



OAK ACTIVITIES
Turning Acorns into Oaks

Oak Activities LTD Safeguarding and Child Protection Policy

Reviewer:	Michael Kaoura and Stuart Nimmo
Position:	Senior Designated Safeguarding Leads
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Key Contacts for Safeguarding and Child Protection in Counties

Role/Organisation	Contact Details
Rutland Safeguarding	childrensreferrals@rutland.gov.uk 01572 758407 Monday to Thursday 8.30am-5pm, Friday 8.30am to 4.30pm 0116 305 0005 outside of these hours earlyhelp@rutland.gov.uk 01572 758493 Rutland LADO – 01572 758454 lado@rutland.gov.uk
Cambridgeshire and Peterborough Safeguarding	Telephone: 0345 045 5203 (8-6pm Monday to Friday) 01733 234 724 (out of hours) Email: referralcentre.children@cambridgeshire.gov.uk MASH – 01733 864170 Peterborough Professional Consultation Line – 01733 864180 Cambridgeshire: 01223 727967

	<p>LADO@cambridgeshire.gov.uk Peterborough: 01733 864038 LADO@peterborough.gov.uk</p>
Central Bedfordshire Safeguarding	<p>Telephone: MASH – 01234718700 Out of hours – 03003008123 Multi.agency@bedford.gov.uk accessreferral@centralbedforshire.gov.uk</p> <p>LADO – 03003008142 LADO@centralbedfordshire.gov.uk</p>
Bedfordshire Borough	<p>MASH – 01234 718700 Out of hours – 03003008123 ifdinformation@bedford.gov.uk</p> <p>LADO – 01234 276693 Lado@bedford.gov.uk</p>
Norfolk County Council	<p>MASH – 03448008020 LADO@norrfolk.gov.uk</p> <p>For concerns relating to a member of staff delivering education please contact NCC education, Quality Assurance and Intervention Service (EQAIS)</p> <p>Telephone: 01603 307797</p>

INTRODUCTION

For the purposes of this policy, the definition of alternative provision is as follows: education arranged by local authorities for children of compulsory school age who, because of exclusion, illness or other reasons, would not otherwise receive suitable education; alternative provision can also be used by schools for children on a suspension (fixed period exclusion); and for children being directed by schools to off-site provision to receive education intended to improve their behaviour. [Arranging Alternative Provision - guide for LAs and schools](#)

Oak Activities fully recognises the responsibility it has under section 175 of the Education Act 2002 (as amended), to have arrangements in place to safeguard and promote the welfare of children.

Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18.

This responsibility is more fully explained in the statutory guidance for schools and colleges 'Keeping Children Safe in Education' (September 2025). All staff must be made aware of their duties and responsibilities under Part One of this document, which are set out below.

Staff should read the above document together with 'Annex B' of 'Keeping Children Safe in Education', 2025, if they are working directly with children. For those staff who do not work directly with children Annex A can be issued instead but this is a matter for the school/college to decide.

Through their day-to-day contact with pupils and direct work with families all staff in school have a responsibility to:

- Identify concerns early to prevent them from escalating;
- Provide a safe environment in which children can learn;
- Identify children who may benefit from early help;
- Know what to do if a child tells them he/she is being abused or neglected;
- Follow the referral process if they have a concern.

This policy sets out how the settings Senior Management Team discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils who attend Oak Activities. Our policy applies to **all** staff, paid and unpaid, working within Oak Activities, including Directors. AP Tutors, AP Teachers and Senior Managers can be the first point of disclosure for a child. Concerned parents/carers may also contact the Oak Activities and its Directors.

The commissioning school or local authority is ultimately responsible for the provision they put in place. As such the commissioner, prior to placement, should always conduct their own due diligence to assess whether the provision is safe, offers high quality education and is suitable for meeting the child's individual needs in line with the below elements of this policy.

It is consistent with the Safeguarding Children Partnership Board procedures for all commissioning Local Authorities that Oak Activities work with. Below is a link to Cambridgeshire and Peterborough safeguarding board.

[Cambridgeshire & Peterborough Safeguarding Partnership Board](#)

There are four main elements to our policy:

PREVENTION through the teaching and therapeutic support offered to pupils and the creation and maintenance of a whole setting protective ethos;

PROCEDURES for identifying and referring cases, or suspected cases, of abuse or exploitation. The definitions of the categories of abuse are attached (see Appendix A);

SUPPORTING CHILDREN particularly those who may have been abused or witnessed violence towards others;

PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN

Processes are followed to ensure that those who are unsuitable to work with children are not employed.

This policy is available to parents on request and is on our website [Knowledge Hub | Oak Activities](#).

1.0 PREVENTION

- 1.1 We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children.
- 1.2 Oak Activities will therefore:
 - 1.2.1 Establish and maintain an environment where children feel safe, including in a digital context, and are encouraged to talk and are listened to.
 - 1.2.2 Ensure children know that there are trusted adults within Oak Activities whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate.
 - 1.2.3 Tailor our curriculum to be age and stage of development appropriate so that it meets the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
 - 1.2.4 Incorporate into the curriculum, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice and equality (for subject specific tuition it can be incorporated through relationship building and pastoral support)..
 - 1.2.5 Ensure that all Oak Activities staff challenge instances of prejudice related behaviour, including but not limited to, instances of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
 - 1.2.6 Pupils in alternative education provisions are often on a specific part-time programme and do not have access to the full curriculum offer they would receive if they were in full-time education in a school. These gaps in the 'preventive curriculum' include.
 - PSHE
 - Spiritual, Moral, Social and Cultural

- British Values to teach democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- Relationship Sex Education (RSE).

To address these gaps, we shall endeavor through our culture to build an ethos that is respectful, kind and open, to allow trusting relationships to form. We will support pupils to recognise and stay safe from abuse and exploitation in all contexts. We shall create a culture where pupils feel safe and an environment where they can share their worries and concerns. We shall grow to understand each individual child's lived experience and respond accordingly.

- 1.2.7. Although we may not directly teach the 'preventative curriculum' we shall, through our interactions, mentoring, support and on-going professional curiosity, create activities and opportunities in order that we can address some of the challenges that pupils may be experiencing.

The below lists are not exhaustive of what we might see and address through our interactions and these may differ slightly for different age groups and for those pupils with SEND.

For primary aged and SEND pupils:

- How to recognise if family relationships are making them feel unhappy or unsafe and how to seek help or advice from others if needed.
- How to recognise who to trust and who not to trust, how to judge when a friendship is making them feel unhappy or uncomfortable and how to seek help or advice from others, if needed.
- The importance of permission-seeking and giving in relationships with friends, peers and adults.
- That some people behave differently online, including by pretending to be someone they are not.
- The rules and principles for keeping safe online, how to recognise risks, harmful context and contact and how to report them.
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met.
- About the concept of privacy and the implications of it for both children and adults; including that it is not always right to keep secrets if they relate to being safe.
- That each person's body belongs to them, and the differences between appropriate and inappropriate or unsafe physical, and other, contact.
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know.
- How to recognise and report feelings of being unsafe or feeling bad about any adult or other children.
- How to ask for advice or help for themselves or others, and to keep trying until they are heard.
- How to report concerns or abuse, and the vocabulary and confidence needed to do so.
- Where to get advice e.g. family, school and/or other sources.

Secondary Age Specific:

- Characteristics of positive relationships of all kinds, online and offline, including romantic relationships. Support pupils to understand the role of consent, trust, mutual respect, honesty, kindness, loyalty, shared interests and outlooks, generosity, boundaries, tolerance, privacy, and the management of conflict, reconciliation and ending relationships.
- Online risks, including the importance of being cautious about sharing personal information online and of using privacy and location settings appropriately to protect information online.
- Not to provide material to others that they would not want to be distributed further and not to pass on personal material which is sent to them.
- How to report incidents of sharing images of themselves [Report Remove | Childline](#)
- Pupils should be taught where to go for advice and support about something they have seen online that has upset and/or disturbed them.
- That pornography, and other online content, often presents a distorted picture of people and their sexual behaviours and can negatively affect how people behave towards sexual partners.
- The concepts and laws relating to domestic abuse including controlling or coercive behaviour, emotional, sexual, economic or physical abuse, and violent or threatening behaviour.
- What constitutes sexual harassment or sexual violence, and that such behaviour is unacceptable, emphasising that it is never the fault of the person experiencing it.
- The concepts and laws relating to harms which are exploitative, including sexual exploitation, criminal exploitation and abuse, grooming, and financial exploitation.

1.2.8 Contextual Safeguarding

Oak Activities recognises that safeguarding risks may occur outside of the home. Staff will consider risks arising from:

- Peer Relationships
- Community and Environmental Factors
- Online Activity

Safeguarding responses will take into account the child's full context, not solely their family situation.

1.2.9 Child Voice

All preventative work will actively seek and respond to the child's views, wishes and lived experience. This will inform planning, interventions and safeguarding decisions.

2.0 PROCEDURES

2.1 We will follow the procedures set out by any local authority that we are commissioned to support children in. Oak Activities staff are informed regarding safeguarding procedures to ensure the correct processes are followed when reporting a concern that aligns with the pupils home local authority.

2.2. The Senior Designated Safeguarding Leads are:

Stuart Nimmo.

2.2.1 The Deputy Designated Safeguarding Leads are:

Stuart Nunn, Lindsay Nicoll, Ketron Lunn, Lisa Milner, Rebecca Howitt, Rebecca Adler, Danielle Lenton, Richard Brewster, Emma Peacock, Kelly Howell, Kelly Johnson, Heidi Spedding, Carolyn Merricks, Amber Parkinson, Rebecca Randall, Claire Norris, Allana Cartwell Emma Harnwell, Louise Terrey, Fiona-Jayne Coombs

2.2.2 The nominated Director for Safeguarding and Child Protection is:

Michael Kaoura and Tom Milner

In addition, we have the following roles:

2.2.3 The Prevent Lead is:

Stuart Nimmo

2.2.4 The Online Safety Lead is:

Lindsay Nicoll

2.2.5 The Domestic Abuse Lead is:

Lindsay Nicoll

2.3 The Oak Activities Training and Compliance Team will:

2.3.1 Appoint a senior member of staff from the leadership team to the role of Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Lead, DDSL), the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

2.3.2 Ensure that the role of DSL and DDSL is explicit in the role holder's job description (as outlined in Keeping Children Safe in Education, 2025 Annex C).

2.3.3 Ensure that the DSL has the appropriate status and authority within the school to carry out the duties of the post. Give the DSL the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters. (See 'Keeping Children Safe in Education, 2025, Annex C). Ensure that the DSL and deputies have undertaken the necessary training that is provided by the appropriate local authority Safeguarding Team, and that this training is updated **at least every two years**.

2.3.4 Ensure that in addition to the formal training set out above, the DSL and DDSLs refresh their knowledge and skills e.g. via updates, meetings or additional training **at least annually**.

2.3.5 Ensure that every member of staff, paid and unpaid, and Directors/Senior Management Team knows who the Designated Safeguarding Leads and Deputies are and the procedures for passing on concerns from the **point of induction**.

Staff members who have a concern would raise this through MyConcern. This concern becomes the priority of the staff and should be completed immediately. All DSL/DDSL's are notified of the concern and specific allocated onsite DDSL will manage the concern, support as required by the DSL's. Concerns are reported to onsite DDSL who will then organise and manage the concern in conjunction with DSL.

- 2.3.6 Ensure that the DSL or DDSL are always available (during school hours, during term-time) to discuss any safeguarding concerns and that all staff are clear upon the course of action they must take if in exceptional circumstances the DSL and DDSL are not available.

In the rare absence of a DDSL on each site, staff will report to one of the Senior Leadership/Director DSL's. In the rare circumstances that all DSL's or DDSL's are not available, staff can contact the Directors responsible for Safeguarding within Oak Activities. See Annex C, page 170 of Keeping Children Safe in Education 2025 for details of requirements.

- 2.3.7 Liaise with the three safeguarding partners (Local Authority, Integrated Care Board and police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2026.
- 2.3.8 Nominate a Director for safeguarding and child protection, Michael Kaoura and Tom Milner, who have undertaken appropriate training.
- 2.3.9 Ensure every member of staff, Managers, Senior Leadership team, and Directors knows:
- the name of the Designated Safeguarding Lead/Deputies and their role;
 - how to identify the signs of abuse and neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online.
 - that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful
 - how to pass on and record concerns about a pupil/student
 - that they have an individual responsibility to be alert to the signs and indicators of abuse and exploitation; and for referring safeguarding concerns to the DSL/DDSL
 - what is meant by, and the importance of, showing professional curiosity
 - that they have a responsibility to provide a safe environment in which children can learn
 - where to find the Multi-Agency Procedures on the Safeguarding Children Partnership Board website
 - their role in the early help/targeted support process
 - the process for making referrals to children's social care
 - the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.
 - the role of filtering and monitoring and the process for reporting issues also applies to providers that deliver online learning.
- 2.3.10 Ensure all staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, at induction. The training should be **regularly updated**, as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

- 2.3.11 Ensure that **all** staff, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies, including low level concerns and allegations against staff.
- 2.3.12 Ensure that parents are informed of the responsibility placed on Oak Activities and staff in relation to child protection by setting out these duties in the Oak Activities Safeguarding and Child Protection Policy.
- 2.3.13 Ensure that this policy is available publicly either via Oak Activities website <https://oakactivities.com> or by other means.
- 2.3.14 Prior to the placement starting, all relevant information should be shared with providers and other parties (commissioning school, parents, relevant agencies) involved in the placement. This should be jargon free and include any information on SEN, disability or medical need, literacy, safeguarding or other issues, as well as any information requested by the provider as appropriate as per the Arranging Alternative Provision - guide for LAs and schools).
- 2.3.15 Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers/tutors and other relevant staff as necessary.
- 2.3.16 Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

As an Alternative Provision Provider managing safeguarding between Oak Activities and the Commissioning Body e.g. Local Authority or School/Academy. Oak Activities ensure that appropriate safeguarding checks are carried out for all staff recruited. Oak Activities adheres to all quality assurance and compliance checks conducted and will share details around Safeguarding, Whistleblowing Procedures, Safer Recruitment Processes as requested.

- 2.3.17 The alternative provision provider will inform the commissioning school of any changes to arrangements that may put the child at risk, e.g. staff changes, so that the commissioning school can assure itself that appropriate safeguarding checks have been carried out on new staff.
- 2.3.18 The Providing setting must ensure that the commissioning school know where the pupil is based during school hours, including any satellite sites used by the provider.
- 2.3.19 Oak Activities is a non school alternative provision (NSAP). We recommend commissioning bodies follow the legislative guidance below;
- [Working together to improve school attendance \(applies from 19 August 2025\)](#)
[Arranging Alternative Provision - guide for LAs and schools](#)
[*Non-school alternative provision: voluntary national standards](#)
- 2.3.20 The commissioning school and alternative provider should agree on appropriate reporting processes including how the provider can report any issues or concerns, and this includes reporting on daily attendance and significantly all unexpected and unexplained absences.

- 2.3.21 Commissioning schools are required to carry regular reviews of the provider setting(s) to ensure all safeguarding measures remain in place. These reviews should be at least half termly.
- 2.3.22 Oak Activities require all commissioners, either local authorities, or schools/Academies to attend half termly reviews for each learner that accesses our support. Oak Activities uses LearnTrek MIS system to report weekly and half termly progress reports. These are shared automatically through the system to commissioners. Oak Activities invites all commissioners to conduct quality assurance and monitoring reviews at all our sites.
- 2.3.23 All concerns must be acted upon immediately. There should be no delay in sharing information where a child may be at risk.
The DSL / DDSL will:
- Assess the level of need
 - Make referrals to Children's Social Care where appropriate
 - Collaborate with commissioners with actions

2.4 Multi-Agency Working

Oak Activities will:

- 2.4.1 Work to develop effective links with relevant services to promote the safety and welfare of all pupils/students.
- 2.4.2 Co-operate as required, in line with 'Working Together to Safeguard Children,' (2026), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.
- 2.4.3 Where it has been agreed between the provision and the commissioning school as per their Service Level Agreement, the provider will notify the commissioning school and contact the Social Care Team immediately if:
- it should have to issue an AP Timeout to a pupil who is subject to a Child Protection Plan (whether for a fixed period or a decision to end the placement);
 - there is an unexplained absence of a pupil who is subject to a Child Protection Plan;
 - there is any change in circumstances to a pupil who is subject to a Child Protection Plan.
- 2.4.4 When a pupil who is subject to a Child Protection Plan leaves, information will be transferred to the new school/setting immediately. The Child Protection Chair and Social Care Team will also be informed by the commissioning school.
- 2.4.5 Oak Activities work in partnership with the Local Safeguarding Children Partnership (LSCP) and follows local procedures. Staff will co-operate fully with multi-agency safeguarding arrangements

2.5 Record Keeping

Oak Activities will:

- 2.5.1 Keep clear, detailed, accurate, written records of concerns about children, even where there is no need to refer the matter to Children's Social Care immediately.

2.5.2 Records should include:

- a clear and accurate account of events;
- the child's wishes and feelings;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached, rationale for decision making and the outcome.
- A clear chronology of concerns including record of any discussion/communication with parents, other agencies etc
- Demonstrating professional curiosity, exploring and questioning information rather than accepting situations at face value.

2.5.3 Electronic records are stored on an identified, purpose-built, secure platform (MyConcern). If a commissioning school is also using MyConcern, Oak Activities will clarify at point of induction to ensure they can link systems and allow for DSL's to view concerns and share real time chronologies.

2.5.4 Ensure all relevant safeguarding records are sent to the receiving school or establishment when a pupil moves schools/settings, within five days, in accordance with 'Keeping Children Safe in Education, 2025, (page 174) and the Education Safeguarding Team's Guidance on Keeping and Managing Child Safeguarding Records.

The DSL will consider whether it would be appropriate to share information with the new school/college/setting in advance of a child leaving.

2.5.5 Make parents aware that such records exist except where to do so would place the child at risk of harm.

2.5.6 Ensure all actions and decisions are led by what is considered to be in the best interests of the child and rationales are included for all discussions and decisions made.

2.6 Confidentiality and information sharing

2.6.1 Information about children and their families is defined as 'special category data', i.e. information that identifies a living individual. Collection, storage and sharing of personal data is governed by the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.

Oak Activities will:

2.6.2 Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately.

2.6.3 Ensure staff are aware that they have a professional responsibility to share information promptly and proportionately with other agencies in order to safeguard children, (as set out in 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).

Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a pupil or parent they will refer the request to the DSL.

2.6.4 Ensure staff are clear with children that they cannot promise to keep secrets.

2.7 The Designated Safeguarding Lead/Deputies will:

- 2.7.1 Disclose information about a pupil to other members of staff on a 'need to know' basis, considering what is necessary, proportionate and relevant. Parental consent may be required.
- 2.7.2 Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent where to do so might place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime.
- 2.7.3 Record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children 2026')
- 2.7.4 In cases where the 'serious harm test' is met, schools/settings must withhold providing the data in compliance with schools'/settings obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools/settings should seek independent legal advice.
- 2.7.5 Seek advice about confidentiality from outside agencies if required. (See [Information sharing advice for safeguarding practitioners - GOV.UK](#) DfE May 2025)

2.8 Communication with Parents/Carers

Oak Activities will:

- 2.8.1 Ensure that parents/carers are informed of the responsibility placed on the school/setting, Oak Activities and staff in relation to child protection by setting out its duties in Oak Activities prospectus/website.
- 2.8.2 Undertake appropriate discussion with parents/carers prior to involvement of another agency unless the circumstances preclude this action.
- 2.8.3 Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, for example if Oak Activities believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

2.9 Child-on-Child Abuse

- 2.9.1 All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of settings and online. By definition, it applies to abuse by one child of another child - regardless of the age, of stage of development, or any age differential between them.
- 2.9.2 We recognise that child-on-child abuse can manifest itself in many ways. This can include but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate personal relationships between children; physical abuse; harmful sexual behaviour; sexual violence and sexual harassment including upskirting, and online sexual harassment; child sexual exploitation; child criminal exploitation; hate incidents and hate crime; racism; and initiation/ hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be

an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

2.9.3 All forms of child-on-child abuse are unacceptable and will be taken seriously.

Oak Activities will therefore:

2.9.4 Create a whole setting protective ethos in which child-on-child abuse, including sexual violence and sexual harassment will not be tolerated.

2.9.5 Provide training for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators.

2.9.6 Ensure that staff do not dismiss instances of child-on-child abuse, including sexual violence and sexual harassment as an inevitable part of growing up or 'banter'.

2.9.7 Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.

2.9.8 Ensure that staff members follow the procedures outlined in this policy when they become aware of child-on-child abuse, referring any concerns of child-on-child abuse to the Designated Safeguarding Lead (or deputy) in line with safeguarding procedures. This information needs to be shared with the commissioning schools DSL immediately.

2.9.9 Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk. Oak Activities will ensure that these children have a trusted adult within Oak Activities to talk to.

2.9.10 Recognise the risk of intra familial harms and provide support to siblings following incidents when necessary.

2.9.11 The Designated Safeguarding Lead will refer to the Safeguarding Children Partnership Board's [Child-Sexual-Behaviour-Assessment-Tool.pdf](#) (safeguardingcambspeterborough.org.uk) and/or any other local authority assessment tool if there is a concern that a young person may be displaying sexually harmful behaviours.

2.10 **Dealing with Sexual Violence and Sexual Harassment between children**

2.10.1 Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

2.10.2 Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school/college/setting.

2.10.3 Oak Activities will:

Work closely with the commissioning school if they have been made aware that a pupil attending their setting has been identified as either a 'victim' or 'alleged perpetrator' of sexual harassment or sexual violence.

- 2.10.4 Refer to 'Keeping Children Safe in Education - Part Five', 2025 for full details of procedures to be followed in such cases. Also see 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, March 2025)
- 2.10.5 Make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
- 2.10.6 Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- 2.10.7 Make decisions on a case-by-case basis.
- 2.10.8 Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- 2.10.9 Implement measures and contribute as necessary to additional documentation, for example a Risk Management Safety Plan in order to offer the best support and safeguarding for all pupils. The providers DSL along with the commissioning schools DSL will review this document on a regular basis. Record any risk management safety plans and keep them under review to keep the victim, alleged perpetrator and if necessary other children and staff members, safe.
- 2.10.10 Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- 2.11 Liaise closely with external agencies, including police and social care, when required.

3.0 SUPPORTING CHILDREN

Oak Activities recognises that **any** child may be subject to abuse and that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and as such will support all children by:

- 3.1 Providing curricular opportunities to encourage self-esteem and self-motivation.
- 3.2 Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.
- 3.3 Applying Oak Activities behaviour policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the pupil's sense of self-worth. Oak Activities will ensure that the pupil knows that some behaviour is not valued in society but s/he is valued and not to be blamed for any abuse which has occurred.

- 3.4 Liaising with the senior mental health lead from the commissioning body where safeguarding concerns are linked to mental health in Oak Activities for advice on case management.
- 3.5 Liaising with other agencies which support the pupil such as Social Care, Child and Adolescent Mental Health Services, Emotional Health and Wellbeing Service, Cambridgeshire Sexual Behaviour Service or Early Help (Targeted Support) Teams.
- 3.6 Where necessary and agreed by the commissioning school Oak Activities will ensure supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- 3.7 Oak Activities recognises that whilst **any** child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for children in particular circumstances.

Please see page 10 of Keeping Children Safe in Education, 2025 for the complete list. The list includes:

3.8 Children with Disabilities, Certain Health Conditions, Additional Needs or Special Educational Needs

We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are most vulnerable to abuse and can face additional safeguarding challenges both online and offline. The setting's staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse, neglect and exploitation.

Oak Activities have pupils with emotional and behavioural difficulties and/or challenging behaviours. Oak Activities will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.

As part of the PSHE curriculum staff will teach children personal safety skills that correlates with their age, ability and needs. Children will be taught personal safety skills such as: how to recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how to recognise and manage risk including online. The content of lessons will be shared with parents/carers so that these skills can be supported at home.

Oak Activities have pupils who may have communication difficulties and we are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead, such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.

Where necessary, Oak Activities will request additional support/training from commissioning body to support staff in the use of Makaton, PECS or other communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the child.

Under the Equality Act, there is also a duty to make reasonable adjustments for disabled children and young people.

We promote high standards of practice, including ensuring that disabled children know how to raise concerns, and have access to a range of adults with whom they can communicate.

Pupils who attend Oak Activities may have an Education, Health and Care Plan and multi-agency planning and involvement to support integrated care.

3.8.1 Young Carers

Oak Activities, alongside the commissioning local authority and/or School/Academy, recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

Oak Activities alongside the commissioning local authority and/or School/Academy will seek to identify young carers; offer additional support internally; signpost to external agencies; be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.

3.8.2 Children at Risk of Criminal Exploitation

Criminal exploitation of children is a form of harm that is a typical feature of county lines activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

All staff will consider whether children are at risk of abuse or exploitation in situations outside their families. These are referred to as Extra-Familial Harms/Contextual Safeguarding and/or Risks Outside the Home.

Oak Activities will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.

The setting(s) Designated Safeguarding Lead (DSL) and the commissioning schools DSL will complete Safeguarding Children Partnership Board's [Contextual Risk Screening Tool | Cambridgeshire and Peterborough Safeguarding Partnership Board](#) (safeguardingcambspeterborough.org.uk) and contribute to the referral to Social Care if there is a concern that a young person may be at risk of criminal exploitation. Oak Activities staff will ensure that they follow all local authorities processes around identifying children and young people at risk of exploitation.

Oak Activities recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and/or trafficking and have procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

3.8.3 Children at Risk of Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

CSE 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.

Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

The setting(s) Designated Safeguarding Lead (DSL) and the commissioning schools DSL will complete Safeguarding Children Partnership Board's [Contextual Risk Screening Tool | Cambridgeshire and Peterborough Safeguarding Partnership Board \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk) and contribute to the referral to Social Care if there is a concern that a young person may be at risk of CSE. Oak Activities staff will ensure that they follow all local authorities processes around identifying children and young people at risk of exploitation.

Oak Activities recognises that young people who go missing can be at increased risk of sexual exploitation and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

There is an expectation that each Education Safeguarding Team will share police information of missing children and an at risk of child exploitation.

At Oak Activities we work in partnership with Local Authorities and their Police service to identify and provide appropriate support to pupils who have gone missing through the Operation Encompass scheme. The Local Authority Safeguarding Teams will share police information of missing child episodes with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

3.8.4 Children Frequently Absent from Education

Oak Activities recognises that children who are unexplainable and/or persistent absences from education, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, and child criminal exploitation, modern slavery, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

The setting monitors and follows up on the attendance of individual pupils closely, as outlined in the SLA which stipulates the attendance process between the provider and

commissioning school. This supports both the commissioning school and provider to identify patterns of absence to aid early identification of concerning patterns of absence.

Oak Activities endeavors to hold more than one emergency contact for each pupil to provide additional options to make contact with a responsible adult if this has been agreed with the commissioning school. This agreement should also ensure that the commissioning school is also notified promptly of unexplained and unexpected absences.

Oak Activities will inform any other professionals involved if a child who is absent from education is subject to a Child Protection Plan or there have been ongoing concerns.

3.8.5 Children Misusing Drugs or Alcohol

The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse, is not necessarily sufficient in itself to consider a Child in Need or Child Protection referral. However, the setting(s) will inform the commissioning school as soon as they become aware.

When there is evidence or reasonable cause:

- To believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse or criminal exploitation
- The child's substance misuse dependency is affecting their mental and physical health and social wellbeing
- Where the misuse is suspected of being linked to parent/carer substance misuse.
- Where the child's substance misuse dependency is putting the child at such risk that intensive specialist resources are required
- Where the child is perceived to be at risk of harm through any substance associated criminality

3.8.6 Children Living with Substance Misusing Parents/Carers

Misuse of drugs and/or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic violence.

When Oak Activities receives information about drug and alcohol abuse by a child's parents/carers they will share what is relevant, proportionate and necessary with the provider to ensure continued safeguarding and support for the child. If the setting receives information about drug and alcohol abuse by a child's parents/carers they will contact the commissioning schools DSL immediately.

This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children
- Children exposed to unsuitable caregivers or visitors, e.g. customers or dealers
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
- Disturbed moods as a result of withdrawal symptoms or dependency
- Unsafe storage of drugs and/or alcohol or injecting equipment

- Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child
- Child or household member found in possession of Class A or Class B drugs / drug paraphernalia found in home.
- Evidence of substance/drug misuse during pregnancy

3.8.7 Children Living with Domestic Abuse

The Domestic Abuse Act 2021 applies to those aged 16 or over and introduces the first ever statutory definition of domestic abuse. It also recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are 'personally connected' regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional, coercive or controlling behaviour.

Oak Activities recognises that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. Oak Activities staff will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

At Oak Activities we are working in partnership with Police and Local Authorities to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass.

Oak Activities relies on each Education Safeguarding Teams to share police information of all domestic incidents to which Police have been called, where one of our pupils has been present. This will be shared with the Designated Safeguarding Lead(s) (DSL)/Domestic Abuse (DA) Lead.

On receipt of any information, the DSL/DA Lead will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

3.8.8 Children at risk of 'Honour- Based' Abuse including Female Genital Mutilation

Honour-Based Abuse can be defined as:

'An incident or pattern of violence, threats of violence, intimidation, coercion, control or abuse (including but not limited to psychological, physical, sexual, economic, spiritual, faith-related or emotional abuse) motivated by the perpetrator's perception that an individual has shamed, or may shame, the perpetrator, the family, or community or has otherwise broken, or may break, the perceived norms of the community's accepted behaviours, including by speaking out about the abuse and where the perception of shame may also prevent a victim from accessing support or help.'

Oak Activities takes these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBA through training. Staff are required to treat all forms of HBA as abuse and follow the procedures outlined in this policy.

The new Marriage and Civil Partnership (Minimum Age) Act 2022 bans marriage for 16 and 17-year-olds, who no longer will be allowed to marry or enter a civil partnership, even if they have parental consent, as the legal age of marriage rises to 18.

It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used.

Oak Activities will manage any concerns relating to forced marriage sensitively and will report concerns immediately via the procedures outlined in this policy.

FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is under 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the setting's DSL, who will contact the commissioning schools/Academy and Local Authority's DSL and where necessary they will make joint, appropriate and timely referrals to social care and/or Police. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the pupil's wishes.

In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers/tutors in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers/tutors should still consider and discuss any such case with the setting's DSL and involve the commissioning schools/Academy and Local Authorities' DSL and social care and/or Police as appropriate.

3.8.9 Children previously in care or who have returned home to their family from care

Oak Activities recognises that a previously looked after child potentially remains vulnerable. School/Oak Activities will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern in

accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board Multi-Agency Procedures. [Cambridgeshire & Peterborough Safeguarding Partnership Board](#). Oak Activities staff will ensure that they follow all local authorities processes in relation to children in care or previously in care.

3.8.10 Children showing signs of Abuse, Neglect and/or Exploitation

Oak Activities recognises that experiencing abuse or neglect may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. Oak Activities may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse, neglect and/or exploitation may display this through their own behaviour, which may be difficult or dangerous, or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school/college/setting and/or can occur between children outside of these environments. 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. Risks Outside the Home take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

Oak Activities will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy.

3.8.11 Children at Risk of Radicalisation

Children are susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of Oak Activities safeguarding approach.

The Director for Business, Development and Compliance will ensure that a DSL has undertaken Prevent Lead training and that all staff receive training about the Prevent Duty.

Staff are required to be alert to changes in children's behavior which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. Oak Activities Designated Safeguarding Lead (and Deputies) should work alongside the commissioning schools DSL/Prevent Lead and be aware of local procedures for making a Prevent referral using the Prevent National Referral Form found on the Cambridgeshire and Peterborough Safeguarding Board website.

[National Prevent referral form \(safeguardingcambspeterborough.org.uk\)](https://www.cambridgeshireandpeterboroughsafeguardingboard.org.uk/national-prevent-referral-form)

See also Prevent Duty Guidance: for England and Wales, HM Government, (March 2025).

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to those who are vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will determine the individuals vulnerability and consider the appropriate support.

Channel Contact Details

Norfolk

Preventreferrals-NC@norfolk.police.uk

Russell.cole2@norfolk.gov.uk

Central Bedfordshire

For adults aged 18 years and over, referrals for concern are made via the Adult Safeguarding Team: adult.protection@centralbedfordshire.gov.uk or telephone 0300 300 8122 (Monday – Thurs from 8.45am – 5pm and Fri from 8:45am – 4:30pm), outside of those hours on 0300 300 8123

For children and young people 0 – 17 years, referrals for concern are made via the Intake and Assessment Team: cs.accessandreferral@centralbedfordshire.gov.uk or telephone 0300 300 8585 if you are concerned there is immediate risk of harm.

Lincolnshire

prevent@lincs.pnn.police.uk

channel@lincs.pnn.police.uk

Cambridgeshire & Peterborough

prevent@cambs.pnn.police.uk

01480 422596

3.8.12 Privately Fostered Children

Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative, in their own home for 28 days or more.

Oak Activities will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Fostering Assessment Team.

3.8.13 Children who have Family Members in Prison

Oak Activities are committed to supporting children and young people who have a parent or close relative in prison and will work with the commissioner and family to find the best ways of supporting the child.

Oak Activities recognises that children with family members in prison are at risk of poor outcomes including: poverty, stigma, isolation, poor mental health and poor attendance.

Oak Activities will treat information shared by the commissioner and family in confidence and it will be shared on a 'need to know' basis.

Oak Activities will work with the family, specialist organisations and the child to minimise the risk of the child not achieving their full potential.

4.0 Early Help and Multi-Agency Working

Early Help is provided to support children and families as soon as concerns emerge, at any point in a child's life. All staff have a responsibility to identify children who may benefit from Early Help and to take appropriate action.

Oak Activities staff should consider Early Help where a child:

- has unmet developmental, emotional, or social needs.
- is at risk of escalating harm if support is not provided.

Where appropriate, staff will:

- discuss concerns with Designated Safeguarding Lead (DSL) and Family Liaison Officer
- in collaboration with the Family Liaison Officer, seek consent for Early Help Intervention.
- Contribute to Early Help Assessments and Plans.

Oak Activities will:

- Work collaboratively with partner agencies in line with local safeguarding arrangements
- Actively contribute to Team Around the Child (TAC) processes
- Share relevant information in a timely and lawful way
- Family Liaison Officer will support or undertake the role of Lead Practitioner for students not on a school role.

Where another professional is the Lead Practitioner, Oak Activities will:

- Co-Operate with the plan
- Attend Multi-Agency Meetings
- Provide relevant information and updates

All Early Help Interventions will:

- be Child-Centred
- take into account the child's views, wishes and lived experience
- be regularly reviewed to ensure impact.

If a child's needs escalate, staff will make a referral to children's social care without delay.

4.1 Escalation and Professional Challenge

Oak Activities recognises the importance of professional curiosity and maintaining a position of respectful uncertainty when working with children and families.

Staff are expected to:

- Challenge decisions made by other professionals if they believe a child remains at risk
- Escalate concerns where there is disagreement or lack of appropriate action

Escalation procedures include:

- Discussing concerns with the Designated Safeguarding Lead (DSL) immediately
- Following local safeguarding partnership escalation procedures where necessary

All challenges and escalations will be:

- Clearly recorded
- Timely
- Focused on achieving the best outcome for the child

At all times, the child's safety and welfare will remain the paramount consideration.

5.0 PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN

5.1 Oak Activities will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part Three of 'Keeping Children Safe in Education', 2025. This section should be read in conjunction with Oak Activities Safer Recruitment Policy.

5.2 In line with Oak Activities Safer Recruitment Policy. Oak Activities ensures that all staff are recruited safely by:

- Obtaining enhanced DBS checks
- Verifying identify and right to work in the UK
- Obtaining at least two references

A Single Central Record (SCR) is maintained and regularly reviewed

5.3 The Directors/Senior Management Teams will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

**The following members of staff have undertaken Safer Recruitment training:
Tom Milner, Michael Kaoura, Keith Jones, Maddie Joel, Thomasina Francis, Stuart Nunn, Stuart Nimmo & Lindsay Nicoll,**

5.4 Allegations that may meet the harms threshold (Part Four, Section One)

5.4.1 Any allegation of abuse made against AP Tutors, AP Teachers, Directors, Senior Managers (including other staff and volunteers) that meets the harms threshold as set out in Keeping Children Safe in Education, 2025, Part Four, Section One, will be reported straight away to *a member of the Senior Safeguarding Management Team (Michael Kaoura - Director and Stuart Nimmo – DSL).*

5.4.2 In cases where the Senior Safeguarding Management Team is the subject of an allegation, it will be reported to the Director for Safeguarding Tom Milner. Oak Activities will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2025.

5.4.3 Oak Activities will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against an AP Tutor, AP Teacher, Directors, Senior Managers (including other staff and volunteers) within one working day and adhere to the relevant procedures set out in 'Keeping Children Safe in Education', 2025, Part Four *and Oak Activities Whistleblowing Policy.*

5.4.4 The Senior Safeguarding Management Team will ensure that allegations are reported to the commissioner immediately and LADO within one working day. The LADO will advise on all further action to be taken.

5.4.5 Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Oak Activities will use the guidance chart found at Appendix B to support their decision-making.

5.4.6 Where Oak Activities identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact the commissioner and children's social care, and as appropriate the police immediately.

5.4.7 Oak Activities will consider:

- **Looking after the welfare of the child** - the Designated Safeguarding Lead (or Deputy) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

5.4.8 Oak Activities will ensure that any disciplinary proceedings against AP Tutor, AP Teacher, Directors, Senior Managers (including other staff and volunteers) relating to child protection matters are concluded in full even when the member of staff, supply staff or volunteer is no longer employed within Oak Activities and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

5.4.9 All staff (including volunteers) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

5.5 **Concerns that do not meet the harms threshold (Part Four, Section Two)**

5.5.1 Low level concerns that do not meet the harms threshold should be reported to the AP Manager, Senior DSL, HR Manager, and Directors for Safeguarding immediately. NB: The term low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test.

5.5.2 In cases where the AP Manager, Groups Operations Director, Senior DSL and/or Director for Safeguarding are the subject of an allegation, it will be reported to the Managing Director for Safeguarding Tom Milner. Oak Activities will follow the procedures set out in Part Four, Section Two of 'Keeping Children Safe in Education', 2025.

5.5.3 Oak Activities will deal with any such concern, no matter how small, where an adult working in or on behalf of Oak Activities 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.

5.5.4 All concerns low level and those that lead to further investigation should be recorded in writing and logged on MyConcern. 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.

- 5.5.5 Oak Activities will decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

Oak Activities stores all confidential information through MIS system called LearnTrek. LearnTrek holds all information regarding our pupils personal details, behaviours, outcomes and development.

Oak Activities records all sensitive Safeguarding information on MyConcern. MyConcern is used to share any sensitive information securely. If personal files need to be downloaded and shared, this is done using encryption. MyConcern is also utilised to record and manage any staff concerns or investigations.

Oak Activities use a HR and recruitment system called SAM People. This allows for personal information relating to staff to be stored and managed securely. SAM People also holds the companies Single Central Record.

- 5.5.6 Oak Activities will promote an open and transparent culture in which all concerns about all adults working in or on behalf of Oak Activities are dealt with promptly and appropriately. This will enable the school/setting to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of Oak Activities are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

- 5.5.7 Oak Activities should ensure that **all** staff, including AP Tutors, AP Teachers, Senior Managers, Directors and/or supply staff, are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the Oak Activities Code of Conduct. As part of the Induction process, all staff, including AP Tutors, AP Teachers, Senior Managers, Directors and/or supply staff, will receive guidance about how to create appropriate professional boundaries (both online and offline) with all children, especially those with a disability or who are vulnerable. Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

- 5.5.8 All staff have signed to confirm that they have read the Oak Activities Staff Code of Conduct for all Adults which is based on guidance for 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022).

- 5.5.9 Oak Activities will ensure that AP Tutors, AP Teachers, Senior Managers, Directors and/or supply staff are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).

6.0 SENIOR MANAGEMENT AND DIRECTORS BOARD SAFEGUARDING RESPONSIBILITIES

- 6.1 Senior Management and Directors should ensure they facilitate a whole setting approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront

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.

6.2 The Senior Management and Directors fully recognises its responsibilities with regards to safeguarding and promoting the welfare of children. It aims to ensure that the policies, procedures and training in school are effective and comply with the law and government guidance at all times.

It will:

- Nominate a Director, **Michael Kaoura**, for safeguarding who will take leadership responsibility for the settings safeguarding arrangements and practice and champion safeguarding issues.
- Ensure Directors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, the Public Sector Equality Duty and the local multi-agency safeguarding arrangements.
- Ensure regular safeguarding reporting is made to the Senior Management and Directors.
- Ensure company wide Safeguarding and MyConcern audits are completed twice a year. Reports will be used to analyse the effectiveness of the systems and procedures used and any weaknesses will be rectified without delay.
- Ensure that this Safeguarding and Child Protection policy is annually reviewed, ratified, updated and understood and followed by all staff.
- Ensure that this Safeguarding and Child Protection policy is published on Oak Activities website.
- Ensure that children's exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems and ensure the effectiveness is regularly reviewed.
- Ensure children's wishes and feelings are taken into account where there are safeguarding concerns.

7.0 Learning from Reviews

Oak Activities is committed to learning from safeguarding practice reviews, including Local Child Safeguarding Practice Reviews and National Child Safeguarding Practice Reviews. Relevant findings, including thematic learning from national reviews and local safeguarding partnership briefings, will be considered and acted upon.

The Lead Designated Safeguarding Leads are responsible for reviewing relevant learning and ensuring it is disseminated to staff where appropriate. Senior Management will ensure that recommendations are considered, and that the action plans are developed and implemented where required.

Learning from safeguarding practice reviews will be used to inform updates to safeguarding policies and procedures, staff training, supervision, and wider practice. The organisation will monitor the implementation of learning to ensure continuous improvement in safeguarding practice.

8.0 OTHER RELATED POLICIES AND PROCEDURES

- 8.1 Oak Activities Whistleblowing Policy
- 8.2 Oak Activities Code of Conduct for all Adults
- 8.3 Oak Activities Safer Recruitment Policy
- 8.4 Oak Activities GDPR Data Privacy Policy
- 8.5 Oak Activities Health and Safety Policy
- 8.6 Oak Activities Complaints Policy
- 8.7 Oak Activities PREVENT Policy
- 8.8 Oak Activities Positive Relationship Policy
- 8.9 Oak Activities Absconding Policy

Definitions**CHILD**

Within the context of this policy a “child” is defined as anyone under the age of 18 (the Children Act 1989, Education Act 2002). Further the IEG additional duties regarding support, protection and safeguarding also extends to learners within the 14 to 18 age range in addition to infants and young children in its child care provision.

ADULT

Adult at Risk - It is recognised within this policy that any adult may be vulnerable or become a victim of abuse. Specifically, an “adult at risk” is defined as any person who is 18 years of age or over and has a reduced capacity to give consent to disclosure of abuse allegations or suspicions. As defined by the Law Commission (1995) the IEG uses the following indicators to identify an adult who is, or may become “at risk” whilst they are registered with the IEG. The individual:

Is or may be in need of community care services by reason of mental or other disability, age or illness

Is or may be unable to take care of himself or herself

Is unable to protect himself or herself against significant harm or serious exploitation. Whilst not definitive, the main categories of people covered by the definition of “adult at risk” include those who:

- o have a learning disability
- o have a physical or sensory impairment
- o have a mental illness including dementia
- o are old and frail

- o are detained in custody or under a probation order

- o are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker)

Children in Need of Protection

Children in Need of Protection and early help - Some children and young people are in need because they are suffering or likely to suffer “significant harm”. Where local authorities believe a young person is suffering, or likely to suffer, significant harm, they have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a young person, this can be done through contacting the early help team (FFAP) to share concerns and ensure the early identification of needs within families.

Children in Need

Children and young people who are defined as being “in need” under Section 17 of the Children Act 1989, are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of service(s). A child with a disability is a Child in Need.

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). (DoH 2014).

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

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

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 other 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.

Extremism

Extremism is defined by the Crown Prosecution System (CPS) as: “The demonstration of unacceptable behaviour by using any mean or medium to express views, which:

Encourage, justify or glorify terrorist violence in furtherance of particular beliefs

Seek to provoke others to terrorist acts

Encourage other serious criminal activity or seek to provoke others to serious criminal acts

Foster hatred which might lead to inter-community violence in the UK”

Female Genital Mutilation (FGM)

FGM comprises of 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 a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Teachers must personally report to the Police, cases where they discover that an act of FGM appears to have been carried out. As per the requirements set out in ‘Keeping Children Safety in Education 2016’ teachers who fail to report such cases will face disciplinary action.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning difficulties, for example). In addition, some communities use religion and culture as a way to coerce a person into marriage.

Honour-Based Abuse

So-called ‘honour-based’ abuse (HBA) encompasses 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. All forms of HBA are abuse (regardless of motivation) and should be handled as such. If in any doubt, staff should speak to the learners.

Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

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

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

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

Safeguarding and Child Protection

These terms are used interchangeably, and they have different meanings. Safeguarding is what we do for all children and young people, whilst Child Protection refers to the procedures we use for children and young people at risk of significant harm or who have been harmed.

Where local authorities believe a young person is suffering, or likely to suffer significant harm, they have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a young person.

Significant Harm

The concept of significant harm is the threshold that justifies compulsory intervention into family life in the best interests of the child or young person and gives local authorities a duty to make enquires as to whether to take action (Section 47, Children Act 1989) to safeguard or promote the welfare of a young person who is suffering, or likely to suffer significant harm. The Act also gives powers to the Police to take emergency action to protect a young person from significant harm.

Vulnerable Adult

A vulnerable adult definition used is: 'A person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or exploitation.'

- Receives personal care, or nursing, or support to live independently in their own home or in a care home
- Receives any health or social services support
- Has substantial learning or physical disability
- Has a physical or mental illness, chronic or otherwise, including addiction to alcohol or drugs
- Has a substantial reduction in physical or mental capacity due to advanced age or illness.

Serious Violence

All staff should be aware of 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.

Types of Abuse and how to recognise signs

The following explanations of possible signs of abuse are taken from Working Together to Safeguard Children.

Lists of signs and symptoms cannot provide a definitive diagnosis of abuse and many children or young people at some time of their life may exhibit one or maybe more of them. However, such signs and symptoms may suggest abuse if a young person exhibits either several of them, perhaps within a short space of time, or an extreme form of a particular symptom, or if a pattern of signs and symptoms emerges.

It is important that practitioners are aware of the signs and symptoms and, whilst they may be indicative of some other problem or issue, the possibility that the young person is being abused should not be discounted. Any concern about a young person who is showing signs of abuse or of being at risk of abuse should be followed up with the learners.

Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse when they witness it at home and/or suffer it in an intimate personal relationship. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Physical Abuse

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

Possible Signs

- Bruises and scratches to face and head
- Pinch bruises or bite bruises
- Bruising around both eyes simultaneously
 - Torn frenulum (skin linking upper jaw and lip)
 - Fingertip bruising on front and back of chest (gripping)
 - Finger or hand marks on any part of the body
 - Ligature marks on either neck, arms or legs
 - Cigarette burns
 - Linear or shaped burns or bruises (e.g. iron/radiator)

- 'Non-cascade' scalds
- Head injury, may be no outward sign of injury
- Poisoning
- Bald patches
- Recurrent unexplained/untreated injuries or lingering illness
- Possible Behaviour
- Explanation inconsistent with injury
- Refusal to discuss injuries
- Fear of going home or parents being contacted
- Arms and legs kept covered in hot weather or fear undressing
- Frozen watchfulness/cowering/flinching at sudden movements
- Withdrawal from physical contact
- Fear of medical help
- Admission of excessive punishment
- Running away
- Self-destructive tendencies

Emotional Abuse

Is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development? It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Possible Signs

- Speech delay, poor verbal ability, lack of communication skills
- Bed wetting, soiling (without physical cause)
- Lack of concentration, learning problems
- Unreasonable fear of new situations
- Eating disorders (over eating and under eating)
- Inappropriate emotional responses to stressful situations
- Low self-esteem
- Self-mutilation
- Alcohol, drugs, solvent misuse

Possible Behaviour

- Over reaction to mistakes
- Obsessive behaviour (e.g. rocking, twisting hair, sucking thumb)
- Withdrawal from relationships with other children

- Fear of parents being contacted
- Extremes of passivity or aggression
- Attention seeking
- Chronic running away
- Compulsive stealing, scavenging for food or clothes
- Impaired capacity to enjoy life

Neglect

Is the persistent failure to meet a child's basic physical and/or psychological need, likely to result in a serious impairment of the child's health or development? Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical harm and external harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect or, or unresponsiveness to a child's basic emotional needs.

Possible Signs

- Unkempt appearance, poor personal hygiene
- Poor skin/hair condition
- Drop through height/weight centiles
- Small stature (where not a family characteristic)
- Constant tiredness
- Repeated accidents
- Untreated medical conditions
- Inappropriate clothing
- Constant hunger
- Frequent lateness, or non-attendance at school
- Accidental self-poisoning

Possible Behaviour

- Chronic running away
- Compulsive stealing
- Scavenging of food and clothes
- Low self-esteem
- Neurotic behaviour (e.g. rocking, thumb sucking, hair twisting)
- Inability to make social relationships

Tendency to destroy things

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the

production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse, as can other children.

Possible Signs

- Wetting and soiling themselves
- Sudden drop in College performance/poor concentration
- Obsessed with sexual matters as opposed to normal exploration
- Changes from being happy and active to being fearful and withdrawn
- Unexplained sources of money/gifts
- Urinary infections, bleeding or soreness in the genital/anal areas
- Vaginal discharge – vaginal warts
- Soreness and bleeding to the throat
- Chronic ailments e.g. stomach pains, headaches without obvious cause
- Eating disorders
- Becomes severely depressed
- Has a poor self-image
- Uses drugs/alcohol to excess
- Not allowed to have friends around or to go out on dates
- Fearful of undressing for physical education
- Venereal infection
- Pregnancy

Possible Behaviour

- Overly compliant behaviour
- Behaves in a sexually inappropriate way in relation to their age
- Withdrawn and unhappy, insecure and “clingy”
- Plays out sexual acts in too knowledgeable a way for their age
- Regresses to behavioural pattern of much younger children
- Say of themselves that they are bad or wicked
- Arriving early at school/College and leaving late with few, if any, absences
- Excessive masturbation – exposing themselves
- Drawings of sexually explicit nature
- Attempts to sexually abuse another child
- Recurring nightmares and/or fear of the dark
- Had a “friend who has a problem” and then tells about the abuse of “a friend”
- Self-mutilates/attempted suicide
- Running away
- Prostitution

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Dealing with Allegations or Concerns about an Adult Working with Children

Allegation or concern raised about a member of staff or adult to Oak Activities Directors and Senior Management Team

Directors and Senior Management Team to decide if the incident meets the harm threshold? The harm threshold is met where it is alleged that an adult working (or volunteering) in the Oak Activities has:

- *behaved in a way that has harmed a child, or may have harmed a child and/or*
- *possibly committed a criminal offence against or related to a child and/or*
- *behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or*
- *behaved or may have behaved in a way that indicates they may not be suitable to work with children (see KCSIE Part 4)*
- *Considerations will be made with regard to the questions in Box A*

YES

NOT SURE

NO

Contact the relevant LADO, details found under Key Contacts within the Safeguarding Policy

The LADO will ask for specific information about the issue and confirm whether or not it meets the harm threshold. If it does, they will begin a formal process to manage the allegation. If it doesn't meet the threshold then they will record the information and advise you to treat the issue as a Low Level Concern. You will need to inform the staff member that LADO hold information on them.

This is a Low Level Concern. Consider carefully what action to take in response, taking advice from your HR Provider as appropriate. Keep a record in a secure central file. An example form for this purpose is available for use if required.

If Oak Activities need **further advice** on any aspect of this then please see Key Contacts Information Details on Page 2 and 3 of this Policy.

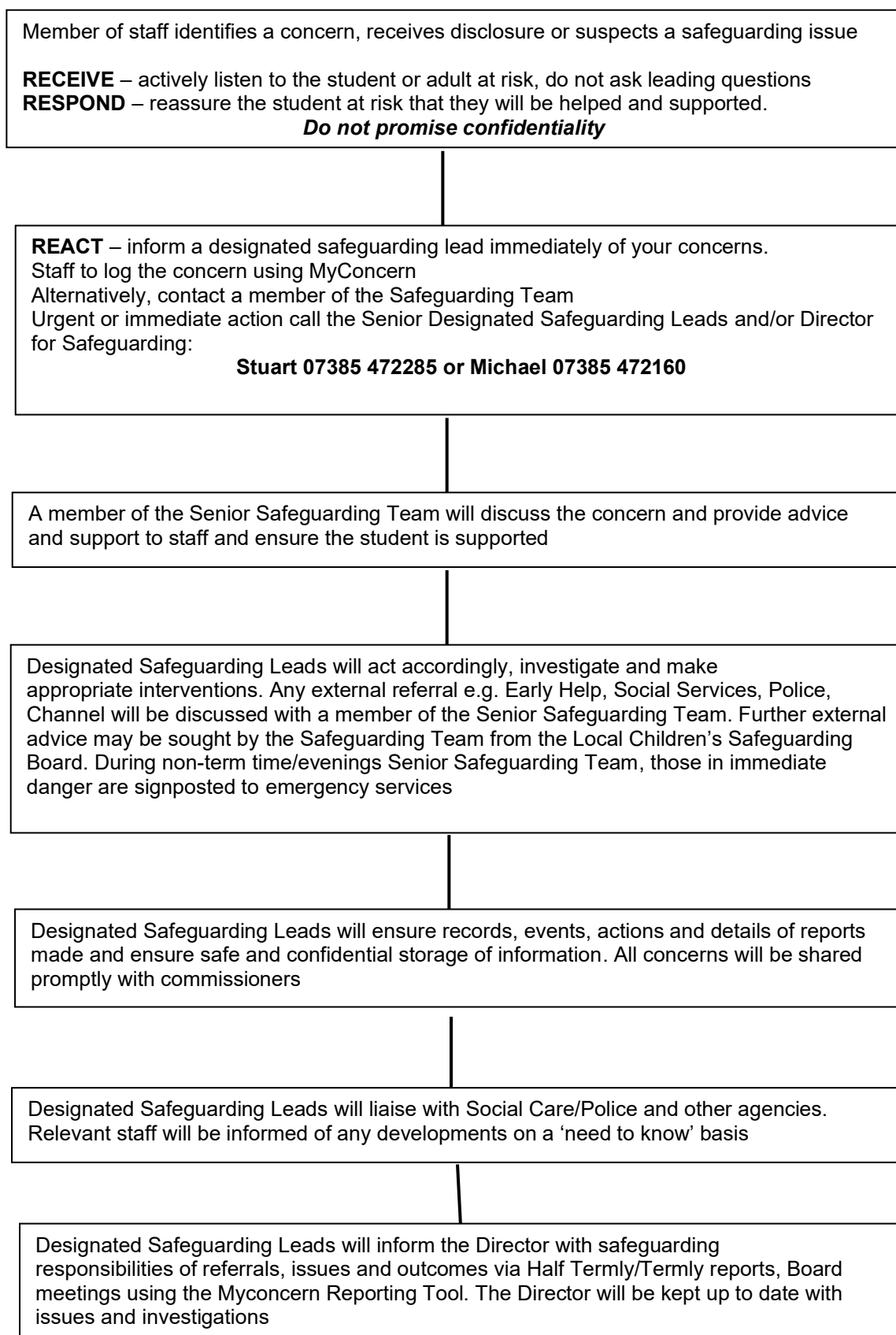
Box A:

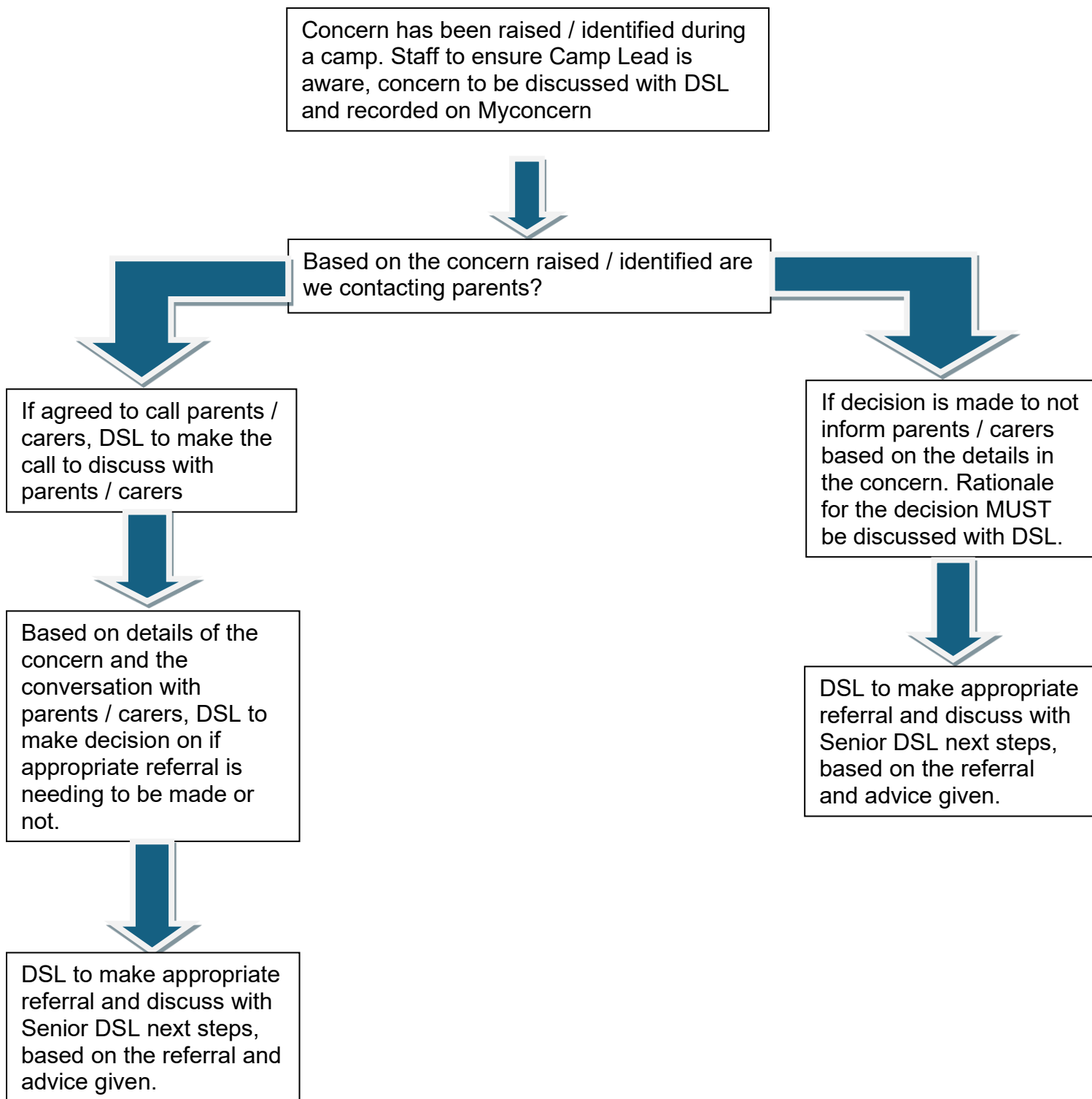
- How long has the adult or member of staff worked for you?
- Have there been any previous concerns raised?
- Is this a one-off or part of a pattern of behaviour?
- Has the member of staff previously been given advice in this area?
- Would an associated pattern of behaviour (if it exists) be seen by others? (How closely do they work with other colleagues?)
- Might this have been a planned action or event?
- Could this behaviour be inadvertent? What is the likelihood of this?
- Could this be the precursor to more concerning behaviour?
- Did it occur in a 'public' or 'private' place? Was this in school or out of school?
- If electronic devices are involved, have any relevant files been deleted and is there any evidence of this?
- If this relates to inappropriate language, what is the precise nature of the language used? How inappropriate is it? What was the context – where was this, and who were the listeners? Could this be seen as 'banter' or might it have more serious undertones?

What to do if a child or adult discloses sensitive information to you:

If an employee is informed about abuse they must take the following steps:

- Always place the child or adult's welfare and interests as the paramount consideration.
- Listen carefully and actively to the person
- Let the person guide the pace and remember their ability to recount an allegation will depend on age, culture, language and communication skills, and disability.
- Do not show shock at what is being said. This may discourage the child or adult from talking, as they may feel you are unable to cope with what they're saying, or perhaps that you're thinking badly of them.
- Do not investigate. If anything needs to be clarified in order to understand the safeguarding risk, ask clear, open questions:
 - ask 'what, when, who, how, where' questions
 - ask 'do you want to tell me anything else?'
 - do not ask any 'why' questions as these can suggest guilt or responsibility.
- Remain calm and reassure the person that they have done the right thing by talking to a responsible adult.
- Never promise to keep a secret or confidentiality.
- It is important that this fact, and its implications of transparency and reporting, are emphasised in early and ongoing conversations.
- Ensure the child or adult at risk understands what will happen next – you will log the concern and pass it on to the Safeguarding Lead.

Dealing with a Concern from a Student



Oak Activities Safeguarding Structure

Appendix F

Designated Safeguarding Lead – Strategic Oversight	Michael Kaoura	Business Development and Compliance Director
Designated Safeguarding Lead – Operational Oversight and PREVENT Lead	Stuart Nimmo	Behaviour and Welfare Manager
Deputy Designated Safeguarding Lead	Stuart Nunn	Group Operations Director
Deputy Designated Safeguarding Lead – Domestic Abuse and Online Safety Lead	Lindsay Nicoll	Curriculum and Standards Programme Manager
Deputy Designated Safeguarding Lead	Ketron Lunn	Family Liaison and Welfare Officer
Deputy Designated Safeguarding Lead	Lisa Milner	Wellbeing Supervisor
Thorpe Primary AP Site Deputy Designated Safeguarding Leads	Rebecca Howitt Rebecca Adler Danielle Lenton	AP Manager Deputy AP Manager Deputy AP Manager
Winyates Secondary AP Site Deputy Designated Safeguarding Lead	Richard Brewster Emma Peacock	AP Manager Deputy AP Manager
Eyrescroft Secondary AP Site Deputy Designated Safeguarding Leads	Kelly Howell Kelly Johnson	AP Manager Deputy AP Manager
Vocational Hub (Paston / Hampton) Deputy Designated Safeguarding Leads	Heidi Spedding	Deputy Site DSL (Hampton)
The Paddocks Deputy Designated Safeguarding Lead	Fiona-Jayne Coombs	AP Manager
St Ives Secondary AP Site Deputy Designated Safeguarding Leads	Carolyn Merricks Amber Parkinson Rebecca Randall	AP Manager Deputy AP Manager Deputy Site DSL
Chesterton Primary AP Site Deputy Designated Safeguarding Leads	Claire Norris Allana Cartmill	AP Manager Deputy AP Manager
Witchford Secondary AP Site Deputy Designated Safeguarding Leads	Emma Harnwell Louise Terrey	AP Manager Deputy Site DSL