26. Health and Safety .......................................................... 25
27. Safeguarding pupils who are vulnerable to extremism; The Prevent duty ............... 27
28. Emotional Health & Well-being ........................................ 28

Appendix A – Key information for all staff........................................ 32

Child Criminal Exploitation (CCE) .................................................................... 32
Child Sexual Exploitation (CSE) .......................................................................... 32
County Lines ........................................................................................................ 33
Child Trafficking & Human Slavery ..................................................................... 33
Information on Specific Forms and Categories of Child Abuse .............................. 34
Risk Indicators ...................................................................................................... 34
Signs of abuse in children: .................................................................................. 35
A1. Neglect .......................................................................................................... 35
A2. Physical Abuse ............................................................................................... 35
A3. Sexual Abuse .................................................................................................. 36
A4. Emotional Abuse ............................................................................................ 38
A5. Responses from Parents/Carers ..................................................................... 38
A6. Children with a Disability .............................................................................. 39
A7. Homelessness .................................................................................................. 39
A8. Children and the court system ...................................................................... 40
A9. Looked After Children and Previously Looked After Children ......................... 40
A10. Liaison with the virtual head ........................................................................ 40
A11. Children in alternative provision ................................................................ 40

Appendix B - The Academy's Statutory Duty .................................................... 41

Appendix C - The Oasis 9 Habits ....................................................................... 42

Appendix D – Roles & responsibilities within Oasis ........................................... 43

Appendix E – COVID-19 & Safeguarding ............................................................ 47

RACI Matrix .......................................................................................................... 52

Document Control .................................................................................................. 54
Key Contacts for Safeguarding and Child Protection at the Academy

Executive Principal
Contact email: Jo.Gass@oasisshirleypark.org
Telephone: 020 662 7321

SECONDARY PHASE

Principal
(holding responsibility for safeguarding within the Academy):
Contact email: Jo.Gass@oasisshirleypark.org
Telephone: 020 8662 7321

Designated Safeguarding Lead:
Contact email: L’Tanya.Miller@oasisshirleypark.org
Telephone: 020 8656 0222 Select Option 1

Deputy Designated Safeguarding Leads
Deborah Center
Lisa Thomas
Jean King
Telephone:

Designated Looked After Children and Previously Looked After Lead:
Contact email:
Telephone:

Mental Health Lead:
Contact email:
Telephone:
PRIMARY PHASE

Principal:
(holding responsibility for safeguarding within the Academy):
Contact email:
Mobile

Designated Safeguarding Lead:
Contact email:
Telephone:
Mobile:

Designated Safeguarding Lead:
Contact email:
Telephone:
Mobile:

Deputy Designated Safeguarding Lead:
Contact email:
Telephone:

Designated Looked After Children and
Previously Looked After Lead:
Contact email:
Telephone:

Regional Director
Contact email: via Exec. Assistant Lara Fisher

Oasis National Safeguarding Lead
Contact email:
Mobile:

Local Authority Designated Officer (LADO):
Contact email:
Telephone:

Single Point of Contact for PREVENT (SPOC)
Contact email:

Local Authority Safeguarding contact numbers and emails are held within the academy.
1. Introduction

1.1 As safeguarding and child protection is undertaken, the Oasis vision is important. Our vision is for community – a place where everyone is included, making a contribution and reaching their God-given potential. Our ethos is a statement of who we are and it is an expression of our character. Rooted in the story and beliefs of Oasis, we describe our ethos through a particular set of values that inform and provide the lens on everything we do:

- A passion to include everyone
- A desire to treat people equally respecting differences
- A commitment to healthy, open relationships
- A deep sense of hope that things can change and be transformed
- A sense of perseverance to keep going for the long haul

It is these ethos values that we want to be known for and live by. It is these ethos values that also shape our policies. They are the organisational values we aspire to. We are committed to a model of inclusion, equality, healthy relationships, hope, and perseverance throughout all the aspects of the life and culture of every Oasis Hub and community.

Everyone who is part of Oasis needs to align themselves to these ethos values. The values themselves are inspired by the life, message and example of Jesus but we make it clear that we will not impose the beliefs that underpin our ethos values. We recognise and celebrate the richness that spiritual and cultural diversity brings to our communities. We respect the beliefs and practices of other faiths and will provide a welcoming environment for people of all faiths and those with none.

1.2 The Oasis 9 Habits

The Oasis Ethos is aspirational, inspirational and something that we have to constantly work at. It is important to remember that every organisation is made up of its people, and people don’t always get things right every day. This means that there can sometimes be a dissonance between what we say we are, as stated in our ethos values, and what we actually do and experience.

Recognising this is helpful because it reminds us that we each have things to work on; we have space to grow, develop and change to become the best version of ourselves. To help us in this process of personal growth and development we have the Oasis 9 Habits. It is our bespoke and unique approach to character development. We know that by living the way of the habits, the Oasis Ethos behaviours we aspire to will become second nature to us.

We also believe that this process of continually developing our character and being transformed to become the best version of ourselves is really important for every staff member and student. Therefore, we actively promote and practice the Oasis 9 Habits which are an invitation to a way of life characterised by being compassionate, patient, humble, joyful, honest, hopeful, considerate, forgiving and self-controlled.

We believe that by becoming people who live this way, by becoming the best version of ourselves, we are transformed, and we are also able to play our part in bringing transformation locally, nationally and globally.

1.3 In light of the Oasis vision, Ethos and 9 Habits, we aim to create an organisational culture that promotes flourishing and positive wellbeing for every member of staff and student – to create environments where people can discover the wholeness of life. The word we use to describe this is Shalom. Shalom means peace, wellbeing, wholeness, nothing broken, nothing missing, and
everything as it should be. Along with our ethos and 9 Habits this provides a lens through which to focus - facilitating the flourishing of staff, students.

1.4 Therefore in line with the Oasis ethos and 9 Habits, Oasis Community Learning (OCL) fully recognises its responsibilities for safeguarding children. Their welfare and safety is at the heart of OCL’s vision for providing ‘Excellent Education at the Heart of our Communities’. In this policy, a ‘child’ means all children and young people under 18 years of age.

2. What is this policy about?

The central purpose of Oasis is to transform communities so that they are safe and healthy places to be and to live. Oasis realises that it cannot make a commitment of this kind without first being committed to the safeguarding and safekeeping of its students. In accordance with the relevant law and guidance, this policy sets out our procedures for safeguarding and child protection. It applies to all Oasis Community Learning staff (central and academy-based), Hub Council members and volunteers working at the academy.

3. In brief

Safeguarding and promoting the mental, emotional and physical welfare of children is everyone’s responsibility who works or volunteers in OCL. Consequently, everyone who comes into contact with our children has a role to play in safeguarding and child protection. In doing so, all staff and volunteers should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

4. In more detail

4.1 In accordance with the relevant law and guidance, this policy sets out our procedures for safeguarding and child protection. It applies to all Oasis Community Learning staff (central and academy-based), Hub Council members and volunteers working at the academy.

4.2 The academy recognises that some children are living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes. Some may need early help or intervention from other organisations in order to overcome problems and keep them safe. Please see pages 38 & 39 for Looked After Children and/or those with Special Educational Needs or Disabilities.

4.3 It is important to remember that each academy should follow the guidance of their local multi-agency safeguarding arrangements (MASA) and implement their systems and protocol for referring families for early help and reporting child protection concerns. The MASA will ensure that each academy is aware of issues within the community that are relevant to them. DSL’s should ensure that all staff are aware of those issues and systems for reporting and provide local safeguarding updates.

5. Who is this policy for?

This policy applies to the entire Oasis Multi-Academy Trust. Safeguarding and promoting the welfare of children is everyone’s responsibility, whether they work or volunteer in any of our Academies. Thus, everyone has a role to play in child protection and safeguarding i.e. Principals, Designated Safeguarding Leads, Staff, Suppliers, Volunteers, Board members, etc.

6. Policy Statement

6.1 This safeguarding and child protection policy is intended for use across the Oasis Community Learning Academies and is applicable to all Early Years, Primary, Secondary and 6th Form settings.
6.2 This policy should be followed and adhered to in all situations and circumstances when the safeguarding of our pupils is at stake.

7. The requirements that apply to this policy

This policy has been developed in line with the following key documents:

- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, updated September 2020, DfE
- Working Together to Safeguard Children, July 2018, HM Government
- Inspecting safeguarding in maintained schools and academies, September 2019, Ofsted
- Inspecting safeguarding in safeguarding in early years, education and skills settings, September 2019, Ofsted
- The current Oasis E-Safety Policy
- Education for a Connected World, UKCCIS 2018
- Multi-agency Statutory Guidance on Female Genital Mutilation, July 2020, HM Government.
- Protecting Children from Radicalisation: the prevent duty, August 2015, DfE
- The Independent School Standards, 2015, DfE
- Competence Still Matters: Safeguarding training for all employees and volunteers 2014, LSCB
- Mental Health and Behaviour in Schools: Departmental Advice, 2014

8. Procedures in respect of Child Abuse:

8.1 Child abuse exists where children have been physically or emotionally abused or severely neglected. Abuse of children who attend our settings are likely to be noticed by the Academy staff and Health Workers or Education Welfare Officers. It is essential, therefore that all those whose work brings them into contact with children and their families know the signs of abuse and the relevant procedures.

8.2 This academy has the role of recognising and responding to potential indicators of abuse and neglect, all other action should be taken by those with statutory powers to help the child. Early contact and close liaison with such agencies is therefore regarded as essential by the academy.

8.3 In the event of an actual or suspected case of child abuse by adults, parents, or any other adult, it is the responsibility of staff to report this to the Designated Safeguarding Lead (DSL) as soon as possible.

8.4 A qualified Designated Safeguarding Lead (DSL) will be available to discuss any

This means that in our school we will all know the signs of child abuse and are aware of the procedures that we must follow to safeguard the child.

All our staff will read:
- Appendix A of this policy, and
- Annex A of Keeping Children Safe in Education 2020

And we will keep records of this within our academy.

Our DSL team is listed on page 4.

All our staff will use CPOMS to record their concerns about a child but will also discuss their concerns with the DSL.

During term time and normal academy hours, a DSL will always be available in our
safeguarding concerns.

8.5 The Designated Safeguarding Lead (DSL) is responsible for ensuring that children are identified and the appropriate agency involved.

8.6 The Designated Safeguarding Lead (DSL) will attend any reviews called by the Local Authority, and may call on appropriate members of staff for reports.

8.7 It is important that if staff overhear children discussing 'abuse' or 'neglect' that this information is relayed for investigation.

8.8 Safeguarding and child protection concerns should be considered when planning any off-site or residential visits.

8.9 A confidential register will be maintained of all those students known to be at risk.

Academy. For the majority of time, this will be a DSL being on site. In exceptional circumstances during normal school hours, and for after school provision, access to the DSL may be by a phone, Skype or Teams call. This will be clearly advertised.

During holiday club style provision run by the Academy, access to a DSL/DDSL will be through a phone call or Skype/Teams message.

In our school a list of those students taking part in any trip will be passed to the Designated Safeguarding Lead (DSL) to ensure that staff are made aware of all essential information relating to the students in their care.

The Academy will maintain a list of those students deemed to be vulnerable, and this list will be reviewed weekly by the DSL Team.
9. Flow chart for staff actions:

Staff have concerns about a child and take immediate action. Staff record their concerns on CPOMS and speak to the DSL or Deputy DSL.

- Referral not required. School staff take relevant action, via the pastoral team possibly including early help.
- Referral made if concerns escalate.
- DSL (or staff member) makes a referral to social care (and/or the police if concerns are immediate).

Within 1 working day, social worker makes decision about the type of response that is required.

- Child in need of immediate protection: referrer informed.
- Section 47 enquiries appropriate: referrer informed.
- Section 17 enquiries appropriate: referrer informed.
- No formal assessment required: referrer informed.

- Appropriate emergency action taken by social worker, police or NSPCC.
- Identify child at risk of significant harm: possible child protection (CP) plan.
- Identify child in need (CIN) and identify appropriate support.
- Academy considers support offer within the school or an Early Help assessment.

Staff should do everything they can to support social workers. At all stages, staff should keep the child’s circumstances under review, and raise concerns with the DSL or Deputy DSL, to ensure the child’s circumstances improve. The best interests of the child must ALWAYS come first.
10. Academy Responsibilities

10.1 In our Academy we recognise that because of the day to day contact with children, academy staff and volunteers are well placed to observe signs of harm, abuse, neglect, victimisation and/or exploitation. Therefore we will all ensure arrangements are in place to safeguard and promote the welfare of children by:

- Maintaining an environment where all children feel secure, are encouraged to talk, and are listened to
- Ensure all children know the adults in the academy who they can approach if they have worries
- Teaching students to keep themselves safe from all forms of abuse including; child sexual exploitation, female genital mutilation, forced marriage, extremism, radicalisation, and peer on peer abuse.

10.2 We will support our staff by:

- Providing effective, ongoing training and development for all staff
- Addressing concerns and making robust referrals to other agencies, at the earliest possible stage
- Developing effective links with relevant agencies in all matters regarding safeguarding and child protection
- Monitoring and supporting children who are subject to child protection plans, contributing to the implementation of the plan
- Keeping meticulous, written records of concerns about children, even where there is no need to refer the matter immediately (dates, times, person/s responsible and actions) ensuring all records are kept securely
- Ensuring the suitability of all staff through safe recruitment practice
- Ensuring all Oasis academy staff and volunteers understand their responsibilities with regard to safeguarding and child protection
- Ensuring that parents and carers have an understanding of the responsibility placed on the academy and its staff for safeguarding and child protection
- Maintaining awareness of those children who are persistently absent or missing from school, notifying the local authority in line with ‘Children Missing in Education’ protocols
- Maintaining clear procedures for reporting allegations against staff members.

10.3 Oasis Community Learning (OCL) recognises that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The academy may be the only stable, secure and predictable element in the lives of children at risk. The academy will support all children through:

- Appropriate staff conduct, in line with the policy
- Relevant curriculum design and implementation to teach pupils about staying safe at all times, including when they are online
- Daily practice underpinned by the Oasis ethos, vision, values and ‘9 Habits’ found in APPENDIX D
- Consistent implementation of the Academy’s Health & Safety, Anti-bullying, Safer recruitment, Behaviour and online safety policies and related practice
- Close liaison with other agencies such as social services, Child and Adult Mental Health Service, the Education Welfare and Psychology Services.
10.4 In line with Government guidelines in KCSiE 2020, our Academy will where reasonably possible, hold more than one emergency contact number per pupil or student. This provides the Academy with additional options for making contact with a responsible adult when a child is missing school and is also identified as a welfare and/or safeguarding concern.

11. Safeguarding Children

11.1 Contextual Safeguarding

KCSiE 2020 writes about the importance of the context in which school safeguarding must be considered, including behaviours that are associated with factors outside the school which can occur between children outside of these environments i.e. whether children are at risk of abuse or exploitation in situations outside their families.

11.2 Safeguarding covers a broad range and aims to achieve the following:

- Protecting children from maltreatment
- Preventing impairment of children’s health and/or development
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care
- Undertaking that role so as to enable children to have optimum life chances, so they can enter adulthood successfully.

Within our Academy our DSLs will consider the contextual safeguarding in their early working in any safeguarding process.

This means that in our Academy we:

- Recognise the importance of information sharing between professionals and other agencies as vital in identifying and tackling all forms of child abuse.
- Will ensure any fears about sharing information will not be allowed to stand in the way of protecting the safety and welfare of any or our children.

11.3 Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as:

- Staff conduct,
- Health and safety,
- Bullying,
- Online safety,
- Arrangements for meeting the medical needs, providing first aid and/or intimate care,
- Building security,
- Alcohol, drugs and substance misuse,
- Positive behaviour management,
- Physical intervention and restraint (reasonable force).

The Academy will maintain at least two contact numbers for each child (including numbers for parents who are separated).

In our Academy all these policies are accessible for staff and parents to read.

We will record when staff have been given a policy and expect them to adhere to it.

Staff will be able to go to their line manager for support if they don’t understand the policy.
12. Data Protection & Sharing Safeguarding Information - GDPR

12.1 In our school the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 will not prohibit information about children being shared with specific authorities if it is for the purposes of safeguarding children and individuals at risk.

12.2 Information that could be relevant to keeping a child safe will be shared so that informed decisions can be made about a child’s welfare. We recognise that we have a duty of care for our students and safeguarding is of upmost importance to us.

12.3 GDPR does not ‘trump’ safeguarding. Processing safeguarding data is necessary for compliance with our legal obligation to which OCL is subject. Therefore, consent is not needed for the effective sharing of safeguarding information between an academy and relevant authorities.

12.4 Photographs and films represent key ways of making memories of events within school and OCL recognises its legal obligations to Data Protection in the processing of personal data.

12.5 OCL requires that in general, for the protection of children, where photographs of pupils are used in school publications, including the website, the pupils should not be named. Conversely, if a pupil’s name appears, the pupil’s image should not.

This means that in our academy we will apply the OCL guidance issued around photography, social media, websites and printed publications in schools:

Specific guidance for our staff can be found in the OCL Photography guidance document.
13. **Dealing with Disclosures of Abuse**

13.1 It is important that all our staff know how to deal with a disclosure of abuse or neglect.

*Remember* - If a pupil choses to confide in you, it means they trust you and want you to help them. Dealing with a disclosure may be frightening, but you should also feel privileged that the child has chosen you to talk to.

13.2 If you see or hear something that concerns you:
- Don’t ignore it
- Don’t feel silly – if it worries you, someone else needs to know
- If it is related to a child being at risk – see the DSL, or Deputy DSL immediately and definitely before the child goes home that day
- Upload all information to CPOMS (or the agreed system for recording) and seek advice immediately from your DSL
- If it is something related to safeguarding, but not a child whose safety is immediately at risk – inform the appropriate Pastoral Leader via CPOMS, or the agreed system for monitoring
- All staff may raise concerns directly with Children’s Services. If they feel an incident is not being dealt with appropriately, or they are unable to locate relevant staff
- Concerns about adults in the academy should be made directly to the Principal.

At this point, take the following steps:
- Explain to the student that the disclosure must be reported – emphasise your trust in them.
- Do not promise to keep the allegation secret or that ‘everything will be alright’
- Reassure by telling the student that they have done the right thing in telling you, do not offer physical reassurance
- Do not admonish in any way e.g., ‘I wish you had told me sooner’
- Inform the DSL initially verbally
- Under no circumstances, discuss the matter with any other person - if the allegations prove to be untrue, any such discussion would be deemed defamatory.

13.3 Dealing with disclosures of abuse:
- Always listen carefully and quietly – do not press for any evidence at all
- Remain calm and reassuring – do not dismiss the disclosure – do not show distress or concern
- Do not refute or try to belittle the allegation
- Show that you care through open and reassuring facial and body language
- Do not interrogate or ask leading questions (it could later undermine a case)
- Ensure you take a written verbatim account of the child’s disclosure using the appropriate academy Disclosure Form and record keeping system or, where appropriate, through CPOMS.

13.4 With the DSL, prepare a detailed report itemising the information revealed by the student with absolutely no opinion:
- Actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported and follow-up action taken within the academy
- Date and sign any written record of events and action taken and keep confidential and secure
- You must keep, in absolute confidence, a copy of the report, as will the DSL.
14. Multi-Agency Safeguarding Arrangements

There may be safeguarding issues that are specific to the local area or population that need to be identified in partnership with the Multi-Agency Safeguarding Arrangements (MASA) and or other agencies such as gang membership, FGM, CSE, extremism and the safeguarding of vulnerable adults.

This means that in our Academy All staff will be made aware of specific issues relating to locality that could impact the safety of children at the academy. We will have a comprehensive training plan to keep staff up-to-date. We will also ensure that our students are kept informed of issues within their SRE and PHSE curriculum.

15. The main issues for each Locality

<table>
<thead>
<tr>
<th>These are the MASA identified issues in your area:</th>
<th>This is how our curriculum address the relevant issues:</th>
<th>This is the training our staff have to address the relevant issues:</th>
<th>This is how our Academy promotes positive messages about tackling these issues with the community and other stakeholders:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Domestic Violence</td>
<td>PSHE</td>
<td>Internal CPD, HAYS training programme</td>
<td>Hub events, LEA publications, Website</td>
</tr>
<tr>
<td>County Lines</td>
<td>Assemblies</td>
<td>HAYS training programme</td>
<td>Hub events</td>
</tr>
<tr>
<td>Gang violence</td>
<td>PSHE and assemblies</td>
<td>Internal CPD, Local authority training</td>
<td>Hub events</td>
</tr>
<tr>
<td>Food poverty</td>
<td>PSHE, Assemblies, News &amp; Debate</td>
<td>CPD</td>
<td>Food hub, website and newsletters</td>
</tr>
<tr>
<td>Children Missing in Education (CME)</td>
<td>Attendance assemblies</td>
<td>Internal CPD- monitoring and improving attendance</td>
<td>Website, MCAS- parent app, Hub events</td>
</tr>
<tr>
<td>Mental Health &amp; wellbeing</td>
<td>PSHE, Recovery &amp; wellbeing curriculum</td>
<td>Internal CPD, coaching</td>
<td>Local authority services, hub events, website</td>
</tr>
</tbody>
</table>
16. Female Genital Mutilation

16.1 FGM is a criminal offence – it is child abuse and a form of violence against women and girls, and therefore should be treated as such.

16.2 With effect from October 2015, all schools are subject to a mandatory reporting requirement in respect of female genital mutilation (FGM).


16.3 FGM involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

16.4 Four types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris
- Type 2 Excision – partial/total removal of clitoris and labia minora
- Type 3 Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

16.5 When a teacher suspects or discovers that an act of FGM is going to be, or has been, carried out on a girl aged under 18, that teacher has a statutory duty to report it to the Police.

16.6 Failure to report such cases MAY result in disciplinary sanctions.

This means that in our academy we ensure:

- Our staff are supported to talk to families and local communities about sensitive concerns in relation to their children and to find ways to address them together wherever possible.
- All staff are up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.
- The issue of FGM and other such issues will be reflected in our Academy curriculum plans and, in an age appropriate way, incorporated into lesson plans.

As with all other safeguarding and child protection issues the DSL will lead our Academy in addressing FGM.

It is our expectation that a teacher¹ who has to report a suspicion of FGM will do this with the full support of a member of the DSL team.

If any member of our staff does suspect that a girl is at risk of or has undergone FGM they will let the designated safeguarding lead know straight away and an immediate referral will be made to the Police and to Children’s Social Care Services (if there is a delay in reporting it should be no later than 1 working day after disclosure).

¹ For the purpose of FGM, reporting ‘teacher’ is defined as those who carry out teaching, not just restricted to those who are qualified. This then includes support staff with a teaching role.
17. Honour Based Abuse (HBA)

17.1 Where HBA affects children and young people it is a child protection issue. It is an abuse of human rights.

17.2 Children and young people who suffer Honour Based Abuse are at risk of Significant Harm through physical, sexual, psychological, emotional harm and neglect.

17.3 In some cases they are also at risk of being killed. Some reasons that have been given for HBA are:

- Protecting family ‘honour’
- To control un-wanted behaviour and sexuality (including perceived promiscuity or being lesbian, gay, bisexual or transgender)
- Strengthening family links
- Protecting perceived cultural and/or religious ideals
- Preventing unsuitable relationships
- Assisting claims for residence and citizenship in the UK
- Perceived immoral behaviour e.g. make-up or dress; use of mobile phone; inter faith relationships.

In our academy we take the disclosure of HBA very seriously and act on it.

The DSL will refer to Children’s Social Care, the Police and the National Forced Marriage Unit promptly.

Under no circumstances will we:

- Let the family or social network know about the concerns,
- Speak to the child in front of family members,
- Approach the family or community leaders
- Attempt mediation, or
- Use members of the community to interpret.

Concerns will be stored on CPOMS but access limited to a small group within the organisation.
18. Peer on Peer Abuse

18.1 It is important that an academy can recognise that children are capable of abusing their peers, and that this abuse can include physical abuse, sexting, initiation/hazing, sexual violence and harassment.

18.2 The Oasis values, ethos and behaviour policies provide the platform for staff and students to clearly recognise that abuse is abuse and it will never be tolerated or diminished in significance.

18.3 It should be recognised that there is a gendered nature to peer on peer abuse i.e. that it is more likely that girls will be victims and boys perpetrators.

18.4 Schools should recognise the impact of sexual violence and the fact children/young people can, and sometimes do, abuse their peers in this way.

18.5 When referring to sexual violence this policy is referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: there is intentional penetration of the vagina, anus or mouth of another person (B) with his penis, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.

- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina, anus or mouth of another person (B) with a part of her/his body or anything else, the penetration is sexual, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.

- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, (B) does not consent to the touching and (A) does not reasonably believe that (B) consents.

This means that in our academy:

We will not tolerate instances of peer on peer abuse and will not pass it off as “banter”, “just having a laugh” or “part of growing up”.

In our Academy we consider all peer on peer abuse as unacceptable and will be taken very seriously.

We will follow both national and local guidance and policies to support any children/young people subject to peer on peer abuse, including sexting (also known as youth produced sexual imagery) and gang violence.

We will follow the guidance on managing reports of child-on-child sexual violence and sexual harassment in schools.

We will utilise the Oasis Children who pose a Risk to Children School Safety Plan.

We will always report episodes of ‘up-skirting’

- Up-skirting is typically defined as taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Our DSL team will complete the ‘Children who pose a risk to children’ school safety plan to assess risk and manage the integration in school.

We will also utilise the search and confiscation guidance produced by the DfE, and deal with incidents of youth produced sexual imagery guidance by UKCISS.
19. Children Missing in Education

19.1 Oasis academies believe all students, regardless of their circumstances or background are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs.

This means that in our academy we will:

- Operate a stringent attendance tracking system that is overseen by a member of the leadership team.
- We will use effective attendance management strategies that enable us to account for every child.

Our academy will hold two telephone contact numbers for the parents of each student.

In our academy we will only authorise leave of absence in exceptional circumstances.

The Principal will determine the length of time that the child can be away from the academy.

19.2 Academies will tackle Persistent Absentees and report on children who are persistently absent from school to the Regional Director.

In our school our attendance staff are trained to look out for these triggers and the academy works in partnership with the Local Authority to ensure localised risks are taken note of and shared with all staff.

19.3 Leave of absence requests will be viewed against the safeguarding vulnerabilities for:

- Forced Marriage (both males and females)
- Traveling to Conflict zones or countries with a higher prevalence of FGM.

In our school our attendance staff are trained to look out for these triggers and the academy works in partnership with the Local Authority to ensure localised risks are taken note of and shared with all staff.

19.4 The DSL will, as soon as a concern is established, alert the Local Authority.

Staff who have pastoral responsibility undergo training on attendance and safeguarding issues on an annual basis.

We will implement the SOL guidance on effective attendance to ensure effective practice in CME.

Pupil/student absence will be followed up on a daily basis as a matter of priority.

Where there is no response to indicate the whereabouts of the pupil/student, unless
circumstances indicate that a child is at risk and immediate action is necessary.

In our academy we will:
- Undertake a 1st day phone call or text to try to establish the child’s whereabouts,
- Complete a home visit on the 1st day for every child who is on the academy ‘vulnerable list’,
- Complete a home visit on the 3rd day who has a continuous period of unexplained absence of three days or more.

When there is unexplained absence of 10 days or more, we will refer the matter to the Local Authority Children Missing Education team.

No student will be removed from an academy roll until all safeguarding checks have been completed or the whereabouts of a pupil/student have been established.

19.5 The admissions register at the academy is kept up to date.
The local authority will be informed of all deletions as soon as the grounds for deletion are met, in line with the local authority guidelines, but no later than deleting the pupil’s name from the roll.

20. Online Safety

20.1 It is essential that children are safeguarded from potentially harmful and inappropriate communications and online material.
As such, the academy ensures appropriate procedures, filters and monitoring systems are in place in accordance with the following policies:
- Oasis E-Safety,
- Acceptable use of Technologies,
- Web Filtering and Device Monitoring through Smoothwall Moderated Monitoring.

20.2 Although appropriate blocking is essential, it should not restrict the students

In our academy:
- The DSL will oversee the delivery of the e-safety curriculum ensuring safeguarding is maintained.
- Online safety is included our curriculum provision as part of providing a broad and balanced curriculum.
- Children are taught about safeguarding, including online, through teaching and learning opportunities, with specific reference to the age related guidance in ‘Education For a Connected World’ resources: https://www.gov.uk/government/publications/education-for-a-connected-world
- We will comply with the Oasis E-Safety Policy
- Our E-Safety and Acceptable use of Technology Policies can be found on the OCL Policy Portal or upon request
- In our academy we monitor the results of our web blocking and monitoring software to
learning or lead to unreasonable restrictions as to what our students can be taught.

ensure that our students work safely and are protected from terrorist or extremist material, cyber-bullying, cyber-crime, sexting, offensive user/trolling, vulnerable user over sharing and grooming.

21. Training and Development of staff

21.1 All staff must complete safeguarding and child protection training as part of their induction.

This means that in our academy:

- All staff and volunteers new to the Academy will be given appropriate Safeguarding training including ACES training as part of their induction programme to the academy.
- Newly recruited staff will complete the online training as part of their induction and will receive academy specific training including being made aware of local risk factors for extremism

In addition we will make sure that:

- Time will be given to enable this commitment to be met
- All academy staff will undertake annual safeguarding and child protection training as organised by the DSL
- Updates will feature regularly in all staff and ALT meetings, as appropriate
- MASA identified local issues will be addressed through staff training.

To achieve this in our academy we will ensure that:

- The Designated Safeguarding Lead (DSL) and Deputy DSL will receive relevant training as per KCSIE 2020 requirements through the OCL DSL training course.
- The DSL will attend Local Authority network meetings as necessary and other appropriate inter-agency training.
- The DSL will attend Prevent training (such as WRAP) as provided by the Home Office and Local Authority.
- The Principal will attend advanced training with a designated provider identified by Oasis Community Learning.

21.2 All staff must access update briefings on safeguarding and child protection each year.

21.3 The DSL team will be appropriately trained and demonstrate attendance at Local Authority and Multi-agency Safeguarding Arrangements meetings..
22. Allegations against Members of Staff

22.1 All allegations of abuse made against a member of staff in relation to a student must be brought to the attention of the Principal immediately.

22.2 If the allegation meets any of the following criteria, the Principal (or other lead person) must report it to the Local Authority Designated Officer the same day. If it is alleged that a teacher or member of staff (including a volunteer) has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he/she is unsuitable to work with children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

22.3 For other allegations the Principal and DSL will decide if further enquiries are required prior to referral to the Local Authority Designated Officer.

22.4 The Local Authority’s Designated Officer must be informed of all allegations that come to the Academy’s attention that meet the criteria so that he/she can consult police and social care colleagues as appropriate.

22.5 All alleged physical injuries must be investigated by the appropriate external agencies.

This means that in our Academy where the Principal considers that a referral appears to meet the LADO criteria, the Principal will inform the Local Authority’s Designated Officer within 1 working day.

In some cases, allegations may be so serious, they will require immediate intervention by the police and or children’s social care services. If this is the case the LADO team will also be informed.

Within 1 working day, all concerns and allegations should be raised with:

- The Principal only - for allegations about a member of staff, including supply staff.
- The Regional Director - for allegations about the Principal/Executive Principal.
- The OCP National Director - for allegations about a Hub worker working for OCP.
- The Regional Director - for allegations about a member of an OCL national team.
- The Chief Executive’s Office - for allegations about the Regional Director.

All LADO referrals will be recorded on the OCL tracking system so that progress and outcomes can be followed.

Where an allegation is made against a supply teacher, the Principal will immediately contact both the agency concerned and the LADO. Our Academy will support any investigation that is required.

During an investigation, it may be that a member of our staff could be suspended or redeployed to work that is not regulated activity.

At the conclusion of any investigation if enough evidence is gathered to have foundation then a referral will be made to the DBS Authority as soon as possible.

23. Suitability of staff and safe recruitment practices

23.1 Safe recruitment practices are an essential part of creating a safe environment for children and young people.

In our academy we will ensure that staff and volunteers working at the academy are suitable to do so.
23.2 Keeping Children Safe in Education 2020 states that schools will be required to complete a risk assessment for each volunteer.

We will follow the specific procedures are outlined in:
- OCL Recruitment & Selection Policy
- Recruitment Toolkit.

Where the volunteer is undertaking regulated activity an enhanced DBS and barred list check will be undertaken.

Where the volunteer is not in regulated activity we will undertake a DBS but are not legally allowed to do a barred list check.

‘Due Diligence’ checks will be made on any speaker invited to host an assembly or speak to students during lessons.

In our school the SCR will be overseen and directly managed by the Principal and reviewed:
- Every half term by the Principal
- By the MST Team
- By the Regional Directors as part of their regular visit schedule
- By the National Safeguarding Lead as part of a systems and practice review

This will allow us to sustain effective safeguarding at our academy.

24. Confidentiality and Record Keeping

24.1 Staff have the professional responsibility to share relevant information about the protection of children with the DSL and Principal and potentially external investigating agencies.

24.2 If a student confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tell the student sensitively that he/she has a responsibility to refer the matter to the Designated Safeguarding Lead (DSL) for the student's own sake.

24.3 Accurate written notes will be kept of all incidents or Child Protection concerns relating to individual pupils.

At our school we will take any disclosure very seriously.

We will seek to reassure our students that the matter will be only be disclosed to the Designated Safeguarding Lead (DSL), who will then decide on appropriate action.

If a member of the academy has a child protection concern, they must inform the DSL or Principal as soon as possible. These will be kept on the student’s Child Protection file within CPOMS.
24.4 As part of their contractual arrangements any external individual or organisation with the academy, be required to work in accordance with the Academies child protection and safeguarding policy.

24.5 Working in partnership with parents is important, the academy should endeavour to do this at all times. It is recognised however that there are occasions when it is in the child’s best interest for work to be undertaken and referrals made without the parents initial consent to ensure the welfare and safety of our students.

24.6 Child Protection records must be kept secure and arrangements in the academy must comply with the Data Protection Policy.

Any external individual or organisation contracted by the academy to work with academy students must report any child protection incidents or disclosures from students to the Principal or DSL at the earliest opportunity.

- To do this our academy will:
  - Aim to help parents understand that the academy has a responsibility for the welfare of all students and has a duty to refer cases to the Local Authority in the best interests of the student.
  - Consider the safety of the student and, should a concern arise the DSL has the responsibility to seek advice prior to contacting parents.
  - Make all our policies available on the website and on request
  - Ensure a robust complaints system is in place to deal with issues raised by parents and carers
  - Provide advice and signpost parents and carers to other services where pupils need extra support.

In our school we use the CPOMS system.

The DSL will ensure that all Child Protection records are kept separately from pupil records and stored securely:

Information from these files will only be shared with relevant staff when it is necessary to do so and in a manner consistent with data protection legislation.

In our Academy we will monitor the progress and achievement of children in need of a social worker to ensure parity in attainment between all out pupils.

24.7 Upon receipt of any request regarding direct access to academy documentation on a Child Protection file, the Principal and DSL will be informed and a decision taken on the appropriate way forward in accordance with the Data Protection Policy.

24.8 When a pupil transfers to another school child protection and safeguarding information will be shared with that school to ensure safe and consistent support for that child.

To do this our academy will:

- Find out the name of the receiving school (and, where appropriate the Local Authority)
- Contact the relevant member of staff at that
25. Early Years Settings within Academies

25.1 As an early year’s provider delivering the Early Years Foundation Stage (EYFS), the Academy aims to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance.

25.2 Including a member of staff responsible for leading on safeguarding within the early years.

In our academy we will ensure that all children in the nursery and reception classes, and/or two-year old provision, are able to learn, develop, be safe and healthy by providing:

- A safe secure learning environment where children can be seen and heard at all times.
- A named member of staff in the DSL team.
- A member of staff who holds a current, paediatric first aid certificate who available on the premises at all times.
- A qualified 1st Aider accompanies children on school trips
- A designated key worker who liaises with parents and carers
- Routine monitoring of health and safety practices, to promote children’s safety and welfare
- Appropriate staffing, ratios and qualifications comply with statutory guidance and can meet the needs of all children
  - **Nursery** 1/13 children with one member of staff a qualified teacher and at least one member of staff to hold full level 3 qualification
  - **Reception** class size limited to 30, led by a qualified teacher, with suitably qualified support staff).

26. Health and Safety

26.1 There is a robust interaction between this policy and the Health and Safety policy to meet the statutory responsibility for the safety of students and staff at the academy.

In our school the Principal will identify and manage risk through the use of risk assessment carried out:

- On an annual basis for the academy learning spaces and environment in and outdoors
- For all school trips and educational visits
- For pupils travelling between locations during the school day
26.2 People accessing the site will be authorised.

It is expected that all staff, visitors and contractors will:

- Report to the academy reception on arrival.
- Provide proof of identity.
- Wear a name badge at all times with lanyards differentiating the groups:
  - Academy staff will use the designated academy lanyard
  - Visitors whose DBS Status has been confirmed will wear GREEN lanyards and may be allowed to access the school unsupervised.
  - Visitors who do not have a DBS or have not had confirmation will wear a RED lanyard and will be supervised on-site.
  - Members of a National Oasis team will wear a national lanyard, or GREEN lanyard if the DBS status has been confirmed.
- Be made aware of the arrangements for safeguarding, health and safety.

26.3 The Academy will promote the health of all students, including children in the Early Years.

In our school we will do this by:

- Taking necessary steps to stop the spread of infection.
- Administering medicines and/or intimate care only in line with our academy policy
- Taking appropriate action where students are unwell
- Notifying the HSE of any serious accident, illness or death of any child whilst at the Academy.
- Notifying Ofsted, in the case of children attending the early years, within 14 days.

26.4 Day-to-day responsibility for health and safety issues at the academy will be delegated
to a member of staff who is suitably trained and competent to carry out duties.

27. Safeguarding pupils who are vulnerable to extremism; The Prevent duty

27.1 The Prevent strategy aims to stop people becoming terrorists or supporting terrorism. While it remains rare for children to become involved in terrorist activity, the Academy recognises some, from an early age can be exposed to terrorist & extremist influences or prejudiced views. As with other forms of safeguarding strategies, early intervention is always preferable.

27.2 The Trust is aware there have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

27.3 Our Trust is committed to working with the local authority and other local partners, families and communities to play a key role in ensuring young people and our communities are safe from the threat of:

Extremism – such as the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Radicalisation – such as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Terrorism – defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause

27.4 All academy staff need to be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection.

In line with fundamental British Values and the Oasis ‘9 Habits’ our Academy values inclusion, tolerance and the freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning healthy communities in which the Academy is based.

Both pupils and teachers have the right to speak freely and voice their opinions.

The Principal and the Designated Safeguarding Lead will assess the level of risk within the academy and put actions in place to reduce that risk.

Actions for our school will include consideration of the new SRE curriculum, PSHE curriculum, SEND policy, assembly content.

Risk assessment will include the use of school premises by external agencies, integration of pupils by gender and SEN, anti-bullying policy and other issues specific to the academy’s profile, community and the Oasis ethos.

All our staff will be aware that children at risk of radicalisation may display different signs or seek to hide their views.
27.5 The academy will identify a Prevent Single Point of Contact (SPOC) who will be the lead within the academy for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the Designated Safeguarding Lead. If there is a concern that a young person is being radicalised or at risk of being drawn into terrorism refer to Children’s Services as with any other safeguarding concern.

27.6 The Trust will ensure that the DSL and SPOC (if different) will complete a local Workshop to Raise Awareness of Prevent (WRAP) and that this training will be cascaded to staff.

27.7 Due diligence checks should be undertaken by the academy on any organisation that uses its facilities.

27.8 These checks will include:
- An internet search on the organisation
- Checks with local groups,
- MASA & Local police checks
- Local Authority checks.

27.9 Details of agreement/s will be recorded and kept on file.

28. Emotional Health & Well-being

28.1 Our Academies have an important role to play in supporting the mental health and wellbeing of all our pupils.

Staff will use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

When any member of our staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and/or the Designated Safeguarding Lead (if this is not the same person) and record their concerns on CPOMS.

In addition, links with the local Channel lead can made by the DSL and where necessary, individual cases will be referred to the local Channel Panel for screening and assessment.

In our school this will be part of our annual CPD training programme by the DSL.

Our academy will only allow use of the premises by other organisations and/or supplementary schools if they provide:
- An overview of what it intends to teach or provide
- The ethos they promote fit easily with the 9 Habits and the Oasis ethos.
- Their work promotes British Values
- They can provide evidence that they have practised safe recruitment and their staff have the requisite DBS checks.

This means that in our Academy we will:
Ensure that all of our staff are 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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.
28.2 As a Trust we must ensure we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Our staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem.

Any member of staff who is concerned about the mental health or wellbeing of a student should speak to the mental health lead in the first instance.

If there is a fear that the student is in danger of immediate harm then the normal child protection procedures should be followed with an immediate referral to DSL or the Principal.

If the student presents a medical emergency then the normal procedures for medical emergencies should be followed, including alerting the first aid staff and contacting the emergency services if necessary.

Where a referral to CAMHS is appropriate, this will be led and managed by the Mental Health lead in conjunction with the DSL.

To support this we will have a Mental Health Lead in our Academy who has the Mental Health First Aid (MHFA) qualification.

28.3 The skills, knowledge and understanding needed by our students to keep themselves and others physically and mentally healthy and safe are included as part of our developmental of or SRE and PSHE curriculum.

The specific content of lessons in our Academy will be determined by the specific needs of our pupils but there will always be an emphasis on enabling students to develop the skills, knowledge understanding, language and confidence to seek help, as needed, for themselves or others.

The DSL will liaise with the Mental Health Lead in the Academy and with the appropriate mental health professionals.

The DSL will liaise closely with Children’s Social Care Services to ensure that the appropriate approach to care is taken, including child protection services.

Where appropriate our Academy will provide ‘in-house’ emotional health and well-being support to our pupils.

In the same way that pupils with physical needs have an Education Health Care plan, these plans will also be used to support pupils with mental health needs.
28.5 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

**This means that in our Academy we will as a minimum, deliver regular training about recognising and responding to mental health issues as part of our regular safeguarding training in order to enable them to keep students safe. We will host relevant information on our virtual learning environment for staff who wish to learn more about mental health.**

Training opportunities for staff who require more in depth knowledge will be considered as part of our performance management process and additional CPD will be supported throughout the year where it becomes appropriate due developing situations with one or more students.

As an academy we will be vigilant for signs of emotional well-being concerns. These may include:

- Physical signs of harm that are repeated or appear non-accidental
- Changes in eating/sleeping habits
- Increased isolation from friends or family, becoming socially withdrawn
- Changes in activity and mood
- Lowering of academic achievement
- Talking or joking about self-harm or suicide
- Abusing drugs or alcohol
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing – e.g. long sleeves in warm weather to cover limbs.

It is the aim of our Academy to keep peers safe, we will consider on a case by case basis which friends may need additional support. Support will be provided either in one to one or group settings and will be guided by conversations by the student who is suffering and their parents with whom we will discuss:

- What it is helpful for friends to know and what they should not be told
- How friends can best support
- Things friends should avoid doing/saying which may inadvertently cause upset
- Warning signs that their friend needs help (e.g., signs of relapse).

Additionally, we will want to highlight with peers:

- Where and how to access support for themselves

28.6 Our school staff may become aware of warning signs which indicate a student or a member of staff is experiencing mental health or emotional wellbeing issues.

These warning signs should always be taken seriously.

If staff have a mental health concern about a pupil that is also a safeguarding concern, immediate action should be taken.

28.7 When a student is suffering from mental health issues, it can be a difficult time for their friends. Friends often want to support but do not know how. In the case of self-harm or eating disorders, it is possible that friends may learn unhealthy coping mechanisms from each other.
28.8 It may be shocking and upsetting for parents/ carers to learn of their child’s issues and many may respond with anger, fear or upset during the first conversation even if they already have concerns from their child’s behaviours at home.

- Safe sources of further information about their friend’s condition
- Healthy ways of coping with the difficult emotions they may be feeling.

In our Academy we will work closely with parents & carers to support the whole family, unless to do so places the child at additional risk.

We will provide clear means for parents to contact the Mental Health Lead if they have further questions and arrange a follow up meeting or phone call as parents often have many questions as they process the information.

To support parents and carers at the end of each meeting we will agree next steps and always keep a brief record of the meeting on the child’s CPOMS file.
Appendix A – Key information for all staff

Through the Oasis’ ethos, values and behaviour for learning policy, the Academy provides a platform to ensure children and young people are given the support to respect themselves and others, and understand their role as a local and global citizen, being aware of the potential issues they face. This includes child on child sexual exploitation.

Child Criminal Exploitation (CCE)

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

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

In addition Child Criminal Exploitation is a coverall heading for the following issues:

- County Lines
- Child Trafficking & Human Slavery
- Gang affiliation & knife Crime.

Child Sexual Exploitation (CSE)

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. It is important to note that this is Child Abuse and participation should NOT be viewed as consensual. It is a problem that occurs for boys as well as girls.

Sexual exploitation can take many forms ranging from the completely inappropriate relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship.

The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Child Sexual Exploitation does not always involve physical contact as it can occur through the use of technology. This can affect any child or young person (male or female) under the age of 18 years. The age of consent is immaterial in CSE – it is child abuse.
The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs of CSE can include:

- Inappropriate sexual or sexualised behaviour
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Associating with other young people involved in sexual exploitation
- Repeat sexually transmitted infections
- Going to hotels or other unusual locations to meet friends
- Unexplained changes in behaviour or personality
- Repeat pregnancies, abortions and miscarriage
- Moving around the country, appearing in new towns or cities, not knowing where they are.
- Involved in abusive relationships, intimidated and fearful of certain people or situation
- Receiving unexplained gifts or gifts from unknown sources
- Getting in/out of different cars driven by unknown adults
- Recruiting other young people to exploitative situations
- Having older boyfriends or girlfriends
- Contact with known perpetrators
- Having multiple mobile phones and worrying about losing contact via mobile

### County Lines

Gangs use children and vulnerable people to move drugs and money including concealing concealed on or about their person. It can also include the person being forced to conceal the drugs internally (known as ‘plugging’). Gangs establish a base, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’.

One of the key factors found in most cases of County Lines is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection).

If staff suspect that a child is a victim of County Lines exploitation they must follow the academy’s procedures for reporting child protection concerns and report to the DSL immediately. The DSL should report to the local safeguarding children’s board immediately and the police if there is a risk of immediate harm.

### Child Trafficking & Human Slavery

The academy keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation and access support, advice and resources via STOP THE TRAFFIK, a sister company within the Oasis Charitable Trust. The resources include lesson content on:

- What is human trafficking?
- Healthy relationships and grooming
- Online safety
- Staff training on child trafficking
- Assembly and lesson resources on vulnerable communities.
Through the use of these resources and others, our staff are supported to recognise warning signs and symptoms in relation to specific issues.

Our staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.

Our Designated Safeguarding Lead knows where to seek and get advice as necessary from the Local Authority and national specialist organisations such as STOP THE TRAFFIK. Staff are available for advice and links to relevant support with dealing with a potential trafficking situation if needed found at https://www.stopthetraffik.org/

Information on Specific Forms and Categories of Child Abuse

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

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children (peer on peer abuse).

In a situation where abuse is alleged to have been carried out by another child/peer, the child protection procedures outlined in this policy should be adhered to for both the victim and the alleged abuser; that is, it should be considered a childcare and protection issue for both children.

All abusers must be held accountable for their behaviour and work must be done to ensure that abusers take responsibility for their behaviour and acknowledge that the behaviour is unacceptable. If there is any conflict of interest between the welfare of the alleged abuser and the victim, the victim’s welfare is of paramount importance.

Abusive behaviour, which is perpetrated by peers, must be taken seriously. It is known that some adult abusers begin abusing during childhood and adolescence, that significant numbers will have suffered abuse themselves and that the abuse is likely to become progressively more serious. Early referral and intervention is therefore essential in line with Section 3 of this policy.

Peer on peer abuse can manifest itself in many ways. This could for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. It could be through ‘sexting’ using online communications, text or image messaging. Please refer to the online safety policy for further information, Child Exploitation Online Protection Centre (CEOP) for further guidance on sexting at http://www.ceop.police.uk/

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- must be regarded as indicators of the possibility of significant harm
- justifies the need for careful assessment and discussion with designated safeguarding lead and may require consultation with and/or referral to Children’s Services.

The absence of such indicators does not mean that abuse or neglect has not occurred.
Signs of abuse in children:

A1. Neglect

Neglect is 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 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.
- Being neglectful, or unresponsive to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is regularly not collected or received from school
- The child is left at home alone or with inappropriate carers.

A2. Physical Abuse

Physical abuse 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.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or a belt
- Injuries involved in domestic abuse situations where the child is a direct victim
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
• Symptoms of drug or alcohol intoxication or poisoning
• Unaccountable covering of limbs, even in hot weather
• Fear of going home or parents being contacted
• Fear of medical help
• Fear of changing for PE
• Inexplicable fear of adults or over-compliance
• Violence or aggression towards others including bullying
• Isolation from peers.

A3. Sexual Abuse

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

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family. Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

• Inappropriate sexualised conduct
• Sexually explicit behaviour, play or conversation, inappropriate to the child’s age.
• Continual and inappropriate or excessive masturbation
• Self-harm (including eating disorder), self-mutilation and suicide attempts
• Regressive behaviour, enuresis, soiling
• Involvement in prostitution or indiscriminate choice of sexual partners
• Touching others inappropriately
• An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

• Pain or itching of genital area (anal, vaginal or penile)
• Blood on underclothes
• Pregnancy in a younger girl where the identity of the father is not disclosed
• Thrush, persistent complaints of stomach disorders or pains
• Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.
Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate sexual behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity including any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

Equality – Consider differentials of physical, cognitive and emotional development, power, control and authority including passive and assertive tendencies.

Consent – agreement including all of the following:

- Understanding what is proposed; based on age, maturity, developmental level, functioning and experience.
- Knowledge of society’s standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence
- A clear understanding that children under the age of 13 cannot consent to sexual activity.

Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.
In evaluating sexual behaviour of children and young people, the above information should be used only as a guide and should be discussed with the DSL. It is also worth reviewing concerns against the ‘Brook Traffic Light System’ (Brook 2012):

Sexual abuse, including suspected abuse by peers will always be investigated and will not pass it off as “banter”, “just having a laugh” or “part of growing up”.

A4. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child/young person such as to cause severe and persistent adverse effects on the child/young person's emotional development. It may involve conveying to children/young people 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/young person 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 the child/young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child/young person participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person including domestic abuse (violence) situations where the child is witness either in person, or being in the same building as the victim. It may involve serious bullying (including cyber bullying), causing children/young people frequently to feel frightened or in danger, or the exploitation or corruption of children/young people. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

A5. Responses from Parents/Carers

Research and experience indicates that the following responses from parents may suggest a cause for concern across all five categories:

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home; or
- Violence between adults in the household
- Evidence of coercion and control.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

A6. Children with a Disability

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise on a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child’s means of communication
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting
- Misappropriation of a child’s finances; or
- Inappropriate invasive procedures.

There is a concern sometimes that, for children with SEN and disabilities, their SEN or disability needs are seen first, and the potential for abuse second. If children are behaving in particular ways or they’re looking distressed or their behaviour or demeanour is different from in the past, maybe staff should think about that being a sign of the potential for abuse, and not simply see it as part of their disability or their special educational needs. Children with SEND have a higher risk of being left out, of being isolated from their peers, and they are disproportionately affected by bullying.

A7. Homelessness

Being homeless or at risk of being homeless presents a real risk to a child’s welfare. Indicators that a family is at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour. The Homelessness Reduction Act 2017 places a legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment for their needs and circumstances. Further information that summarises the new duties is available at: www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets
A8. Children and the court system

When children are required to be a witness in a criminal court, either for crimes committed against them, or for crimes that they have witnessed, it is important they are supported. KCSIE 2020 provides two age appropriate support guides:


A9. Looked After Children and Previously Looked After Children

All staff should have awareness of issues around safeguarding looked after and previously looked after children. Leaders should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe. A previously looked after child remains vulnerable and it is important that all agencies work together to ensure that prompt action is taken on concerns to safeguard this particularly vulnerable group.

The Principal must appoint a designated teacher to promote the educational achievement of children who are looked after & previously looked after to ensure that this person has appropriate training. The designated teacher is also responsible for promoting the educational achievement of children who have left care.

Staff need to be aware of the legal status of a looked after child’s care arrangements. In particular, they should ensure that appropriate staff have the information they need in relation to a child’s looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child’s care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child’s social worker and the name of the virtual school head in the authority that looks after the child.

A10. Liaison with the virtual head

Virtual school heads receive pupil premium plus additional funding based on the latest published numbers of children looked after in the authority.

The Academy's designated teacher for looked after & previously looked after children will work with the virtual school head to monitor the child’s welfare and discuss how funding can be best used to support the progress of the child and meet the needs identified in the child’s personal education plan.

A11. Children in alternative provision

Schools are responsible for the safeguarding of their pupils when they’re placed in an alternative provision. Schools should obtain a written statement from the provider that safeguarding practices are consistent with that of the Academy.
Appendix B - The Academy's Statutory Duty

This policy sets out how the academy will meet its statutory duty under section 175 of the Education Act 2002, to safeguard and promote the welfare of our students. It has been developed in accordance with the law and guidance found at https://www.gov.uk/ that seeks to protect children.

Related policies
Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting the medical needs, providing first aid and/or intimate care, building security, drugs and substance misuse, positive behaviour management and the use of physical intervention and restraint (reasonable force).

This document must therefore be read, used and applied alongside Oasis policies.

There may be safeguarding issues that are specific to the local area or population that need to be identified in partnership with the Local Multi-Agency Safeguarding Arrangements and or other agencies e.g. gang membership, FGM, CSE, extremism and the safeguarding of vulnerable adults. See page 2 for our LASB contact details. All staff will be made aware of specific issues relating to locality that could impact the safety of children at the academy.

The Single Central Record (SCR) is an important part of the academy’s commitment to Safeguarding and will be monitored locally by the Principal on a termly basis and by Regional Directors in their work to challenge and review the impact of leaders to sustain effective safeguarding at the academy, by MST and by the National Safeguarding Lead during a visit. The SCR will be overseen and directly managed by the Principal, who is responsible for safeguarding in the academy, and the academy safeguarding leadership team.
Appendix C - The Oasis 9 Habits

- Compassionate
- Patient
- Humble
- Joyful
- Honest
- Hopeful
- Considerate
- Forgiving
- Self-controlled
Appendix D – Roles & responsibilities within Oasis

Safeguarding and promoting the welfare of children is **everyone’s responsibility**. Everyone who comes into contact with children and their parents or carers has a role to play in safeguarding children.

Knowing what to look for is vital to the early identification of abuse and neglect and if staff are unsure they should always speak to the designated safeguarding lead or deputy – if in exceptional circumstances, the designated safeguarding lead (or deputy lead) is not available, staff should consider speaking to a member of the ALT and/or take advice from your local Children’s Social Care Team. All actions that are completed in the absence of a designated safeguarding person should be shared with them at the very earliest opportunity.

The Board of Trustees will determine and keep under review safeguarding policy and practice in Oasis academies.

The **Chief Executive Officer**, as delegated by the Board of Trustees, is accountable for safeguarding children through Oasis Professional Governance and the Safeguarding Steering Group. The CEO reports to the Board on all Safeguarding issues.

**Principals** are accountable for the effective safeguarding of children in their academies.

The **Oasis National Safeguarding Steering Group** forms a fundamental part of OCL’s approach to ensuring our children have the right to protection from all types of harm and abuse and the promotion of their welfare, in line with the OCL vision.

The steering group’s core purpose is to provide clear guidance so that each individual Academy can implement effective, best policy and local procedures to safeguard children. It brings together (each term):

The Regional Director with Safeguarding Lead Responsibilities, the Oasis National Safeguarding Lead, OCL service leaders from education, human resources, estates management, Oasis Community Partnerships and representative Principals and Designated Safeguarding Leads.

All staff working (including visiting staff) must:

- Observe and comply with the staff code of conduct
- Attend all relevant training and development provided by OCL
- Academy Induction training, must now include the school’s behaviour policy and the school's procedures for managing children who are missing in education, as well as the staff code of conduct, and the child safeguarding and child protection policy
- Keeping Children Safe in Education Part 1 has to be read by all members of the staff; and for everyone working directly with children, they also need to read Annex A
- Know how to deal with a disclosure; if a pupil discloses to a member of staff that they are being abused, the staff member should refer to the flowchart and follow guidance set out in this policy.
- Report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead, or in their absence, the Deputy DSL. This is in line with the Child Protection Procedures and legal duty for reporting FGM.
- Be alert to the signs of harm and abuse, including issues that can manifest themselves due to peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Further information can be found in **APPENDIX A**.
Know the Designated and Deputy Safeguarding Lead’s name and contact details including telephone numbers and email, available on page 4

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

- is disabled and has specific additional needs
- has special educational needs (whether they have a statutory education, health and care plan)
- is a young carer
- is frequently missing/goes missing from care or home;
- is misusing drugs or alcohol
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or
- has returned home to their family from care

All staff must be aware of the early help process; this includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. All early help cases should be reviewed regularly and if the situation is not improving then consideration should be given to a referral to children’s social care for assessment for statutory services.

The Hub Council will:

- Contribute any local, contextual information that may support children’s safety and welfare.

The Principal will:

- Be responsible for the effective safeguarding of children in the academy and for developing a culture of safeguarding in all aspects of academy and Hub working.
- Be responsible for the implementation of this and all related policies and procedures, ensuring that the outcomes are monitored
- Undertake the OCL annual safeguarding audit, and report outcomes to their RD through the academy action plan for safeguarding
- Ensure that whilst the activities of the designated safeguarding lead (DSL) can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out below, remains with the designated safeguarding lead
- Meet each week with the DSL and regularly with the academy safeguarding team
- Attend advanced training with an accredited provider identified in liaison with their RD
- Through the DSL team ensure that:
  - All staff are vigilant to harm and abuse, are able to identify those students for whom there are child protection concerns and can make appropriate referrals, including to early help services.
  - Promote the educational outcomes and track the progress and attainment of all the vulnerable children, but specifically ‘those in need of a social worker’.
  - All staff and volunteers are trained sufficiently so they have the skills, knowledge and understanding necessary to keep children safe at all times, including on site, when attending alternative provision, educational visits off site or work-related learning
- Ensure that the KCSiE guidelines for effectively managing SEND and safeguarding are in place including the 2020 updates to this area
- Appoint a designated teacher to promote the educational achievement and welfare of children who are looked after and previously looked after and to ensure that this person has appropriate training
- Communicate clearly to visitors, parents and students so everyone understands the Academy’s
safeguarding policy and procedures

- Ensure that there is a deputy DSL in place to add capacity and ensure sustainable provision
- Ensure consideration to the range of responsibilities the DSL undertakes e.g. the DSL needs to have the flexibility to act immediately on a referral that requires an urgent response and time to attend lengthy meetings or case conferences
- Ensure that contact and role details of the DSL and Deputy DSL are clearly displayed in staff areas, the staff handbook and website (along with this policy)
- Bring to the attention the Regional Director safeguarding matters and report on a termly basis at the specific safeguarding governance meetings (see national calendar) and through regular C+R meetings. Any specific incidents must be reported directly to the RD as they occur
- Ensure safe recruitment practice is followed when recruiting to posts, and ensure appropriate action is taken when an allegation is made against a member of staff
- Ensure the academy offers a safe environment through effective implementation of the Oasis health and safety policy to meet the statutory responsibilities for the safety of students and staff at the academy.

The Designated Safeguarding Lead is responsible for:

- Being available term time during academy hours (or the deputy DSL in their absence) for staff or volunteers to discuss any safeguarding concerns
- Ensuring that all cases of suspected or actual problems associated with child protection are referred to the appropriate agencies in line with procedures set out in this policy, keeping the Principal appraised
- Ensuring the academy’s safeguarding policy and practice is relevant and consistent with the most recent statutory guidance outlined in Section 2.5
- Being aware of the latest national and local guidance and requirements and keeping the Principal and staff informed as appropriate
- Attend accredited, enhanced training as defined by the local Multi-Agency Safeguarding Arrangements to fulfil the role
- Ensuring that appropriate training for staff is organised according to the agreed programme with the Principal and renewed through ongoing professional development
- Ensuring families are fully aware of the academy safeguarding policies and procedures and are kept informed and involved
- Keeping Children Safe in Education 2020 says that schools should have at least two emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at home. The DSL is responsible for ensuring this is in place
- Ensuring that effective communication and liaison takes place between the Academy and the Local Authority, and any other relevant agencies, where there is a Safeguarding concern in relation to an academy student
- Ensuring that all staff have an understanding of child abuse, neglect and exploitation and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs (SEN) and disabilities
- Maintaining details of any looked after child’s social worker and the name of the virtual school head (in the authority that looks after the child)
- Working with the relevant Virtual School Head to discuss how funding can be best used to support the progress of looked after children at the academy and meet the needs identified in the child’s personal education plan
- Dealing with allegations of abuse in accordance with local and statutory procedures
- Supporting the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate if early help is appropriate
- Ensuring that adequate reporting and recording systems are in place
• Ensuring relevant records are passed on appropriately when students transfer to other schools, or are being educated at alternative provision or off-site education
• Being aware of children who are or who may be living in a private fostering arrangement. The Local Authority Private Fostering Officer is known to the Academy and ensures liaison to support the welfare and safety of the child
• Undertaking the OCL annual safeguarding audit with the Principal and Deputy DSL

The Designated and Deputy Safeguarding Lead will meet regularly with the Principal and safeguarding leadership team to discuss safeguarding issues including outcomes and implementation of actions relating to case conferences and core groups and all current case work. These meetings must be evidenced by minutes and/or on CPOMS. Other key staff will be invited as appropriate.

Safeguarding matters arising will be discussed routinely at each staff and/or ALT meeting and each RD visit (all safeguarding issues will be flagged immediately to the RD by the principal).
Appendix E – COVID-19 & Safeguarding

Oasis believes all students, regardless of their circumstances or background are entitled to education which is suitable to their age, ability, aptitude and any special educational needs.

Despite the emergency nature of the current situation it remains everyone’s role to recognise and respond to potential indicators of abuse and neglect. All action should be taken by those with statutory powers to help the child. Early contact and close liaison with such agencies are therefore regarded as essential by the Academy.

The DSL team should be allocated time to support staff and children regarding new concerns (and referrals as appropriate) as well as maintaining contact with vulnerable children as yet to return.

In the event of an actual or suspected case of abuse by adults, parents, or by a peer, it is the responsibility of staff to report this to the Designated Safeguarding Lead (DSL) as soon as possible. It is important that if staff overhear children discussing 'abuse' or 'neglect' that this information is relayed for investigation.

The DSL Team should do all that is reasonably possible to ensure relevant safeguarding and welfare information held on all children (including returning children) remains accurate. This can be done by asking parents and carers to advise them of any changes regarding welfare, health and wellbeing that they should be aware of before a child returns.

The Designated Safeguarding Lead (DSL) will attend any reviews called upon by the Local Authority by MS Teams, Skype or other means of social distancing and may call on appropriate members of staff for reports.

CPOMS will be used to maintain an accurate register of all those students known to be at risk, and record any actions or interventions delivered.

Children returning from a co-located setting, with a safeguarding incident file – this file should be scanned and uploaded to CPOMS, and a summary of events raised as an incident on the system.

Attendance in the Academy

Attendance at the Academy will be closely monitored and tightly controlled. Students attending will fall into the following categories:

- Where the student is deemed vulnerable
- By specified year group
- If the student has an EHCP
- If the student is in need of a social worker (on a CP or CiN Plan).
- If the student is the child of a Key Worker.
All teaching and support staff looking after groups of children, including Sodexo or other catering staff, must be aware of any medical needs, food allergies and intolerances for children in their care and have access to the appropriate medication to support the child.

**Risk Assessment & Keeping in Touch Call (KiT)**

For students assessed as vulnerable but are at home – these will fall into the following categories:

- **Red** – Students on a CP plan, CiN Plan, EHCP, where a child has stepped down from a statutory plan or where the DSL team assess critical risk – these students will be contacted each 1-2 days
- **Amber** – Students on a CP plan, CiN Plan, EHCP or where the DSL team assess high risk – these students will be contacted every 2-3 days
- **Blue** – Students on a EHCP or EHCP where the DSL team assess medium risk – these students will be contacted every 3-5 days
- **Green** – Students deemed to be at low risk, but still vulnerable – these student will be contacted every 5-10 days.

If students do not attend the provision or do not answer their phones on the agreed contact date:

1. Try all the available numbers for the family, including the emergency contact numbers.

2. Following discussion between the DSL team:
   - Re-assess the risk - does the lack of contact escalate your concerns?
   - For CP/CiN children - speak to their allocated social worker or social work contact arrangements.
   - Seek advice from your local Social Care provision.

3. Unanswered Keeping in Touch Calls (KiT) must be reviewed and logged against the risk assessment for that child.

4. All unanswered KiT Calls should receive a home visit.
   - For children deemed at Critical or High risk this visit must be undertaken on the same day;
   - If the risk is deemed critical (i.e. risk to life) then the DSL may also need to speak to the Police and request a ‘safe & well’ check.
   - For medium and low risk this visit must be scheduled within that working week.

   **No student will be removed from an academy roll until all safeguarding checks have been completed or the whereabouts of a pupil/student have been established.**

**Process where contact with the academy is NOT maintained**

If students deemed vulnerable do not attend the provision or do not answer their phones, this must be reviewed and logged against the risk assessment for that child.

The concerns about lack of contact with a vulnerable family should also be discussed with the Lead DSL to consider if the lack of contact escalates the academy’s concerns about the safety of the child.
If the student is a ‘child in need of a social worker’, a member of the DSL team should speak to their allocated social worker or social work contact, and make arrangements to establish if any contact has already been made by them.

If it is requested by Social services, or felt necessary by the Academy to undertake a Home visit the following should take place, however:

- Staff cannot be forced to undertake a home visit
- Individual consideration should be given to the individual circumstances of the staff who may be considered for home visiting including: shielding their own health status or that of anyone living in their household.

**Pre-Visit:**
- The DSL should discuss the situation with the Principal to alert them of the concern
- A home visit should only be considered if it is deemed essential to establish the safeguarding status of the student
- The OCL Home Visit risk assessment form should be completed
- The justification and risk assessment should be uploaded to CPOMS
- Access to Gloves & hand sanitiser from Academy supplies.

**During the visit:**
- These are doorstep visits only – you should not enter the house unless in exceptional circumstances
- Traveling to and from the visit should be in separate cars if 2 staff are required
- The staff member should wear their Oasis Photo ID Badge and carry a letter of authorisation
- If conducting the visit alone the worker should consider the implications of Lone Working, and let someone within the Academy Leadership Team know where you are going and when you are due to be back home
- Adhere to the government guidance on social distancing and stay 2m away from people
- Avoid any physical contact during the visit
- Avoid touching face during visit
- Gloves should be worn during the visit at all times
- As the staff member is not making physical contact or entering the house & is maintaining the 2m distance, other forms of PPE such as masks or aprons should not be necessary, but if government advice changes the new official guidance should be adhered to
- Re-iterate the importance of the ‘Keeping In Touch’ call with the family.

**On completion of the visit:**
- Remove gloves and use hand sanitiser/anti-bac wipes before getting back in the car (touching door handles/steering wheels etc.).

**On return to the Academy or Home:**
- Wash your hands for 20 seconds on return to the Academy or your home base.
- Record the visit on CPOMS and take any appropriate actions identified as part of the visit.
- Feed back to the Local Authority if/as required.

**Additional steps if the staff member has to enter the home:**
- Entering the home should only be considered in exceptional circumstances where there is
thought to be a risk of significant harm to a child

- Before entering the staff member should discuss their concerns with a member of the ALT (Lead DSL or Principal)
- If the risk of significant harm is suspected then the staff member should consider seeking advice/support from the appropriate emergency service or social care MASH arrangements.
- Gloves and apron should be worn at all times
- Physical contact should be kept to a minimum
- Avoid touching face during the visit
- Do not accept any form of hospitality, however well meant
- If working from the Academy building do not return to the school following a home entry but go back to your house
- Undress on return home and put clothes in a black plastic bag
- Shower straight away using a thick lather of soap
- Place the towel in the black plastic bag
- Place clothes and towel in the washing machine and wash at 40 degrees
- Wash hands for 20 seconds using soap and water
- Place the towel in the black plastic bag
- Place clothes and towel in the washing machine and wash at 40 degrees
- Wash hands for 20 seconds using soap and water
- Return to work or work from home as directed by your ALT member
- Record your visit on the Risk Assessment form
- Upload concerns and actions to CPOMS.

**Online Safety**

It is essential that children are safeguarded from potentially harmful and inappropriate communications and online material. As such, the academy ensures appropriate procedures, filters and monitoring systems are in place in accordance with the following policies:

- Oasis E-Safety,
- Web Filtering and Smoothwall Device Monitoring.

Where students are using Oasis equipment at home, the ability of OCL to filter access is limited. Filtering will be provided to the extent that is possible within the technological constraints.

Where OCL is providing Wi-Fi or internet access for young people at home, this service is unfiltered beyond its use with Oasis devices. Non-Oasis devices, utilising the WiFi will be unfiltered.

Students will be reminded of Internet Safety rules and parents will be expected to manage their children’s safety whilst at home.

Staff delivering teaching online should listen for any cues that indicate a safeguarding concern and report these to the DSL as soon as possible. These cues might include:

- Comments or questions about child abuse or neglect
- Inadequate supervision at home
- The impact of food poverty
- The health status in a family and any young caring responsibilities children have.

**Emotional and Mental Health Support**

Our Academies have an important role to play in supporting the mental health and wellbeing of our pupils and it is anticipated that the return to school after lockdown and the general Covid-19 situation may exacerbate this.
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. As an Academy we have clear systems through CPOMS for identifying and reporting possible mental health problems.

It is important that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, all our staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing an emotional or mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, grief or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children’s experiences, and their high prevalence of special educational needs and mental health needs, can impact on their behaviour and education.

In our Academy, if staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by reporting via CPOMS their concerns and speaking to the DSL or Deputy DSL straight away.
### RACI Matrix

<table>
<thead>
<tr>
<th>Policy Element</th>
<th>Leadership</th>
<th>Academy</th>
<th>Services</th>
<th>Team</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>CEO</td>
<td>COO</td>
<td>Director</td>
<td>Principal</td>
</tr>
<tr>
<td>Section 1.1 – Trust central ethos</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>Section 3.1 – Safeguarding is everyone’s responsibility</td>
<td>A</td>
<td>A</td>
<td>R</td>
<td>A</td>
</tr>
<tr>
<td>Section 4.3 – Multi-agency safeguarding arrangements</td>
<td>A</td>
<td>R</td>
<td>R</td>
<td></td>
</tr>
<tr>
<td>Section 7.1 – Relevant key documents</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 8.1 – Child Abuse Procedures</td>
<td>A</td>
<td>R</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>Section 8.2 – Read accompanying documents</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 8.3 – Use of CPOMS</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 8.4 &amp; 8.5 – The DSL role</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 8.8 – The Academy Vulnerable Children List</td>
<td>R</td>
<td>R</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 10.2 – Staff training</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 11.1 – 11.3 -Contextual Safeguarding</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 12 – Data Protection &amp; GDPR</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td></td>
</tr>
<tr>
<td>Section 13 – Dealing with a Disclosure</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 15 – Locality issues</td>
<td>R</td>
<td>R</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 16.2 – FGM reporting regulations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 17 – Honour Based Abuse</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 18 – Peer on Peer abuse</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 19 – Children Missing to Education</td>
<td>A</td>
<td>R</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>Section 19.5 – Attendance Register</td>
<td>A</td>
<td>A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 20 – On-line Safety</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 21.1 – Staff training &amp; Development</td>
<td>A</td>
<td>R</td>
<td>A</td>
<td>R</td>
</tr>
<tr>
<td>Section 21.2 – Annual Briefing</td>
<td>A</td>
<td>R</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>Section 21.3 – Engaging in the locality briefings</td>
<td>R</td>
<td>A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 22.1 – Allegations against staff</td>
<td>A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 22.2 – Criteria for LADO referral</td>
<td>A</td>
<td>R</td>
<td>R</td>
<td></td>
</tr>
<tr>
<td>Section 23.1 – Safer Recruitment</td>
<td>A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 23.3 – SCR audit process</td>
<td>A</td>
<td>A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 24.1 – Confidentiality &amp; record keeping</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
</tr>
</tbody>
</table>

OCL Safeguarding and Child Protection Policy
Version 7.0/Aug 2020
Owner: Jon Needham
| Section 24.6 – Records retention | A | R | R |
| Section 25.1 – Early Years Settings | A | | |
| Section 26.1 – Health & Safety | A | | R |
| Section 26.2 – Visitors & Contractors | A | R | 
| Section 27.3 – No Platform | A | R | R | R |
| Section 27.4 – Alert to risks of extremism | | | R |
| Section 27.5 & 27.6 – Prevent SPOC | A | | |
| Section 27.7 & 27.8 – List of agencies using OCL facilities | A | | |
| Section 28 – Emotional Health & Well-being | A | R | |
| Section 28.6 & 28.7 – Mental Health Staff Training | A | R | |
| Appendix A – Key information for all staff | A | R | R | R | R |
| Appendix B – Statutory duties | R | A | R | R |
| Appendix C – The Oasis 9 Habits | R | R | R | R | R | R | R | R |
| Appendix D – Roles & Responsibilities within OASIS | A | R | A | R | R |
| Appendix E – COVID-19 & Safeguarding | R | A | R | R | |
**Document Control**

**Changes History**

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Owned and Amended by</th>
<th>Recipients</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.0</td>
<td>01/09/2016</td>
<td>Kirstie Fulthorpe</td>
<td>All Oasis Staff</td>
<td>Updated legislation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Safeguarding and Child protection Lead for OCL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.0</td>
<td>26/09/16</td>
<td>Kirstie Fulthorpe</td>
<td>All Oasis Staff</td>
<td>Updated legislation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Safeguarding and Child protection Lead for OCL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.0</td>
<td>06/09/2017</td>
<td>Philip Beaumont,</td>
<td>All Oasis Staff</td>
<td>Updated Appendix 5&amp;6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Safeguarding and Child protection Lead for OCL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.0</td>
<td>8/8/2018</td>
<td>Philip Beaumont,</td>
<td>All Oasis Staff</td>
<td>Updated reflecting KCSIE 2018</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Safeguarding and Child protection Lead for OCL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.1</td>
<td>3/9/18</td>
<td>Philip Beaumont,</td>
<td>All Oasis Staff</td>
<td>Updated reflecting KCSIE 2018 and formatting issues</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Safeguarding and Child protection Lead for OCL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.2</td>
<td>11/02/19</td>
<td>Paul Tarry,</td>
<td>All Oasis Staff</td>
<td>Updated reflecting KCSIE 2018</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Safeguarding Lead</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>for OCL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.0</td>
<td>02/09/19</td>
<td>Jon Needham</td>
<td>All Oasis Staff</td>
<td>Style &amp; Format changes, update for KCSIE 2019</td>
</tr>
<tr>
<td></td>
<td></td>
<td>National Safeguarding Lead</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1</td>
<td>21/05/20</td>
<td>Jon Needham</td>
<td>All Oasis Staff</td>
<td>Process updates</td>
</tr>
<tr>
<td></td>
<td></td>
<td>National Safeguarding Lead</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.0</td>
<td>10/08/20</td>
<td>Jon Needham</td>
<td>All Oasis Staff</td>
<td>Changes, update for KCSIE 2020 &amp; Inclusion of MH &amp; Ethos statement</td>
</tr>
<tr>
<td></td>
<td></td>
<td>National Safeguarding Lead</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Policy Tier**

☒ Tier 1  
☐ Tier 2  
☐ Tier 3  
☐ Tier 4

**Owner**

Jon Needham

**Contact in case of query**

Jon.needham@oasisuk.org

**Approvals**

This document requires the following approvals.

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Date Approved</th>
<th>Version</th>
</tr>
</thead>
<tbody>
<tr>
<td>Core Strategy Group</td>
<td>CSG</td>
<td>10.08.20</td>
<td>7.0</td>
</tr>
</tbody>
</table>
Position with the Unions
Does the policy or changes to the policy require consultation with the National Unions under our recognition agreement?
☐ Yes
☒ No

If yes, the policy status is:
☐ Consulted with Unions and Approved
☐ Fully consulted (completed) but not agreed with Unions but Approved by OCL
☐ Currently under Consultation with Unions
☐ Awaiting Consultation with Unions

Date & Record of Next Union Review

Location
Tick all that apply:
☒ OCL website
☒ Academy website
☒ Policy portal
☐ Other: state

Customisation
☐ OCL policy
☒ OCL policy with an attachment for each academy to complete regarding local arrangements
☐ Academy policy
☐ Policy is included in Principals’ annual compliance declaration

Distribution
This document has been distributed to:

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Date</th>
<th>Version</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>All Principals/Academies</td>
<td>August 2020</td>
<td>7.0</td>
</tr>
</tbody>
</table>