is aligned and joined up with school practice, providing training and advice as required
- liaising with DSLs at LJS and other schools as appropriate
- contributing to the development plan for safeguarding in line with the School's strategic aims, with a focus on embedding safeguarding ever deeper into the culture
- chairing the Child Protection and Welfare Group and keeping centralised records
- providing advice to the Leadership team and other staff as appropriate

- ensuring that safeguarding record keeping procedures are in place and followed
- assisting with preparation for Inspection on safeguarding matters
- attending meetings and acting as a member of interview panels as required

Casework

- overseeing the management of all cases on the School's safeguarding register
- working with Hsms, CPO, medical professionals, colleagues, parents and external agencies where necessary to ensure that support for vulnerable children is strategically managed, coordinated and appropriately recorded
- instigating and advising on action plans, monitoring progress, providing guidance, training and challenge as necessary, pending sign off with a recorded outcome
- developing strategies for interventions in or across peer groups, whether in-House or across Houses, and directing and coordinating the enactment of strategy pending outcomes/resolution
- conducting investigations into safeguarding concerns and reporting on findings,
- providing individualised risk assessments and targeted interventions for pupils and staff where appropriate
- responding to safeguarding queries or concerns from internal or external parties, keeping the DSL informed of outcomes as appropriate
- managing the process of sharing child protection and welfare information with other schools and (where applicable) universities in accordance with published protocols

Working together

- working with the Deputy Head Pastoral and Safeguarding, Assistant Head Safeguarding, Assistant Head Pastoral, Director of Health and Emotional Wellbeing and Head of Learning for Life to ensure that pastoral care and education are informed by the School's safeguarding casework
- liaising with the Deputy Head Pastoral and Safeguarding to provide support to the Director of Health and Emotional Wellbeing to develop strategies to promote positive mental health in the School (the Director of Health and Emotional Wellbeing reports to the Deputy Head Pastoral and Safeguarding)
- working with the Local Authority Safeguarding team and other agencies as required to promote and safeguard the welfare of children
- liaising with the Governor with responsibility for Safeguarding and providing regular updates for the Governors on casework and other safeguarding matters

Training

- keeping up to date through training
- training the pastoral team in safeguarding awareness, reporting, risk assessment, thresholds and pathways policy and procedures
- managing the development and delivery of the School's wider safeguarding induction and refresher training programme
- liaising with the Director of Teaching and Professional Development on staff INSET as appropriate

The Director of Safeguarding will also

- act to support the designated member of staff to promote the educational achievement of children who are looked after, working through Hsms and Tutors to achieve this
- ensure appropriate safeguarding responses to children who go missing from education settings, particularly on repeat occasions, to help identify any risk of abuse and neglect and to help prevent the risk of their going missing in future

Role Description for LJS DDSL

The Deputy Designated Safeguarding Lead (DDSL) reports to the Designated Safeguarding Lead (DSL), who has ultimate lead responsibility for child protection and safeguarding at Laxton Junior School. The DSL can delegate some aspects of their role, as outlined below, to an appropriately trained Deputy but this lead responsibility lies with the DSL and cannot be delegated.

The role of the DDSL for Laxton Junior School involves the same set of responsibilities as the DSL; these are defined in Annex B of 'Keeping Children Safe in Education' (Department for Education 2026) and should be considered the basis of the DDSL job description.

First response and ultimate responsibility, however, lies with the DSL. The DDSL should only assume these responsibilities in the absence of the DSL but should provide support and advice to the DSL and Staff when required.

At Laxton Junior School, the DSL manages the work of the DDSL; the Laxton Junior School safeguarding team should liaise with the Head of Pastoral Care at Laxton Junior School, the Oundle School Safeguarding team, the School's Director of Health and Emotional Wellbeing, and the Governor with specific responsibility for Safeguarding; this is to ensure that the School's Safeguarding responsibilities are discharged.

Annex B of 'Keeping Children Safe in Education' details the DDSL's responsibility, alongside the DSL, towards managing referrals, working with others, training themselves and others, raising awareness, supporting transition and ensuring availability. Additional to this set of responsibilities, the DDSL at Laxton Junior School should ensure the following responsibilities, specific to our School context, are discharged as part of their role and in conjunction with the DSL.

Manage referrals

- Take responsibility for safeguarding and child protection matters in the absence of the DSL
- Provide support to the DSL when they are managing disclosures, investigations or referrals

Work with others

- Attend weekly meetings with the DSL to ensure information is shared and that the implementation of the Safeguarding Policy and procedures is consistent
- Attend monthly meetings with the DSL, Head of Pastoral Care and the Head of Laxton Junior School to ensure community support is discharged effectively
- In conjunction with the DSL, liaise, at least half-termly, with the Oundle School Safeguarding team to ensure the Safeguarding Policy procedures are implemented consistently across the Oundle School Corporation
- Attend termly meetings with the Governor with specific responsibility for Safeguarding to ensure that the School's safeguarding responsibilities are discharged

Supporting Transition

- Support the transition of safeguarding and welfare information from and to Laxton Junior School in accordance with published protocols

Availability

- Be available to discuss safeguarding concerns at all times during School hours and, when the DSL is out of school, ensure that the safeguarding responsibilities are discharged

Online Safety

- As well as the responsibilities listed in Annex B of 'Keeping Children Safe in Education' and those listed above, the DDSL is the Online Safety Lead for Laxton Junior School and the Chair of the Online Safety Group. Where there is a safeguarding disclosure or concern that is related to online safety, this would be the DSL's responsibility to investigate but would require the support and guidance of the DDSL in their capacity as Online Safety Lead.

The responsibilities for the Online Safety Lead role are listed below:

- Lead monthly meetings of the Online Safety Group
- Develop an online safety action plan
- Ensure policies and procedures that incorporate online safety concerns are in place
- Ensure the whole school community is aware of what is considered to be safe and appropriate online behaviour
- Liaise with the local authority, and other local and national bodies as appropriate
- Work with the Laxton Junior Leadership Team and IT Department to ensure appropriate filtering and monitoring is in place.
- Report any safeguarding concerns related to online safety to the DSL immediately and support their investigation
- Ensure that online practice is in line with current legislation
- Implement online safety training for all members of Staff
- Liaise with Staff to ensure that online safety is embedded throughout the curriculum
- Promote the responsible use of technology and empower children to keep themselves safe online
- Actively engage with national events to promote positive online behaviour
- Engage with parents and carers to ensure they understand their responsibility towards keeping children safe online
- Keep up-to-date with current research, legislation and trends, and access appropriate training to ensure knowledge and skills are regularly refreshed
- Evaluate the delivery of the School's Online Safety Policy and procedures
- Report on online safety to the DSL, Laxton Junior School Leadership Team and the Governing Body
- Liaise, at least termly, with the Oundle School Online Safety Group

Role Description for OS Child Protection Officer

Responsible to: Director of Safeguarding (who acts as one of the School's Deputy Designated Safeguarding Lead)

Job Purpose

The Deputy Head Pastoral and Safeguarding oversees the management of all Child Protection and Safeguarding issues in the School, as the Designated Safeguarding Lead. The CPO works closely with the Director of Safeguarding who takes immediate line management responsibility for the day to day safeguarding casework in the School.

The CPO should be the first point of access for safeguarding issues, complaints or allegations. They are responsible for contacting the Director of Safeguarding promptly with a written summary of all safeguarding issues that they encounter. Having agreed the strategy for dealing with the case, they are then responsible for ensuring that the correct procedure is followed for making sure that all relevant parties liaise as appropriate and for monitoring progress and keeping accurate records. They are required to keep the Director of Safeguarding fully informed on progress, taking advice as necessary, and ensuring that there are appropriate arrangements in place for monitoring and review until the case is signed off as completed.

As part of the School's Safeguarding Training Programme, the CPO is responsible for delivering Safeguarding Training as required. They attend regular management meetings with the Director of Safeguarding and the meetings of the Child Protection and Welfare Group. They are expected to liaise with the Hsms, Health Centre and Emotional Wellbeing Team and others as appropriate as part of their casework. They are also expected to support the Director of Safeguarding with the administration of safeguarding work; for example, updating training materials, maintaining intranet pages, collating case information, preparing welfare correspondence and sharing information appropriately with those who need to know.

The Designated Child Protection Officer has a role with:

Policy

- Holding and being conversant with current local and national safeguarding procedures and inter-agency working.
- Keeping up to date through training. It is a requirement for the staff with designated responsibility for safeguarding that this takes place at least every two years.
- Informing and keeping abreast of the School's annual reviews of its Safeguarding Policy.
- Advising, on the basis of their day-to-day experience in the job, on any areas which need attention when it comes to the development of policies and procedures to safeguard children.
- Ensuring that any deficiencies or weaknesses in safeguarding policy and procedures are remedied without delay through the Designated and/or Deputy Designated Safeguarding Lead.

Raising Awareness

- Promoting and developing safeguarding awareness with all involved in the School's pastoral care system.
- Briefing and guiding academic and support staff and senior pupils on safeguarding matters, and playing an active part in the School's safeguarding training programme, details of which are outlined in the Safeguarding Policy. All staff must receive induction training prior to starting work, with updates at least annually and refresher training at least every three years.
- Ensuring that staff know where to find the Safeguarding Policy and procedures and that their importance is understood.

Referrals

- Liaising with external agencies on safeguarding matters as directed by the Director of Safeguarding and/or Designated Safeguarding Lead.

Appendix 2 Safeguarding in the Early Years Foundation Stage

This appendix should be read alongside the School's wider safeguarding arrangements and associated policies. The requirements of Section 3 of the Early Years Foundation Stage Statutory Framework for Group and School-Based Providers are implemented through this policy and the School's wider policies and procedures, including those relating to safer recruitment and staff suitability, whistleblowing, attendance, first aid and medical needs, allergies, behaviour and restrictive intervention, SEND, intimate care, online safety and electronic devices, health and safety, risk assessment and educational visits. These policies apply to EYFS provision as appropriate.

The Designated Safeguarding Lead for the EYFS is the School's Designated Safeguarding Lead. The DSL and Deputy DSLs are identified at the beginning of this policy.

The School takes all necessary steps to keep EYFS children safe and well. Staff working within the EYFS are required to remain alert to concerns relating to a child's welfare at home, within school or elsewhere and must follow the safeguarding procedures set out in this policy.

Safeguarding concerns and allegations

Concerns about the safety or welfare of an EYFS child must be acted upon without delay in accordance with this policy, local safeguarding procedures, *Working Together to Safeguard Children* and *Keeping Children Safe in Education 2026*.

Any safeguarding concern or allegation concerning a member of staff, volunteer, contractor or other adult working with children will be managed in accordance with Part Four of *Keeping Children Safe in Education 2026*, including consultation with or referral to the Local Authority Designated Officer (LADO) where appropriate and any regulatory reporting requirements applicable to the School.

Safeguarding training and supervision

All EYFS practitioners receive safeguarding training in accordance with the EYFS statutory framework and *Keeping Children Safe in Education*. Safeguarding training is provided at induction and practitioners are supported to understand and implement the School's safeguarding procedures. EYFS safeguarding training is renewed at least annually, with safeguarding updates provided throughout the year.

Appropriate supervision arrangements are in place for staff who have contact with children and families. Supervision provides opportunities to discuss children's development and wellbeing, safeguarding concerns, professional practice and any support or training required.

Attendance and absence

The School follows up unexplained and prolonged absence from the EYFS promptly and in our line with our Attendance Policy.

Paediatric first aid

At least one person holding a current full Paediatric First Aid certificate is on the premises and available at all times when EYFS children are present and accompanies EYFS children on outings. The School considers the number and deployment of qualified staff to ensure that a paediatric first aider can respond promptly in an emergency.

Accidents, injuries and first aid treatment are recorded and parents/carers informed on the same day, or as soon as reasonably practicable.

The School will notify the appropriate local safeguarding agency of any serious accident or injury to, or death of, a child while in its care and will act upon any advice received. Any additional statutory or regulatory notification will be made where applicable.

Supervision, premises and collection

EYFS children are adequately supervised. Children will always remain within sight or hearing.

Children are released only to individuals authorised by their parent/carer. The School operates procedures, including named adults and where appropriate passwords, to verify collection arrangements. Reasonable steps are taken to prevent unauthorised access to the premises and to verify the identity of visitors.

The School regularly assesses and manages risks within the EYFS environment and undertakes appropriate checks of indoor and outdoor provision. Written risk assessments are completed where appropriate.

Food, allergies and safer eating

Information about dietary requirements, food allergies, intolerances and relevant health needs is obtained from parents/carers and shared with relevant staff.

Known allergies and intolerances are managed in partnership with parents/carers and, where appropriate, healthcare professionals through appropriate allergy action plans.

EYFS children are appropriately supervised whilst eating and remain within sight and hearing of staff. A member of staff holding a current full Paediatric First Aid certificate is present in the room whilst EYFS children are eating.

Restrictive Intervention, including reasonable force

Any physical or restrictive intervention involving an EYFS child is undertaken only where permitted by law and in accordance with the School's Restrictive Intervention, including Reasonable Force Policy. Every occasion on which physical intervention is used is recorded and parents/carers are informed on the same day, or as soon as reasonably practicable in line with our policy.

Mobile phones, cameras and electronic devices

The School's policy governing mobile phones, cameras and other electronic devices with imaging and sharing capabilities applies to all EYFS provision.

Staff must not use personal devices to photograph, video or otherwise record children. School-owned devices provided for educational use are appropriately secured and used in accordance with the School's data protection, online safety and safeguarding procedures. Loss of any device containing or capable of accessing information or images relating to pupils must be reported immediately in accordance with School procedures.

Personal mobile phones belonging to staff working in the EYFS must be stored securely away from children during working time. Any exceptional use in an emergency must be in accordance with the School's policy and approved by the Head/Deputy.

Visitors, volunteers and contractors must comply with the School's requirements concerning mobile phones, cameras and recording devices.

Children's use of technology

In accordance with the EYFS statutory framework, the School has regard to the Department for Education's guidance on screen use in early years settings. Technology is used purposefully, appropriately and safely and does not unnecessarily displace high-quality interaction, physical activity, play or other developmentally appropriate experiences.

Other EYFS welfare requirements

The School ensures that staffing arrangements and ratios meet the statutory EYFS requirements; that appropriate intimate care and toileting arrangements are in place; that emergency evacuation arrangements are understood by staff; and that banned dog breeds prohibited under section 1 of the Dangerous Dogs Act 1991 are not kept or present on premises used for EYFS provision.

Appendix 3 Contact details published to Oundle School pupils

Pastoral Care

In addition to your Hsm, Tutor and Matron you can seek assistance at any time from any member of Staff including the following:

The Chaplaincy		**01832 275360**
The Revd Maria Coulter	meac@oundleschool.org.uk	07734 962673
Fr Joachim Foot	jpwf@oundleschool.org.uk	
The Health Centre and Clayton Rooms		
	healthcentre@oundleschool.org.uk	**01832 277200 (HC) / 277334 (CR)**
Director of Health & Emotional Wellbeing		
Mrs Natalie Jarvis	njarvis@oundleschool.org.uk	
Lead Nurse		
Mrs Karen Shepherd	kshepherd@oundleschool.org.uk	
Lead Counsellor		
Mrs Molly Holmes	mholmes@oundleschool.org.uk	
Deputy Head Pastoral & Safeguarding		
Mr Robin Banerjee *(DSL)*	rb@oundleschool.org.uk	07731 022409 / 01832 277113
Assistant Head Pastoral		
Mr Adam Langsdale	ael@oundleschool.org.uk	01832 277119
Assistant Head Safeguarding		
Mrs Louise Banerjee *(DDSL)*	jllb@oundleschool.org.uk	07595 200222 / 01832 277331
Director of Safeguarding		
Mr Ben Raudnitz *(DDSL)*	br@oundleschool.org.uk	01832 277284
Child Protection Officer		
Mrs Rebecca Lowndes	rll@oundleschool.org.uk	
Proctor		
Dr Chris Quiddington	cjq@oundleschool.org.uk	
Laxton Junior School		
Ms Stacey Crump	smc@laxtonjunior.org.uk	07845 526372
Mr Fraser Harper	fh@laxtonjunior.org.uk	07725 165064
Wyatt House Friend	Mrs Tessa Curtis	01832 720578

The **Head** and **Senior Deputy Head** are available to see pupils on request. Help can also be sought from the following:

Independent Person		
Mrs Gill Kissane	gill.kissane@googlemail.com	07870 821036
Childline		0800 1111
Northamptonshire Children's Trust – Young Northants		0300 126 1000
The Samaritans		116123
ISI		020 7600 0100
Children's Commissioner Help at Hand Service		0800 528 0731
www.childrenscommissioner.gov.uk		

Appendix 4 Advice for schools: Sharing nudes and semi-nudes: how to respond to an incident

Sharing nudes and semi-nudes: how to respond to an incident

An overview for all staff working in education settings in England

UK Council for Internet Safety

This document provides a brief overview for frontline staff of how to respond to incidents where nudes and semi-nudes have been shared.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies.

The DSL or equivalent should refer to the full 2024 guidance from the UK Council for Internet Safety (UKCIS), **Sharing nudes and semi-nudes: advice for education settings working with children and young people**, for managing incidents.

What do we mean by sharing nudes and semi-nudes?

In the latest advice for education settings (UKCIS, 2024), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. Nudes and semi-nudes can be shared online via social media, gaming platforms, chat apps, forums, or involve sharing between devices using offline services. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nudes are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention

Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately. Your setting's child protection policy should outline codes of practice to be followed.

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal**.[1]
- If you have already viewed the imagery by accident (e.g. if someone has shown it to you before you could stop them), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

[1] In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent).

Appendix 5 'Low-level' Concerns

'Low-level' Concerns

The School aims to encourage, create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour set out in the Staff Code of Conduct are lived, monitored and reinforced constantly by all Staff. Such a culture

- enables the identification of inappropriate, problematic or concerning behaviour early
- minimises the risk of abuse and
- ensures that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the School.

A 'low level' concern is defined as one that does not, in the view of the Designated Safeguarding Lead, reach the threshold whereby a child is considered to be at risk of significant harm. Further information can be found in KCSIE 2026:

What is a low-level concern?

426. The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.*

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

- *being over friendly with children*
- *having favourites*
- *taking photographs of children on their mobile phone, contrary to school policy*
- *engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or*
- *humiliating pupils.*

426. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

427. Low-level 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.

428. It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Sharing low-level concerns

Staff are encouraged to share all low-level concerns, however small, so that appropriate action can be taken. This approach protects children and staff alike and enables the values of the School to be upheld in a safe working environment for all.

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

Low-level concerns should be shared with the Head either directly or via the DSL. If the concern has been raised via a third party, the Head or a nominated deputy should collect as much evidence as possible by speaking

- directly to the person who raised the concern, unless it has been raised anonymously and
- to the individual involved and any witnesses

The information collected will help to categorise the type of behaviour and determine what further action may need to be taken to respond to and/or remedy the situation. This information needs to be recorded in writing along with the rationale for decisions and action taken.

Low-level concerns should not be included in references unless they relate to issues that would normally be included in a reference, for example, misconduct or poor performance. Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference unless they (individually or collectively) meet the harm threshold for referral to the LADO and are found to be substantiated.

Appendix 6 Determining Thresholds, Referrals Procedure and the School's Duty to Report

Determining Thresholds

When a concern is reported, the threshold it reaches is considered, with advice being taken from the Designated Officer (DO) at the Local Authority if necessary. If further investigation is required to establish the threshold, then this will be undertaken.

The outcome may be that this is a low-level concern, or that no further action is needed, but it is better to investigate and establish the right threshold than to fail to respond to a case which turns out to represent a safeguarding issue. No further action for safeguarding does not preclude a disciplinary response if the Staff Code of Conduct has been breached, and disciplinary proceedings and grounds for concern over pupils' welfare may be based on 'balance of probability', rather than 'beyond reasonable doubt'.

In cases where a member of Staff resigns following an allegation, the investigation should still be concluded and, if the threshold is met, any findings reported to the DBS.

In some circumstances the School may need to consider an allegation against an individual not directly employed by the School, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures; for example, supply teachers or contracted staff provided by an employment agency or business. When using a supply agency, the School will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. As part of any investigation the agency's Human Resource manager or equivalent will be invited to meetings and the School will keep them up to date with information about its policies.

Referrals Procedure

On receiving an allegation of abuse, the Designated Staff, Head or Governor with specific responsibility for Safeguarding, should:

- Take any steps needed to protect any pupil involved from risk of immediate harm. This may involve allocating an appropriate member of Staff, as far as possible a person chosen by the pupil him/herself to stay with him or her. An inspector receiving an allegation of abuse at the School may stay with the pupil concerned until suitable arrangements for his/her protection are made.

- Not interview or investigate the allegation further. Immediate contact should be made with the DO(s) to discuss any allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. GDPR cannot be allowed to stand in the way of safeguarding children. Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed. Schools must consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. Schools should give due weight to the views of the LADO, *KCSIE* and *WT* when making a decision about suspension. Records concerning allegations of abuse must be preserved for the term of the Independent Inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

- Agree next steps in relation to:

    - Informing a pupil's parents. (It may be inappropriate to inform parents immediately when an allegation has been made.)
    - Any need for medical examination or treatment for the pupil.

- Immediate protection that may be needed for a pupil who has been the victim of abuse, a pupil who has given information about abuse, and a pupil against whom an allegation has been made, as any of these may now be at risk.
- Informing other appropriate people at the School (including any other members of Staff) of the allegation and its investigation. Care should be taken at this stage, as knowledge of an allegation or impending investigation can lead to a serious risk of the alleged perpetrator 'covering up' evidence that may be sought by police or putting pressure on others to remain silent. However, it is also very important that the legal requirement to protect the anonymity of any employee facing an allegation is preserved – the School needs to strike a balance between these two, ensuring its overriding duty to safeguard the welfare of pupils is not compromised.
- Informing the placing authority, if there is one.

Contacting the Designated Officer will initiate an independent investigation if this proves to be necessary, and the Designated Officer will arrange, within pre-set time limits, the involvement of the relevant specialist police personnel and if necessary a meeting of the agencies who may need to be involved, together with the School.

[NB The local authority should make a decision about the course of action to take within one working day of the referral being made and Staff should follow up on the referral if no response or information is received in this timescale.]

- Inform the pupil or adult who made the initial allegation of what the next steps are to be, having agreed these with the Designated Officer. It may be helpful for the call to the Designated Officer to be made while the pupil or adult is waiting, so that he or she can be told the likely next steps immediately after the call. If this is not possible the pupil or adult should be told the next step as soon as possible after the call.

- Inform the Head (unless he is the subject of any of the allegations or suspicions) of the allegation and the action taken as above, and agree necessary further action in line with these standards.

- In the event of an allegation being made against a member of Staff working for or on behalf of the School (including volunteers), the Head will follow the procedures in the guidelines for the Leadership Team prepared by the HR Department. The Head will consider the facts carefully and review all options (e.g. redeployment of member of Staff, moving pupil) before making any decision to suspend an employee (pending investigation) who is alleged to have abused a pupil or pupils. The decision to suspend should be based on firm grounds such as the accused could impede an investigation, there is a continued threat of harm or the allegations are so serious that they are likely to be grounds for dismissal. If suspension is deemed necessary, the rationale and justification for such an action must be agreed between the School and the Designated Officer, and must include the alternatives considered and why they were rejected.

- Take any necessary steps for the longer term protection and support of each pupil who has made allegations of abuse, or is alleged to have suffered from abuse, taking his or her wishes fully into account. This may involve the pupil receiving continuing support and protection from a Staff member chosen by him/her, or changing boarding accommodation, or returning to his/her parents temporarily.

- Take any necessary steps to protect and support a pupil who is alleged to have abused another. The allegation may not later be substantiated, but even if it is, the School continues to have a statutory welfare responsibility towards this pupil while he/she is at the School. Ensure that any pupil being interviewed by the police has available a supportive member of Staff of his/her own choice to accompany him/her if this becomes necessary.

- Take any necessary steps to support a member of Staff against whom an allegation has been made, in addition to protecting their anonymity, for example, offers of external counselling and appropriate reasonable support (including medical) could be considered.

- Notify the Designated Officer of the action taken, as soon as possible. Fulfil obligations to notify the Disclosure and Barring Service (DBS) and, if appropriate, the Teaching Regulation Agency. Ensure co-operation and information sharing by and with the School in any subsequent investigation by the Children's Services or Police.

- Make arrangements where feasible for any pupil who has been the subject of abuse to receive any necessary continuing counselling and support, by agreement with his/her parents where appropriate.

The School's Duty to Report

The School has a duty to refer information to the Disclosure and Barring Service (DBS) if it is clear that a person has harmed, or poses a risk of harm, to a child or vulnerable adult. The School will report any individual who is barred from working with children who has tried to work in any capacity at the School. The School is committed to report to the DBS within one month of leaving the school any person (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. Reports should include as much evidence about the circumstances of the case as possible. The School also agrees to supply information about individuals to the DBS as and when requested to do so.

Professional misconduct cases should be referred to the appropriate regulatory body (the Teaching Regulation Agency) as well as any dismissal for serious misconduct i.e. misconduct of a type which may call into question whether an employee is fit to work in the education sector in the future and where a Prohibition Order may be appropriate. The Teaching Regulation Agency's guidelines on the types of misconduct which should be referred are:

- unacceptable professional conduct
- conduct that may bring the profession into disrepute
- conviction of a relevant offence
- where an individual resigns to avoid being dismissed in such circumstances

The duty on the School is to consider whether a referral should be made. If the School decides that a referral is not necessary, then the rationale for this decision should be recorded and retained by the School in the event that the Teaching Regulation Agency request the information.

Dealing with such matters is complex and the leadership team need to strike the balance between providing support to the member of Staff, investigating such matters thoroughly and fairly, and ensuring that their overriding duty to safeguard the welfare of children is not compromised.

Childcare Disqualification Requirements

The Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (reviewed 2022) state that it is an offence for the School to employ anyone in connection with early years provision (**EYP**) or later years provision (**LYP**) who is disqualified, or for a disqualified person to be directly involved in the management of EYP or LYP.

Full details about Childcare Disqualification are contained in the Recruitment Policy and Compliance Checks Procedures. However, in summary, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria, then the School must inform Ofsted.

Appendix 7 Safeguarding Adults

Abuse occurs when any individual including vulnerable adults is mistreated, neglected or harmed by another person who holds a position of trust. Everyone has a right to feel safe, and to live without fear of abuse, neglect, harassment or exploitation. Abuse can take many forms and can take place anywhere.

This policy applies both to employees or other adults with whom the School comes into contact via a variety of routes. Examples include the School's links with:

- Feeder schools both in the UK and abroad
- Oundle Society and Old Oundelian Club
- Community Partnerships
- Community Action Partners
- Lets and Enterprise
- Other schools or groups visiting Oundle School or Laxton Junior School

Any concerns relating to abuse of adults working at the School or with whom the School comes into contact should be brought to the attention of the Designated Safeguarding Lead for OS or LJS promptly so that they can be acted upon in an appropriate way. The School will refer to its employment policies in such situations, taking advice from external agencies if necessary.

The School's commitment to safeguarding children and adults is outlined in the OS and LJS Information for Visitors leaflets. These are distributed to adults who come into contact with the School for a variety of purposes and available on the School websites.

Appendix 8 Key Documents

Staff working for or on behalf of the School (including volunteers) should read the School's Safeguarding Policy in conjunction with the following documents which are linked in the Staff Handbook:

Guidance and advice:

- 'Keeping Children Safe in Education' 2026
- Data Protection in Schools Toolkit
- 'What to do if you're worried a child is being abused' (HM Government March 2015)
- Northamptonshire Children's Trust - A continuum of need
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (HM Govt and UKCIS 2024)
- Sharing nudes and semi-nudes: how to respond to an incident (UKCIS 2024)
- The Prevent duty: Departmental advice for schools and childcare providers (DfE 2023)
- NSPCC guidance on Harmful Sexual Behaviour and Brook Traffic Light Tool
- When to call the Police Guidance for Schools and Colleges (National Police Chief Council 2020)
- Working Together to Safeguard Children
- Information Sharing Duty

School policies:

- Staff Code of Conduct, Whistleblowing Policy, Health and Safety (including Risk Assessment) and Data Protection Policy for Parents and Pupils
- See also other Staff Handbook Policies including:

Oundle School	Laxton Junior School
• Countering Bullying and Cyberbullying • Pupil Absence and Missing Pupil Procedure • Pupil Welfare • Supervision of Boarders • Learning for Life (PSHE) • Relationships and Sex Education • Educational Support • Technology Policy for all Staff • School Rules (inc Digital Rules and Acceptable Use Policy) • Staff IT Acceptable Use • Attendance of Boarders • Promotion of Good Behaviour and Behaviour Management • Searching and Confiscation • Child Protection and Welfare Group • Educational Visits and Expeditions • Pupil Equality and Diversity • School Medical Routine and Arrangements • Medicines Management Policy • Prevent Duty • Physical Interventions and Restraint • Photography Filming & Publication of Images • Complaints • Visitor Control (inc Visiting Speakers and Houses) • Site Map with Visitor and Safeguarding Information • Recruitment Policy and Compliance Checks Procedures	• Countering Bullying and Cyberbullying • Early Years Foundation Stage • Missing Child • Supervision of Children • Learning for Life • Relationships and Sex Education • Computing • Technology Policy for all Staff • Online Safety, Bring your own Device and Pupil Online Safety Charter • Staff IT Acceptable Use • Photography Filming & Publication of Images • Attendance • Behaviour • Prevent Duty • Restrictive interventions, including use of reasonable force • Allergy Safety • Administering Medicines Learning Support and EAL • Educational Visits • Equal Opportunities and Disability • First Aid • Information for Visitors • Cameras and Mobile Phones • Complaints • Recruitment and Compliance Checks Policy and safer recruitment procedures