D'OVERBROECK'S
OXFORD
A NORD ANGLIA EDUCATION SCHOOL

POLICY FOR SAFEGUARDING & PROMOTING THE WELFARE OF CHILDREN

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POLICY FOR SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN

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1 INTRODUCTION

Keeping Children Safe in Education (KCSIE) 2026 places greater emphasis on whole schools safeguarding responsibility, multi-agency working, early intervention, information sharing, online safety (including artificial intelligence), Violence Against Women and Girls (VAWG), mental health, child on child abuse and Family Help. d'Overbroeck's has reviewed this policy to reflect these developments and the information sharing duty under section 16LA of the Children Act 2024

The proprietors and staff at d'Overbroeck's are fully committed to their responsibility to safeguard and promote the welfare of all our students. We aim to create a caring, secure environment in which young people feel safe, respected and valued, and in which their welfare is paramount. All our systems, processes and policies at d'Overbroeck's operate with the best interests of the student at their heart.

We recognise that effective safeguarding depends upon strong multi-agency working and timely information sharing. The school will work collaboratively with students, parents, carers, families, other schools, safeguarding partners and relevant professionals to identify concerns, provide support and promote welfare at the earliest possible opportunity.

This policy applies to all staff at d'Overbroeck's, including temporary staff, volunteers, proprietors and governors. It is an expression of our commitment to safeguarding in all aspects of the life of the school, and to working together with other agencies in order to ensure that we have effective systems and procedures within the school to identify, assess and support any children who may be suffering from harm, at risk of suffering from harm, or in need of additional support.

It is essential that everyone working in school understands their safeguarding responsibilities. The policy aims to raise the awareness of all staff of their responsibilities in identifying and reporting possible cases of abuse or of instances where a child is thought to be at risk. It also aims to ensure that there are structured procedures within the school which are understood by all staff and which will be followed by all members of the school community in cases where abuse or the risk of harm are suspected.

The policy, including the Code of Conduct, is sent with their contracts of employment to all newly appointed staff who are asked to confirm that they have read and understood it. It is part of the Safeguarding training, which forms part of their induction. Staff receive refresher training every two years and they are alerted, usually by email, to periodic revisions to the policy and procedures and to any updates or changes in government guidance.

The policy is reviewed and updated in the light of experience and of the latest guidance and regulations. It is posted on the school's website, and copies are available on request to parents and anyone associated with the school.

It is written with regard to the following documents as per the Regulatory Framework:

- 'Keeping Children Safe in Education' – 'KCSIE' – (DfE, September 2026)
- KCSIE incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (September 2018)
- 'Working Together to Safeguard Children' (HM Government March 2026)
- ISI Handbook for the inspection of association independent schools, including residential (boarding) schools and registered early years settings (effective from 1 Sept 2023; last updated September 2026)

- 'What to do if you're worried a child Is being abused – advice for practitioners' (DfE March 2015)
- The Children Acts 1989 and 2004 as amended in the Children's Wellbeing and Schools Act 2026
- The Education Act 2002
- The Human Rights Act 1998
- Equality Act 2010: advice for schools
- Safeguarding and Child protection Briefing for Educational Establishments, Generalist level training (OSCP, September 2026)
- The use of social media for on-line radicalisation (July 2015)
- Prevent Duty Guidance: England and Wales 2023 (Updated March 2024)
- 'Signs, symptoms and effects of child abuse and neglect', NSPCC factsheet (updated September 2026)
- What to do if you think a child is at risk of abuse or neglect - Oxfordshire Safeguarding Children Partnership (oscp.org.uk) (online guidance, accessed September 2026)
- The National Minimum Standards for Boarding Schools (last updated May 2026)
- UK Council for Child Internet Safety (UKCIS)
- Mental health and behaviour in schools (November 2018)
- Teachers Standards (DfE December 2021)

2 THE RESPONSIBILITIES OF THE PROPRIETORS

The Board of Governors holds the responsibility for safeguarding. All governors receive appropriate safeguarding and child protection (including online) training at induction and their training is regularly updated. The Board are fully aware of their responsibilities and obligations, and committed to providing strategic challenge to test and assure themselves that the school's safeguarding policies and procedures are compliant with all current legislation and that they are effective and support the delivery of a robust whole school approach to safeguarding.

The Board of Governors are aware of the safeguarding partners and the local arrangements regarding safeguarding partners and the child death review partner. They recognise their duty to work together with the local authority and the chief officer of police to safeguard and promote the welfare of local children including identifying and responding to their needs.

The Board of Governors are also aware of their obligations to provide a co-ordinated offer of early help when additional needs of children are identified, and to operate safeguarding procedures in line with locally agreed inter-agency procedures to provide additional support to children subject to child protection plans.

The Board of Governors are aware of their obligations under the Human Rights Act (1998), the Equality Act (2010) and the Oxfordshire multi-agency safeguarding arrangements. The Board of Governors are aware that being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach some articles of the Human Rights Act. The Board of Governors are also aware that schools have obligations under the Equality Act (2010) that they must not unlawfully discriminate against students because of their age, sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, marital or civil partnership status, or sexual orientation (protected characteristics). The Board of Governors will carefully consider how they are supporting

students with regard to protected characteristics and the legal duties placed on schools in relation to safeguarding and promoting the welfare of children.

The Board of Governors will ensure that all staff undergo safeguarding and child protection training (including online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. They will ensure that this training is regularly updated and in line with any advice from the safeguarding partners.

The Board of Governors will ensure that the school has appropriate filtering and monitoring systems in place to block harmful and inappropriate content without unreasonably impacting teaching and learning, that their effectiveness is regularly reviewed termly and that the leadership team and relevant staff have an awareness and understanding of the provisions in place, manage them effectively and know how to escalate concerns when identified.

The Chair of the Board of Governors is nominated, as well as the Principal, to liaise with the local safeguarding board and any partner agencies on issues of child protection. The Chair is also nominated to deal with any allegations of abuse which may be made against the Principal.

The Board of Governors includes a governor (Sue Hill) who holds a specific role with regard to oversight of the school's safeguarding policy and procedures. This governor will contribute to the annual safeguarding report which is submitted to the Board of Governors and will attend the annual Safeguarding Review meeting. This governor will also be consulted by the DSL as and when appropriate on revisions to this policy and on keeping abreast of the latest DfE and ISI guidance. The Board of Governors undertakes an annual review of the school's safeguarding policies and of all procedures for dealing with any issues relating to them. This includes a review of the speed and efficiency with which such procedures may have been applied in practice. The Board of Governors and Proprietors have an obligation under the Data Protection Act 2018 and GDPR to keep the information they hold safe and secure, however, this should never prevent the sharing of information for the purposes of keeping children safe.

Given the critical importance of ensuring best practice at all times when dealing with issues of child abuse, any deficiencies or weaknesses in the school's child protection arrangements that may come to light at any point will be remedied without delay.

In all matters relating to child protection d'Overbroeck's will follow the procedures laid down by the Oxfordshire Safeguarding Children's Partnership (OSCP). We will participate in Child Safeguarding Practice Reviews (CSPR's), other reviews and file audits as and when required to do so by the Oxfordshire Safeguarding Children Partnership. We will ensure that we have a clear process for gathering the evidence required for reviews and audits and embed recommendations into practice and complete required actions within agreed timescales.

3 SAFEGUARDING – A DEFINITION

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing the impairment of children's mental and physical health or development;

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; Promoting the upbringing of children with their birth parents, or otherwise

their family network through a kinship care arrangement, whenever possible

and where this is in the best interests of the child.

- taking action to enable all children to have the best outcomes.

The aim of safeguarding is to enable children to have optimum life chances and to enter adulthood successfully.

What's the difference between Safeguarding and Child Protection?

Safeguarding is a broader term than child protection; it is being proactive in mitigating risk to children by putting measures in place to keep children safe. It encompasses all the elements set out above and is what a school should do for all children. Child Protection is part of this definition and refers to reactive activities or measures undertaken to protect children who have been harmed or are at significant risk of being harmed. Policies and procedures for Child Protection are, therefore, included in the Safeguarding policy and procedures.

Where a child is thought to be suffering significant harm, or to be at risk of suffering significant harm, this must be reported to children's social care immediately. Action must also be taken to promote the welfare of children who are believed to be in need of additional support, even if they are not suffering harm or at immediate risk. Such instances must be addressed through inter-agency assessment using local processes.

4 STAFF WITH DESIGNATED RESPONSIBILITY FOR SAFEGUARDING AT D'OVERBROECK'S

4.1 Designated Safeguarding Lead (DSL)

The governing body and proprietors ensure that an appropriate senior member of staff from the School Leadership Team is appointed to the role of Designated Safeguarding Lead (DSL). The DSL takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL at d'Overbroeck's is the Vice Principal, Pastoral.

4.2 Other staff with designated responsibilities for safeguarding and child protection (Deputy DSLs)

As a school with several teaching sites, d'Overbroeck's has a number of senior staff with designated responsibilities for child protection and safeguarding matters within the school. Members of staff may communicate a safeguarding or child protection concern to any of the colleagues named below; and any of them may deputise for the DSL in her absence.

They are:

- Chris Bromham (Principal)
- Joanne Croft, (Vice Principal – Pastoral), the school's Designated Safeguarding Lead and Prevent Lead
- Stephen Creamer (Vice Principal, Staff and Curriculum)
- Mikaela Parker (Director of Wellbeing, Senior Deputy Designated Safeguarding Lead)

- Nick Haines (Head of Senior School)
- Emily Nicholls (Deputy Head, Senior School)
- Andrew Colclough (Head of Sixth Form)
- Fatima Safi (Deputy Head of Sixth Form)
- Michelle Barrett (Head of Year 12)
- Marilou Polymeropoulou (Head of Year 13)
- Hannah Mungall (Head of Boarding)
- Emma Jenkins (Deputy Head of Boarding)
- Freya Paterson (Lead School Nurse)

Contact details for the Designated Staff are provided in Section 23 below.

4.3 **Responsibilities of the Designated Safeguarding Lead (DSL)**

The DSL takes the lead responsibility for safeguarding and child protection, including online and digital safety and understanding the filtering and monitoring systems and processes in place. The DSL is also the 'Prevent designated lead'. With the help and support of the other staff with designated responsibility, the DSL is responsible for: raising awareness and ensuring that the school's safeguarding policies and procedures are known and used appropriately by all members of the school community; offering advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings and/or supporting other staff to do so, and contributing to the assessment of children. The DSL liaises with the Locality Community Support Service (LCSS) regarding early help and ensures that prompt referrals are made to the Multi Agency Safeguarding Hub (MASH) where there are concerns that a child may be at risk or in need of help. The DSL also manages any referrals to the Channel programme, the DBS or the police and liaises with the LADO where appropriate. The DSL ensures that all staff at the school receive the necessary Safeguarding induction and training on appointment, and that this is renewed at the required intervals.

The DSL helps promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff as appropriate. The DSL is responsible for sharing information about students joining the school with key staff where appropriate, such as the SENDCo, and for outgoing students with the new school securely to enable them to have the support in place when that child arrives.

The DSL will ensure that the school complies with the safeguarding partner arrangements, contributing to multi-agency work by working with the local authority, the Integrated Care Systems and the chief officer of police.

The DSL would ensure that safeguarding information is shared appropriately, lawfully and in a timely manner with relevant agencies, schools and professionals in accordance with KCSIE 2026 and the information sharing duty under Section 16LA of the Children Act 2024.

The role and responsibilities of the DSL and of the other members of the Designated Staff team are set out in detail in their respective job descriptions and follow the guidance provided in KCSIE, September 2026

The DSL is also responsible for reporting to the Board of Governors annually on all significant aspects of Safeguarding policy and procedures.

4.4 **Independent Person for boarders**

All boarding schools are required to nominate an 'Independent Person. The Independent Person is someone who is not a member of the school's staff and whom boarders may contact if they wish to communicate any concerns that they don't feel able to discuss directly with staff.

Our Independent Person is Emily Webb. Her name and contact details are posted in all our teaching buildings and boarding houses.

5 D'OVERBROECK'S POLICY ON SAFEGUARDING – PRINCIPLES

- The central principle is that our approach must always be child-centred and that the welfare of the child is the paramount consideration. In all situations, and in particular where there may be a potential conflict of interest, the child's best interests must always be the primary aim of every action or decision.
- All staff members have a responsibility to ensure our buildings and grounds are safe. This includes ensuring the safety of any visitors into school (see Security, Access control, Workplace safety and Lone working policy; Visiting Speakers Policy) The school will not accept the behaviour of any individual that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.
- All staff should be aware that safeguarding incidents can happen anywhere and at any time, and that they are required to be alert to any possible concerns. Safeguarding incidents can be associated with external factors outside of the school or family, so "contextual safeguarding" (wider environmental factors in a student's life that may be a threat to their safety and/or welfare) should be considered.
- All staff in a school have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. In such circumstances all staff have a responsibility to take appropriate action, working with other services as needed.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or be threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- All staff in a school have a responsibility to identify children who may benefit from Family Help, Early Help or other support services. d'Overbroecks is committed to working with

students, families, safeguarding partners and other professionals as early as possible by concerns emerge, to prevent needs escalating and to promote positive outcomes.

- The school will participate in preventative and protective information sharing with relevant agencies where this supports the safeguarding and welfare of children
- The school recognises that safeguarding concerns are often interconnected and may involve multiple vulnerabilities and risks. Staff should be alert to wider context of concerns and understand that abuse, neglect, exploitation and other safeguarding concerns rarely occur in isolation
- All students know that there are adults to whom they can turn if they are worried. These include teaching and pastoral staff, personal tutors / Directors of Studies, the School Counsellors and, in the case of boarders, members of the boarding team and the Independent Person.
- If staff members have concerns about a child, they should raise these with the school's Designated Safeguarding Lead (DSL) or with one of the other Designated Staff without delay. Situations that involve staff at the school should be reported directly to the Principal. Reporting to the DSL also includes instances where there is a concern that a child or young person may be at risk of being radicalised or drawn into extremism. The DSL and Designated Staff will usually decide whether to make a referral to children's social care. It is important to note, however, that the DfE guidance 'Keeping Children Safe in Education' (September 2026) makes clear that 'anybody can make a referral'.
- If a child is thought to be in immediate danger or is at risk of harm, a referral will be made immediately the Multi Agency Safeguarding Hub (MASH) or to the police. If the referral is not made by the Designated Safeguarding Lead (DSL), then the DSL should be informed as soon as possible that a referral has been made.
- If staff members have concerns of a safeguarding or child protection nature about another member of staff, including supply staff and volunteers, then this must be referred to the Principal without delay or, in their absence, to the Chair of Governors. Concerns about the Principal should be referred to the Chair of Governors, and concerns about the Chair of Governors should be referred directly to NEA Safeguarding Lead.
- If the Designated Staff believe that a crime may have been committed, then the matter will be reported to the police without delay.
- If the child's situation does not appear to improve, the staff member with concerns should request an update from the DSL team or further support from the DSL.
- Members of staff should be aware that they may be asked to support social workers to take decisions about individual children. Schools and their staff are a part of a wider safeguarding system for children, and schools should work with all other agencies involved including social care, health services and the police, to promote the welfare of children and to protect them from harm. Any student with Social Service support or interventions should be highlighted to the DSL team and recorded on CPOMS.
- Raising concerns – all staff and volunteers should feel able to raise concerns about poor or unsafe practice and about potential failures in the school's safeguarding systems or processes, and that such concerns will be taken seriously by the school's senior leadership. For more detail, please see Section 18.16 below on Whistleblowing.

- Recording – full and clear record keeping at all stages of the child protection process is essential.
- Confidentiality – where safety is at stake, confidentiality cannot and must not be promised to a child. Confidentiality is always qualified and never absolute when a child is at risk. In this context, it means 'not holding information which should be shared, and not sharing information that should not be shared'.
- Speed of response – issues of child protection must be dealt with immediately: delay may be prejudicial to the child's safety.
- 'Do not investigate!' It is not for the school to investigate a suspicion of abuse, whether it be centred on a member of the school staff or a member of the child's family. The child should not be questioned beyond establishing that there is cause to refer the case to the relevant external agency.

6 A SAFEGUARDING CONCERN vs IMMEDIATE RISK OF HARM

All staff should be clear about the distinction between a safeguarding concern and a child being in immediate danger or risk of harm. Both types of situation require prompt and clear action on the part of staff, but the nature of the response may be different.

If a child is thought to be in immediate danger or is at risk of harm, a referral must be made immediately to children's social care or to the police. The DSL should be informed as soon as possible after reporting.

6.1 Family Help and Early Help

The school supports the Families First approach and recognises the importance of collaborative assessment and intervention with partner agencies to meet children's needs at the earliest opportunity

Any child may benefit from family help and early help, but all school staff should be particularly alert to the potential need for family help and early help for a child who is: disabled or who has additional needs (including health and mental health needs); a young carer; privately fostered; frequently missing (from education, home or care); has experienced multiple suspensions; at risk of being exploited (criminally or sexually) or radicalised; at risk of so-called "honour"-based abuse; at risk of being drawn to anti-social or criminal behaviour; misusing alcohol and other drugs; affected by a parent/carer offending or in custody; affected by family circumstances presenting challenges (eg, adult drug or alcohol misuse, adult mental health issues or domestic abuse).

All members of staff need to be alert to any signs of emerging problems or potential concerns; and these must be flagged to the DSL or to one of the other members of the School's Safeguarding team as soon as possible.

With parental consent, any such concerns would usually then be raised with the Locality and Community Support Service (LCSS) by a member of the school's Safeguarding team. The LCSS would support professionals at school in understanding the Strengths and Needs form and Team Around the Family meetings to ensure the students and families have supportive plans in place and receive the right support at the right time. The Safeguarding team is familiar with Oxfordshire's Threshold of Needs, which includes the process for the local early help and the type and level of early help services provided Oxfordshire Early Help and the LCSS

6.2 **Safety plan and Risk Assessment**

A safety plan or risk assessment should be put in place for any student where there is a specific vulnerability or a need to protect them from bullying, harassment or any other identified threat.

Safety plans and risk assessments will be written by the pastoral team with the student and will then be communicated to parents for comment, with the agreed and signed document being circulated to all staff involved in implementing the plan, either directly via email or through staff briefing should all staff need to be made aware. Any updates to the document will also be communicated immediately. The plan must also be recorded on CPOMS. The safety plan is a living document and should be reviewed regularly, the time period to be agreed at the time of writing. It will also be informed by any updates received by external agencies such as the police, CAMHS, LCSS, etc. The safety plans and risk assessments will be monitored regularly and immediately following any incident or update.

7 STATUTORY ASSESSMENTS

Staff should be aware of the local family help arrangements and the statutory assessment process that may follow a referral. These include Child in Need assessments under Section 17 of the Children Act 1989 and Child Protection enquiries under Section 47 of the Children Act 1989

As part of their statutory duties under the Children Act 1989, local authorities undertake assessments of the needs of individual children to determine which services to provide and what action to take. The member(s) of staff concerned may be asked to participate in such an assessment. Staff in schools need, in particular, to be aware of two types of assessments:

- **A 'child in need assessment' (Section 17)** – A child in need is defined under Section 17(10) of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired without the provision of services; or a child who is disabled.
- **A 'child protection enquiry' (Section 47)** – If the local authority has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, they have a duty to make enquiries under Section 47 of the Children Act 1989 to enable them to decide whether they should take any action to safeguard and promote the child's welfare.

8 SAFEGUARDING TRAINING FOR STAFF

All staff are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately. Staff have a responsibility to protect children from abuse in all its forms, including the risk of radicalisation or being drawn into extremism, whenever they are in a position to do so. They should be familiar with the school's policy on safeguarding children and with the school's child protection procedures; and they should know how to access and implement them, independently if need be.

Regular training for staff in these matters is therefore very important. The policy at d'Overbroeck's, which is in line with current legislation and OSCP guidance, is that:

- The DSL and all other Designated Staff undergo training to provide them with the knowledge and skills required to carry out their role. This is updated every two years.

- All other staff and volunteers receive safeguarding training on appointment and this is updated in full every two years, with annual training to include updates in line with OSCP advice (inducing relating to Prevent and online safety).
- All staff, including those who do not work directly with children, are required to read KCSIE 2026 Part One in full and confirm that they have read, understood and will comply with its content
- School leaders, DSLs and staff who work directly with children should also be familiar with Annex B and other relevant safeguarding guidance.

In addition:

- The DSL and the other members of staff with designated responsibilities keep their knowledge and skills refreshed and updated at regular intervals, at least annually, in order to allow them to understand and keep up with any developments relevant to their role.
- The DSL and the Safeguarding team ensure that all other staff members are kept regularly informed (at least annually) of updates or changes in government guidance, or in the school's policy and procedures, in matters of safeguarding and child protection. This is done in Inset days and staff meetings, via email and using the Safeguarding Noticeboards in the school staffrooms.

Induction and training for new staff

Arrangements relating to safeguarding training for host families are set out in the school's Host Family Recruitment Policy.

All arrangements for the initial induction and training in Safeguarding for new members of staff are set out in detail in the school's Safer Recruitment Policy. Safeguarding induction content covers (and copies provided where indicated *):

- Safeguarding and Promoting the Welfare of Children policy *
- Online safety, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- School policy – role and identity of DSL and deputies *
- The most recent version of Part One of the DfE publication, 'Keeping Children Safe in Education' *
- Behaviour, Rules, Rewards and Sanctions policy
- Safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods (Attendance policy *)
- Staff Code of Conduct * (including whistleblowing and acceptable use of IT, staff/student relationships and communications including use of social media).

9 RECOGNISING CHILD ABUSE

What is child abuse and what are the signs?

Abuse is a form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the

impact of witnessing ill treatment of others (eg, a child seeing, hearing or experiencing the effects of domestic abuse).

Child abuse may occur in the family or in an institutional or community setting by those known to them or, more rarely, by others, eg, via the internet; it may be committed by a member of the school staff; or it may be committed by other children within the school. The definitions given below should help in recognising possible abuse.

Staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as in day-to-day life and technology may be used to facilitate offline abuse.

Staff should bear in mind that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be covered by a single definition of label and that, in most cases, multiple issues are likely overlap with one another.

Staff should also be aware that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. The school ensures that all staff are aware of the additional barriers that can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

The school supports these additional challenges with direct training and with reference to the school's SEND policy.

TYPES OF ABUSE AND NEGLECT

9.1 **Physical abuse**

Physical abuse happens when a child is deliberately hurt, causing injuries such as cuts, bruises and broken bones. It can involve hitting, shaking, throwing, poisoning, burning or scalding, slapping, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates, or deliberately induces, the symptoms of an illness in a child, usually as a means of attracting attention to themselves. Children affected by this form of abuse will tend to have a greater frequency of illness normally combined with a significantly higher than average level of absence from school.

Signs that may indicate physical abuse:

- Bruises and abrasions around the face (particularly the ears and neck area below the ears)
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft areas of the face such as cheeks
- Fingertip bruising to the front or back of torso
- Bite marks

- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings
- Injuries to genital areas

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

9.2 **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 penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can also take place online, and technology can be used to facilitate abuse offline. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (KCSIE, 2026).

Exploitation is the balance of power between the child and the other person at the time that the sexual activity first occurred. Exploitation is considered to have occurred if the activity was unwanted when it first began and/or involved a misuse of conventional age, authority or gender differentials.

Signs that may indicate sexual abuse:

- Sudden changes in behaviour and school performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need for constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Bed wetting / incontinence
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for gym activities
- Sexually Transmitted Disease
- Fire setting

It is also important to note that there may be no signs.

9.3 **Emotional abuse**

Emotional abuse is ‘the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development’.

It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving children 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's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill treatment of another.

It may involve serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone. (KCSIE, September 2026)

Signs that may indicate emotional abuse:

- Over-reaction to mistakes
- Lack of self-confidence / esteem
- Sudden speech disorders
- Self-harming
- Extremes of passivity and / or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

9.4 **Neglect**

Neglect is 'the persistent failure to meet a child's basic physical and/or psychological needs, which is 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);
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs (KCSIE, September 2026). Educational neglect is also considered: Neglect is also Child Abuse: Know All About It | NSPCC

Signs that may indicate neglect:

- Excessive hunger

- Poor personal hygiene
- Frequent tiredness
- Inadequate clothing
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight (the same applies to weight gain, or being excessively overweight)
- Low self esteem
- Poor dental hygiene

CHILD-ON-CHILD ABUSE (previously referred to as peer on peer abuse)

Children can abuse other children, and this can happen inside of school, outside of school and online. All staff should maintain an attitude of "it could happen here". It is very important that **all staff challenge abusive behaviour between students** and **are clear as to the school's policy and procedure with regard to child-on-child abuse.** It is recognised that it is more likely that girls will be victims and boys' perpetrators, but all child-on-child abuse is unacceptable. Child-on-child abuse is most likely to include, but may not be limited to:

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

d'Overbroeck's has a zero tolerance approach to child-on-child abuse. We will not down-play certain behaviours, eg, dismissing sexual harassment as "just banter", "having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. We recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and simply not being reported. Messages communicated to students, implicitly and explicitly, directly and indirectly, as part of our daily school life will always make absolutely clear that child-on-child abuse, in whatever form it may take, is not acceptable. Students can report child-on-child abuse to any member of staff; their concerns will always be taken seriously and dealt with promptly, firmly and fairly. Children may not find it easy to tell staff about abuse verbally, but they can show signs or act in ways that they hope adults will notice and react to. In some cases, a friend may make a report or a member of staff may overhear a conversation or observe a behaviour that indicates something is wrong. If staff have any concerns regarding a child's welfare, including concerns about child-on-child abuse, they must report it to the DSL or member of the safeguarding team immediately. Allegations of child-on-child abuse will be recorded on CPOMS and will be followed up by the DSL or member of the safeguarding team, in liaison with external agencies as appropriate (see Section 24 below, External Agency Contact Details).

For additional advice, see: Child on child abuse - Oxfordshire Safeguarding Children Partnership

9.5 **Bullying, including cyberbullying**

Bullying may be defined as repeated (systematic) aggressive verbal, psychological or physical conduct by an individual or group against another person or persons. It may be deliberate harassment or an aggressive act of omission which causes physical or psychological hurt. Very often bullying is the act of oppressing or dominating by threat or force where the aggressor may persecute or tease physically or morally in order to frighten into action or inaction. Bullying can also result from a one-off incident.

Bullying can include:

- Physical (eg, pushing, hitting, kicking, pinching, poking, biting, taking/damaging belongings);
- Verbal, in English or another language (name-calling, homophobic abuse, racist abuse, threats, belittling, spreading rumours, disinformation or misinformation taunts, teasing, conspiracy theories, making disparaging or offensive remarks, sarcasm);
- Emotional (tormenting, ridiculing, humiliating, spreading rumours, ignoring, isolating, threatening gestures, manipulation, coercion, intimidation, hiding belongings);
- Cyber-bullying: in which emotional, psychological (eg, social exclusion) or verbal bullying can be conducted through a digital medium, such as text messages, social media or gaming and email, all of which may be used to transmit offensive or embarrassing messages and photographs.

The school's Anti-bullying policy sets out the detail of the policy and procedures that are in place in order to prevent bullying and to deal with it if and when it occurs within the school.

NB Please note that the procedures set out below for dealing with allegations of abuse, in particular with regard to the instruction not to investigate, do not apply in instances of alleged

bullying that are not deemed to constitute child abuse. In such cases, the procedures set out in the school's Anti-bullying policy should be followed.

When does bullying become a child protection issue?

Under the Children Act 1989 a bullying incident should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. Where this is the case, then as a school we have a duty to report the concern to the local authority children's social care.

Signs that may indicate bullying:

- Behavioural changes such as reduced concentration, becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go to school, etc
- A marked drop off in performance at school
- Physical signs such as stomach aches, headaches, difficulties in sleeping, changes in eating habits
- Appearing ill at ease in the school environment or in the company of peers, or a desire to remain with adults seeming upset, withdrawn or outraged after using phone/ tablet/ computer and unwilling to talk or secretive about online activities and mobile phone use

Children who are lesbian, gay, bisexual or gender questioning

KCSIE September 2026 states that a young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, children who are perceived to be lesbian, gay or bisexual (whether or not they are) can be targeted by other children. Our school acknowledges the need to treat everyone equally, with fairness, dignity, and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect.

Staff have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding. d'Overbroeck's staff always endeavour to reduce any additional barriers faced by students who are lesbian, gay or bisexual and to provide a safe space for students to speak out or share their concerns.

When supporting a gender questioning student, staff will take a cautious approach, mindful that the Cass review identified that there remain many unknowns about the impact of social transitioning and that children may well have wider vulnerabilities, including having complex mental health and psychosocial needs and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder. Staff will refer to the gender questioning guidance (draft for consultation, Department for Education 2023) and KCSIE 2026, consider the broad range of the student's individual needs and address wider vulnerabilities, such as the risk of bullying. This will be in partnership with parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child) and considering any clinical advice that is available.

9.6 **Child-on-child sexual violence**

Sexual violence or harassment can occur between two students of any age or sex. It can also occur through a group of children sexually assaulting or harassing a single student or group of students.

Sexual violence includes:

- rape;
- assault by penetration;
- sexual assault – intentionally touching another person in a way that is sexual;
- causing someone to engage in sexual activity without consent.

Students are taught about consent via the Relationships and Sex Education (RSE) programme (see d'Overbroeck's RSE policy) and further information can be found at: What is sexual consent?

9.7 **Child-on-child sexual harassment**

Sexual harassment is defined *as 'unwanted contact of a sexual nature'* that can occur online or offline and both inside and outside of school. Sexual harassment is likely to violate a student's dignity, and/or make a student feel intimidated, degraded or humiliated, and/or create a hostile, offensive or sexualised environment. It must always be challenged.

Examples of sexual harassment include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour such as: deliberately brushing against someone, interfering with someone's clothes (which could also cross a line into sexual violence);
- upskirting (which is a criminal offence);
- displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment, which may include:
    - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (see Section 9.10, 'Sharing of nudes and semi-nudes')
    - sharing of unwanted explicit content
    - sexualised online bullying
    - unwanted sexual comments and messages, including on social media
    - sexual exploitation; coercion and threats
    - coercing others into sharing images of themselves or performing acts they're not comfortable with online

9.8 **Harmful Sexual Behaviours (HSB)**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Harmful sexual behaviours (HSB) are abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two

years' difference in age or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, eg, if the older child is disabled or smaller in stature. HSB can occur online and/or face to face and can also occur simultaneously between the two.

d'Overbroeck's is fully away of its duty to safeguard and promote students' welfare in relation to sexual harassment and abuse. The school does this by working hard to foster healthy and respectful relationships between students through Relationship and Sex Education (RSE) and Personal, Social and Health Education (delivered in the Personal Development programme). Within these programmes the school will tackle issues such as:

- healthy and respectful relationships;
- consent;
- what respectful behaviour looks like;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- sexual violence and harassment always being wrong;
- addressing cultures of sexual harassment.

The reporting/investigating of any incidents is conducted according to the information found in the practical guidance for staff in Section 16. In addition, a log is kept by the DSL of all incidents of harmful sexual behaviour so that potential patterns of concerning, problematic or inappropriate behaviour (or locations) can be identified, including whether there are wider cultural issues within the school. This information is then used to review policies, teaching and training to minimise the risk of it happening again.

9.9 **Responding to reports of sexual violence and sexual harassment**

a) How allegations will be dealt with by the school:

We will reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward; they will be supported and kept safe. It will be explained to students, in a way that avoids alarming or distressing them, that the law on child on child abuse is there to protect them rather than criminalise them. Abuse that occurs online or outside of the school will be treated equally seriously.

- Where we have reason to suspect that a student may be suffering, or is likely to suffer, significant harm as a result of the actions of another student (or students), whether this be in or outside of school, online or in a boarding context, advice will be sought from local authority children's social care as a matter of urgency, and a referral made as soon as possible thereafter if this is the advice received.
- All allegations and investigation notes will be kept on the schools CPOMS system.

We will consider every report of sexual violence and/or sexual harassment on a case-by-case basis, considering the criteria set out in KCSIE (September 2026). KCSIE states that there are four likely scenarios for the schools to consider when managing any reports. In summary, these are:

- manage internally;

- early help;
- referral to local authority children's social care;
- reporting to the police.

The information in KCSIE (September 2026) will be used to decide which of these options is most appropriate in each case.

b) How the school will support victims, perpetrators and any other child affected by child-on-child abuse:

- All staff should refer to Section 16 of this document on practical guidance for staff.
- In the event of any disclosure about child-on-child abuse, all the children involved, whether alleged perpetrator(s) or victim, will be treated as being 'at risk', and this will inform the school's handling of the situation.
- Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.
- Where there has been a report of sexual violence, the DSL (or a deputy) will make an immediate risk and needs assessment. This will consider:
    - the alleged victim, the child that may have been harmed, (especially their protection and support)
    - whether there may have been other victims
    - the alleged perpetrator(s), the child that may have caused harm
    - any actions appropriate to protect other young people
    - any actions required to make the location of the reported incident safer
    - intra familial harms and any necessary support for siblings
- Risk assessments will be recorded and kept under review, to actively consider the risks posed to all students.
- The DSL will engage with local authority children's care and specialist services as required, and any professional risk assessments (eg, from social workers or sexual violence specialists) will be used to inform and update the school risk assessments.
- We appreciate that children who have experienced sexual violence display a wide range of responses to their experience (including, in some cases, clear signs of trauma, physical and emotional responses or no overt signs at all). We will continue to show sensitivity to the needs of the child, irrespective of how overt the child's distress is.
- The victim will be asked if they would find it helpful to have a designated trusted adult at school and, as far as possible, the school will support the victim's choice of any such adult.

Further information and support on specialist interventions can be found in KSCIE 2026 Annex B.

9.10 **Sharing of nudes and semi-nudes**

The 'sharing of nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices (eg, Apple's AirDrop which works offline).

Alternative terms used by young people may include 'dick pics' or 'pics'. Professionals may refer to 'youth produced sexual imagery' or 'sexting' (though note that some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images). The legal term for youth produced sexual imagery or 'youth involved' sexual imagery is indecent imagery.

The sharing of nudes and semi-nudes is illegal: by sending an explicit image, a young person is producing and distributing child abuse images, and therefore risks being prosecuted, even if the picture is taken and shared with their permission.

The sharing of nudes and semi-nudes leaves students potentially very vulnerable: the sender has no control over the images. They may be stored or shared online with any number of others. Although they can be deleted on social media or they may appear to last only a few seconds on apps like Snapchat, images can still be saved and copied by others and they may be found at any point in the future. This may lead to embarrassment, emotional distress, bullying and increased vulnerability to blackmail and exploitation.

Although the production of nudes and semi-nudes will likely take place outside of school, sharing can take place and issues are often identified or reported in school. We will respond to instances of sharing of nudes and semi-nudes by investigating swiftly, fully and by following the guidance set out by the UK Council for Internet Safety (UKCIS, December 2020), to make sure our students are safeguarded, supported and educated.

It will be explained to students, in a way that avoids alarming or distressing them, that the law is in place to protect children and young people rather than criminalise them.

See also guidance for staff (Section 16). **The key consideration for staff is not to view or forward illegal images of a child.**

Sharing nudes and semi-nudes: advice for education settings working with children and young people (www.gov.uk)

SPECIFIC SAFEGUARDING ISSUES

9.11 **Mental health**

The school plays an important role in supporting the mental health and welling of our students. The Director of Pastoral Care and Wellbeing, the School Nurse, the School Counsellors and the Pastoral leads in each section of the school work closely to promote wellbeing, resilience and mental health as part of an integrated whole school approach to social and emotional wellbeing, tailored to the needs of our students (eg, see Mental Health and Behaviour in Schools guidance (DfE, 2021) and Promoting children's and Young People's Emotional Health and Wellbeing: a whole school and college approach, PHE 2021). This is implemented through, for example, the Personal Development programme, assemblies and Form time, one-to-one meetings with Directors of Studies and whole school initiatives.

Mental health problems can in some cases be an indicator that a young person has suffered or is at risk of suffering abuse, neglect or exploitation. Such abuse can impact on behaviour, education and mental health. Staff have an awareness of mental health problems and how, in some cases, these can be an indicator of the child being at risk of harm.

Staff should recognise that mental health concerns, including suicide ideation, may become safeguarding concerns and should be reported to the DSL without delay where there is concern regarding a student's safety or welfare

If a member of staff is concerned about the mental health of a student, they should record it (via CPOMS – see details of recording and reporting detailed in Section 16 of this policy) so that it is escalated to the DSL and the safeguarding team. Where appropriate, support will then be offered in school (eg, via School Nurse or School Counsellors) or via referral to external support. If there is an immediate safeguarding concern, the member of staff should take immediate action by following the Child Protection policy and speaking to the DSL or another member of the Designated Staff team. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

Most parents who suffer mental ill-health can care for and safeguard their children and/or unborn child. Some parents, however, will be unable to meet the needs and ensure the safety of their children. The school will follow the guidance outlined in 'working with parents with mental health problems and their children (Think child, think parent, think family: a guide to parental mental health and child welfare)'. Our approach is to recognise; seek support; instil preventive factors and monitor. The Designated Safeguarding Lead would seek support through the Early Help team but escalate to the MASH Team if they were concerned that the child involved was being placed at immediate risk of harm.

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. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school. More information can be found in the Mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See Better Health Every Mind Matters for links to all materials and lesson plans.

9.12 **Child exploitation and serious violence**

Staff should understand that child criminal exploitation and sexual exploitation may be linked to modern slavery, trafficking and coercive control. A child cannot consent to their own exploitation

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late;
- Children who regularly miss school or do not take part in education.

The above CCE indicators can also be indicators of CSE, as can:

- Children who have older boyfriends or girlfriends; and
- Children who suffer from sexually transmitted infections or become pregnant.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. Although the indicators may not be the same, girls are at risk of criminal exploitation too.

a) Child Criminal Exploitation (CCE) and County Lines

Some specific forms of CCE include: children being forced or manipulated into transporting drugs or money thought county lines, working in cannabis factories, shoplifting or pickpocketing and being forced or manipulated into committing vehicle crime or threatening/ committing serious violence to others.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, eg, using dedicated mobile phone lines, both locally and across the UK. Children can be exploited to move, store and sell drugs and money. They can be targeted and recruited into county lines in several locations and are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county line gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Key to identifying potential involvement in county lines are missing episodes, where the student may have been trafficked for the purpose of transporting drugs. In this instance referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any young person under the age of 18 irrespective of gender;
- can affect vulnerable persons over the age of 18;
- can still be classed as exploitation even if the activity appears consensual;
- is often associated with violence or threats of violence, force or enticement-based compliance methods;
- can be perpetrated by individuals, groups, males or females, and young and old adults;
- is usually displayed by some form of power imbalance between victim and perpetrator. This can be due to gender, cognitive ability, physical strength, status, economic resource or other imbalances.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals and OSCP Child Criminal Exploitation.

b) Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. As such, it may involve physical contact, including assault by penetration, nonpenetrative acts (such as masturbation, kissing, rubbing and touching outside clothing) and non-contact activities (see Section 9.2, 'Sexual abuse'). CSE can occur

over time or be a one-off occurrence, and may happen without the child's immediate knowledge (eg, through others sharing videos or images of them on social media). CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise that they are being exploited, eg, believe they are in a genuine romantic relationship. Further information about CSE can be found in Annex B of KCSIE September 2026.

The Oxfordshire Safeguarding Children's Partnership offers the following information and advice: CSE Toolkit: CE-Screening-Tool-1.pdf

c) Serious violence

All staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime. These may include:

- Increased absence from school;
- Change in friendship groups/relationships with older groups or individuals;
- Signs of self-harm or unexplained injuries and changes in wellbeing;
- Significant changes in performance;
- Unexplained gifts or new possessions which may be linked to individuals associated with criminal gangs.

A range of risk factors increase the likelihood of involvement in serious violence, such as: being male; having been frequently absent of permanently excluded from school; having experienced child maltreatment and having been involved in offending (eg, theft, robbery).

The following Home Office Advice is available for staff:

- Preventing youth violence and gang involvement
- Criminal exploitation of children and vulnerable adults: county lines
- Gangs and youth violence: for schools and colleges.

See also Section 12 below, 'Action to be Taken if a Student is Missing from School'.

9.13 **Domestic abuse**

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

Operation Encompass operates in all police forces across England and helps police and schools work together to provide emotional and practical help to children. It provides an advice/helpline service for staff members from educational settings who may be concerned about children who have experienced domestic abuse (Tel: 0204 513 9990)

9.14 So-called Honour-based abuse including Forced Marriage and Female Genital Mutilation (FGM)

FGM is one manifestation of what has come to be known generically as '**so-called honour-based abuse'** ('HBA'). The term encompasses crimes which are committed ostensibly to protect or defend the honour of the family and/or the community. All forms of so-called HBA constitute abuse, regardless of motivation.

A forced marriage is one entered into without the full and free consent of one or both parties and duress is involved. Duress can include physical, psychological, financial, sexual or emotional pressure. In addition, it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial "marriages" as well as legal marriages.

FGM, as a cultural or religious phenomenon practised in certain communities and in certain parts of the world, involves procedures that intentionally alter or injure the female genital organs for non-medical reasons. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is internationally recognised as a violation of the rights of girls and women. It is illegal in the UK, and a form of child abuse with long-lasting harmful consequences.

Professionals in all agencies need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM. Taken individually, these may not indicate risk; but where there are two or more indicators present, this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so great sensitivity should always be shown when approaching the subject.

If staff have a concern that a child may be at risk of FGM, action must be taken without delay. Staff must activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Circumstances that may point to FGM happening:

- A child talking about getting ready for a special ceremony;
- A child's family taking a long trip abroad;
- A child's family being one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including those from Yemen, Afghanistan, Kurdistan, Indonesia and Pakistan);
- Knowledge that a sibling has undergone FGM;
- A child talking about going abroad to be 'cut' or to prepare for marriage.

Mandatory reporting duty: Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report stand to face disciplinary sanctions.

KCSIE 2026 states that it will be rare for teachers to see visual evidence of FGM and teachers should not examine pupils or students. The same definition of what is meant by "to discover an act of FGM appears to have been carried out" applies to all professionals to whom the mandatory reporting duty applies.

Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's Designated Safeguarding Lead and involve children's social care as appropriate.

The duty does not apply in relation to at risk or suspected cases (ie, where the teacher does not discover that an act of FGM appears to have been carried out). In these cases, teachers should follow the school's safeguarding procedures.

Further information on when and how to make a report can be found through the following link: Multi-agency statutory guidance on FGM

9.15 **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child, and can be committed by parents or other family members, people known to the victim, and by strangers.

Community safety incidents are incidents in the vicinity of the school which raise concerns, eg, people loitering nearby or unknown adults engaging children in conversation.

In relation to these issues, our aim is to build students' confidence and give them practical advice on how to keep themselves safe, including advice from the local police where appropriate.

9.16 **Children and the court system**

Children are sometimes required to give evidence in criminal courts (either for crimes committed against them or for crimes they have witnessed). Making child arrangements via the family courts following separation can also be stressful for children. In both cases, we will support children and families as much as possible and refer to the age appropriate guides available for this purpose (see KCSIE, September 2026).

9.17 **Cybercrime**

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray in cyber-dependent crime. Cyber dependent crimes are crimes that can be committed only by using a computer, eg, unauthorised access to computers ("hacking"), attempts to make a computer, network or website unavailable by overwhelming it with internet traffic ("booting" or denial of service attacks) and making, supplying or obtaining malicious software (ie, malware such as viruses, spyware etc) with the intent to commit further offence. Any concerns about these issues should be referred to the DSL.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

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

9.18 **Preventing radicalisation**

The Counter-Terrorism and Security Act 2015 places a duty on schools, in the exercise of their functions, to have due regard to the need to prevent students in their care from being drawn into extremism and terrorism ('the Prevent duty').

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that endangers or causes serious violence to a person/people, property or electronic systems.

The rejection of all forms of intolerance and extremism is wholly in keeping with our school ethos and approach, of which one of the central tenets, as expressed in our Curriculum Policy, is *'to promote a broad, tolerant and open-minded understanding of the world around us, including an appreciation of the democratic process and precluding the promotion of partisan political views in the classroom, in extra- and co-curricular activities, or in any other aspect of the school's activities'.*

Our Curriculum Policy goes on to say that *'the active promotion of the fundamental values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of others, including those with different faiths and beliefs, has long been deeply embedded in our school's ethos and in our day-to-day practice, both in and out of the classroom'.*

In line with government guidance, we see the Prevent Duty as being an integral part of our duty of care and of our Safeguarding responsibilities towards our students. Just as we need to be vigilant about signs of possible physical, emotional, sexual and other types of abuse or neglect, so we need to be alert to signs of any of our students being at risk of being radicalised or drawn into extremism.

Keeping children safe from risks of terrorist exploitation via social media is also an integral part of our efforts to safeguard children from other forms of online abuse and is therefore addressed in our school e-Safety policy.

We consider, given our school ethos and the values espoused by the great majority of our students and their families, that the risk of any of our students being drawn into radicalisation and extremism is comparatively low. That said, we want to avoid any risk of complacency in assuming that it cannot ever happen here. We will therefore remain vigilant and pro-active through:

- Continuing to foster and promote our school ethos, which has always been predicated on tolerance, open-mindedness and mutual respect, and infusing these values in all aspects of our school life;

- Assessing the risk of any of our students being radicalised or drawn into extremism and taking early action, eg, by reporting the issue to the MASH and to the local Channel team, where we feel that a child may be at risk;
- Protecting our students from being drawn into extremism by having robust safeguarding policies and procedures that explicitly address these issues;
- Keeping abreast of policies, procedures and guidance issued by the OSCP and working in partnership with the OSCP, the local Channel team and other agencies as appropriate to fulfil our Prevent responsibilities;
- Taking steps to ensure that our staff have the necessary training, knowledge and confidence to identify children who may be at risk of being drawn into extremism and to challenge extremist ideas if and when they should arise in school;
- Making sure that the teaching and presentation of political ideas in any aspect of school life is always balanced and fair-minded;
- Taking care to ensure that external speakers who are invited to speak in school, and any third parties that may wish to hire our school premises, are suitably vetted and supervised to ensure they do not use these opportunities to promote or advocate extremist views or to speak in support of terrorist organisations or activity;
- Doing all we can to ensure that our students are safe from terrorist and extremist material online when accessing the Internet at school.

Some possible indicators of vulnerability to radicalisation:

- family tensions
- a sense of isolation
- experience of racism or discrimination
- feelings of failure and inadequacy or of being an outsider in society or friendship groups, etc.

Signs that a young person may be being drawn to extremism or radicalisation

There is no single way of identifying an individual who is likely to be susceptible to an extremist or terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Young people at risk of radicalisation may display different signs or seek to hide their views. Staff need to use their professional judgement in identifying students who might be at risk of radicalisation and act proportionately.

It is nevertheless helpful to bear in mind that those in the process of being radicalised may show some or all of the following signs. They may:

- become involved with a new group of friends;
- search for answers to questions about identity, faith and belonging;
- possess extremist literature or advocate violent actions;
- change their behaviour and language;
- seek to recruit others to an extremist ideology.

As ever, it is important to bear in mind that there may be other reasons for some of the behaviours listed above, such as alcohol or drug abuse, family breakdown, domestic abuse, bullying, etc. It is important, therefore, to be cautious in assessing these factors in order to avoid inappropriately labelling or stigmatising individuals because they may possess a particular characteristic or fit a particular profile.

Government guidance on the Prevent Duty expressly says that even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. It also makes clear that the Prevent duty does not require teachers to carry out unnecessary intrusion into family life but, as with any other safeguarding risk, they must take action when they observe behaviour of concern.

If a student is considered to be at risk of radicalisation

During the process of radicalisation, it is possible to intervene to prevent vulnerable people from being radicalised. If a member of staff should have reason to think that a student may be at risk of radicalisation, s/he must report their concerns without delay to the DSL (who is also the Prevent Lead) or to one of the other designated staff.

The DSL will consult with the local Prevent team and follow their advice on how to proceed. This may result in a referral to the local Channel programme.

Channel

Channel focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn to terrorism. It provides a mechanism for schools to make referrals if they concerned about an individual being vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Further information and guidance

The government's 'Educate against Hate' website is a good source of information and guidance for staff and parents and includes possible warning signs of radicalisation: Radicalisation and Extremism - Examples and Behavioural Traits

9.19 **Misogyny and Violence Against Women and Girls (VAWG)**

The school recognises misogyny, harmful gender stereotypes and Violence Against Women and Girls (VAWG) as safeguarding concerns which may contribute to sexual harassment, harmful sexual behaviour, abuse and violence. Through curriculum, pastoral support and behaviour management. d'Overbroeck's promotes respectful relationships, equality in a culture where discriminatory or abusive behaviour is challenged.

9.20 **Other specific safeguarding issues include:**

- Misuse of drugs and/ or alcohol
- Child with family members in prison
- Drug/alcohol abusing parents
- Fabricated or induced illness
- Faith abuse

- Hate
- Gangs and youth violence
- Gender-based violence / violence against women and girls (VAWG)
- Forced marriage (illegal in the UK, and a form of so-called 'honour-based violence' along with FGM)
- Trafficking
- Homelessness
- Young Carers

10 ONLINE SAFETY

The use of technology has become a significant component of many of the safeguarding issues listed above. Child sexual exploitation, radicalisation and sexual predation: technology often provides the platform that facilitates this harm. The school endeavours to protect and educate students and staff in their use of technology and establish mechanisms to identify, intervene in and escalate any concerns where appropriate. As summarised by KCSIE September 2026, the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

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

Staff should be aware of emerging online risks associated with artificial intelligence (AI), including AI generated indecent images, deepfakes, online manipulation, exploitation and harmful interactions with generative AI platforms.

Issues relating to e-safety at d'Overbroeck's are the responsibility of the Designated Safeguarding Lead, who will work closely with colleagues such as the Head of Digital Learning, IT Manager, Head of Boarding and the members of staff who have designated roles in respect of safeguarding and child protection. Given the rapid developments in technology, apps and young people's behaviour online, online safety is reviewed regularly (including in meetings of the safeguarding and pastoral teams, chaired by the DSL) to ensure we are reflecting on and addressing the current risks students face.

The school has detailed advice and guidance contained within its e-Safety policy including monitoring and filtering of the school's service (meeting digital and technology standards in schools and colleges) and clear guidance on mobile technology. The school meets cyber security standards.

Students are taught how to keep themselves safe online and when accessing remote education, and regular updates and reminders are communicated, both to students and to parents. During periods of remote education, parents will be made aware of what their children are being asked to do online and which staff their child is having interactions with online. All interactions with staff will be via designated school systems (eg, school email, MS Teams) – see Section 18.4 'Communication with students'. The provision for teaching about online safety comes mainly via the Personal Development curriculum, ICT curriculum, Form time and assemblies, and updates from the DSL and Pastoral leads via email, Teams, and one-to-one conversations. Effectiveness of filtering and monitoring systems will be fully reviewed monthly and the outcomes recorded in the Filtering and Monitoring meetings minutes. See also e-Safety policy. The DfE guidance, Teaching Online Safety in Schools outlines how schools can ensure their pupils understand how to stay safe and behave online. Annex B of KCSIE (September 2026) also provides further sources of information and support on online safety for schools, parents and children.

10.1 **Education at home**

The school maintains the capability to provide remote education when it is not possible for some or all of their students to attend in person.
See: providing remote education; guidance for schools

10.2 **Mobile phones**

d'Overbroeck's recognises that mobile phones can provide distractions and hinder social interactions. As a default the school has a mobile phone free environment, and a designated space is available at Sixth Form for students to use. Please see the school's Mobile Phone Policy for information on the application of this across the sites. The school ensures that students are educated on the benefits of a phone free environment through the Personal Development (PD) programme and through assemblies and visiting speakers.

11 PROMOTING AWARENESS OF, AND SUPPORT WITH, SAFEGUARDING ISSUES AMONG STUDENTS

The curriculum and pastoral systems at d'Overbroeck's are designed to foster the spiritual, moral, social and cultural (SMSC) development of all our students and to ensure that students are taught how to keep themselves and others safe. All staff play a key role in helping to ensure that students relate well to one another, that they feel safe and comfortable in the school environment and that there is a spirit of openness in which students are aware that they have access to a wide range of staff and other adults who will listen to them (including the School Counsellors, the School Nurse and, in the case of boarders, the Independent Person). We aim to ensure that all students know that their concerns will be treated seriously and that they can safely talk about their feelings, express their views and give feedback. Systems are in place to promote this, including regular questionnaires, discussions (eg, in Form Times, assemblies, House Meetings, School Council, etc). Posters displayed around the school site provide easily understood and accessible information about how students can report concerns and access support. We support students to feel safe, develop confidence and independence and increase the development of self-esteem and self-assertiveness while not condoning aggression or bullying. The d'Overbroeck's values are underpinned by policies (eg, Behaviour, Rules, Rewards and Sanctions policy, Anti-bullying policy, e-safety policy, etc).

All staff at d'Overbroeck's are expected to lead by example and to play a full part in the collective effort to promote an awareness, which is appropriate to their age, among all students of issues relating to health, safety and well-being. Staff also have a responsibility to maintain a spirit of tolerance, mutual support and open communication within the school and to ensure that bullying is kept at bay and that the school's anti-bullying policy is applied whenever the need arises.

We expect the development of SMSC to be integral to the taught curriculum in most subjects. Personal Development lessons, including covering relevant issues through Relationships Education and Sex Education (see also RSE policy), assemblies, contributions from invited outside speakers and daily time in Personal Tutor Groups provide specific and regular opportunities for discussion of moral and social issues, on what may constitute appropriate/ inappropriate behaviour and on safeguarding issues. The teaching of online safety, with the aim of helping students to develop an awareness of the risks involved in the on-line environment and of how to use it safely, is an important part of our ICT curriculum as well as the PD programme.

We listen to our students and involve them when reviewing policies such as the anti-bullying policy, RSE policy or when considering how we can better address issues of equality in a school context. All bullying, including cyber-bullying, prejudice-based and discriminatory bullying, is taken very seriously and we aim always to deal with any instances that may arise pro-actively, sensitively and promptly – and in a way that is designed to raise awareness and to help with the personal development not only of those directly concerned but also their peers and the broader student community.

12 ACTION TO BE TAKEN IF A STUDENT IS MISSING FROM SCHOOL

Students being absent from school, particularly repeatedly and/or for prolonged periods and students missing education can act as a vital warning sign to a range of safeguarding issues, including neglect, child sexual and child criminal exploitation, mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM so called Honour Based Abuse and risk of Forced Marriage etc.

The school will respond promptly to a student absence (as set out in our 'Attendance and Unauthorised student absence' policy) to ensure that the student is safe, that we know where they are and the reason for the absence.

As directed by Keeping Children Safe in Education 2026, the school will hold two emergency contacts for each student on roll.

The school will inform the local authority of any student who has been absent for a prolonged period (without the school's permission for a continuous period of 10 days or more) and/or on repeated occasions and work with the local authority children's services, in line with the "Working together to improve school attendance" guidance. Failure to report children missing from education would constitute non-compliance with the duty to have regard to Keeping Children Safe in Education. Children who go missing from school with no explanation, or who fail to return after a planned absence, will be regarded in the first instance as an immediate safeguarding concern. Every effort will be made to locate the child, liaising with the police and welfare officers as appropriate. The school is aware of, and will implement in full, the requirements of the statutory guidance for children and young people who are missing from home and/or from education: Children Missing Education: statutory guidance for local authorities

We will inform the local authority of any student who is going to be deleted from our school Admissions Register where the student:

- has been taken out of school by their parents and the school has received written notification from the parent that they is being educated outside the school system, eg, home education *;
- has ceased to attend school and no longer lives within reasonable distance of Oxford;
- has been certified by a relevant medical practitioner as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither the student nor their parent(s) has indicated the intention to continue to attend this school after ceasing to be of compulsory school age;
- is in custody for a period of more than four months due to a final court order and we as a school do not reasonably believe s/he will be returning to the school at the end of that period; or,
- has been permanently excluded.

* In accordance with the recommendation of KCSIE (September 2026), if a parent expresses their intention to remove their son/daughter from the school with a view to educating at home, we will work with the local authority and other key professionals to try to coordinate a meeting with parents to discuss this.

The notification will be made as soon as the grounds for deletion are met, but no later than deleting the student's name from the register.

13 PRIVATE FOSTERING ARRANGEMENTS

Any arrangement where a student who is under the age of 16 is living with a host family for more than 28 days counts as a 'private fostering arrangement'.

The terminology is potentially misleading: 'private fostering' has nothing to do with 'being a foster parent'; and the private fostering team's primary objective is to ensure that all children under 16 years living with a host family in the UK are being appropriately cared for and that they are well and happy throughout their stay with their host family. d'Overbroeck's does not usually have students under the age of 16y living with a host family. However, if d'Overbroeck's were to have a student under the age of 16y living with a host family for more than 28 days, the school would follow all procedures required under the relevant regulations, including liaising directly with the private fostering team within the Oxford City Social Services Department regarding the placement.

Staff in the Boarding Team would give the private fostering team basic information about each student (name, age, nationality, guardian/parent details) and which host family they would be living with. This would be done soon after the placement was confirmed and no later than seven days after the start of term.

There are specific criteria that these families hosting must meet, and the private fostering team will ensure that d'Overbroeck's has carried out all the required checks.

The private fostering team will contact the parents or guardian of the students concerned to give them their contact details; they will visit the host family early in the academic year to meet the family members and to check the quality of the accommodation; and they will meet with the

students at school once every 6 weeks until either the student has reached his or her 16th birthday or s/he is no longer living with a host family. We would notify the private fostering team if there were any change to the arrangement or were the arrangement to end.

Our policy and practice in this respect are in line with the Children Act 1989 and 2004, the UKVI requirements for student visas, and the National Minimum Standards for Boarding Schools.

14 THE USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

If d'Overbroeck's facilities or premises are hired or rented out to organisations or individuals in order to provide services or activities which are not under the direct management of school staff, assurance will be sought that the body concerned has the appropriate safeguarding and child protection policies and practices in place. Arrangements will be made to liaise with the school on these matters where appropriate. Safeguarding arrangements will be included in any lease or hire agreement as a condition of use and occupation of the premises, and failure to comply with this will lead to a termination of the agreement.

15 PROCEDURES FOR DEALING WITH DISCLOSURES OR ALLEGATIONS OF ABUSE

An allegation of abuse may be made against a member of staff, a member of supply staff, a volunteer, a governor, a student, parent or other person connected to the school. If a member of staff is made aware of any allegation of abuse, or if knowledge of possible abuse comes to his/her attention, it is his/her duty to listen to the student, to provide reassurance that the student is being taken seriously and that they will be supported and kept safe, and to record the student's statements – but not to probe or put words into the student's mouth.

On hearing an allegation of abuse or complaint about abuse directly from a student, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given: the student should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility.

The member of staff should make and submit an accurate written record and inform the DSL or one of the other Designated Staff immediately.

The DSL will refer all allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering or is likely to suffer significant harm to the MASH (Multi-Agency Safeguarding Hub) as soon as possible, and in any case within 24 hours.

Concerns relating to child sexual exploitation or about child radicalisation will be referred to the relevant bodies following the guidance issued by the OSCP.

In all cases, the member of staff receiving the disclosure / allegation may choose to contact the MASH directly. Keeping Children Safe in Education makes clear that 'anybody can make a referral'. Contact details for the MASH, including an out of hours emergency contact number, are given in Section 24 of this policy.

Where the allegation is **against a member of staff (including against the DSL) or volunteer at the school or any other person in a position of trust**, it must be **reported to the Principal**, not to the DSL. If the Principal is unavailable, the Chair of the Board of Governors should be informed.

Where the allegation is **against the Principal**, the member of staff should **inform the Chair of the Board of Governors.** If the Chair cannot be reached immediately, then the LADO should be contacted directly. Contact details for the Chair of the Board of Governors and the LADO are given Sections 22 and 24 below.

Any such allegations of abuse will be dealt with according to the statutory guidance set out in Part 4 of 'Keeping Children Safe in Education' (September 2026). See section 19 below.

15.1 Taking the child's wishes into account

Where there is a safeguarding concern, the child's wishes and feelings will be taken into account as far as possible when determining what action to take and what services to provide.

15.2 Safeguarding and children with special educational needs and disabilities (SEND)

It is recognised that children with special educational needs or disabilities (SEND) can present additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's impairment without further exploration; children with SEND can be disproportionately impacted by issues such as bullying, without necessarily showing outward signs; communication barriers.

It is important, therefore, to be particularly sensitive to these issues when considering any aspect of the welfare and safety of such children, and to seek professional advice where necessary.

16 PRACTICAL GUIDANCE FOR STAFF

16.1 Response to an allegation

The needs and wishes of the child should be paramount (along with the protecting the child) in any response. It is important that the child feels as much in control of the process as is reasonably possible.

What to do if someone shares a safeguarding concern about themselves or someone else:

- **Always stop and listen straight away** to someone who wants to tell you about incidents or suspicions of abuse. Do so as neutrally as you possibly can, without displaying shock or disbelief.
- **Reassure the student** that they are being taken seriously and that they will be supported and kept safe. Never give a student the impression that they are creating a problem by reporting **any** form of abuse and/or neglect. A student should never be made to feel ashamed for making a report.
- **Write brief notes** of what they are telling you, if possible while they are speaking. Include details of any injuries. Always keep your original notes, however rough. It's what you wrote at the time that may be important later. If you don't have the means to write at the time, make notes of what was said as soon as possible afterwards.

  Record the date, time, place and any noticeable non-verbal behaviour. Wherever possible, record the actual words used by the child. Record statements and observable things rather than your interpretations or assumptions.

- **Never make a promise that you will keep what is said confidential or secret**. If you are told about abuse, you have a responsibility to report it so that action can be taken. However, do your best to reassure the child that the information will be shared only with those who need to know.
- **Do not ask leading questions** that might give your own ideas of what might have happened (of the type "Did s/he do x to you?"). Just ask open questions, eg, "what do you want to tell me?" Or "is there anything else you want to say?"

  Do not criticise the any parties allegedly involved . Do not ask the student to repeat his or her account for another member of staff.
- **Explain what you have to do next** and who you have to talk to.
- Immediately tell the DSL or one of the other designated members of staff (see Section 23) unless they are themselves accused or suspected of abusing. Don't tell other adults or young people what you have been told.
- **Discuss** with the designated member(s) of staff whether any steps need to be taken to protect the person who told you about the abuse.
- **If the allegation is against a designated member of staff** see Section 19 below for details of the procedure to follow in the case of an allegation against a member of staff.
- If the allegation is about the sharing of nudes or semi-nudes (indecent images), never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal. You should also not ask the student to disclose information regarding the imagery, and should not delete it, or ask the student to delete it. If you view the imagery by accident (eg, if a young person has showed it to you before you have had chance to ask them not to), you should report this to the DSL and seek support.
- **Never attempt to carry out an investigation** of suspected or alleged abuse by interviewing people etc. This should be left to children's social care and police staff who are trained to do this.
- **Try to get some support yourself**. The Designated Staff should be a good source of such support.

  Finally…

Never think abuse is impossible in your group, or that an accusation against someone you know well and trust is bound to be wrong.

16.2 **A few things one could say to a child who decides to confide in a member of staff:**

- 'What you are saying to me is important and I will treat it as such.'
- 'I'm glad you were able to tell me / someone.'
- 'I will help you as best I can.'
- 'This is so important I need to talk to someone about it.'

16.3 **Recording**

Make any records at the time – while listening if possible – otherwise as soon as possible afterwards. Remember always to keep your original notes, however rough they may be.

Ensure your record is clear and legible and as detailed as possible; record: date, time, place, what was seen or heard, persons present; what action was taken and by whom. Also note the emotional state the child was in.

Use the TED technique to speak with the student:

Tell me about it
Can you **Explain** to me…
Describe exactly what happened.

Written records should be stored securely and confidentially on CPOMS. They should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up;
- a note of any discussions and decisions made, including the rationale for these decisions action taken and the outcome.

Any physical injuries should be recorded on the body map which is on CPOMS. Do not take any photos of injuries.

16.4 **To report or not to report**

It can be very difficult to know when to report / refer and when not to, especially with what may appear to be minor issues – for fear that one may be acting too soon, on a hunch that may prove groundless, or getting a colleague or a member of the student's family 'into trouble'.

However, even minor concerns may have an unexpected significance when taken in the context of further information and circumstances of which others may be aware. It is, therefore, important to discuss even vague concerns with the DSL or with one of the other designated members of staff for guidance and advice on whether a referral needs to be made. The DSL or other designated member of staff will then be able to put support in place for Children in Need (eg, early help, pastoral support, children's social care as appropriate). Children at Risk should be reported to children's social care immediately (within 24h) and if a crime has been committed this should be reported to the police.

It is important to note also that any staff member can refer their concerns to children's social care directly. Anybody can make a referral.

The consequences of not reporting your suspicion if a child has been abused could be far more serious than making a report that proves to be unfounded.

16.5 **Information sharing and data protection**

The Data Protection Act 2018, UK GDPR and the Children Act 2024 support the timely sharing of information where it is necessary to safeguard and promote the welfare of children

In line with the information strategy under section 16LA of the Children Act 2024, d'Overbroeck's will share relevant safeguarding information with appropriate agencies and

professionals where this is necessary to safeguard or promote the welfare of a child.

The school will work collaboratively with students, families, other schools, local authorities and partner agencies and will participate in preventative information sharing discussions where appropriate in order to identify emerging concerns, reduce risk and promote student welfare.

Information will be shared in a timely, proportionate, necessary and secure manner, with appropriate records maintained of discussions and actions taken

Where students with a school safeguarding file leave d'Overbroeck's, the DSL will ensure that their file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first five days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt.

In addition to the school safeguarding file, the DSL will consider if it would be appropriate to share any information with the new school/ college in advance of a child leaving, eg, information that would allow the new school/college to continue supporting a child who has had a social worker and been a victim of abuse, or a child who is currently receiving support through the "Channel" programme.

16.6 **Informing parents**

Maintaining open and honest communication with parents is a key tenet at d'Overbroeck's. We believe that, as a general principle, parents should be informed about any concerns regarding their children. However, it is important to stress that concerns of a child protection nature must in the first instance be referred to the DSL, or to one of the other senior staff with designated responsibility for child protection at d'Overbroeck's, who will decide on the appropriate response.

Where it has been judged that a referral to Social Care needs to be made by the Designated Safeguarding Lead or by one of the other senior staff at d'Overbroeck's with designated responsibility for child protection, we will aim to share our intention to refer with the student's parents or guardians – unless it is deemed that to do so would put the child at greater risk of harm or impede a criminal investigation.

16.7 **Reporting to the police**

Where the DSL believes that a crime may have been committed, she will report the matter to the police without delay. It will also be referred to the NSPCC.

The Police and Criminal Evidence (PACE) act advises that "The role of the appropriate adult (AA) is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons", with there being further elaboration that the AA is expected to observe that the police are acting properly and fairly in relation to a vulnerable detained persons rights and entitlements, as well as helping the detained person understand their rights.

17 STAFF RECRUITMENT

17.1 **Safer recruitment practices**

Our procedures for the selection and recruitment of all staff and volunteers follow the government's recommendations for the safer recruitment of staff and volunteers who work with children and young people. They comply with the principles and practices set out in

'Keeping Children Safe in Education' (September 2026) and with the Independent School Standards regulations (Part 4, 2014).

Members of the teaching and non-teaching staff at d'Overbroeck's, including part-time staff, temporary and supply staff, and visiting staff such as peripatetic music teachers and sports coaches, are subject to the necessary statutory pre-appointment checks before starting work. Volunteers, host families accommodating our students, contractors working regularly during term-time and any agency or third-party staff whom we may use from time to time are also subject to the relevant statutory checks.

The school will obtains confirmation that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with our students here at school, on another site or at a separate institution.

The school's HR Team is responsible for co-ordinating all staff recruitment procedures and checks at d'Overbroeck's.

d'Overbroeck's keeps a Single Central Record (SCR) of all staff, which complies with all current regulations and contains records of all the required documentation and checks for all staff, proprietors and for host family members (and anyone else who is over the age of 16 and who lives in the home of a d'Overbroeck's host family). The SCR is monitored, reviewed and audited to ensure compliance but the Governing Body and Senior Leadership Team.

The school will ensure recruitment procedures reflect current KCSIE 2026 requirements regarding regulated activities and volunteers, including the removal of the supervision exemption where applicable

Fuller details of our procedures for ensuring compliance with current regulations and guidance on staff recruitment are set out in the school's Safer Recruitment Policy.

17.2 DBS and other checks on current staff

KCSIE (September 2026) states that schools need to carry out new checks on existing staff under the following circumstances:

- if an individual working at the school moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children (in such circumstances, the relevant checks for that regulated activity must be carried out);
- if there has been a break in service for 12 weeks or more;
- if there are concerns about an individual's suitability to work with children.

18 STAFF BEHAVIOUR AND CODE OF CONDUCT

The nature of the interactions between staff and students is central to the ethos at d'Overbroeck's. At the heart of this ethos lie trust, mutual respect and an emphasis on being true to oneself and on encouraging open and honest communication. We are a school community that values and promotes individuality, enthusiasm and personal commitment, and flexibility. We want to get to know our students and to work with them as individuals, each with her or his own personality, talents, interests, needs and aspirations. However, staff need to take care to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. Our Code of Conduct for staff is designed to accommodate and promote this ethos while ensuring that our working practices are

thoughtful and well-considered and that they are designed with the safety and protection of staff and students in mind.

Please also refer to the Nord Anglia Education Code of Conduct and Ethics, which can be found on the d'Overbroeck's website.

18.1 **Making a professional judgement**

It is important to stress that this guidance cannot provide a complete checklist of what is or is not appropriate behaviour for staff in all circumstances. There may be occasions and circumstances in which staff members may have to make decisions or take action in the best interests of a child or young person which could contravene the guidance given in this Code, or where no guidance exists.

In such circumstances, judgements and actions taken should always be recorded and shared with a senior member of staff as soon as possible after the event.

At all times, members of staff are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge. They should always consider whether their actions are warranted, proportionate and safe, and whether they are applied equitably.

18.2 **Propriety and behaviour**

All staff in a school have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is therefore expected that members of staff at d'Overbroeck's will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.

Staff should be aware that safe practice also involves using judgement and integrity about behaviours in contexts other than the work place.

There may be times, for example, when an adult's behaviour or actions in their personal life may come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in the workplace or to indicate an unsuitability to work with children or young people. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour.

All staff are required to adhere to the Acceptable use of IT Policy for Staff.

18.3 **Position of trust**

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education are in positions of trust in relation to the young people in their care.

It is an offence under Section 16 of the Sexual Offences Act, 2003, for a person in a position of trust, such as a teacher, to engage in a sexual relationship with a young person under the age of 18 even if, in the case of those over the 16, the relationship is consensual. d'Overbroeck's policy goes beyond this in stating that members of staff must not under any circumstances engage in a relationship with any student at d'Overbroeck's, regardless of whether or not they are under the

age of 18. Failure to adhere to this policy would result in the school's disciplinary procedures being invoked.

Staff must take all reasonable steps to ensure that their actions and behaviour do not place them or students at risk of harm or of allegations of harm to a student. Interactions and communications between staff and students at d'Overbroeck's should remain professional in nature at all times.

18.4 **Communication with students**

Communications with students must always be professional in nature and in motivation. Communication should always take place via the designated school email address or on Microsoft Teams. Staff should not write personal messages to students in any medium – including letters, notes, text messages, emails, messages left on social networking websites, or any other form of private messaging service. They should not accept students as friends on social media.

Communication with students should not be from a personal phone or email address; if a member of staff needs to contact a student by telephone or email, s/he should do so using a school telephone and/or the d'Overbroeck's email system. Staff must not communicate with students using text messages, nor give their personal mobile phone numbers or personal email addresses to students.

The group leader on all school trips and visits involving an overnight stay should take a school mobile phone with him/her and may ask the students for their mobile numbers before allowing them out in small, unsupervised groups. The school mobile should be used for any contact with students that may be necessary. The group leader must then delete any record of students' mobile phone numbers at the end of the trip or visit and should ensure that students delete the school trip mobile number if they stored this on their own devices during the trip.

The only exception to the above is if a staff member holds a school mobile as part of their role. In this case, the member of staff may use the school mobile for communication (via text or WhatsApp). However, if they do so, they should retain all the messages on the phone so that they have a record of conversations with the students should it be required.

It is strongly recommended that staff do not communicate with former students on personal social media. If staff need to contact former students for work purposes in the first year, it is strongly recommended that this is via the staff member's d'Overbroeck's email or d'Overbroeck's MS Teams account. It is worth noting that a student leaving d'Overbroeck's at the end of an academic year may be on the School Roll until the end of August of that year.

18.5 **One-to-one situations**

Members of staff at d'Overbroeck's are likely to find themselves in one-to-one situations with a student from time to time. In our Sixth Form in particular, one-to-one meetings between students and their Director of Studies (who is their personal and academic tutor) are a key feature of our pastoral and mentoring approach. In addition, teaching staff at d'Overbroeck's will often take the time to give extra support to a student who needs it; there are some instances where a subject may need to be taught in one-to-one lessons; the School Counsellors need to see students in private, as may boarding Heads of House and other staff with pastoral responsibilities from time to time.

We all have a responsibility to ensure that our behaviour is totally beyond reproach, and that it is not likely inadvertently to lay us open to allegations of abuse. It is good practice to: avoid one-to-one meetings with students in remote or secluded areas of the school; wherever possible, ensure that others are within earshot; use a room with a visual panel and / or leave the door open (unless there are good reasons why the conversation has to be had in confidence); avoid the use of 'Engaged' or equivalent signs, as they may create an opportunity for secrecy or the interpretation of secrecy.

It is important always to report to a member of the designated safeguarding team any one-to-one situation in which a student may show signs of becoming uncomfortable or ill at ease (see also Section 20, 'Low level concerns').

Pre-arranged meetings with students away from the school premises are not permitted unless approval has obtained from their parent and the DSL or other senior colleague with delegated authority.

18.6 **Physical contact with students**

There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, but it is crucial that they do so only in ways which are appropriate to their professional role. Staff should, therefore, use their professional judgement at all times.

Staff should not have unnecessary physical contact with students and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by students or onlookers. A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection. Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority.

If a member of staff believes that an action could be misinterpreted or that it may have been misinterpreted, s/he should record the incident and circumstances and inform the DSL or one of the other colleagues with designated responsibility who will advise on the best course of action in the circumstances.

18.7 **Physical restraint**

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL who will decide what to do next.

Please refer to the d'Overbroeck's Restrictive Interventions Policy for more details.

18.8 **Physical education and other activities requiring physical contact**

Where exercises or procedures need to be demonstrated, great caution should be used if the demonstration involves contact with students and, wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and games, or who offer music tuition, will, on occasions, have to initiate physical contact with students in order to support a student so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the student's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

18.9 **Transporting students**

It is inadvisable for a member of staff to give a lift in a car to a student alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting being present.

That said, there will inevitably be circumstances in which a member of staff, in their professional capacity and in the normal course of their duties, is required to transport a student unaccompanied in a car. It is not unusual, for instance, in cases where a boarding student needs to move from one host family to another for one of the colleagues from the Boarding Office to help them do so. Another example may be a member of the PE department needing to accompany a student to A&E following a sporting injury. In all such situations, the journey should be made known to a senior member of staff and a note made of the journey, its purpose and the time, date and destination. The member of staff concerned should retain this note in case it needs to be referred to at a later date.

18.10 **Confidentiality**

Staff members should never give absolute guarantees of confidentiality to students or adults wishing to tell them about something serious. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem and that they will not tell anyone who does not have a clear need to know. They will also take whatever steps they can to protect the informing student or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.

Staff may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances they may have access to, or be given, highly sensitive or private information. These details must be kept confidential at all times and shared only when it is in interests of the child to do so. Such information must not be used to intimidate, humiliate, or embarrass a child or young person concerned. It should never be shared casually in conversation or passed to any person other than on a strictly need-to-know basis.

There may be circumstances in which a member of staff may be expected to share information about a child, for example if abuse is suspected. In such cases, staff have a duty to pass such information on without delay, but only to those with designated responsibilities for child protection.

If a member of staff is in any doubt about whether to share information or keep it confidential they should seek guidance from a senior member of staff or from one of the colleagues with designated responsibility for safeguarding and child protection.

18.11 **Photography and videos**

Many school activities involve the taking or recording of images. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well-

being of students. Informed consent from parents and agreement from the student should always be sought before an image is taken for any purpose.

Careful consideration should be given to the question of how these activities are organised and undertaken. Care should be taken to ensure that all parties understand the implications of the image being taken, especially if it is to be used for any publicity purposes or published in the media or on the Internet.

Staff should:

- Act in accordance with the school's Taking, Storing and Using Images of Children Policy;
- Be clear about the purpose of the activity and what will happen to the images when the lesson/activity is concluded;
- Ensure that a senior member of staff is aware of the use and its purpose;
- Avoid making images in one-to-one situations, or ones which show a single child with no surrounding context;
- Ensure students are aware that they are being photographed and that they have agreed to this; also that they understand why the images are being taken, and that they are appropriately dressed;
- Use only equipment provided or authorised by the school;
- Remain sensitive to any students who, for whatever reason, appear uncomfortable and recognise the potential for such activities to raise concerns or lead to misunderstandings.
- Any photographs involving students taken on an authorised personal device should be deleted from the personal device as soon as they have been downloaded onto the school system;
- Seek permission from parents where appropriate;
- Be able to justify any images of children in their possession.

It is totally unacceptable for any member of staff at d'Overbroeck's to take photographs of students for their personal use.

18.12 **Home visits**

All work with students and parents should, wherever possible, be undertaken in school or other recognised workplace. There may, however, be occasions where, in response to urgent or specific situations, it is necessary to make one-off or regular home visits. While we recognise that staff at d'Overbroeck's are highly unlikely to have to make such visits, we think it advisable to set out a code of conduct that should be applied if and when relevant.

Where staff are required to visit a student's home, it is essential that two members attend, and a senior member of staff has approved the visit, or sequence of visits, and that an appropriate risk assessment is in place to safeguard students and the adults who work with them. A risk assessment should include an evaluation of any known factors regarding the child/young person, parents and others living in the household.

Specific consideration should be given to visits outside of 'office hours' or in remote or secluded locations. Following an assessment, appropriate risk management measures should be in place

before visits are agreed. Where little or no information is available, visits should not be made alone.

Where a programme of work is to be undertaken in the home, an appropriate work space should be provided and a written work plan/contract should be agreed with the student and parent. This should include: clear objectives; content; timing; and duration of sessions; ground-rules; child protection and confidentiality statements. The plan should take into account the preferences of student and parent.

There should also be an agreement that the parent or other suitable adult will remain in the home throughout the session. Where the situation is such that changes in agreed work arrangements are required, a quick assessment will be necessary to determine if the session can continue. The DSL or another appropriate senior member of staff should then be informed as soon as is practically possible.

18.13 **Actively promoting fundamental British values**

In common with all schools, we are required to 'actively promote the fundamental British values of democracy, the rule of law, individual liberty and respect and tolerance for others, including those with different faiths and beliefs'. We also need to be able to demonstrate that we do this.

These values are entirely in keeping with the ethos at d'Overbroeck's and should therefore be inherent in everything that we do. Nevertheless, it is important always to bear these in mind and to ensure that they infuse every aspect of our school life, in the classroom, in extra-curricular activities, etc.

18.14 **The Prevent Duty**

The Counter-terrorism and Security Act 2015 places a duty on schools to take active steps to prevent their students from being radicalised or drawn into extremism and terrorism. In line with government guidance, we consider our responsibilities under The Prevent Duty to be part of our broader responsibilities to safeguard and promote the welfare of our students. To this end, a concern that a student is at risk of being radicalised or drawn into extremism should be treated in exactly the same way as a concern relating to physical, emotional, sexual or any other sort of abuse. Such concerns must be communicated at a very early stage to the DSL or any of the other staff with designated responsibility for child protection.

We also have a duty to ensure that any speakers we invite to speak in school are suitably vetted in advance, and supervised while they are speaking or otherwise interacting with students, to ensure that such talks can never present an opportunity for extremist or partisan views to be promoted in our school.

18.15 **A non-partisan approach to political, ethical and religious issues**

A healthy understanding of the world around us is an important part of the educational experience that we want to provide for our students. In doing so, the emphasis should always be on open-mindedness, tolerance and critical evaluation – encouraging students to appreciate that, where moral, ethical, religious or political questions are concerned, there is always likely to be a multiplicity of viewpoints, and stressing the need to respect the views of others.

When such issues arise, in subject teaching or in in the context of any other activities must always ensure that they offer a balanced presentation of opposing views which precludes the promotion of partisan (ie, one-sided) opinions or dogma.

ISI guidance also stipulates that 'pupils should not be actively encouraged by teachers or others to support particular political viewpoints'.

18.16 Whistleblowing

Safeguarding in a school is everyone's responsibility. All staff and volunteers should feel able to contribute to, and help improve, the school's safeguarding and child protection arrangements and policy.

By the same token, all staff and volunteers should also feel able to raise concerns about what they may consider to be inadequate or unsafe practice or about potential failures in the school's safeguarding policy and practice. Such concerns should be addressed directly to the DSL or to one of the other member of the Safeguarding team. They will always be taken seriously and given careful consideration by the senior leadership team. Low-level concerns should also be reported (see Section 20).

If a member of staff has concerns about the behaviour or another member of staff towards a student, then s/he should report these concerns at once to the Principal, and in their absence to the Chair of the Board of Governors (as outlined in Section 19.1 below).

To report such a concern, a member of staff may, in the first instance, go and talk to the Principal to make a verbal report. In such instances, the Principal will ask the member of staff concerned to make a written note of their concerns and submit them to him immediately after the meeting. If the initial report is made in writing (by note or email for instance), the Principal will ask to see the member of staff as soon as practically possible after receipt of the report to hear the concerns in more detail.

It cannot be overemphasised that such concerns must be reported at once; nobody who reports a genuine concern in good faith needs to fear retribution. A member of staff or a student reporting a child protection issue, allegation or concern will suffer no adverse consequences, regardless of the status of the person against whom the allegation was made and of whether the allegation or concerns prove founded over time, provided the report was made in good faith. The NSPCC whistleblowing helpline (tel: 0800 028 0285, from 8 am to 8 pm Monday to Friday, or email: help@nspcc.org.uk) is also available for staff in schools who, for whatever reason, do not feel able to raise concerns regarding any child protection failures internally or feel that their safeguarding concerns are not being addressed.

The Nord Anglia Education Whistle Blower Protection Policy can be found on the d'Overbroeck's website, and provides further information about whistle blowing in broader context, eg, how an employee can report any breach of the Nord Anglia Education Code, Compliance Policies, laws or regulations. The policy includes contact information for an independently run ethics hotline.

19 ALLEGATIONS AGAINST STAFF AND VOLUNTEERS

19.1 Dealing with an allegation of abuse against a member of staff

This section sets out the school's policy in any case in which it is alleged that a member of staff has:

- behaved in a way that has harmed a child, or that may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates that he or she may pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

KCSIE (September 2026) gives detailed guidance on how schools should deal with allegations of abuse by teachers and other staff. We would, of course, be guided by this if and when such a situation arose. The following is a summary of the salient points.

An allegation of abuse made against a member of staff will always be treated with the greatest care. Our response has to be considered and sensitive to all parties. It must aim for a quick resolution to the benefit of all concerned, avoiding all unnecessary delays. It must also aim to strike a balance between the need to protect children from abuse on the one hand, and the need to protect staff from false or unfounded accusations on the other.

An allegation may be received in one of various ways: it may be a direct complaint made by a student or a parent to another member of staff or directly to a relevant external agency; it may come from another party that may have been told about or witnessed abuse; or it may come as an anonymous referral.

If a member of staff is informed about a possible allegation, s/he should **immediately report the matter to the Principal**, who will discuss it with the LADO (Local Authority Designated Officer) as soon as possible and, in any case, within 24 hours of receiving the allegation. In the absence of the Principal, the matter should be reported to the Chair of the Board of Governors, who will seek to report the allegation to the Principal at the earliest possible opportunity and assume responsibility for contacting the LADO if the Principal is unavailable. If the member of staff feels that there is a conflict of interest in reporting the matter to the Principal, they should report it directly to the LADO.

If the allegation is **against the Principal**, then it must be **reported directly to the Chair of the Board of Governors** (see Section 22 of this document for contact details) without informing the Principal first. The Chair will inform the LADO as soon as possible.

If the Chair cannot be contacted immediately, the allegation should be reported directly to the LADO, tel: 01865 810603). Out of office hours, call the Emergency Duty Team on 0800 833408.

In all cases, the member of staff receiving the disclosure/allegation may choose to contact the MASH directly. Keeping Children Safe in Education 202 makes clear that 'anybody can make a referral'.

19.2 **What happens next?**

Each situation will be assessed on its own merit and with due regard to the welfare of the child in question while at the same time supporting the person who is the subject of the allegation.

Under no circumstances should the school's senior management, or indeed any member of staff at the school, conduct their own investigation without prior consultation with the LADO or, in more serious cases, the police, so as not to jeopardise statutory investigations.

The timescale required to deal with a particular issue will depend on the nature, seriousness and complexity of the allegation. However, in all cases, the aim will be to try resolve the issue as quickly as possible while, of course, ensuring a fair and thorough investigation.

All allegations will be investigated as a priority and without delay. The LADO will judge whether or not the allegation or concern meets the relevant threshold with the information available at that time. Should the information change then further consultation may take place. If, after initial consideration and discussion with the LADO, it is concluded that the allegation does not involve a possible criminal offence, it will be for the school to deal with it. This will be done quickly and with due regard to the school's disciplinary procedures. We will aim to follow the recommendations relating to timescales given in Part Four of 'Keeping Children Safe in Education (September 2026), which are as follows. 'For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the designated officer(s). In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.'

Where further investigation is required, the nature, content and context of the allegation will be discussed with the LADO and a course of action agreed with them, including how an investigation should be carried out and by whom, whether the police should be informed, and what should be said to the individual concerned and the parents of the child / children involved.

Where the allegation concerns a member of staff, a volunteer or another student, the subject of the allegation would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. A member of staff will normally be appointed to keep the person informed of the likely course of action and the progress of the case.

Where an allegation relates to a member of supply staff provided by an agency, the agency should be fully involved.

19.3 **Suspension**

The possible risk of harm to the child needs to be effectively evaluated and managed, both in respect of the child involved in the allegations and of any other children who may be directly or indirectly involved. In some cases, this may lead the school to consider suspending the person until the case is resolved. However, before doing so, the school will consider very carefully whether the circumstances of the case warrant the member of staff to be suspended from contact with students or whether alternative arrangements can be put in place until the allegation or concern are resolved. A member of staff will be suspended only if it is judged that there is no reasonable alternative. The advice and guidance of the LADO will always be sought in such instances.

Where the decision is taken to suspend a member of staff, the reasons and justification will be recorded and the member of staff notified of the reasons.

As part of its duty of care to its staff, the school will seek to provide effective support for a colleague who may be facing an allegation. S/he will be provided with a named contact at the school if they are suspended.

If a member of boarding staff is suspended pending an investigation of a child protection nature, then the school will make arrangements for the member of staff concerned to be housed away from the boarding house such that s/he will have no direct contact with students until the matter is resolved.

19.4 **False allegations**

If an allegation is determined to be false or unsubstantiated, the Principal will, after conferring with the LADO, determine whether the student should be given a sanction, which could include temporary or permanent exclusion, as well as a referral to the police if there are grounds for believing that a criminal offence may have been committed. In such cases the DSL will also refer the matter to children's social care services to determine whether the child concerned is in need of help or support, or may have been abused by someone else.

In the rare event that an allegation is shown to have been deliberately invented or malicious, the Principal should consider whether any disciplinary action is appropriate against the student who made it, or, if the person concerned was not a student, whether the police should be asked to consider if any action might be appropriate.

19.5 **Record keeping**

The outcome of investigation of an allegation will record whether it is:

- Substantiated – there is sufficient evidence to prove the allegation;
- Unsubstantiated – there is insufficient evidence either to prove or disprove the allegation. The term therefore implies neither guilt nor innocence;
- Unfounded – to reflect cases where there is no evidence or proper basis which supports the allegation being made;
- False – there is sufficient evidence to disprove the allegation; or
- Malicious – there is sufficient evidence to disprove the allegation – and that there has been a deliberate act to deceive.

If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a comprehensive record of the allegation, details of how it was followed up and resolved, and a note of any action taken and decisions reached will be kept on the confidential personnel file of the member of the staff concerned, and a copy provided to him or her, in accordance with DfE advice.

19.6 **References**

KCSIE (September 2026) states that:
'cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference […] Substantiated allegations should be included in references, provided that the information is factual and does not include opinions.'

19.7 **Confidentiality and reporting restrictions**

During the course of the investigation the school, in consultation with the LADO, will decide what information should be given to parents, staff and other students and how press enquiries are to be dealt with.

Due consideration will be given to the provisions in the Education Act 2011 relating to reporting restrictions identifying teachers who are the subject of allegations from students. Restrictions are in place regarding the reporting or publication of any material that that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). Schools are required to make every effort to maintain confidentiality and to guard against unwanted publicity.

These restrictions apply up to the point where the teacher concerned is charged with an offence or the Secretary of State (see below) publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves.

19.8 **Reporting staff departures to the Disclosure and Barring Service**

The school is obliged, in common with all other schools in the UK, to make a referral to the Disclosure and Barring Service (DBS) if the two main conditions below are both met:

Condition 1 – Any person, whether employed, contracted, a volunteer or a student, who has been permanently removed from a regulated activity because s/he is considered unsuitable for work with children. This would include instances of dismissal or non-renewal of a fixed-term contract; instances of re-deployment to a non-regulated activity that involves no unsupervised contact with children; instances where the school is unwilling to engage a supply teacher provided by an employment agency; the termination of the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; and resignation, retirement or voluntary withdrawal from supply teaching, contract working, a teacher training course or volunteering.

Condition 2 – The person being referred has:

- engaged in 'relevant conduct', ie, harmed, or poses a risk of harm, to a child or vulnerable adult through their action or inaction (eg, emotional, psychological, physical, sexual, neglect);

or

- satisfied the 'harm test', ie caused actual harm or presented a significant risk of harm to a child, corroborated by tangible or at least credible evidence;

or

- received a caution for, or been convicted of, a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence. A relevant offence for the purposes of referrals to DBS is an automatic inclusion offence as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009 (amended) and the Safeguarding Vulnerable Groups (Prescribed Criteria and Miscellaneous Provisions) Regulations (Northern Ireland) 2009.

The school is also under a duty to refer, through the Teaching Regulation Agency, to the Secretary of State, under sections 141D and 141E of the Education Act 2002, any instance where a teacher has been dismissed (or would have been dismissed had they not resigned) because of serious misconduct. The Secretary of State may, following an investigation, decide to make a prohibition order in respect of that person. The reasons for such an order to be considered are 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

The address for DBS referrals is:
Disclosure and Barring Service
PO Box 3961
Royal Wootton Bassett
SN4 4HF

Referrals to the Teaching Regulation Agency (TRF)
Referrals are generally made online via the TRF website. The page also explains how to make a referral via email or by post.

19.9 **Review following the conclusion of a case**

As soon as practically possible after the conclusion of a case in which an allegation is substantiated, the DSL will review the circumstances of the case with the LADO to determine whether any improvements need to be made to the school's procedures or practice to avoid similar events from occurring in the future. The DSL will ensure that the review is through and takes into account all aspects of the case and of the way in which the school dealt with it, including a review of the decision to suspend where this was the case.

20 LOW LEVEL CONCERNS (CONCERNS THAT DO NOT MEET THE HARM THRESHOLD)

Concerns that do not meet the harm threshold may arise in several ways and from a number of sources, eg, suspicion; complaint; disclosure made by a child, parent or other adult within or outside of the school; or as a result of checks undertaken. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a "nagging doubt" – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct (including inappropriate conduct outside of work) and does not meet the allegations threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include:

- being over friendly with students;
- having favourites;
- having photographs of students on their mobile phone, contrary to school policy;
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door;
- humiliating students.

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

It is very important that low level concerns are shared, to embed a culture of openness, trust and transparency in which the expected behaviour set out in the Staff Code of Conduct is lived, monitored and reinforced by all staff. This should also protect staff from potential false allegations or misunderstandings.

Staff should **share low level concerns responsibly with the Principal**, who will handle and respond to such concerns sensitively and proportionately. The Principal will collect as much information as possible by speaking directly to the person who has raised the concern, to the individual involved and any witnesses. The Principal is the ultimate decision maker in respect of all low-level concerns but may wish to consult with the DSL. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken (eg, supporting the individual to correct unprofessional behaviour at an early stage, identifying any weaknesses in the school's safeguarding system, etc). A record will be kept of the details of the concern, the context in which the concern arose and the action taken, along with the rationale for the decisions and the actions taken. The name of the individual sharing their concerns should also be noted, though if the individual wishes to remain anonymous then that will be respected as far as reasonably possible. If there is any doubt as to whether the information which has been shared about a member if staff as a low-level concern in fact meets the harm threshold, the Principal will consult the LADO.

KCSIE (September 2026) is clear that schools should only provide substantiated safeguarding concerns/allegations that meet the harm threshold in references. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, eg, misconduct or poor performance, or where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated. Low level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential pattern of inappropriate behaviour can be identified.

21 STUDENTS OVER 18 YEARS OF AGE

During their final year at school (Year 13), most students at d'Overbroeck's (and other senior schools in the UK) will turn 18 years old (ie, become legal adults). In addition, some students at d'Overbroeck's may, for a variety of reasons, be slightly older than would be typical for Sixth Form students in the UK. This could be because, for example, they have taken time out from education for health reasons, or because the educational system in their own country has a different structure. The following section of the policy (developed in consultation with the LADO) considers any safeguarding concerns that may arise for younger students from having 18y+ students in school and boarding as well as any safeguarding concerns relating to 18y+ students themselves. A separate 18+ risk assessment provides more detail.

21.1 Expectations of students aged 18+

Students who are 18+ have greater legal freedoms than the general school population, such as: ability to purchase alcohol, tobacco, knives; ability to access to 18+ films and media content; ability to visit 18+ venues. However, the school rules apply to all students, regardless of age (eg, see Behaviour, Rules, Rewards and Sanctions policy; Boarding House Rules; Smoking policy; Substance abuse policy). Taking alcohol as an example, it is prohibited for students to have alcohol in their possession at school or in boarding, or to consume alcohol on school premises or on a school visit. It is also against the rules for a student to return to school/ boarding/ educational visit having consumed alcohol. This school rule applies irrespective of the student's

age. At the most serious end, failure to adhere to the school rules jeopardises the student's place at the school.

21.2 **Students 18+ in relation to younger students**

Older students, including those 18+, can provide invaluable support and role modelling for younger students in terms of social, emotional and academic development. The opportunities for students of different age groups to work together are encouraged.

The nature of the three sections of the school, which are physically separated, means that Sixth Form students (including 18+) are not routinely on the same teaching site as younger students. Most opportunities for students to mix – whether it be for academic mentoring, a social or sporting event or an educational visit- are facilitated by staff. Staff are therefore able to lead in mitigating risks, eg, by ensuring that older students are briefed appropriately (academic mentoring) or liaising with other colleagues such as the EVC and DSL team (risk assessments for events/ trips).

In boarding, students also live in houses with other students from the same section of the school (either Sixth Form or The International Section/Senior School). For this reason, there is naturally some segregation between the older and younger year groups in boarding. However, within the Sixth form boarding houses, inevitably some students will be over 18, and some will be under 18. Careful consideration is therefore given when each student is placed in a boarding house, and factors such as student preference, student vulnerability and student age are taken into account.

In all our boarding houses, students have en-suite rooms. Some Sixth Form students also live in host families.

Students are paired carefully and age is considered. For example, a student who is nearly 18 when joining d'Overbroeck's would not share a room with a student younger than 17 years. However, we would not want two students who have "grown up" together at d'Overbroeck's (eg, two friends joining the Sixth form from Year 11) to face a barrier to sharing a room, just because one student turns 18 a few months before the other. As such, each pairing is assessed on an individual basis and a risk assessment is put in place where necessary.

21.3 **Safeguarding arrangements for students 18+**

All students, regardless of age, are encouraged to talk to a member of staff about any concerns. Students throughout the school are taught that safeguarding concerns will be passed to the DSL team, who have additional training in support and referral processes. Members of the DSL team have completed adult safeguarding training and know how to refer 18+ students for support (see External Agency Information in section 24). Consideration will be given to support and guidance relating to independence, wellbeing and risk taking, on a case-by-case basis. The wishes of the student will always be listened to and acted upon, and then a decision will be made about what needs to happen next.

Students are taught (eg, via Personal Development) and reminded (eg, via assemblies and one-to-one meetings with staff) about the changes which come with becoming an 'adult' at 18. Staff explain and check attitudes, skills and knowledge regarding the changes in students' legal status and how that affects them. This includes information about increased responsibility for health and medical care, increased financial responsibility and risk (including fraud and scams),

personal data and consent, access to different local services (eg, adult mental health services, safeguarding and support services) etc.

22 CONTACT DETAILS FOR THE CHAIR OF THE BOARD OF GOVERNORS

Richard Davies
richard.davies@nordanglia.com
Tel: +41 79 542 0796

23 CONTACT DETAILS FOR D'OVERBROECK'S STAFF WITH DESIGNATED RESPONSIBILITY FOR CHILD PROTECTION AND SAFEGUARDING

- Chris Bromham (Principal)
  01865 688602; 07468 348179 chris.bromham@doverbroecks.com
- Joanne Croft (Vice Principal - Pastoral Care, DSL and Prevent lead)
  01865 888931; 07884 457087 joanne.croft@doverbroecks.com
- Mikaela Parker (Director of Wellbeing and Senior DDSL)
  01865 688521; 07385 665458 mikaela.parker@doverbroecks.com
- Stephen Creamer (Vice Principal - Staff and Curriculum)
  01865 688998; 07385 665457 stephen.creamer@doverbroecks.com
- Nick Haines (Head of Senior School)
  01865 688704; 07500 849496 nick.haines@doverbroecks.com
- Emily Nicholls (Deputy Head, Senior School)
  01865 688523 emily.nicholls@doverbroecks.com
- Andrew Colclough (Head of Sixth Form)
  01865 688606; 07570 683751 andrew.colclough@doverbroecks.com
- Michelle Barrett (Head of Year 12)
  01865 688476 michelle.barrett@doverbroecks.com
- Hannah Mungall (Head of Boarding)
  01865 688482; 07570 683822 hannah.mungall@doverbroecks.com
- Freya Paterson (Lead Nurse)
  07990 076246 freya.paterson@doverbroecks.com

24 EXTERNAL AGENCY CONTACT INFORMATION

- Oxfordshire Safeguarding Children Partnership (OSCP): www.oscp.org.uk
- Local Authority Designated Officers (LADOs):
  Jo Lloyd; Amie Pilcher, Sandra Barratt
  01865 810603; LADO.safeguardingchildren@oxfordshire.gov.uk,
- Education Safeguarding Advisory Team (ESAT):
  Jo Lloyd; Sandra Barratt; Becky Langstone; Sophie Kendall
  01865 810603; ESAT.safeguardingchildren@oxfordshire.gov.uk

Children's Social Care

- MASH (Multi-Agency Safeguarding Hub) – 01865 519800
  mash-childrens@oxfordshire.gcsx.gov.uk
- Children's Social Care Team (Oxford City) – 01865 328563
- Emergency Duty Team – 0800 833 408

For issues relating to radicalisation / extremism / Prevent

- The Prevent Lead at d'Overbroeck's is the DSL, Jo Croft
- To report concerns to the police
  Thames Valley Police Prevent Officer: preventreferrals@thamesvalley.pnn.police.uk
- For advice / information from local children's services
  MASH (Multi-Agency Safeguarding Hub) – 0345 050 7666
  mash-childrens@oxfordshire.gcsx.gov.uk
- DfE helpline for non-emergency advice to staff and governors
  0207 340 7264 counter.extemism@education.gov.uk
- Emergency reports: Anti-Terrorist Hotline – 0800 789 321

For issues relating to students aged 18+

- Oxfordshire Safeguarding Adults Board (OSAB)
  01865 328282 osab@oxfordshire.gov.uk
  Home - Oxfordshire Safeguarding Adults Board

To have a consultation with a Safeguarding Social Worker in the Safeguarding Adults Team of the County Council, or to follow-up on a safeguarding concern raised, call 01865 328232 or email SafeguardingAdults@Oxfordshire.gov.uk.

The following document supports decision making around when an issue is non-reportable (green), when a consultation with the Adult Safeguarding Team at Oxfordshire County Council should be undertaken for further advice (amber), and when there is a clear safeguarding concern (red).
OSAB-Safeguarding-Adults-Consideration-SAC-Framework-V3.pdf
How to Make a Good Adult Safeguarding Referral: A Guidance for professionals

Other contacts

- The NSPCC helpline help@nspcc.org.uk; 0800 028 0285
- Police emergency – 999
- Police non-emergency – 101
- Disclosure and Barring Service (DBS) – 03000 200 190
- Teaching Regulation Agency (TRA) – 0370 000 2288 (general enquiries);
  0207 593 5393 (teacher misconduct)

Sources of advice and information

- Keeping Children Safe in Education (KCSIE September 2026); Appendix B contains important additional information about specific forms of abuse and safeguarding issues, including links to additional support.
- Preventing and Tackling Bullying and Mental Health and Behaviour in Schools
- When to call the police – NPCC guidance for schools and colleges www.npcc.police.uk
- The NSPCC website https://www.nspcc.org.uk
- Contextual Safeguarding Network
- Data protection toolkit for schools www.gov.uk/government/publications/data-protection-toolkit-for-schools
- Education at home: safeguarding and remote education
- Disrespect NoBody
- DfE Working together to improve school attendance (July 2026)
- Preventing Youth Violence and gang involvement
- The right to choose: government guidance on forced marriage
  School staff can contact the Forced Marriage Unit if they need advice or information (020 7008 0151; fmu@fcdo.gov.uk)
- Criminal exploitation of children and vulnerable adults: county lines (October 2023)
- Centre of Expertise on Child Sexual Abuse, including free evidence-based resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024)
- Stop It Now
- Promoting and supporting mental health and wellbeing in schools and colleges (April 2026)
- Promoting children and young people's emotional health and wellbeing: A whole school approach (2021)
- NSPCC - Safeguarding Children with special educational needs and disabilities (SEND) (Updated September 2026)

The Children's Commissioner for England

The Children's Commissioner for England promotes the views and best interests of children and young people in England, and is a good source of information and advice on children's rights.

The current Commissioner is Rachel de Souza. You may find out more about the work of the Children's Commissioner's office by visiting www.childrenscommissioner.gov.uk. Children and young people under the age of 18 may use the website not only to seek information but also to make contact and communicate their views and questions: Contact us | Children's Commissioner for England (childrenscommissioner.gov.uk)

25 CONFIDENTIALITY OF CHILD PROTECTION RECORDS

Child protection records must be kept secure and confidential, separately from other school records. They are made available to other staff only on a 'need to know' basis.

This policy should be read in conjunction with other d'Overbroeck's policies (available from the school website or on request from the school), such as:

Anti-bullying policy
Behaviour, rules, rewards and sanctions
e-Safety policy
Lettings policy
Mobile phone policy
Relationships and Sex Education (RSE) policy
Restrictive interventions policy
Security, access control, workplace safety and lone working policy
Visiting speakers policy

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