Safeguarding Policy
consistent with *Keeping Children Safe in Education 2026*

Including all of the Pre-Prep and Early Years Foundation Stage

JGB

Last updated 1st September 2026, to be reviewed by September 2027

Summer Fields is committed to safeguarding and promoting the welfare of children. We expect all staff, governors and members of the school community to share this

 This policy is in line with *Keeping Children Safe in Education 2026* and has been updated under guidance from the Oxfordshire Education Safeguarding Advisory Team

commitment and to become familiar with this Safeguarding Policy. This policy is available on the school website (www.summerfields.com) and may also be obtained as a hard copy from the school office.

This is to confirm that the Safeguarding Policy has been reviewed and approved by the Board of Governors of Summer Fields.

	Signature	Name	Date
Chairman		J Rooth	
Safeguarding Governor		C Patterson	
Head Master		J E Floyd	
DSL		J G Blackstone	
DSL (maternity cover)		O J S Bishop	

Signed copy stored in the School Office

Date: 1 September 2026

Date for review: 1 September 2027

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Key Personnel

Position	Name (s)	Contact details
Designated Safeguarding Lead (DSL)	Joanna Blackstone Head of Pre-prep (maternity leave)	01865 951253 (office) 07484005022 jgc@summerfields.com dsl@summerfields.com safeguarding@summerfields.com
DSL (maternity cover)	Oliver Bishop Deputy Headmaster	07789 710426 ojsb@summerfields.com safeguarding@summerfields.com dsl@summerfields.com
Deputy DSL(s)	John Floyd Headmaster Charles Langley Senior Deputy Head Claire Coolin Head of PSHE Colette Cawthra Head Sister Ellie Harris Head of Pre-prep (maternity cover)	01865 459209 (office) safeguarding@summerfields.com 01865 459208 (office) 07599 907293 cwl@summerfields.com safeguarding@summerfields.com cmc@summerfields.com safeguarding@summerfields.com cpc@summerfields.com Safeguarding@summerfields.com Esh@summerfields.com Safeguarding@summerfields.com
Designated Mental Health Lead	Charles Langley Senior Deputy Head	As above

School's named 'Prevent' lead	Joanna Blackstone	As above
Nominated Safeguarding Governor	Charlie Patterson	SafeGov@summerfields.com
Chairman of Governors	Jeremy Rooth	Chairman@summerfields.com or via the Clerk to the Governors djjk@summerfields.com
Education Safeguarding Advisory Team / Local Authority Designated Officers (LADOs)	Jo Lloyd (LADO) Sandra Barratt Amie Pilcher	01865 810603 Lado.safeguardingchildren@oxfordshire.gov.uk ESAT.safeguardingchildren@oxfordshire.gov.uk
Locality Community Support Service (LCSS) worker	Kim Costar	LCSS Central, 0345 2412705 LCSS.Central@oxfordshire.gov.uk or LCSS North, 0345 2412703 LCSS.North@oxfordshire.gov.uk
Multi Agency Safeguarding Hub (MASH)	Katrina Johnston (education representative)	0345 050 7666 Katrina.Johnston@oxfordshire.gov.uk
Out of hours Emergency Duty Team (EDT)		0800 833408
TVP Prevent Coordinator		01189 536349 preventreferrals@thamesvalley.pnn.police.uk

Thames Valley Police		101 or in emergencies 999
The County Attendance Team		01865 323513 childrenmissingeducation@oxfordshire.gov.uk

Summer Fields School recognises its responsibility for safeguarding and child protection.

1. Introduction

This policy has been developed in accordance with the principles established by the Children Act 1989; and in line with the following guidance:

- *Keeping Children Safe in Education 2026*
- *Working Together to Safeguard Children 2026*
- *Relationships Education, Relationships and Sex Education (RSE) and Health Education 2026*
- *Revised Prevent duty guidance: for England and Wales 2021*
- Oxfordshire Safeguarding Children Board guidelines

At Summer Fields the Board of Governors and school management take seriously their responsibility under Section 11 of the Children Act and duties under *Working Together to Safeguard Children 2026* to safeguard and promote the welfare of children.

The school will operate all safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the local safeguarding partners. The school will work together with other agencies to ensure adequate arrangements exist within our setting to identify and support those children who are suffering harm or are likely to suffer harm.

In Oxfordshire, statutory safeguarding partners comprise three key local organizations: Oxfordshire County Council, the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (ICB), and Thames Valley Police. Together, they form the joint leadership for protecting children and vulnerable adults across the county, working together under the umbrella of the Oxfordshire Safeguarding Children Board (OSCP).

This policy applies to all members of staff in our school, including all permanent, temporary and support staff, Governors, volunteers, contractors and external service or activity providers.
Our school should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child free from discrimination or bullying where children can learn and develop happily.

This policy applies to all our staff, governors and volunteers working in our school and within boarding facilities.

This policy has been written in line with Working Together to Safeguard Children 2026 and Keeping Children Safe in Education 2026 and should be read and used in conjunction with that guidance.
All staff will sign (on the school's internal online training portal) to confirm they have read and understood this policy.

2. Policy Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to.

We maintain an attitude of 'it could happen here' where safeguarding is concerned.

The purpose of this policy is to provide staff, volunteers and governors with the framework they need to keep children safe and secure at Summer Fields and to inform parents and guardians how we will safeguard their children whilst they are in our care.

3. The aims of these procedures are:

- To provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure that they meet their statutory responsibilities

- To ensure consistent practice across the school and all boarding facilities, and ensure that safeguarding follows a whole-school approach

- To demonstrate our commitment to protecting children

4. Definitions

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance 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 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; and
• taking action to enable all children to have the best outcomes.

Child protection is an aspect of safeguarding but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

The term ***staff*** applies to all those working for or on behalf of the school, full-time or part-time, in either a paid or voluntary capacity. This also includes parents and governors.

Child refers to all young people who have not yet reached their 18th birthday. This will apply to all pupils at Summer Fields and the policy will extend to visiting children from other schools.

Parent refers to birth parents and other adults in a parenting role; for example, adoptive parents, step parents, guardians and foster carers.

Abuse could mean neglect, or physical, emotional or sexual abuse, or any combination of these. Parents, carers and other people can harm children either by direct acts and / or by their failure to provide proper care. Specific explanations of these categories are provided within this policy.

DSL refers to Designated Safeguarding Lead
DDSL refers to Deputy Designated Safeguarding Lead.

OSCP refers to Oxfordshire Safeguarding Children Partnership.

LCSS refers to Locality Community Support Service.

MASH refers to Multi Agency Safeguarding Hub.

ESAT refers to the Oxfordshire Education Safeguarding Advisory Team

LADO refers to the Local Authority Designated Officer (LADO)

5. Principles and Values

Children have a right to feel secure and cannot learn effectively unless they do so. All children have a right to be protected from harm.

All staff have a key role to play in the prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account *contextual safeguarding*, (Annex 6 of this policy) in accordance with the guidance.

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.

Whilst the school will work openly with parents as far as possible, it reserves the right to contact Children's Social Care or the police without notifying parents if this is believed to be in the child's best interests.

We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

Our school acknowledges the need to treat everyone equally, with fairness, dignity and respect. Our school and Governing Body promote an inclusive and anti-discriminatory whole-school culture as part of our safeguarding responsibilities. Racism, faith-based prejudice and other discriminatory behaviours will be recognised, challenged and responded to appropriately. Children will be supported to understand how to treat others with respect and to understand the impact that prejudice and discrimination can have on others.

6. Leadership and Management

We recognise that staff anxiety around child protection can compromise good practice and so have established clear lines of accountability, training and advice to support the process and individual staff.

At Summer Fields, the Head of Pre-prep, Joanna Blackstone, is the Designated Safeguarding Lead (DSL) and assumes overall responsibility for safeguarding, while ensuring that the Deputy DSLs are fulfilling their role. The school's Safeguarding Committee, comprising the DSL, the four deputy DSLs and the deputy headmaster meets weekly during term time. The DSL provides leadership for safeguarding within our school, including ensuring robust challenge, reflective discussion and professional oversight of safeguarding decisions, particularly where concerns are emerging, cumulative or complex.

Summer Fields ensures there are robust arrangements in place to provide safeguarding leadership when the DSL is unavailable. Deputy Designated Safeguarding Leads have appropriate access to safeguarding records and systems to enable them to carry out their role effectively. Our school ensures that secure arrangements are in place to facilitate the sharing of safeguarding information between members of the safeguarding team where necessary to protect children.

Any individual at Summer Fields can contact the DSL or one of the deputy DSLs (DDSL) if they have concerns about a child. In the first instance, communication should be made in person to one of the team, if they are unavailable then via email or telephone.
There is a nominated safeguarding governor, Charlie Patterson, who takes leadership responsibility for safeguarding. The Chairman of Governors, Jeremy Rooth, will receive reports of any allegations against the headmaster and act on half of the governing body.

7. Record Keeping

- Staff will record any welfare concerns that they have about a pupil, or if a pupil reveals a safeguarding concern, in either written or online format, and pass them without delay to the DSL. Staff should make an accurate and factual record of any concern as soon as possible. Detailing:
  - A clear and comprehensive summary of the concern including the child's voice.
  - Record of actions taken including consideration of any urgent medical attention.

- Records will be completed on the same day as the incident/event is reported to the staff member, using the child's words and facts, and will be signed and dated by the member of staff.

- All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded in writing via use of the online management system, CPOMS. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.

- The school will discuss any concerns we have with the child's parents. There may be occasions when this is not appropriate, and if so, school staff would consult with other agencies prior to involving parents. We will record any decision not to discuss with parents and why.

- Our record keeping procedures are in line with the KCSIE 2026 guidance.

- The headmaster will be kept informed of any significant issues by the DSL, Deputy DSLs and by other members of the senior management team.

8. Confidentiality and Information Sharing

- Summer Fields recognises that all matters relating to child protection are confidential. The headmaster / DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.

- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.

- All staff must be aware that they cannot promise a child they will keep secrets which might compromise the child's safety or wellbeing.

- Safeguarding records will be sufficiently detailed to support effective multi-agency working and enable professionals to understand the child's lived experience, identified risks, protective factors, actions taken, outcomes achieved and the rationale for safeguarding decisions.

- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in our school. Safeguarding records are kept in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and in line with Data protection in schools - Record keeping and management - Guidance - GOV.UK

- All safeguarding records will be transferred securely and without unnecessary delay, in accordance with UK GDPR, data protection legislation, and Keeping Children Safe in Education, 2026, to the child's receiving school or setting within five school days. Where safeguarding concerns are significant or complex, the DSL will ensure a direct discussion takes place with the receiving DSL to support continuity of safeguarding arrangements. A record of the transfer will be retained.

- The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. When a pupil moves to a new school, their child protection records will be transferred securely and a confirmation of receipt requested, within five days of the start of a new term or, if the transfer occurs mid-term, within five days.

- OSCP provides advice on the Seven Golden Rules of Information Sharing https://www.oscb.org.uk/wp-content/uploads/2019/07/The-Seven-Golden-Rules-for-Info-Sharing.pdf

- Guidance to support schools with data protection activity, including compliance with GDPR
  Data Protection Tool Kit

9. Training and induction

All staff at Summer Fields are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately.

Our DSL and DDSLs undergo training to provide them with the knowledge and skills required to carry out their role; the DSL and any members of the safeguarding team undergo their DSL training every two years through the OSCP. This training includes training on inter-agency working and updated training on the Prevent duty. The OSCP, Oxfordshire ESAT and LADO also publish regular safeguarding updates, newsletters and briefing material – all of which is used to keep up to date with safeguarding best practice.

All staff receive safeguarding training on induction and regular updates at least annually, with full safeguarding refresher training provided in accordance with school requirements; all staff and governors are trained to a generalist level every three years at least. EYFS staff are trained to generalist level every two years, in line with EYFS framework guidelines. This training is provided by OSCP and includes guidance on Prevent duty and online safety.

Any update in national or local guidance will be shared with all staff in briefings and then captured in the next whole school training. This policy will be updated during the year, if necessary, to reflect any changes brought about by new guidance.

All staff, including those who do not work directly with children, and Governors are required to read and understand Part One of KCSIE 2026. Staff working directly with children must read Part One, as well as this policy. They do this via the school's internal online training portal.

The DSL updates school staff and volunteers on any changes to safeguarding legislation and procedures and relevant learning from Child Safeguarding Practice Reviews (CSPRs) in line with Working Together 2026. These updates will include learning from local and national CSPRs, with a focus on what this means for our schools safeguarding practice.

Separate training is provided to all new staff on appointment as part of their induction process, which also includes online safety. Induction training is updated at least annually and during induction a new member of staff will be briefed on:

- An understanding (and copy) of this Safeguarding Policy.
- An understanding of the policy and procedures for dealing with child-on-child abuse (see Annex 4 below).
- An understanding of maintaining online safety within the school (see Annex 5 below and the school's separate E-Safety Policy). This includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Knowledge of the identity and role of the DSL and deputy DSLs (see paragraph 6 and Annex 1 of this policy).
- An understanding (and copy) of KCSIE 2026, Part 1
- The school's pupil Behaviour Policy and Countering Bullying Policy, which include details of measures to prevent bullying, including cyber-bullying, and all prejudice-based and discriminatory bullying, especially in respect of the protected characteristics identified within the Equality Act 2010.
- The correct safeguarding response to children who go missing from education (see Annex 6 below). They will be given a copy of the school's separate Children Missing from Education Policy.
- An understanding (and copy) of the Staff Code of Conduct with specific regard to Safeguarding. This policy includes information about whistleblowing, the acceptable use of IT, the use of social media and staff/pupil relationships.
- The school's Low Level Concerns Policy.

10. Safeguarding Children with Special Educational Needs and Disabilities

Summer Fields acknowledges that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may be more susceptible to peer group isolation or bullying than other children, and staff should be particularly alert to the possibility of prejudice-based bullying, in contravention of the Equality Act 2010 in respect of protected characteristics.

Staff are also encouraged to be aware that children with SEN and disabilities can be disproportionally impacted and affected by safeguarding-linked behaviours such as bullying and other forms of peer-on-peer abuse, without always outwardly showing signs of abuse.

Furthermore, additional barriers can exist for staff when it comes to recognising neglect or abuse among children with SEN or disabilities. All members of staff will be encouraged to explore appropriately possible indicators of abuse such as behaviour or mood change, or injuries, and not to assume that they are related to the child's disability. They should be aware that children with SEN and disabilities may not always outwardly display indicators of abuse, and may have difficulty in communicating any such issues.

Summer Fields will ensure that children with SEN and disabilities, specifically those with communication difficulties, will be supported to ensure that their voice is heard and acted upon.

The school will take positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils with certain protected characteristics in order to meet their specific need. This includes making reasonable adjustments for disabled children and those identified as having special educational needs.

11. Reporting and referring concerns

KCSIE 2026 states: 'No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.'

School staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

At Summer Fields we recognise the importance of sharing information and reporting concerns to help ensure children are protected.

The following procedures apply to all staff working in the school and are covered during training to enable staff to understand their role and responsibility.
The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or is at risk of harm.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children, and those with disabilities, special needs or with language delay, may be more likely to communicate concerns by means of behaviour rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility which will include children visiting the site as well as those who are pupils.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused (they may feel embarrassed, humiliated, or be being threatened). Staff should speak to the DSL if they have concerns about a child. Being subjected to harassment, violence and/or abuse may breach children's rights as set out in the Human Rights Act 1998.

If a member of staff suspects abuse, exploitation or neglect; spots signs or indicators of abuse, exploitation, neglect or mental health concerns; or if they have a disclosure of abuse, exploitation or neglect made to them, they must:

1. Respond appropriately by listening and offering reassurance.

2. Make an initial record of the information on the same day, either paper-based or online.

3. Report it to the DSL or, in their absence, a DDSL immediately.

4. The DSL will consider if there is a requirement for immediate medical intervention; however, urgent medical attention should not be delayed if the DSL is not immediately available.

5. Make an accurate factual record as soon as possible (either written or online) and within 24 hours of the occurrence, of all that has happened, including details of:
   - Dates and times of their observations
   - Dates and times of any discussions in which they were involved
   - Any injuries
   - Explanations given by the child or another adult
   - What action was taken
   - Any actual words or phrases used by the child
   - Any questions the staff member asked (remembering not to ask any leading questions)

   The records must be signed and dated by the author.

6. In the absence of the DSL or their Deputy, **any member of staff** can and must be prepared to refer directly and immediately to Children's Social Care (and the police if a crime has been committed) if there is the potential for immediate significant harm. They can do this to the LADO or MASH teams; alternatively they may carry out a no names consultation with LCSS, if appropriate. All contact details are in the 'Key Personnel' section above.

Following a report of concerns, the DSL must:

1. Decide whether there are sufficient grounds for suspecting significant harm, in which case a referral must be made to Children's Social Care and the police if it is appropriate. The rationale for this decision should be recorded by the DSL.

2. Normally the school should try to discuss any concerns about a child's welfare with the family, where possible, and seek their agreement before making a referral to Children's Social Care. However, parental consent is not required for referral to any statutory agency and, in accordance with DfE guidance, communication with parents should only take place when it will not place the child at increased risk or could impact a police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police

may need to conduct a criminal investigation. The child's views should also be taken into account.

3. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm the DSL (or Deputy) must contact Children's Social Care via MASH, sharing:
    i. the known facts
    ii. any suspicions or allegations
    iii. whether or not there has been any contact with the child's family.

    The MASH can be contacted by telephone on **0345 050 7666.**

4. If a child is in immediate danger and urgent protective action is required, the police must be called immediately. The DSL or DDSL must then notify Children's Social Care of the occurrence and what action has been taken.

5. When a pupil needs *urgent* medical attention and there is a suspicion of parental abuse causing the medical need, the DSL or their Deputy should seek immediate advice from the MASH about informing the parents, remembering that parents should normally be informed if a child requires urgent hospital attention. However, as in all cases, if it is felt this could put the child at greater risk, then any action should be taken in the best interests of the child.

7. If there is not considered to be a risk of significant harm, the DSL or DDSL will either actively monitor the situation, consider the Early Help process or contact the LCSS for a no names consultation.

    All contact details are in ANNEX 8 of this policy.

12. Multi-agency Working

Summer Fields recognises safeguarding as a shared, multi-agency responsibility and contributes actively, respectfully and constructively to joint decision-making, information sharing and coordinated plans to support children and families.

Our school will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.

The DSL will participate in Child Safeguarding Practice Reviews (CSPRs), other reviews and file audits as and when required to do so by the Oxfordshire Safeguarding Children's Partnership. The DSL will consult with relevant staff and ensure clear processes for gathering the evidence required for reviews and audits and will embed recommendations into practice and complete required actions within agreed timescales.

Where disagreements arise between professionals or agencies, these will be managed respectfully and escalated in line with local safeguarding partnership procedures. Our school recognises the importance of constructive challenge to ensure that children receive the right help at the right time.

All staff are aware of the processes for supporting children and families including criteria, referral route and associated legislation including:

- Community-based Family Help assessments:
- Family Help support/Targeted early help (Section 10 and 11 of the Children Act 2004).
- Children in Need including how this applies for disabled children (Section 17 of the Children Act 1989).
- Child protection- when there is reasonable cause to suspect a child is suffering or likely to suffer significant harm (Section 47 of the Children Act 1989).
- Care and supervision orders (Section 31 of the Children Act 1989).
- Duty to accommodate a child (Section 20 of the Children Act 1989).

13. **Safer Recruitment** (to be read in conjunction with the school Safer Recruitment Policy)

Summer Fields school recognises that safeguarding responsibilities do not end once recruitment checks have been completed. Safeguarding vigilance, professional conduct, supervision, training, low-level concern reporting, allegation management and ongoing suitability assessments form part of our school's safer culture.

All staff understand the requirement to disclose to the Headmaster any concern that may affect their suitability to work with children.

The Governing Body will seek assurance that safeguarding considerations are embedded throughout the employee lifecycle, including recruitment, induction, supervision, development and departure from employment.

Our school is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with children and staff.

Our school maintains an accurate Single Central Record (SCR) in line with statutory guidance. This will be monitored and reviewed to ensure compliance by the Governing Body and our school's Leadership Team.

The Governing Body will ensure that at least one person on every recruitment panel has completed safer recruitment training.

Our school is committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2018 and related obligations under the Childcare Act 2006 in schools, for those staff and management who work with children up to the age of 8.

Summer Fields school will ensure that contractors and providers are aware of our school's safeguarding policy and procedures and that this will be referred to and followed if an allegation is made regarding a member of their agency. Our school will require that employees and volunteers provided by these organisations use our school's procedures to report concerns.

We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with Keeping Children Safe in Education 2026. If assurance is not obtained, permission to work with our children or use our school premises may be refused.

When we commission services from other organisations, we will ensure that compliance with our policies and procedures is a contractual requirement.

14. Allegations against staff or volunteers (including those accessing the school premises)

All staff understand the processes and procedures to manage any safeguarding concern or allegation (no matter how small) about staff members including supply staff, trainee teachers, volunteers and contractors).

If anyone has a concern or an allegation is made about a member of staff (including supply staff, trainee teachers, volunteers and contractors), this is referred to the Headmaster. If the concern relates to the Headmaster, this is referred to the Chair of Governors.

If there is a concern or an allegation about a member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold; this should be reported in accordance with the low-level concerns policy.

The harm threshold as defined in Working Together to Safeguard Children 2026 details the requirement to refer any concern or allegation about anyone working with children (whether paid or voluntary) who may have:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he 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.

Any concern or allegation that may meet the harm threshold must be referred to the Local Authority Designated Officer (LADO).

Once an allegation has been received by the headmaster or Chairman of Governors, they will contact the LADO team on 01865 810603 or lado.safeguardingchildren@oxfordshire.gov.uk as soon as possible and before carrying out any investigation into the allegation other than preliminary enquiries.

The LADO must be told of allegations against adults working with children and young people within 24 hours. This includes allegations relating to individuals or organisations using the school premises for the purpose of running activities for children (for example community groups, sports associations, residential/non-residential lets, or other service providers that run extra-curricular activities). As with any safeguarding allegation, the school must follow this Safeguarding Policy and associated procedures, including informing the LADO.

In liaison with the LADO team, the school will determine how to proceed and if necessary, a referral will be made to the MASH and/or the police.

If an allegation is substantiated and the person is dismissed or the school ceases to use the person's services, or the person resigns in advance of dismissal or otherwise ceases to provide his or her services, the LADO should discuss with the headmaster whether the school will decide to make a referral to the Disclosure and Barring Service (DBS) for consideration of inclusion on the barred lists. See DBS barring referral guidance

In the case of professional misconduct by a member of the teaching staff, it should also be considered whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.
https://www.gov.uk/guidance/teacher-misconduct-referring-a-case

There is a legal requirement for employers to make a referral promptly to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

15. Whistleblowing in a Safeguarding Context

While the school has a separate Whistleblowing Policy, this is a summary that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly.

This does not replace the Whistleblowing Policy and should be read in conjunction with the school's policy.

Whistleblowing is a term that is used when a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed. All staff and volunteers should feel able to raise concerns and know that they will be taken seriously by the Senior Leadership Team.

There are a limited number of areas that can be called 'Whistleblowing', and the policy protects staff from being punished for raising concerns.

Within Summer Fields, the headmaster is the senior manager and responsible for all staff. If you are concerned that any member of staff within the school is not following safeguarding processes or behaving in a way that is placing children at risk, you should, in the first place, make the headmaster aware.

If your concern is about the headmaster, you should raise this with the Chairman of Governors, who can be contacted as identified on page 4 of this policy.

If you would prefer to raise your concerns outside of the school, then you are able to contact the NSPCC whistleblowing line on 0800800 5000 or email help@nspcc.org.uk or make contact with Oxfordshire County Council.

If you believe that a member of the school staff is harming a child (an allegation) and this has been reported to the headmaster and no (or insufficient) action has been taken, or the member of staff you have concerns about is the headmaster, then you should contact the Designated Officers team (LADO) on 01865 810603 or email lado.safeguardingchildren@oxfordshire.gov.uk

If you believe that a child is being abused by individuals outside the school, you can make a referral to Children's Social Care by calling the MASH on: **0345 050 7666** (office hours) or **0800 833408** (outside of office hours).

Further guidance for staff can be accessed through:

https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2 and through the NSPCC website https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/

16. Preventing radicalisation – the Prevent duty

Section 26 of the *Counter-Terrorism and Security Act 2015* requires all schools to 'have due regard, in the exercise of their functions, to prevent people from being drawn into terrorism.' This is known as the 'Prevent Duty' and guidance can be found here: Revised Prevent duty guidance for England and Wales. DfE advice for schools, of March 2023, states that: 'School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately'.

Radicalisation refers to the process by which a person comes to support terrorism or forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. During the process of radicalisation, it is possible to intervene to prevent susceptible people being radicalised.

Summer Fields is fully committed to safeguarding and promoting the welfare of all its pupils. As a school we recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. Staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. All staff are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

The DSL is the school's Prevent duty lead.

All of our staff undergo online Prevent Awareness training to support them in identifying radicalisation and in understanding what steps they need to take to protect the children and families in our school.

Prevent referrals

Members of staff who have concerns about a boy will make these concerns known to the DSL at the earliest opportunity. The DSL will then make a judgement as to whether or not it is appropriate to make a referral, through the Oxfordshire MASH to the Prevent or Channel programmes.

The OSCP guidance on PREVENT can be found here:
https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/prevent/

Channel Awareness

Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be susceptible to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages and an individual will be required to provide their consent before any support delivered through the programme is provided.

The training package below is for anyone who may be asked to contribute to, sit on, or even run a Channel Panel. It is aimed at all levels, from a professional asked to input and attend for the first time, to a member of staff new to their role and organising a panel meeting.

https://www.elearning.prevent.homeoffice.gov.uk/channelawareness

Additional support

The DfE has published further advice for schools on the Prevent duty, complement the Prevent guidance. There are two learning modules, in addition to the Channel Awareness link immediately above.

- The training link below offers an introduction to the Prevent duty and explains how it aims to safeguard vulnerable people from being radicalised, supporting terrorism or becoming terrorists themselves.
  http://www.elearning.prevent.homeoffice.gov.uk

- The package below builds on the Prevent awareness eLearning training. It is designed to make sure that when we share a concern that a vulnerable individual may be being radicalised, that the referral is robust, informed and with good intention, and that the response to that concern is considered, and proportionate

  https://www.elearning.prevent.homeoffice.gov.uk/preventreferrals

- Educate Against Hate - Prevent Radicalisation & Extremism is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

17. Related Safeguarding Policies

This policy should be read in conjunction with other school policies as listed below:

- Staff Code of Conduct with specific regard to Safeguarding
- Low Level Concerns Policy
- Prevent Risk Assessment
- Behaviour Policy, including the 'Restraint of Pupils'.
- Countering Bullying Policy (including cyber bullying)
- Equality and Diversity Policy
- Data Protection Policy
- Missing Child Policy
- Relationship and Sex Education Policy
- Learning Support (SEND) Policy
- Health and Safety Policy
- Risk Assessment Policy
- First Aid Policy
- Medical Care Policy
- Acceptable Use of Technology Policy
- Taking of Images Policy
- Safer Recruitment Policy
- Whistleblowing Policy

18. EYFS

In the EYFS setting mobile telephones must be locked away in the staff room. Only school cameras, iPads or other school devices may be used to take photographs, which must be promptly downloaded to the school computer system and then deleted from the device. See the Staff Code of Conduct with specific regard to Safeguarding for further guidance on photography.

All staff who work in the Pre-prep, or who have involvement with EYFS children, are required to sign a Childcare Disqualification Self-declaration form, in line with the Disqualification under the Childcare Act 2006. This includes staff who are involved with any supervised activity, including wrap-around care, and those involved with the management of the Pre-prep. Staff who work with children under 8 years old outside of the school day are also required to sign the form. This includes any peripatetic teachers, gap students and extra-curricular teachers. Staff are asked to sign the form on an annual basis.

19. Policy review

As a school, we review this policy at least annually in line with DfE, OSCP and Oxfordshire ESAT requirements, and any other relevant statutory guidance. The policy will also be updated at any time within that year, as needed, to be kept up to date with safeguarding guidance or any safeguarding issues as they emerge and evolve; lesson learnt will also be taken into account.

Date approved by governing body:

Date reviewed by governing body:

Annex 1

Roles and Responsibilities at Summer Fields

1) Staff responsibilities

All staff, both in school and across all boarding facilities, have a key role to play in identifying concerns early and in providing help for children. To achieve this, they will:

- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for children to develop the skills they need to recognise, assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of 'it could happen here' with regards to safeguarding.
- Understand how best to take all reasonable action to limit pupils' exposure to the risks from the school's IT system.
- Record their concerns if they are worried that a child is being abused and report these to the DSL as soon as practical that day. If the DSL is not contactable immediately a DDSL should be informed.
- Be prepared to refer directly to Social Care, and the police if appropriate, if there is a risk of significant harm and the DSL or DDSL is not available.
- Follow the allegations procedures, as set out in this policy and KCSIE 2026, if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the Oxfordshire Safeguarding Children Board (OSCP) and take account of guidance issued by the DfE.
- Support pupils in line with their child protection plan.
- Treat information with confidentiality but never promise to 'keep a secret'.
- Notify the DSL or DDSL of any child on a child protection plan or child in need plan who has unexplained absence.
- Have an understanding of Family Help, and the local process for Family Help; also contextual safeguarding and be prepared to identify and support children who may benefit from early help.
- Liaise with other agencies that support pupils and provide early help.
- Ensure they know who the DSL and DDSL are and know how to contact them.
- Have an awareness of this Safeguarding Policy; the Behaviour Policy; the Staff Code of Conduct; the Low Level Concerns Policy; all procedures relating to the safeguarding response for children who go missing from education; and the role of the DSL.
- Have an awareness of Mental Health problems and how in some cases are an indicator of the child being at risk of harm.

2) Senior Management Team responsibilities:

- Contribute to inter-agency working in line with *Working Together to Safeguard Children 2026* guidance.

- Provide a co-ordinated offer of early help when additional needs of children are identified.
- Ensure staff are alert to the various factors that can increase the need for family help as identified in KCSIE 2026.
- Work with Children's Social Care, supporting their assessment and planning processes including the school's attendance, including school holidays, at conference and core group meetings and the contribution of written reports for these meetings.
- Carry out tasks delegated by the governing body such as training of staff, safer recruitment and maintaining a single central register.
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff, regardless of their position within the school.
- Treat any information shared by staff or pupils with respect and follow agreed policies and procedures.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE) and the OSCP procedures.

3) Governing body responsibilities

- Ensure the school has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Code of Conduct, a Behaviour Policy and a written response to children who go missing from education.
- Ensure safeguarding arrangements reflect emerging safeguarding risks including extra-familial harm, attendance related vulnerability, online harms, technology-enabled abuse, exploitation and serious violence.
- Ensure OSCP is kept informed in line with local requirements via the annual safeguarding report returned to the Education Safeguarding Advisory Team.
- Ensure recruitment, selection and induction follows safer recruitment practice including all appropriate checks.
- Ensure allegations against staff are dealt with by the headmaster and that allegations against the headmaster are dealt with by the Chairman of Governors.
- Ensure a member of the senior management team is appointed as Designated Safeguarding Lead and has this recorded in their job description.
- Ensure staff have been trained appropriately and that training records have been updated in line with guidance.
- Ensure any safeguarding deficiencies or weaknesses are remedied without delay.
- Ensure a nominated governor for safeguarding is identified.
- Receive a written, termly safeguarding report / review, supplied by the DSL and conveyed to the governing body by the nominated governor for safeguarding.
- Ensure they facilitate a whole-school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront of school policy, and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

- Ensure that the school has appropriate IT filters and monitoring systems in place that are effective in reducing children's exposure to harmful online content and activity. These arrangements will be proportionate, age-appropriate, risk based and regularly reviewed.
- Maintain strategic oversight of filtering and monitoring arrangements and will receive appropriate assurance regarding their effectiveness, at least once per academic year.
- Ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, is integrated, aligned, and considered as part of the whole-school or safeguarding approach and wider staff training and curriculum planning.
- Consider the above training requirements; the governing body should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively, to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.
- Ensure where the governing body hires or rents out school facilities or premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

4) DSL responsibilities *(to be read in conjunction with the DSL role description in KCSIE 2026)*

In addition to the role of all staff and the senior management team, the DSL will:

Manage referrals:

- Refer cases to MASH, and the police where appropriate, in a timely manner avoiding any delay that could place a child at greater risk.
- Identify any safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- Refer to the *Oxfordshire Threshold of Needs* to assist with decision making.
- Have responsibility to ensure there is at least one key adult for Operation Encompass and a point of contact for Child Exploitation.

Record keeping:

- Keep records of child protection concerns securely and separately from the main pupil file and use these records to assess the likelihood of risk.
- Ensure that safeguarding records are transferred accordingly (separate from pupil files) and in a timely fashion when a child transfers school.
- Ensure that, where a pupil transfers school and is subject to a child protection plan, their information is passed to the new school immediately and that the child's social worker is informed.

Raising awareness:

- Attend appropriate training and demonstrate evidence of continuing professional development to carry out the role.

- Ensure every member of staff knows who the DSL and the DDSLs are, has an awareness of the DSL role and knows how to contact them.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and their responsibility to refer any concerns about a child to the DSL, or concerns about an adult to the headmaster.
- Ensure that all staff are aware of the school's policy on ICT and understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Ensure any members of staff joining the school outside the agreed training schedule receive induction prior to commencement of their duties.
- Ensure each member of staff has read and understood this Safeguarding Policy, including providing induction to new staff members. Induction and training must include the school's Behaviour Policy and the school's procedures for managing children who are absent from education, as well as the Staff Code of Conduct, responsibilities in relation to filtering and monitoring in relation to ICT and dealing with disclosures and managing allegation processes.

Training knowledge and skills:

- Have overall responsibility for online safety and keeping children safe online at Summer Fields.
- Be aware of the training opportunities and information provided by OSCP to ensure staff are aware of the latest local guidance on safeguarding.
- Develop, implement, and review procedures in the school that enable the identification and reporting of all cases, or suspected cases, of abuse.
- Meet any other expectations set out for DSLs in KCSIE 2026.

Multi-agency working and information sharing:

- Help 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.
- Work alongside and liaise with the three Safeguarding Partners in line with *Working together to Safeguard Children* and NPCC guidance: When to call the police

Quality assurance:

- Assist the governing body in fulfilling its safeguarding responsibilities, as set out in legislation and statutory guidance.
- Provide a written, termly safeguarding report / review, to be conveyed to the governing body by the nominated governor for safeguarding.
- Provide a yearly written report, in conjunction with SLT and IT, on the effectiveness of the filtering and monitoring systems in school. This report will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks.
- Complete the 175/157 annual safeguarding report and submit to the Local Authority.

Annex 2

Dealing with disclosures (further support)

Guiding principles: the seven R's:

Receive

- Listen to what is being said, without displaying shock or disbelief.
- Accept what is said and take it seriously.
- Make a note of what has been said as soon as practicable.

Reassure

- Reassure the pupil, but only so far as is honest and reliable.
- Don't make promises you may not be able to keep, for instance 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'.
- Do reassure, for instance you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'.

Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
- Do not ask leading questions. Such questions may invalidate your evidence (and the child's) in any later prosecution in court.
- Do not ask the child why something has happened.
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible.
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and to whom you have to talk. Reassure the pupil that it will be a senior member of staff.

Report

- Share concerns with the DSL, or if they are absent the Deputy DSL, as soon as possible.
- If you are not able to contact your DSL or the Deputy, and the child is at risk of immediate harm, contact MASH or Police immediately

Record

- If possible, make some very brief notes at the time, and record them electronically, either via email or CPOMS, as soon as possible.
- Keep your original notes on file.
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words

- Complete a body map to indicate the position of any noticeable bruising.
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'.

Remember

- Support the child: listen, reassure, and be available.
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.
- Try to get some support for yourself if you need it.

Review processes (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

Annex 3

Abuse and Neglect

Knowing what to look for is vital to the early identification of abuse and neglect. **All staff** should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy).

All staff at Summer Fields should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Definitions and Indicators of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face).
- Clusters of bruises – e.g. fingertip bruising (caused by being grasped).
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head.
- Bruises on the back, chest, buttocks, or on the inside of the thighs.
- Marks indicating injury by an instrument – e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle.
- Bite marks.
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g. electric fire, cooker, cigarette.
- Scalds with upward splash marks or *tide marks.*
- Untreated injuries.
- Recurrent injuries or burns.
- Bald patches.

In the social context of a school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury.

- the explanation uses words or phrases that do not match the vocabulary of the child (adult words).
- no explanation is forthcoming.
- the child (or the parent/carer) is secretive or evasive.
- the injury is accompanied by allegations of abuse or assault.

You should be concerned if the child:

- is reluctant to have parents/carers contacted.
- runs away or shows fear of going home.
- is aggressive towards themselves or others.
- flinches when approached or touched.
- is reluctant to undress to change clothing for sport.
- wears long sleeves during hot weather.
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention.
- admits to a punishment that appears excessive.

The link to OSCP guidance on physical abuse is here:
https://www.oscb.org.uk/safeguarding-themes/physical-abuse/

Emotional abuse:
The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Indicators of emotional abuse

Developmental issues
- Delays in physical, mental and emotional development.
- Poor school performance.
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive.
- Over-reaction to mistakes.
- Continual self-deprecation ('I'm stupid, ugly, worthless' etc.)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g. wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

Social issues
- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses
- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ('I deserve this')
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Most harm is produced in *low warmth, high criticism* homes, not from single incidents.
Emotional abuse is difficult to define, identify or recognise, and often to prove.
Emotional abuse is chronic and cumulative and has a long-term impact.

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

Link to OSCP guidance on emotional abuse:
https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/emotional-abuse/

Link to OSCP guidance on Domestic Abuse
https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/domestic-abuse/

Sexual abuse:
involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic.
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent.
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too. The sexual abuse of children by other children is a specific safeguarding issue in education.

Indicators of sexual abuse

Physical observations
- Damage to genitalia, anus, or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour or promiscuity
- Hinting at sexual activity. Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour
- Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed

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

NSPCC research has highlighted the following examples of the neglect of children under 12:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected

often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

The link to the OSCP guidance on Neglect and toolkit is here:
http://www.oscb.org.uk/safeguarding-themes/neglect/
Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL.

Indicators of neglect
The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The OSCP childcare and development checklist/toolkit provides a more detailed list of indicators of neglect and is available to all staff.

Physical indicators of neglect
- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect
- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food

Our staff are aware that safeguarding issues often overlap and can put children at risk of harm, including but not limited to, the categories of above. The following are understood as being potential indicators of risk:
- Drug taking and/or alcohol misuse
- Unexplainable and/or persistent absences from education
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation
- Consensual and non-consensual making or sharing of nudes or semi nudes.

Additional information on these safeguarding issues and information on other safeguarding issues are included in Keeping Children Safe in Education 2026.

Annex 4

Child-on-Child Abuse Sexual Harassment, Violence including Harmful Sexual Behaviours (HSB)

All staff understand that child-on-child abuse includes a wide range of behaviours including bullying (including cyberbullying, prejudice-based and discriminatory bullying), discriminatory behaviour including racism and faith-targeted abuse, sexual harassment, sexual violence, harmful sexual behaviour, misogynistic and misandrist language, weapon-related threats and online abuse.

Such behaviour is never acceptable and should not be tolerated or dismissed as banter, part of growing up or normal behaviour.

Child-on-child abuse can occur between children of any age and sex and can take place both inside and outside of school, online and offline. It may be a one-off incident or a pattern of behaviour and should never be tolerated or dismissed.

Our school recognises that racist, faith-targeted, prejudice-based and other discriminatory behaviour between children can constitute child-on-child abuse and may have significant impact on a child's welfare, wellbeing and sense of safety. Such incidents will be taken seriously and considered within our safeguarding procedures as well as relevant behaviour, anti-bulling and equality procedures.

All staff at Summer Fields school understand that sexual violence and sexual harassment is not acceptable, and we are committed to creating a culture where children feel confident to report concerns, knowing they will be taken seriously.

Harmful sexual behaviours exist on a continuum and range from developmentally appropriate behaviour to problematic, abusive or violent behaviour. Responses are proportionate, child-centred and take account of the needs of both the victim and the alleged perpetrator, recognising that children displaying harmful behaviour may also be vulnerable.

When responding to concerns, Summer Fields School will:

- Take all reports seriously, even where there is no physical evidence.
- Avoid victim-blaming and ensure children are supported appropriately.
- Consider the impact on the wider school environment.
- Involve external agencies where required.
- Consider whether racism, faith-based prejudice, faith-targeted abuse or other discriminatory factors are present and the impact these may have on the child's welfare and sense of safety.
- Record decisions, actions taken and rationale clearly.

All staff understand that even if there are no reports this does not mean abuse, harassment or violence is not happening, it is possible that abuse is unreported. Our staff challenge inappropriate behaviours between children that are abusive in nature.

At Summer Fields school, we follow Part 5 of Keeping Children Safe in Education when responding to all concerns related to child-on-child sexual violence, sexual harassment and

harmful sexual behaviours and recognises the need for clear reporting routes, consistent responses and ongoing support for all children involved, including alleged perpetrators, in line with a trauma-informed approach.

In order to minimise the risk of child-on-child, all staff should:

- be aware that children can abuse other children. It can occur between children of any age and sex.
- be aware that sexual violence and sexual harassment can occur both in school and outside school. It can occur through a group of children sexually assaulting or sexually harassing a single child, or another group of children; it may involve pupils at other schools.
- be aware that it can occur face-to-face (both physically and verbally) or online.
- be aware that it is more likely that girls will be the victim of sexual violence and sexual harassment, and more likely that it will be perpetrated by boys, but that all child-on-child abuse is unacceptable, will not be tolerated and will be taken seriously.
- be able to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
- as with all areas of safeguarding, always maintain the attitude that 'it could happen here'.
- understand that even if there are no reports of child-on-child abuse in the school, it does not mean it is not happening, it may just be that it is not being reported.
- Understand the importance of challenging inappropriate behaviours between peers as some such behaviours can in fact be abusive in nature.
- speak to the DSL (or one of the DDSLs) immediately if they have any concerns regarding potential child-on-child abuse.
- Be clear that certain behaviours, or reports or disclosures of certain behaviours, will never be passed off as 'just banter', 'just having a laugh', part of growing up or 'boys being boys'. Any such tolerance can lead to a culture of unacceptable behaviour, an unsafe environment for our pupils and, in worst case scenarios a culture that normalises abuse and can lead to children accepting it as normal and not coming forward to report it.
- be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

In order to minimise the risk of child-on-child in boarding lodges, the following steps are taken:

- Pupils are reminded frequently about the importance of respecting each other's space.
- Boarding Lodges are supervised with at least two residential staff, a gap assistant and other visiting lodge assistants.
- Boarding Lodges are secured overnight with unique entrance fingerprints, staff passes and unique alarm codes.

- The areas immediately outside the Boarding Houses are not to be used as gathering/socialising places, to respect boarders' privacy.
- Inappropriate sexual behaviour is covered in the Schools behaviour policy and is an example of a serious breach of discipline and behaviour and may lead to an exclusion from the school.
- The Head of Boarding is a DDSL and if a case of Child-on-Child Abuse is suspected he would meet with the DSL to discuss any risk assessment and whether this would impact on the victim or alleged perpetrator and their ability to remain within the boarding setting.

All staff should understand that just because there are no reports of child on child abuse within a particular lodge it does not mean it is not happening; it may simply mean that it is not being reported, therefore it is vital that staff report any concerns relating to child on child abuse to the DSL or one of the DDSLs immediately.

It is recognised that boarders may have an additional vulnerability to other pupils in the school as they are living in a "home away from home" and need to be provided with appropriate care for their welfare in loco parentis.

Procedures for dealing with incidents of child-on-child abuse

- All staff should be clear as to the procedures for reporting and dealing with incidents of child-on-child abuse and the important role they must play both in preventing it and responding.
- If a pupil is in immediate danger or at risk of significant harm, a referral to children's social care and/or the police should be made immediately. Anyone can make a referral. Where a referral is not made by the DSL, they should be informed as soon as possible that a referral has been made
- If a member of staff thinks for whatever reason that a child may be at risk of experiencing abuse by another child, or of abusing another child, they should discuss their concern with the DSL without delay so that a course of action can be agreed.
- If a pupil speaks to a member of staff about child-on-child abuse that they have witnessed or are part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgment. As above, they should then discuss their concern with the DSL without delay.

Children who are the victims of child-on-child abuse, sexual violence or sexual harassment will find the experience stressful and distressing. The experience will, in all likelihood, adversely affect their educational attainment and may be exacerbated if the alleged perpetrator attends the same school. As detailed elsewhere in this policy, Summer Fields is aware that safeguarding incidents and behaviour can be associated with factors outside school.
The risk of child-on-child abuse can be greatly minimised by early intervention and help. Staff should look out for early indicators of abuse, as set out in Part 1 of KCSIE and in this policy. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and even violent behaviour in the future.

Sexual violence and sexual harassment between children

There is concern nationally relating to a culture of misogyny and sexual harassment in many schools and the DfE and Ofsted have reviewed school procedures. Schools are now required to have clear mechanisms for pupils to report concerns within school that are signposted and prevalent.

Sexual violence and sexual harassment are not acceptable and Summer Fields takes a zero-tolerance approach to abuse.

The initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Any school that failed to recognise, acknowledge or understand the scale of harassment and abuse, or downplayed some behaviours, might actually lead to a culture of unacceptable behaviour.

Part 5 of the statutory guidance in *Keeping Children Safe in Education 2026* now sets out how Summer Fields will manage reports of child-on-child sexual violence and harassment. The further Department for Education (DfE) guidance document, *Sexual violence and sexual harassment between children in schools and colleges* (2021) has now been withdrawn. It contains detailed information on:

- what sexual violence and sexual harassment constitutes.
- important context to be aware of, including: what is consent, power imbalances, and developmental stages.
- Harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves.
- Related legal responsibilities for schools.
- Advice on a whole-school approach to preventing child-on-child sexual violence and sexual harassment.
- More detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrators(s).

If a report is made, the designated safeguarding lead / headmaster will take the lead in how the report is dealt with, given the high-profile nature of the report. Where the DSL is unavailable, a Deputy DSL will lead. On a case-by-case basis, there will be consideration made as to the gender of the DSL or Deputy, so that the victim feels comfortable with how the investigation is managed.

When it comes to action to manage the report, the needs and wishes of the victim will take centre stage. Considerations should include how the investigation proceeds and what support the victim requires. Support should also be provided to alleged perpetrators and any other pupils who may be involved.

Where a report of rape, assault by penetration or sexual assault is made, children's social care and the police will be informed. Before doing so, this will be discussed with the victim and their parents/carers, explaining why it is important for other agencies to know and how these agencies will be able to support the victim. Other allegations will be managed within the school and/or with support from children's social care providers.

KCSIE 2026 sets out the steps the school will take to manage the students involved, including the writing of risk assessments, separating the students in lessons, investigating the report and supporting the victim and alleged perpetrator

Our school also has access to, and will utilise where necessary, The Lucy Faithfull Foundation; this website has developed a HSB toolkit, which provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.

https://www.lucyfaithfull.org.uk/advice/concerned-about-a-child-or-young-persons-sexual-behaviour/what-is-harmful-sexual-behaviour/

The tool uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals:

- Make decisions about safeguarding children and young people.
- Assess and respond appropriately to sexual behaviour in children and young people.
- Understand healthy sexual development and distinguish it from harmful behaviour

Annex 5

Online Safety, Remote Learning, and Filtering and Monitoring

It is recognised by Summer Fields that the use of technology presents challenges and risks to children and adults both inside and outside of school. It is essential that children are safeguarded from potentially harmful and inappropriate online material. Our school approach to online safety is to protect and educate children and staff in their use of technology and we have mechanisms to identify, intervene and escalate any concerns.

Our school recognises the increasing safeguarding considerations associated with generative artificial intelligence (AI) and ensures that filtering & monitoring, staff training and pupil education reflects associated risks in line with Department for Education expectations.

Our school understands that the breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate 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, including consensual and non-consensual sharing of self-generated intimate images and/or videos, including those generated using AI, e.g. deepfakes, sharing other explicit images and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If we feel pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group APWG

Filtering and Monitoring

Summer Fields recognises that filtering and monitoring systems are an important safeguarding measure but cannot prevent all online harm. Our children are supported through education, staff vigilance, safeguarding procedures and a whole-school approach to online safety.

Staff are aware of emerging online harms including AI-generated content, manipulated imagery, deepfakes, online coercion, online exploitation, harmful online communities, misogynistic content, extremist content and technology enabled abuse.

Our Governing Body are responsible for ensuring Summer Fields has appropriate filtering and monitoring systems in place and that there is review of their effectiveness at least once every academic year, with records maintained of those reviews.

Whilst considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the Governing Body also consider the age range of our pupils, those who are potentially at greater risk of harm and how often they access the IT system.

Additional guidance on filtering and monitoring is accessible through Meeting digital and technology standards in schools and colleges - Filtering and monitoring: core standard - Guidance - GOV.UK

The school has a zero-tolerance policy towards either the consensual or non-consensual sharing of nude and semi-nude images and/or videos. Any such indecent would be considered a form of harmful sexual behaviour and would be a serious breach of the school's Behaviour Policy and Countering Bullying Policy. All such incidents would be dealt with using a proportionate approach, taking into consideration the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

Summer Fields recognises the specific risks that can be posed by mobile telephones, cameras and other kinds of smart technology. In particular, it is recognised that many children now have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means that some children, either at school or at home, may sexually harass, bully and control others via their mobile and smart technology; share indecent images, both consensually and non-consensually (often via large chat groups); and view and share pornography and other harmful content.
At Summer Fields, no boy is permitted to have access during the school day to mobile technology. The school E-Safety Policy states that:

- 'Boarders must leave all personal portable devices in their respective lodges under the care of their lodge parents between return to lodge at the start of term or after a Short Leave, Long Leave or Weekend Leave away from school; they will receive the device back when they next depart from school. If day boys are given authorisation to bring a mobile phone to school (for instance for use during the journey to and from school), they should be left in the care of the School Secretary in Reception for the duration of the school day. Any device that communicates over the internet, including smartwatches and other wearable technology, are not permitted.

In accordance with KCSIE 2026 and EYFS 2026, the school has appropriate policies in place that are shared and understood by all members of the school community. Further information about specific approaches relating to this can be found in various of the schools policies:

  - E-Safety Policy
  - Acceptable Use Policy
  - Remote Learning Policy
  - Taking of Images Policy
  - Countering Bullying Policy
  - Staff Code of Conduct

In the EYFS setting mobile telephones must be locked away in the staff room. Only school cameras, iPads or other school devices may be used to take photographs, which must be promptly downloaded to the school computer system and then deleted from the device.

Cybercrime
At Summer Fields, we are aware that children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), would consider referring into the Cyber Choices programme.

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

As schools, including Summer Fields, increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. Summer Fields takes great care to ensure that appropriate filtering and monitoring systems are in place when pupils and staff access school systems and internet provision. The school's Remote Learning Policy gives further detail.

The school has taken all reasonable steps to ensure that the school network is safe and secure, principally but not exclusively through the use of filtering. All members of the school community should be aware that internet and email communications through the school network and staff email addresses are monitored. The school acknowledges that whilst filtering and monitoring is an important part of school's online safety responsibilities, it is only one part of our approach to online safety. Pupils and adults may have access to systems external to the school control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.

Summer Fields ensures that where children are being asked to learn online at home, suitable advice is provided to enable them to do so safely.

Summer Fields will ensure a comprehensive whole-school curriculum response is in place to enable all pupils to learn about and manage online risks effectively, and will support parents and the wider school community (including all members of staff) to become and remain aware and alert to the need to keep children safe online.

The relevant paragraphs in the school's Countering Bullying Policy state:

'Through appropriate education we aim to:

- Ensure that pupils, staff and parents are educated to understand what cyber bullying is and what the consequences of undertaking it are.
- Have in place policies and procedures to prevent incidents of cyber bullying within the school and its wider community.

- Have in place effective measures to report cyber bullying and to deal effectively with any perpetrators of it, whether members of the community or outsiders.
- Monitor the effectiveness of our counter measures.'

Pupils are clearly told that they should report cyber bullying, whether against them or witnessed, immediately to staff. Additional guidance is provided by several links on the school homepage and there is a 'Report Abuse' button prominently displayed, linking directly to the *CEOP* (Child Exploitation and Online Protection) Advice & Help Centre, which offers advice and provides support. E-Safety software helps monitor cases of cyber bullying and aid the reporting of them to the Deputy Head Pastoral; the Deputy Headmaster; the DSL or the Headmaster, as appropriate.

The Head of ICT is trained as a *CEOP Ambassador Trainer* and maintains a position at the forefront of technical knowledge in order to pre-empt any potentially hazardous developments in technology.

This section should be read in conjunction with the school's published E-Safety Policy. The E-Safety Coordinator is the Senior Deputy Head.

Annex 6

Safeguarding issues

All staff should have an awareness of safeguarding issues which can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) can put children in danger.

Mental health

At Summer Fields, we aim to promote positive mental health and wellbeing for our whole school community (pupils, staff, parents and carers); we recognise how important mental health and emotional wellbeing is to our lives, in just the same way as physical health. This is recognised by our school motto *Mens sana in corpore sano* ('A healthy mind in a healthy body'), adopted upon the school's foundation in 1864.

We recognise that children and young people's mental health is a crucial factor in their overall wellbeing and can affect their learning and achievement. All children and young people will have varying mental health during their school career. However, some face significant life events which can seriously impact their emotional wellbeing and can include mental illness.

All staff must be aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. When a child has suffered abuse and/or neglect, staff should be aware that this can have a lasting impact on their mental health, behaviour and education.

The Department for Education (DfE) recognises that: 'Schools have a role to play in supporting the mental health and wellbeing of children'" (*Mental Health and Behaviour in School, 2018*). Schools should be a place for all pupils to experience a nurturing and supportive environment that has the potential to develop self-esteem and give positive experiences for overcoming adversity and building resilience.

Schools are also a place of respite from difficult home lives, and school life offers positive role models and relationships, which are critical in promoting the wellbeing of all young people.

Only appropriately trained professionals should attempt to diagnose mental health conditions. Other staff are, however, well placed to observe children day-to-day and to identify those whose behaviour suggests that they may be experiencing or at risk of developing a mental health problem. Any member of staff who has a concern about the mental health of a child that might also be a safeguarding concern should speak to the DSL or a DDSL straight away and follow all procedures in this policy. The School Counsellor is available to see or talk to pupils.

The role of school is to ensure that students can manage times of change and stress, and that they are supported to reach their potential or access help when they need it. The school also has a role to play in ensuring that pupils learn about what they can do to maintain positive mental health, what affects their mental health, how

they can help to reduce the stigma surrounding mental health issues, and where they can go if they need help and support.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.
As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. At Summer Fields we engage with parents and try to build children's confidence, rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children, for 5-11-year olds and 12-17 year olds, which explain each step of the process, support and special measures that are available. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children and Summer Fields is aware of its responsibilities when this situation arises in a family. The Ministry of Justice has launched an online information tool with clear and concise information on the dispute resolution service

Children missing from education

All staff should be aware that children going missing from school, particularly repeatedly, can act as a vital warning sign of a range of possible safeguarding issues. This may include abuse and neglect, which may involve sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. All staff should be aware of the Summer Fields Children Missing from Education Policy and school procedures for unauthorised absence.

Children Who Are Absent from Education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are absent for prolonged periods or missing from education in their area.

The schools should have in place appropriate safeguarding procedures and responses for children who are identified as absent or missing from education, particularly on repeat occasions.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and criminal exploitation - particularly county lines. School staff should follow the school's procedures for dealing with children who are persistently absent and children missing education to identify such abuse as early as possible and, in the case of absent pupils, this helps prevent the risk of them becoming a child absent from education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and have a social worker (such as a child who is a child in need, who has a child protection plan or is a child we care for), where being absent from education may increase known safeguarding risks within the family or in the community. For further guidance see further guidance: Working Together to improve school attendance

The law requires all schools to have an admission register and an attendance register. All pupils must be placed on both registers. An appropriated response is needed when a child has poor attendance or is regularly missing education.

The school must inform the local authority of any pupil who is going to be deleted from the admission register, by contacting the Admissions Team on 01865 815175. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All schools must inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

Children with family members in prison

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

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted that exploitation, as well as being physical, can be facilitated and/or take place online.

While there is still no legal definition of 'Child Criminal Exploitation' or CCE, it is increasingly being recognised as a major factor behind crime in communities, while also simultaneously victimising vulnerable young people and leaving them at risk of harm. 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 wellbeing.
• children who misuse drugs and alcohol.
• children who go missing for periods of time or regularly come home late; and
• children who regularly miss school or education 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.

The link to OSCP guidance on CSE is here:
https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/child-exploitation/child-sexual-exploitation/ and also
https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/child-exploitation/modern-slavery-trafficking/

The link to OSCP guidance on child criminal exploitation is here:
https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/child-exploitation/child-drug-exploitation-county-lines/
Government Guidance:
Child sexual exploitation: guide for practitioners

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or

more importing areas within the UK, using dedicated mobile phone lines or another form of 'deal line'.

Exploitation is an integral part of the county lines offending model, with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims and their families if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are children-missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs; in these cases, a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services or third sector providers who offer support to victims of county lines exploitation.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the guidance Modern slavery: how to identify and support victims

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded.
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources.
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the 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, 'NSPCC-when to call the police' and National Cyber Security Centre - NCSC.GOV.UK

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse, and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be 'personally connected' (as defined in section 2 of the 2021 Act). Further information can be found in Paragraph 43 of KCSIE 2026.

All staff should be aware that 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'). It is important to explain to children that they will be taken seriously and that the law is in place to protect rather than criminalise them. Schools should understand intra-familial harms and put in place any necessary support for siblings following any incident.

Drugs and Alcohol

Children can be at risk of drugs and alcohol directly and indirectly. They may be at direct risk of having access to these substances (see guidance on gangs) or indirectly because they effect family life at home through use by parents/carers, siblings, child-minders etc. Risks associated with drugs and alcohol and should be built into the curriculum policy.

More details can be found at: Substance Misuse (OSCP)

Homelessness

Being homeless, or being at risk of becoming homeless, presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise or progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals or a discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, including schools, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

In addition, since February 2023 it has also been 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. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and is a form of child abuse with long-lasting, extremely harmful consequences.

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

Fabricated or Induced Illness

Staff must be aware of the risk of children being abused through fabricated or induced illness (FII). There are three main ways of the carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history.
- fabrication of signs and symptoms and falsification of hospital charts and records and specimens of bodily fluids. This may also include falsification of letters and documents.
- induction of illness by a variety of means.

Where this is identified and considered a risk, a referral will be made to the MASH for support and guidance. The school may involve other agencies in making their assessments. That could include the school nurse, community paediatrician or an occupational therapist.

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and the perpetrator can face a sentence of up to two years in prison. Anyone of any gender can be a victim.

Serious violence

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

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's guidance Preventing youth violence and gang involvement and also in preventing Criminal exploitation of children and young adults: county lines

Contextual safeguarding

All staff should be aware that safeguarding incidents and or related behaviour can be associated with factors outside school and can occur between children in a non-school or non-family setting. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harm takes a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

Children's social care assessments should consider such factors, so it is important that a school provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

All further information around safeguarding issues can be found in KCSIE 2026 and on the OSCP website: https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/

Supporting Children who are Questioning their Gender

Our school recognises that children may question their gender identity. In line with statutory guidance, Summer Fields school will take a cautious, considered approach, act in the best interests of the child and work in partnership with parents/carers.

Our school will not initiate a social transition and will only act where a child or their parent has raised a request relating to social transition. Any requests will be handled on a case-by-case basis, with advice sought as appropriate. Policies will not reinforce harmful gender stereotypes. Summer Fields school will remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs.

Annex 7

Low Level Concerns

(This annex is also available as a separate policy, the Low Level Concerns Policy, and within the Staff Code of Conduct)

Introduction

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

Summer Fields adopts a whole-school approach to safeguarding and actively promotes, and seeks to ensure, an open, transparent and trusting culture in which the school's values and behavioural expectations are constantly lived, monitored and reinforced by all staff. All concerns about any adult working in any capacity (employed or voluntary) on behalf of the school will be dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including those concerns which do not meet the 'harms threshold' or 'harms test', as laid out in *Keeping Children Safe in Education 2026*, Part 4, Section 1) are shared responsibly with the correct person, recorded and dealt with appropriately, is critical.

This should encourage an open and transparent culture and enable the school to identify concerning, problematic or inappropriate behaviour early, thus minimising the risk of abuse and ensuring that adults working in or on behalf of the school are clear about professional boundaries and the ethos and values of the school. It should also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

What is a Low Level Concern?

The term 'low level concern' does not mean that it is insignificant, rather that the behaviour towards a child does not meet the 'harms threshold' or 'harms test' as set out in *KCSIE 2026*, Part 4, Sections 1 and 2. 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 considered serious enough to consider a referral to the LADO.

Examples of low level concerns could include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on their own mobile phone;

- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

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. Any such concern (including those that do not meet the 'harm threshold' in *KCSIE 2026 1*, Part 4, Section 1) should be shared with the headmaster (see below).
Summer Fields aims to:

- ensure that all staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, both in themselves and in others;
- empower staff to share any low level safeguarding concerns with the headmaster;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised; and
- help identify any weakness in the school's safeguarding procedures.

Sharing Low Level Concerns

Low level concerns about any member of staff should be reported to the headmaster.

Summer Fields seeks to create an environment in which staff are encouraged and feel confident to self-refer where, for example, they may have found themselves in a situation which could be misinterpreted, might appear compromising to others, or in which their own behaviour might have fallen below expected professional standards.

Where a low level concern relates to a person employed by an agency or contractor, that concern should still be shared with the headmaster and recorded in accordance with the school's low level concerns policy. The headmaster should also inform the employer about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Responding to Low Level Concerns

Concerns about safeguarding should be reported to the headmaster. If the concern has been raised by a third party, the headmaster should collect as much evidence as possible by speaking:

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

The information collected will help the headmaster to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for any decisions and action taken.

Recording Low Level Concerns

All low level concerns should be recorded in writing by the headmaster. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous, then that should be respected as far as reasonably possible.

The school must keep these records confidential, and held securely in compliance with the *Data Protection Act 2018* and the *UK General Data Protection Regulation (UK GDPR)*.

Records should be reviewed periodically so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the 'harms threshold', in which case it will be referred to the LADO.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and, where appropriate, policies could be revised or extra training delivered to minimise the risk of it happening again. The school will retain information on low level concerns at least until the individual leaves its employment.

References

Only substantiated safeguarding allegations will be included in staff references. Low level concerns will not be included unless they relate to issues which would normally be included in a reference, such as misconduct or poor performance. Low level concerns relating exclusively to safeguarding (and not to misconduct or poor performance) will therefore not be referred to in a reference. However, where a low level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

Further information on the management of low level concerns may be found in the updated document:

https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf

Annex 8

Staff Induction, awareness and training

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- The DSL will ensure that all new staff and volunteers (including temporary staff) are aware of the school's internal safeguarding policies and procedures.

- All staff members (including temporary staff) will receive training to ensure they are aware of a range of safeguarding issues.

- All staff members (including temporary staff) will receive regular safeguarding and child protection updates, at least annually.

- The DSL and headmaster will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up-to-date register of who has been trained.

- Although the school has a nominated lead governor for the governing body, Charlie Patterson, the Governing Body will ensure that all Governors receive appropriate safeguarding and child protection (including online) training at induction. This training equips them with the knowledge to provide strategic challenge to assure themselves that the safeguarding arrangements are effective and support a whole school approach to safeguarding. The training should be regularly updated.

- Our school will maintain accurate and up to date records of staff induction and training.

- The DSL will ensure that staff and volunteers are made aware of relevant changes introduced by Keeping Children Safe in Education 2026, including prejudice-based harm, racism and faith-based prejudice, the revised definition of sexual abuse, discriminatory behaviour including racism and faith-targeted abuse as child-on-child abuse, the expectation to promote an inclusive and anti-discriminatory whole-school culture and, where relevant to their role or setting, revised requirements relating to volunteers.

Annex 9

Contacts/links

MASH	**0345 050 7666**	http://www.OSCP.org.uk/concerned-about-a-child/
Out Of Hours Emergency Duty Team	**0800 833408**	
LCSS North	**0345 2412703**	LCSS.North@oxfordshire.gov.uk
LCSS Central	**0345 2412705**	LCSS.Central@oxfordshire.gov.uk
LCSS South	**0345 2412608**	LCSS.South@oxfordshire.gov.uk
Designated Officer Team (LADO)	**01865 810603**	Lado.safeguardingchildren@oxfordshire.gov.uk
Police: Emergency Non-emergency	 **999** **101**	
OSCP	**01865 815842**	oscb.oxfordshire.gov.uk

Information sharing advice:
https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

What to do if you are worried a child is being abused:
https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

NSPCC: https://www.nspcc.org.uk/

Whistleblowing guidance: https://www.gov.uk/whistleblowing

MASH leaflet for parents:
https://www.oxfordshire.gov.uk/sites/default/files/file/business/MashLeafletForParents.pdf

When to call the Police by the National Police Chiefs Council – NPCC:
When to call the Police