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.

Please refer to Section 12 for information on COVID-19 arrangements. This section replaced the COVID Addendum to the Safeguarding Policy.

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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 (abridged version also available for reference at Annex A) and Annex B.

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/DSL OS	Director of Safeguarding/Deputy DSL OS	Deputy Head/DSL LJS	Deputy DSL LJS
Daviona Watt	Ben Raudnitz	Stacey Crump	Fraser Harper
01832 277113	01832 277284	01832 277308	01832 277275
dlw@oundleschool.org.uk	br@oundleschool.org.uk	smc@oundleschool.org.uk	fh@oundleschool.org.uk

Designated Child Protection Officers (CPOs) for Oundle School:

Tabitha Dorman	Louise Banerjee	Rebecca Lowndes	Lorna Page
tad@oundleschool.org.uk	jllb@oundleschool.org.uk	rll@oundleschool.org.uk	ljp@oundleschool.org.uk

Proctor (CPO)

Stephen Heath
srh@oundleschool.org.uk

Sports Centre Safeguarding Team:

Sports Centre Manager & DSL	Operations Manager & CPO	Fitness Manager & CPO	Sales & Marketing Manager & CPO	Sports & Courses Manager & CPO
Sally Dayus	Ed Tate	Nichola Crowley	Ana Levitt	Jamie Stevens
sdayus@oundleschool.org.uk	etate@oundleschool.org.uk	ncrowley@oundleschool.org.uk	alevitt@oundleschool.org.uk	jstevens2@oundleschool.org.uk

September 2023

Your Safeguarding Training - key things to remember

Be Aware of the latest developments in Safeguarding	**Early Help** 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/or her Deputy, and follow the School's Safeguarding policy and procedures. All Staff should know about the Northamptonshire Safeguarding Children Partnership (NSCP) Thresholds Guidance 2022 document which is available from the Safeguarding Team if they feel a child is in need of early help. Link: https://www.nctrust.co.uk/help-and-protection-for-children/Documents/NSCP%20Thresholds%20Guidance%20review%20FINAL%2011-4-2022.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: • Child-on-child abuse incl. (cyber)bullying, physical or sexual abuse/harassment, initiation type violence/rituals • Mental health issues • Youth produced sexual imagery/ nudes and semi nudes (images and/or videos) • Child sexual exploitation • Radicalisation/extremism • Domestic abuse, teenage relationship abuse, serious violence • FGM/forced marriage/'so-called' honour-based violence • Children missing education/private fostering Further details are available in the School's Safeguarding Policy and in Keeping Children Safe in Education Part 1 (abridged version also available for reference at Annex A) and Annex B.
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 SafeguardingChildren Partnership.** • Contact details for Early Help support, the Multi-Agency Safeguarding Hub (MASH) and the Designated Officers are accessible via these links: Link: www.nctrust.co.uk/help-and-protection-for-children/Pages/report-a-concern.aspx Link: www.northamptonshirescb.org.uk/health-professionals/taking-action/designated-officer **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 Director of Communications who will agree the wording with the Head or Bursar.	

September 2023

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/DSL
Mrs Watt
01832 277113
dlw@oundleschool.org.uk

Director of Safeguarding/ Deputy DSL
Mr Raudnitz
01832 277284
br@oundleschool.org.uk

Designated Child Protection Officers (CPOs)

Ms Dorman
tad@oundleschool.org.uk

Mrs Banerjee
jllb@oundleschool.org.uk

Mrs Lowndes
rll@oundleschool.org.uk

Dr Page
ljp@oundleschool.org.uk

Proctor (CPO)

Mr Heath
srh@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 Help** 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 Early Help and refer concerns to Hsms or a member of the Safeguarding Team for advice.	**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 incl. (cyber)bullying, physical or sexual abuse/ harassment, initiation type violence/rituals • Mental health issues • Youth produced sexual imagery/nudes and semi nudes (images and/or videos) • Child sexual exploitation • Radicalisation/extremism • Domestic abuse, teenage relationship abuse, serious violence • FGM/forced marriage/'so-called' honour-based violence • Children 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 • 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 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 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 September 2022) 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 2023) and is committed to working together in accordance with the guidance published in 'Working Together to Safeguard Children' (HM Government July 2018). The School observes the Independent Schools Standards, the Boarding Schools National Minimum Standards (September 2022) 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 Northamptonshire Clinical Commissioning Groups) under new arrangements introduced in September 2019, in response to 'Working Together to Safeguard Children 2018', the School is engaged in and contributes to multi-agency working, following local procedures published by the Northamptonshire Safeguarding Children Partnership: see Northamptonshire Safeguarding Children Partnership Thresholds Guidance 2022.

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 Safeguarding Children Partnership Thresholds Guidance 2022](#).

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. See also: http://www.northamptonshirescb.org.uk/schools/referrals-eha/designated-officer/ (01604 364031/ 01604 367862/ 01604 362633).

- 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 Early Help Assessment (EHA) and Team around the Child (TAC) approaches. The School is committed to working with children and parents to ensure that Early Help is accessed where necessary. If children or parents refuse to consent to an EHA, the School will assess the situation and make decisions as appropriate, taking advice from Children's Services if this is felt necessary.

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
- An Early Help 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

Early Help - If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. 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 are responsible for promoting and safeguarding the welfare of children and are expected to read Part 1 (abridged version also available for reference at Annex A) and Annex B of 'Keeping Children Safe in Education' (Dept. for Education 2023).

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 specific safeguarding issues identified in KCSIE Annex B; 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 2023 - KEY INFORMATION ON ABUSE, NEGLECT AND SAFEGUARDING ISSUES

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 2023).

- **Core KCSIE Part 1 information is copied below.**
- **Further information on specific safeguarding issues is available in KCSIE 2023 Annex B.**
- **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

*21. **All** staff should be aware of indicators of abuse and neglect (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 school and college staff should be aware that abuse, neglect 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 with one another.*

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), criminal 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 sharing of indecent images, especially around 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. 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.*

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 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, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can*

also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.*

Safeguarding issues

*31. **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.*

*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 B of KCSIE.***

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's 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 it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).*

*34. It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. 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 behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.*

*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)*
- *sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)*
- *sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse*

- *causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party*
- *consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)*
- *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 CSE and CCE 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 sexual or criminal activity, in 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. CSE and CCE 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.

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. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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 oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact 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. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

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, development, and ability to learn.*

Female Genital Mutilation (FGM)

44. *Whilst all staff should speak to the designated safeguarding lead (or 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, 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. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.*

47. *If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.*

Serious violence

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

Additional information and support

49. *Departmental advice [What to Do if You Are 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 the 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.*

It is School policy that all Staff read Part 1 and Annex B 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)**
  Daviona Watt, Deputy Head at Oundle School
  Stacey Crump, Deputy Head at Laxton Junior School and DSL for the Early Years Foundation Stage

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

- **Designated Staff at OS**
  Child Protection Officers: Tabitha Dorman, Louise Banerjee, Lorna Page and Rebecca Lowndes
  Proctor: Steve Heath

The Sports Centre has its own Safeguarding Team, led by the Sports Centre Manager Sally Dayus who is trained to DSL level. She 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 House CPO/ 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 (abridged version also available for reference at Annex A) and Annex B of 'Keeping Children Safe in Education' (Dept. for Education 2023)
  2. Safeguarding Policy, which includes information about the identity and role of the DSLs and Deputy DSLs
  3. Whistleblowing Policy
  4. Staff Behaviour Policies
     o Staff Code of Conduct (and Contractors' Code of Conduct, where appropriate)
     o Technology Policy for Staff and Acceptable Use Policy for all Staff

  5. Pupil Behaviour Policies
     o OS Promotion of Good Behaviour and Behaviour Management, and Countering Bullying and Cyberbullying Policy
     o LJS Behaviour Policy, and Countering Bullying and Cyberbullying Policy
     o OS Technology Policy for Pupils and Digital Rules (including Acceptable Use Policy) for Pupils
     o 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 September 2022.

- **Induction**

  All Staff and Governors 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 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 Safeguarding Children Partnership Thresholds Guidance 2022 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 2023).

- **Core KCSIE information is provided in Section 6 of this policy (in italics).**
- **Further information on specific safeguarding issues is available in KCSIE 2023 Annex B.**
- **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 and share information that will 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. 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. If in any doubt about sharing information, Staff should speak to the Designated Safeguarding Lead and/or her Deputy, and follow the School's Safeguarding policy and procedures.

Early Help

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 2023), for **Early Help** for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- 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 drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child

Information about specific safeguarding issues is included in 'Keeping Children Safe in Education' (Dept. for Education 2023) Part 1 (abridged version also available for reference at Annex A) and Annex B which all Staff are required to read. In particular, Staff at Oundle are advised to be aware of and alert to the following 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 2023) 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:
- o close monitoring of children's wellbeing
- o professional curiosity and vigilance from all Staff
- o developmentally appropriate PSHE and RSE curriculum which develops pupils' understanding of acceptable behaviour and keeping themselves safe
- o robust risk assessments where appropriate
- o 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)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- 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 (2023) Part 5 'Child-on-child sexual violence and sexual harassment' 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 help to prevent escalation of harmful behaviours into sexual violence (this can be provided via a multi-agency approach)
c. referral to children's social care (where a child has been harmed or is at risk of harm or in immediate danger)
d. 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 Mental Health Lead advises 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 2023 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, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.*
- *contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.*

- *conduct*: *online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying), 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. 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)

- **Sharing nudes and semi-nudes (formerly referred to as 'sexting')**

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, 2020), 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. 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 2023).

- **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 2021) and 'Children Missing Education' (Dept. for Education statutory guidance for local authorities September 2016), 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 2023, 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 http://www.northamptonshirescb.org.uk/schools/safeguarding-themes/domestic-abuse-

notifications-schools/. 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 2023 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 2023) Part 1 under Safeguarding Issues and in Annex B.

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

Staff are advised to contact a member of the Safeguarding Team if they have concerns about children who may be in need of early help 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 help, prevention and statutory services for everyone working with children is available in Northamptonshire Safeguarding Children Partnership Thresholds Guidance 2022.

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
- 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.

The School takes account of individuals' particular needs in the development of its support structures for these children.

(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:

- o Abuse by an adult or adults
- o Abuse by another child or children (child-on-child abuse)
- o Abuse by people known to or not known to the child
- o Real world settings – in a family, institution or community
- o 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**.

	Oundle School	**Laxton Junior School**
Concerns about a child (incl. Child-on-child abuse)	Refer to a member of the Safeguarding Team at OS or, in their absence, to the DSL or DDSL at LJS	Refer to DSL or DDSL or, in their absence, to a member of the Safeguarding Team at OS
	If the concern relates to harm perpetrated by someone else, do not inform that person	

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 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 / out of hours 01604 626 938) 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) 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. DSL) or Volunteer	Report directly to Head of OS or in her absence to DSL (DDSL if it is about DSL)	Report directly to Head of LJS or in his absence to DSL (DDSL if it about DSL)
	Do not inform the person about whom the concern has been raised	
	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. http://www.northamptonshirescb.org.uk/schools/referrals-eha/designated-officer/ (07831 123193/ 01604 362993)	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:

  o Limit any questioning to the minimum necessary to seek clarification only
  o 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
  o Strictly avoid 'leading' the pupil or adult who has approached them
  o Only ask questions of the 'Tell me what has happened' type
  o **Not** make suggestions or introduce their own ideas about what may have happened
  o **Not** ask questions like 'Did s/he do x to you?'

- Staff should then:

  o Tell the informing pupil or adult that they will now make sure that the appropriate people are brought in to follow up the problem
  o 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
  o Make a written record as soon as possible of what you have been told, using the child's words as far as possible
  o 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)
  o If this cannot be done, contact Children Services direct

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

(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'
- 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 Publicity and Press Relations Officer 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 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 (formerly NCTL) 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.

12. COVID-19 (section retained pending advice from the Local Authority)

This section replaces the Covid Addendum to the Safeguarding Policy which was in force until August 2021. From March 8th 2021 all children, except those who are clinically extremely vulnerable and have been directed to shield at home, have been expected to attend school.

(a) Guidance

The school operates in accordance with Covid-19 guidance from the Department from Education.

The key documents referred to during the pandemic were 'Schools COVID-19 operational guidance' and 'Actions for early years and childcare providers during the coronavirus (COVID-19) outbreak'. Both of these publications were withdrawn on 1st April 2022.

This Covid-19 Safeguarding Policy remains in place for reference as necessary.

(b) Reporting a Concern

Staff are trained to continue to follow the communication channels defined in this Safeguarding Policy and report concerns about children and adults without delay in accordance with usual procedures.

(c) Safeguarding Training and Safer Recruitment

The School has continued its commitment to high quality safeguarding training and safer recruitment procedures since the advent of Covid-19.

(d) Attendance Arrangements and Monitoring

In line with government guidance, the School expects all children to attend school unless they are self-isolating or shielding. The School is responsible for recording attendance, following up absence and reporting children missing education to the local authority in accordance with Government requirements. Parents or carers should contact the School on the first day of absence and inform the school of the reason why the child is not in attendance. Parents should inform the school of any COVID-19 tests that have been carried out and continue to keep the school informed of reasons for absence, as appropriate.

In accordance with the 'Remote Education Temporary Continuity Direction', the School will provide remote education to pupils who are unable to attend school because they are complying with government COVID-19 guidance or legislation. The School will keep a record of remote education delivered. Absence information

will be recorded in the register using the appropriate codes. Information about school attendance codes can be found in:

- [School attendance: Guidance for maintained schools, academies, independent schools and local authorities (August 2020) (applies until the end of 2021/22 academic year)](#)

Where pupils are not able to attend school, as they are following clinical or public health advice related to coronavirus (COVID-19), the absence will not be penalised. The School understand that some parents, carers and children may be anxious about children returning to school and is committed to working closely with families who are finding the transition more challenging to ensure that children are attending regularly. The School will work with other agencies (e.g. health and other education professionals) to support school attendance if this is required, including notifying Children's Social Care if necessary of any non-attendance.

(e) Supporting Children who are Learning at Home

In the event that children are required to shield or to self-isolate, the School will continue to provide remote education and pastoral support in line with the School's Covid-19 frameworks.

(f) Supporting Emotional and Physical Wellbeing

The School is committed to supporting pupils' wellbeing through ongoing development of the academic, pastoral and co-curricular programme to meet the challenges posed by COVID-19. The School supports emotional and physical wellbeing through:

- Learning for Life and PSHE programmes
- Co-Curricular programmes
- Advice, support and training from the Mental Health Lead
- Directing pupils, staff and parents to helpful resources
- Having the child's welfare at the forefront when setting expectations for pupil's learning, whether remotely or in school
- Promoting positive behaviour, taking into account the potential impact of the pandemic
- Being alert to the potential for anxiety, stress or low mood, particularly those who are vulnerable
- Recognising that different children will react differently to the current situation
- Offering support to children emotional via the pastoral system and, where possible, by the Emotional Wellbeing Team
- Advocating a Team around the Child approach to identify issues and develop strategies for support, using the School's established referral pathways
- Working with pupils, parents and external agencies

For children who are identified as a cause for concern, the School will continue to operate support structures in accordance with normal procedures, working with the children themselves, their parents and external agencies as necessary. This requires agreement of appropriate mechanisms for monitoring and review of progress and, if appropriate, arrangements for information sharing between medical professionals to enable the School to provide the best possible care and support for the individual.
If the School is concerned at any time that the best interests of the individual are not being met and that Early Help or a referral to Social Services might be needed, it will consult Northamptonshire Safeguarding Children Partnership's Thresholds Guidance and act accordingly.

(g) Supporting Vulnerable Children

If pupils who are self-isolating or shielding are within the Government's definition of 'vulnerable', the School will keep in regular contact with them by providing remote learning which includes live lessons and pastoral time. Communication with parents will also be important to ensure that appropriate support is provided.

When a vulnerable pupil is required to self-isolate, the School will:
- notify their social worker (if they have one);
- agree with the social worker the best way to maintain contact and offer support;
- check if a vulnerable pupil is able to access remote education support;
- support them to access it (as far as possible); and
- regularly check if they are accessing remote education.

The Government considers vulnerable children and young people include those who:
- are assessed as being in need under section 17 of the Children Act 1989, including children and young people who have a child in need plan, a child protection plan or who are a looked-after child
- have an education, health and care (EHC) plan
- have been identified as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who could therefore benefit from continued full-time attendance. This might include:
  - children and young people on the edge of receiving support from children's social care services or in the process of being referred to children's services or who have previously received support from children's social care services (as identified by local authorities)
  - adopted children or children on a special guardianship order
  - those at risk of becoming NEET ('not in employment, education or training')
  - those living in temporary accommodation
  - those who are young carers
  - those who may have difficulty engaging with remote education at home (for example due to a lack of devices or quiet space to study)
  - care leavers
  - children and young people in a family circumstance presenting challenges for them, such as drug and alcohol misuse, parental offending, adult mental health issues and domestic abuse
  - others at the provider and local authority's discretion including pupils and students who need to attend to receive support or manage risks to their mental health

The School recognises that provision for pupils who have SEND may have been disrupted during the period of restrictions on attendance. Staff will work with local services (such as health and the local authority) to ensure the services and support are in place for a smooth return to School for such pupils.

(h) Clinically extremely vulnerable (CEV) children

Children who have been confirmed as clinically extremely vulnerable and have received a shielding letter should not attend school until they have been removed from the shielding patient list. The School will request a copy of the shielding letter and any other information that may be required to enable appropriate arrangements to be put in place for remote learning alongside social and emotional support.

(i) Supporting children on site

The School will refer to the Government guidance for education and childcare settings on how to support a safe environment and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID-19.

(j) Child-on-Child Abuse

Any disclosures of peer-on-peer abuse are dealt with and recorded in accordance with the School's Safeguarding Policy, having regard to the guidance in Part 5 of KCSIE 2021 and the School's Behaviour Policies and Countering Bullying and Cyberbullying Policies. The School recognises that during any COVID-19 restrictions, an adapted process will be required for managing any report of such abuse and providing appropriately tailored support for victim(s) and perpetrator(s). The School will listen and work with the pupils involved, and parents/carers and any multi-agency partner required to ensure the safety of all pupils.

(k) Online Safety

The School recognises that children both on-site and off-site are vulnerable to abuse and radicalisation online. Children who are at home because they are self-isolating or shielding may be spending more time online and this increases their vulnerability.

The School's approach to online safety is co-ordinated by the Online Safety Groups at Oundle School and Laxton Junior School. Online safety is included in the curriculum at all levels and information is provided to parents/carers as appropriate. 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 Code of Conduct.

The School is committed to providing a safe environment for the pupils online during any COVID-19 restrictions and at any time where remote learning is in place. It is essential that all interaction between Staff and pupils is conducted within the School system to ensure that appropriate filtering and monitoring can take place. All Staff and pupils are expected to be aware of the School's online safety policies, including acceptable use agreements, and what to do if they have concerns/where to go for further help.

All electronic communication with pupils takes place using Teams or the School's email platform. Any pre-existing relationships or situations which mean this cannot be complied with must be discussed with the DSL. The School will continue to ensure the use of online learning tools and systems is in line with privacy and data protection, including GDPR, requirements.

Normal channels for the raising of any safeguarding concerns continue to apply during COVID-19, with mechanisms in place to identify, intervene in, and escalate any incident where appropriate. Given the current situation, the importance of using neutral notification reporting routes is emphasised to the pupils if they encounter any concerns online, with signposts both internally and to age-appropriate sites externally as follows:

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

Staff receive safeguarding training to ensure they are equipped with the skills to keep children safe when using technology for remote learning.

(l) Remote Teaching and Learning

Online teaching and learning where utilised should follow the same principles set out in the School's Staff and Pupil Codes of Conduct, alongside the appropriate Teaching and Learning policies. It is imperative that all Staff who interact with children continue to model appropriate behaviour and look out for signs a child may be at risk, reporting any concerns through the usual channels so that they can be dealt with in accordance with the School's Safeguarding Policy.

The School has provided guidance for Staff and pupils to support them in the remote learning environment. The Safeguarding Team are available to answer queries as they arise. Parents are informed of these arrangements and asked to reinforce with their children the messages which they have learned about keeping themselves safe online, the need for good judgement over what they post, and the importance of raising any concerns promptly with a trusted adult so that these can be addressed. They are also provided with useful resources to assist them in supporting their children to keep themselves safe at home. This guidance will be updated and reissued to parents, pupils and Staff as appropriate.

(m) Contingency Planning

In the event that restrictions in schools are needed to help contain the spread of the virus, the School will refer to the contingency framework, which is reviewed on an ongoing basis and outlines how the School should operate in the event of any restrictions. The School will always ensure that safeguarding children is its priority and work within restrictions to keep children safe.

Appendix 1 Designated Roles – Further Information

Governing Body Responsibilities

Governing Body responsibilities are set out in full in KCSIE 2023 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 C
- 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 C

- **Multi-agency working**
  - Governors should ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2018, and liaising with the three safeguarding partners and other agencies in line with Working Together to Safeguarding Children 2018
  - 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 powers 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**
  - o 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
  - o This links with the mandatory requirement for schools to teach Relationships Education (primary) and Relationships and Sex Education (secondary)
  - o 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
    - ▪ 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 sexual harassment and sexual violence and why these are always unacceptable

- **Online Safety**
  - o 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
  - o Online safety policy and education should consider the four areas of risk defined in KCSIE: content, contact, conduct and commerce
  - o 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
  - o 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
  - o 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 periodically to keep up with evolving cyber-crime technologies

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 C of 'Keeping Children Safe in Education' (Dept. for Educ. 2023).

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 at Oundle School manages the work of the Director of Safeguarding/OS DDSL and liaises with the School's Leadership Team, Mental Health Lead, Head 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.

Role Description for OS Director of Safeguarding and DDSL

Responsible to: Deputy Head (Designated Safeguarding Lead)
Responsible for: Child Protection Officers

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 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 Officers, 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, CPOs, 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 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 to provide management supervision for the Mental Health Lead and develop strategies to promote positive mental health in the School (the Mental Health Lead reports to the Deputy Head Pastoral)
- 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 Professional Development on staff INSET as appropriate

The Director of Safeguarding will also

- act as 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 C of 'Keeping Children Safe in Education' (Department for Education 2023) 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 Mental Health Lead, and the Governor with specific responsibility for Safeguarding; this is to ensure that the School's Safeguarding responsibilities are discharged.

Annex C 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 is reviewed and updated, and that 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 C 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 Officers

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

Job Purpose

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

The CPOs 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 CPOs are 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 Officers have 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

Ms Stacey Crump, Deputy Head of Laxton Junior School, is the Designated Safeguarding Lead for the EYFS; her contact details can be found on the Safeguarding Information Posters at the start of this policy.

Laxton Junior School takes all necessary steps to ensure that all children are kept safe and well. This Safeguarding Policy details the procedures in place to safeguard all children, including those in the EYFS; additional details, specific to safeguarding in the EYFS, are found below.

In relation to the Early Years Foundation Stage (EYFS), the School will notify Ofsted (08456 404040 or 0300 1233155) as soon as is practicable and within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the School whether the allegations relate to harm or abuse which took place on the premises or elsewhere. The School will provide to Ofsted the following information about themselves or an employee when relevant:

- details of any order, determination, conviction, or other ground for disqualification from registration under regulations made under section 75 of the Childcare Act 2006;
- the date of the order, determination or conviction, or the date when the other ground for disqualification arose;
- the body or court which made the order, determination or conviction, and the sentence (if any) imposed; and a certified copy of the relevant order (in relation to an order or conviction).

Laxton Junior School will also notify the local child protection agency of any serious accident or injury to, or the death of, any child while in the School's care, and will act on any advice from those agencies. The School will report any incident within 14 days.

The Cameras and Mobile Phones Policy is a requirement for all schools with EYFS. Our policy on use of mobile phones, cameras and sharing of images is set out in a separate document and is reviewed regularly. It is recognised that personal mobile phones have the potential to be used inappropriately and therefore the School has developed a policy to outline the required protocol for all staff, students, volunteers and parents/carers.

Staff will not use personal devices to take photographs of LJS children; school-provided phones, memory-cards, cameras, Surface-Pros and iPads are available in the EYFS and all other classrooms for this purpose. All School devices, that can be used to capture images of children and their learning, have a passcode enabled. If a School device, containing images of children, is lost, it must be reported to the LJS DSL immediately.

The policy must be read in full, and states:

- In the EYFS, staff should keep their mobile phones in a secure place away from the children; these are to be stored securely during the working day
- Should staff, working with children in the EYFS, need to use their phone in an emergency, this must be reported to the Head or Designated Safeguarding Lead; this is for calls taken in the EYFS classrooms, the EYFS outside area or in any classroom or area where EYFS children are present
- EYFS staff may use their devices at break times and lunch times provided that (i) pupils are not present, (ii) they are not on duty, and (iii) this does not prevent them from responding to a request for assistance from another member of staff or other aspects of their professional duties
- If a child in EYFS is ever recommended to have their own mobile phone to enable ease of contact with parents for medical reasons or for a specialist application (e.g. diabetes), then this phone must remain switched off in the child's medical bag. The School recognises that it may be unsafe to keep this phone locked away and therefore a risk assessment for this phone must be written and approved by the

Designated Safeguarding Lead and Head. Any phone calls on this phone will be recorded on CPOMS, and linked to Parent Contact and Medical.

- All visitors to Laxton Junior School, including Governors and contractors, must adhere to this policy as per the guidance set out for staff and parents. They must not use their phones or cameras during their visit and are not permitted to capture images of our children at any time; this will be communicated to all visitors on arrival and through the 'Visitors' Information' leaflet given to them on arrival.

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
Mr Joachim Foot	jpwf@oundleschool.org.uk	
The Health Centre	healthcentre@oundleschool.org.uk	**01832 277200/273408 (Surgery)**
Lead Nurse		
Mrs Sylvia Meadows	smeadows@oundleschool.org.uk	**01832 277200 (Health Centre)**
Mental Health Lead		
Mrs Natalie Jarvis	njarvis@oundleschool.org.uk	
Deputy Head		
Mrs Daviona Watt	dlw@oundleschool.org.uk	01832 277113
Deputy Head Pastoral		
Mrs Ann Meisner	aem@oundleschool.org.uk	01832 277113
Director of Safeguarding		
Mr Ben Raudnitz	br@oundleschool.org.uk	01832 277284
Child Protection Officers		
Mrs Louise Banerjee	jllb@oundleschool.org.uk	
Ms Tabitha Dorman	tad@oundleschool.org.uk	
Mrs Rebecca Lowndes	rll@oundleschool.org.uk	
Dr Lorna Page	ljp@oundleschool.org.uk	
Laxton Junior		
Ms Stacey Crump	smc@laxtonjunior.org.uk	07845 526372
Mr Fraser Harper	fh@laxtonjunior.org.uk	07725 165064
House Friends		
Mrs Tessa Curtis (W)		01832 720578
Mrs Mary Barkhouse (StA)		01832 782633

The **Head** is available to see pupils without an appointment from 7.50am to 8.20am on Mondays, Thursdays, and Saturdays. Help can also be sought from the following:

Independent Person		
Mrs Judith Stronach	jstronach555@gmail	07411 567006
Childline		0800 1111
Northamptonshire Children's Trust – Young Northants		0300 126 1000
The Samaritans		116123
ISI		0207 600 0100
Children's Commissioner Help at Hand Service	www.childrenscommissioner.gov.uk	0800 528 0731

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 appropriate safeguarding lead person should be familiar with the full 2020 guidance from the UK Council for Internet Safety (UKCIS), *Sharing nudes and semi-nudes: advice for education settings working with children and young people* and should not refer to this document instead of the full guidance.

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

In the latest advice for schools and colleges (UKCIS, 2020), 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. 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. 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 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).

For further information

Download the full guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (UKCIS, 2020) at www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people.

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[1] In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image in order 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 2023:

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:

- o Informing a pupil's parents. (It may be inappropriate to inform parents immediately when an allegation has been made.)
- o Any need for medical examination or treatment for the pupil.
- o 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.
- o 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.
- o 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 she 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 (formerly NCTL). 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 (formerly NCTL)) 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 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 and Compliance Checks Policyr. 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 published in the Staff Handbook:

Guidance and advice:
- 'Keeping Children Safe in Education' including Part 1 and Annexes A and B (Dept. for Ed. 2023)
- 'What to do if you're worried a child is being abused' (HM Government March 2015)
- Northamptonshire Safeguarding Children Partnership Early Help: Northamptonshire Safeguarding Children Partnership Thresholds Guidance 2022
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (HM Govt and UKCIS 2020)
- Sharing nudes and semi-nudes: how to respond to an incident (UKCIS)
- The Prevent duty: Departmental advice for schools and childcare providers (Dept. for Ed. June 2015)
- 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)

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 • Technology Policy for Pupil and Digital Rules (including IT Acceptable Use) • 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 • Prevent Duty • Physical Restraint • Photography Filming & Publication of Images • Complaints • Visitor Control (inc. Visiting Speakers and Houses) • Site Map with Visitor and Safeguarding Information • Recruitment and Compliance Checks Policy and safer recruitment procedures	• Countering Bullying and Cyberbullying • Early Years Foundation Stage • Missing Child • Supervision of Children • PSHE • 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 • Physical Restraint and Use of Reasonable Force • 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

Reviewer – Oundle	DLW
Reviewer – LJS	SMC
Post of Reviewer (s)	Deputy Heads
Review Date	June 2023 effective 1 Sept 2023
Reviewed and filed with both Schools	June 2023 effective 1 Sept 2023
Next Review (1 year)	June 2024