



OCTAVIA HOUSE

Sector-Leading Therapeutic Schools

'Keeping our pupils safe' policy for all Octavia House Schools

Independent School Standards: paragraphs 7 and 34.

This child protection and safeguarding policy pays regard to national guidance issued by the Secretary of State, including ['Keeping children safe in education'](#) (September, 2026) and ['Working together to safeguard children'](#) (March, 2026).

Last external review	September 2026
Next external review	September 2027
Latest update	October 2026

TABLE OF CONTENTS

Key contacts	5
OUR PUPILS' SAFETY ALWAYS COMES FIRST	6
KEY POINTS	7
SAFEGUARDING MECHANISMS	7
VISITING SPEAKERS AND CONTRACTORS' SELECTION POLICY	10
VISITING SPEAKERS	10
VISITORS' MANAGEMENT PROCEDURE	10
CONTRACTORS	10
RESPONDING TO CONCERNS ABOUT INDIVIDUAL PUPILS	11
CHILD PROTECTION – RECOGNITION AND RESPONSE TO ABUSE	13
MULTI-AGENCY WORKING	13
INFORMATION SHARING AND CONFIDENTIALITY	13
SAFEGUARDING – PROVIDING A SAFE ENVIRONMENT	14
SAFEGUARDING PUPILS WITH ADDITIONAL VULNERABILITIES	15
INTIMATE CARE	16
CHILDREN QUESTIONING THEIR GENDER	16
CONTEXTUALISING SAFEGUARDING	17
MENTAL HEALTH & SELF HARM	18
CHILDREN ABSENT FROM, AND CHILDREN MISSING, EDUCATION	19
ALLEGATIONS FROM PUPILS AGAINST OTHER PUPILS ('CHILD ON CHILD ABUSE', INCLUDING HARASSMENT AND VIOLENCE)	21
MINIMISING THE RISK	21
MANAGING ALLEGATIONS AGAINST OTHER PUPILS	21
MISOGYNY, SEXUAL VIOLENCE & SEXUAL HARASSMENT	23
MANAGING INCIDENTS OF SEXUAL VIOLENCE & HARASSMENT	26
MAKING OR SHARING NUDES AND SEMI-NUDES, INCLUDING THOSE GENERATED BY AI	27
CHILD SEXUAL EXPLOITATION (CSE)	29
DOMESTIC ABUSE (INCLUDING TEENAGE RELATIONSHIP ABUSE)	30
FORCED MARRIAGE & HONOUR-BASED ABUSE	31
MODERN SLAVERY	32
FEMALE GENITAL MUTILATION (FGM)	32
BULLYING (ALL FORMS, INCLUDING CYBER BULLYING)	33

ONLINE SAFETY, INCLUDING FILTERING & MONITORING SYSTEMS	33
EXTREMISM & RADICALISATION (THE 'PREVENT' DUTY AND CHANNEL)	36
GANGS/CHILD CRIMINAL EXPLOITATION (CCE) (INCLUDING 'COUNTY LINES' AND SERIOUS VIOLENCE)	38
SEARCHING, SCREENING & CONFISCATION	40
HOMELESSNESS	41
DRUGS & SUBSTANCE MISUSE	42
FABRICATED OR INDUCED ILLNESS	42
CHILDREN & THE COURT SYSTEM	42
CHILD EMPLOYMENT	43
PRIVATE FOSTERING	43
HEALTH & SAFETY	43
WORKING WITH PUPILS' FAMILIES	45
PUPILS' INFORMATION	45
TRANSFER OF CHILD PROTECTION FILES AND SAFEGUARDING INFORMATION	45
CONFIDENTIALITY	46
REFERRALS TO OTHER AGENCIES	46
SAFER RECRUITMENT AND VETTING PROCEDURES	47
SAFER RECRUITMENT	47
PREPARATION	47
ADVERTISING	47
APPLICATIONS	47
INTERVIEWS	48
SELECTION	48
REFERENCES	48
VETTING CHECKS RECORDED ON OUR SINGLE CENTRAL REGISTER	49
AFTER APPOINTMENT	51
VOLUNTEERS	51
CONTRACTORS	52
SUPERVISION OF COLLEAGUES AND THE MANAGEMENT OF ALLEGATIONS OF ABUSE AGAINST COLLEAGUES, INCLUDING 'LOW-LEVEL' CONCERNS	53
SUMMARY TABLE OF WHO WILL INVESTIGATE ALLEGATIONS	56
OUR DUTY TO REFER TO EXTERNAL AGENCIES, INCLUDING THE DISCLOSURE & BARRING SERVICE (DBS) AND THE TEACHING REGULATION AGENCY (TRA)	57
SAFE PRACTICE	58

CHILDCARE DISQUALIFICATION	58
QUALITY AND STANDARDS COMMITTEE - MONITORING & REVIEWING POLICY & PRACTICE	58
APPENDIX 1	60
INFORMATION & GUIDANCE FOR COLLEAGUES	60
APPENDIX 2	62

Key contacts

In addition to this summary page of people's contacts, including the LADOs for the local authorities within which our schools are geographically located, we have contact lists displayed in our schools' staffrooms which lists all the relevant local authority's social care duty team numbers for pupils placed with us.

Director, Safeguarding, Octavia House Schools	Joanne Evans (works across all schools) jevans@ohs.uk 020 3637 4451
Designated Safeguarding Lead, Octavia House Schools, London	Sylke Goldsmith (London) sgoldsmith@ohs.uk 020 4553 8668
Designated Safeguarding Lead, Octavia House Schools, Essex	Susan Douglas (Essex) sdouglas@ohs.uk 020 3651 4396 (option 2)
Safeguarding Coordinator, Octavia House Schools, London	Blue Koppi (London) bkoppi@ohs.uk
Deputy Designated Safeguarding Leads Octavia House Schools, London	Gavin Winters (Vauxhall) gwinters@ohs.uk
	Clare Muscat (Nine Elms) cmuscat@ohs.uk
	Aous Mubarak (Clapham) amubarak@ohs.uk
	Lauren Knight (Kennington) lknight@ohs.uk
Deputy Designated Safeguarding Leads Octavia House Schools, Essex	Robyn Smith (Great Baddow) rsmith@ohs.uk
	Matthew Reed (South Woodham) mreed@ohs.uk
Headteacher Octavia House Schools, London	Elysia Agius eagius@ohs.uk
Headteacher Octavia House Schools, Essex	Ashley Witherington awitherington@ohs.uk

OUR PUPILS' SAFETY ALWAYS COMES FIRST

We understand that our work in safeguarding and protecting pupils must always pay regard to national guidance issued by the Secretary of State and is in line with local guidance and procedures. This 'keeping our pupils safe' (safeguarding) policy is therefore written with due regard to national guidance, the latest of which is ['Keeping children safe in education'](#) (September, 2026), ['Working together to safeguard children'](#) (March, 2026). Our safeguarding policy also pays regard to ['Relationships and Sex Education \(RSE\) and Health Education'](#) guidance, [the Prevent duty](#), and ['the use of social media for on-line radicalisation'](#) guidance. Our schools' procedures for safeguarding children are also compliant with the London and Essex Child Protection Procedures and Safeguarding Partnerships.

This policy is regularly updated (as identified on page 1) by the Director of Safeguarding and updates are disseminated to all colleagues via emails, fortnightly safeguarding refresher workshops and interim training sessions which are provided on training days.

Please note that the word 'child' and 'pupil' are used interchangeably throughout the policy and are synonymous.

Colleagues at Octavia House Schools know that a range of other school policies are central to many aspects of this policy, and this document should therefore be read in conjunction with our policies for:

- anti-bullying
- attendance
- online safety
- equality
- first aid & medication
- health & safety
- healthy living including relationships, sex & health education
- risk assessment
- physical intervention
- behaviour and the DfE's 'behaviour in schools' guidance
- *what we teach* (curriculum)
- *what we do* (therapy)
- discipline, conduct, capability & grievance procedures
- whistleblowing.

All adults working with, or on behalf of, our schools must always follow all of our procedures. Most policies are available on our website, otherwise colleagues can access policies such as Whistleblowing and Discipline, Conduct, Capability & Grievance procedures on our online people management system.

KEY POINTS

Octavia House Schools is committed to safeguarding and promoting the welfare of all our pupils, and expects all colleagues to share this commitment. Our training mantra and philosophy is to 'think the unthinkable'.

All colleagues must be clear about their own role and that of others in providing a caring and safe environment for all pupils and must know how they should respond to any concerns about an individual pupil that may arise. Colleagues are aware that safeguarding and promoting the welfare of pupils is everyone's responsibility and they should consider what is in the best interests of the pupil, at all times.

Octavia House Schools will ensure that all colleagues are made aware that Joanne Evans is our Director of Safeguarding across all sites, along with the London and Essex Designated Safeguarding Leads (DSLs) who have overall responsibility for child protection and safeguarding.

There are also a number of Deputy Designated Safeguarding Leads (DDSLs) across all sites. Though some of the duties inherent to this role can and will be delegated to the deputy DSLs in order that work is completed most efficiently, the ultimate responsibility remains with the DSLs. In the absence of the DSL, the deputy DSLs identified for each school site on page 2 of this policy will undertake the safeguarding duties.

All safeguarding leads have received advanced-level training in order to undertake their roles and are also safer recruitment trained. All safeguarding leads receive updated training at least every two years; and in addition, keep up-to-date with safeguarding developments at least annually.

SAFEGUARDING MECHANISMS

At Octavia House Schools, we ensure that a range of rigorous mechanisms are in place to assist colleagues to understand and discharge their roles and responsibilities, and to ensure consistent application across all sites.

Mechanisms include:

- safeguarding induction, including a three-month safeguarding refresher
- whole-school annual safeguarding training
- online safeguarding training, including on the Prevent duty and cyber security
- weekly safeguarding and therapy refreshers and/or quizzes
- safeguarding emails to colleagues regarding key issues, updates and individual early help plans
- termly link meetings, and site visits where deemed necessary, between the Designated Safeguarding Quality & Standards Committee (DSQSC) member and the Director of Safeguarding

All colleagues must have read and signed to acknowledge their understanding of 'children safe in education' part one in full (September 2026).

Full safeguarding training, drawing upon the latest national and local guidance, is provided to all colleagues on an annual basis.

Regular safeguarding updates are provided throughout the year to ensure that colleagues have the most up to date relevant skills and knowledge to safeguard pupils effectively, specifically through safeguarding and therapy training refreshers. The training programme focuses on topics such as the 'Prevent' duty, Adverse Childhood Experiences (ACE) & toxic stress, equality, child criminal exploitation, sexual violence and sexual harassment, online safety – including understanding roles and responsibilities in relation to our arrangements for our filtering and monitoring on school devices and networks. Colleagues are trained to ensure that they do not make pupils feel like they are doing the wrong thing by reporting a concern; they are never shamed and all concerns are always taken seriously.

Colleagues who are employed during the school year will receive safeguarding training at the very beginning of their onboarding, a refresher after 3 months of employment and at least annually thereafter. This includes how to report a concern and who to.

After receiving training, colleagues will sign a form agreeing that they are aware of their roles and responsibilities, and have read and understood all relevant safeguarding guidance, policies and procedures and agree to implement them. This includes the OHS Handbook, Safeguarding, Behaviour & 'What We Do/Teach' Policies.

All colleagues must identify themselves as employees of Octavia House Schools by wearing a green wristband while on site and their photographic school lanyard when off site.

The child protection register is maintained by the relevant DSL and key colleagues working with pupils are informed of all matters relating to pupils in their classes. In addition to our child protection register, the DSLs keep a live safeguarding log which records any and all concerns raised, and the actions taken, including the rationale for decisions, on the schools' online safeguarding portal.

The Director of Safeguarding provides a report on all safeguarding issues at each termly meeting with the Quality & Standards Committee. Regular contact is maintained with the Designated Safeguarding Quality & Standards Committee Member (DSQSCM), Barney Payne. The DSQSCM and all members of the Quality & Standards committee have undertaken relevant training on safeguarding and child protection, which is regularly updated.

Octavia House Schools always follow safer recruitment procedures so that we can be confident that all adults working in our school are safe to do so. The majority of

senior leaders are safer recruitment trained. Final panel interviews always have a safer recruitment trained colleague present.

All vetting checks will be completed prior to working in our schools, this includes an Enhanced DBS check for any colleague who carries out regulated activity with pupils.

The People Team, Director of Safeguarding, Headteacher and a DSL, will risk assess colleagues based on all known information about the colleague, such as their references and their own declaration of information which might appear on their DBS certificate. If it subsequently transpires that the DBS certificate discloses information which has not previously been declared that could potentially be a cause for concern, including spent or unspent cautions, reprimands, warnings or convictions, the applicant will not be appointed to the school. No colleagues will commence employment at Octavia House Schools prior to a DBS check being obtained.

All pupils deserve the opportunity to achieve their full potential and the purpose of all intervention is to safeguard and promote the welfare of the child. For those colleagues who engage with pupils who experience discrimination in their daily lives or who are from cultures different to those of the professionals, assumption and stereotyping must not be part of our practice. Every effort must be made to ensure that cultural issues are understood and that each individual case is dealt with on its own merits.

Teachers and those working in school have daily contact with pupils in their classes and around the school buildings, and as a result have first-hand knowledge of child development and behavioural norms.

As a result, professionals are in a unique position to identify general concerns, as well as pupils who are at risk and who would benefit from targeted family help. We always share concerns as soon they emerge, not waiting until they meet thresholds and often signpost families to access community-based early help in order to prevent problems from becoming significant. School colleagues are continually discussing pupils and any concerns during the daily briefings and debriefings; leaders also discuss key pupils/concerns during the weekly behavioural analysis meetings. There is a focus on noting and drawing out any particular concerns and securing pupils and families effective support as soon as problems arise, including for pupils who are being/or are at risk of abuse.

However, colleagues do not decide if something is or is not a child protection issue. Any concerns will be passed onto a DSL and/or a deputy designated safeguarding lead and referred using the schools' online safeguarding portal (or directly to the LADO, local authority or Channel, as appropriate). The DSLs are actively involved in coordinating support and being part of the wider safeguarding network around each pupil.

School colleagues follow Octavia House Schools' safeguarding and child protection procedure if they have any concern regarding a pupil. However, colleagues should

also be aware that if there is a risk of immediate serious harm to a pupil, a referral can and should be made to children's social care immediately and that anybody can make a referral. If the pupil's situation does not appear to be improving the colleague with concerns should press for re-consideration.

A significant volume of our safeguarding work involves Lambeth and Essex local authorities, because these are the geographical locations of our schools. However, we have pupils placed from a large number of different local authorities; these individual details are kept on pupils' online files and contacts are available in all our schools' staffrooms.

VISITING SPEAKERS AND CONTRACTORS' SELECTION POLICY

VISITING SPEAKERS

The Head of Schools and Designated Safeguarding Leads oversees the schools' clear, documented vetting and risk assessment procedure to ensure that any visiting speaker is suitable. Colleagues are always made aware of any visitors and will have a clear understanding as to why they are coming in to speak to pupils. Leaders always try to select visiting speakers from an established organisation, and appropriate checks will be undertaken to establish the suitability of the person, including online searches and/or contacting other schools where the person has spoken previously. Risk assessments are collated and all visiting speakers' visits are recorded on the schools' log.

Visiting speakers are made aware that their presentation/workshop will be brought to an early end in the unlikely event that the content proves unsuitable. All information about the visiting speaker and the booking process is recorded on a suitable proforma. After the presentation, feedback from colleagues is gathered to note any contentious subject areas or comments, and state whether the speaker could be booked again in the future. Once a person has visited a school, future checks are refreshed, but are proportionate.

VISITORS' MANAGEMENT PROCEDURE

Visitors to the school must arrive with a valid form of identification. After sign-in, all visitors (including contractors, visiting speakers, social workers, inspectors and external therapists) are accompanied at all times by a colleague in order to ensure the safety and wellbeing of pupils. All visitors must read key safeguarding information on arrival to both confirm their understanding of our safeguarding protocol, and the requirement that they must not share any partisan political views during their visit.

CONTRACTORS

External contractors are commissioned centrally. They do not work in any of our schools during the pupil-facing day. In the exceptionally rare circumstance that

emergency works need to take place during the day, contractors are supervised at all times by an OHS colleague.

RESPONDING TO CONCERNS ABOUT INDIVIDUAL PUPILS

All pupils at OHS must be able to place their trust and confidence in any adult working in the school. They must feel sure that they can speak about any worries or concerns they may have and that they will be listened to, taken seriously and responded to appropriately. All colleagues must therefore know what to do if a pupil chooses to talk to them about any matter which raises child protection concerns.

All colleagues must:

- **Listen to what the pupil is saying without interruption and without asking leading questions**
- Respect the pupil's right to privacy but **not promise confidentiality**
- **Reassure** the pupil that he/she has **done the right thing in sharing**
- **Explain** to the pupil that in order to keep him/her safe from harm the information that has been shared **must be passed on**
- **Report** what has been disclosed to a DSL as soon as possible, or in their absence, one of the DDSs
- **Record**, as soon as is practicable, but on the same day, what was said using the **pupil's actual words** on the **schools' online safeguarding portal**.
- **Remember** that if there is a **risk of immediate serious harm to a pupil** a referral can and should be made to children's social care immediately and that **anybody can make a referral**. If the pupil's situation does not appear to be improving the colleague with concerns should press for re-consideration.

The DSL:

- Takes lead responsibility for safeguarding and child protection, including online safety and ensuring the schools' filtering and monitoring systems are effective
- Manages referrals from school colleagues or any others from outside the school
- Works closely with external agencies, including a pupil's wider professional network, which usually include professionals from SCS and CAMHS
- Helps promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues with colleagues

- Undertakes training and keeps colleagues abreast of latest legislation and guidance
- Raises awareness of safeguarding and child protection amongst colleagues and parents/carers
- Ensures that child protection information is transferred to a pupil's new school
- Is aware of pupils who have a social worker and checks whether the pupil is currently subject to a Child Protection Plan or has been previously subject to a Plan
- Assesses any urgent medical needs of the pupil
- Considers whether a pupil has suffered, or is likely to suffer significant harm
- Considers whether a safeguarding concern should be discussed with the pupil's family or whether to do so may put the pupil at further risk of harm because of delay or the family's possible actions or reactions
- Seeks advice if unsure that a child protection referral should be made
- Liaises with the three safeguarding partners (the local authority, Integrated Care Board (for an area in a LA) and the chief police officer (of the area) and works with other agencies in line with ['Working Together to Safeguard Children'](#) March 2026 and National Police Chiefs' Council (NPCC) – ['when to call the police'](#).

Information will be shared on a 'need to know' basis and must be treated in absolute confidence. Colleagues must not discuss allegations with the pupil, family members or colleagues, as a DSL will lead on this.

The DSL will make a referral to the pupil's local authority children's social care services duty team or, if a referral is not considered appropriate at that stage, make full written records of the information that they have received, detailing the reasons for the judgement that the matter was not referred to the local authority. The DSL keeps a written record of all contact with other agencies. All paperwork relating to child protection is kept securely in a locked cabinet or on our online safeguarding portal, MyConcern. The DSLs, Headteacher and Director of Safeguarding have full access to MyConcern which means that concerns are never missed.

All pupils who are subject to a child protection plan will have core group meetings and case conferences organised by social care services. A member of the safeguarding leadership team (a DSL or one of the DDSLs) will attend these on behalf of the school. Safeguarding colleagues will professionally challenge decisions or outcomes they disagree with and escalate concerns if they remain unresolved. Pupils are aware that these meetings take place and that the school will be presenting a report at the meetings. The Head of Schools will act as the schools' 'designated teachers' and are responsible for Children Looked After (CLA) at their

sites; they liaise accordingly with local authorities and Virtual School Headteachers to promote the educational achievement of pupils who are looked after. They will provide updated information that will then be collated for their Pupil Education Plan (PEP). Support will still be offered to pupils who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England or Wales.

All colleagues including Leaders, Teachers and Therapists monitor pupils who are subject to a social care services Child Protection (CP) or Child In Need (CIN) Plan.

CHILD PROTECTION – RECOGNITION AND RESPONSE TO ABUSE

Owing to the nature of the day-to-day relationship pupils at Octavia House Schools have with colleagues, all adults working in the school are particularly well placed to notice any physical, emotional or behavioural signs that a pupil may be suffering significant harm. We understand that harm means the ill-treatment or impairment of a child's health and/or development, including that caused as a result of witnessing the ill-treatment of another person. All colleagues must therefore be alert to any possible indicators that a pupil is suffering harm and report any concerns to the DSL. Colleagues also recognise that when a pupil has a social worker, it is an indicator that the pupil is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing barriers that may negatively impact on attendance, learning, behaviour and mental health. We take these needs into account when making plans to support pupils who have a social worker.

MULTI-AGENCY WORKING

The three safeguarding partners (local authority, clinical commissioning group and the chief police officer of the area) will make arrangements to work together by setting out relevant named agencies to safeguard and promote the welfare of pupils. The three partners will make arrangements to ensure Octavia House Schools is fully engaged, involved and included in any safeguarding arrangements. Octavia House Schools are under a statutory duty to co-operate with the published arrangements if named as a relevant agency and will consistently engage and contribute to multi agency working.

INFORMATION SHARING AND CONFIDENTIALITY

Octavia House Schools ensures that there are arrangements in place setting out processes for sharing information with the three safeguarding partners, other organisations, agencies and practitioners. See Data Protection (GDPR) policy.

School colleagues have awareness of the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection act 2018 and the UK General Data Protection Regulation (UK GDPR). This includes allowing relevant colleagues to share information without consent where

there is good reason to do so and the sharing of information will enhance the safeguarding of a pupil in a timely manner, or to gain consent would place the pupil at risk.

Octavia House Schools will withhold providing information where the serious harm test is met. For example, in a situation where a pupil is in a refuge or another form of emergency accommodation.

We rely on information sharing advice for safeguarding practitioners and the information Commissioner's interactive tool to decide the most appropriate basis for sharing information. This will usually be 'legal obligation', 'public task' or 'legitimate interest'.

On the rare occasion when we rely on consent as the lawful basis for sharing information, we proceed on the basis that consent from a parent or carer will be needed in relation to children under the age of 12, pupils aged 12 - 15 can give consent to information sharing if they have sufficient understanding of the issues, and pupils aged 16 and over are able to consent on their own behalf.

SAFEGUARDING – PROVIDING A SAFE ENVIRONMENT

All families of pupils attending Octavia House Schools must feel secure in the knowledge that they are entrusting their children to adults who will strive to keep them safe at school. We will do this by:

- Promoting a caring, safe and positive environment within the schools
- Ensuring that our colleagues are appropriately trained in safeguarding and child protection and keep an up-to-date record of all training undertaken
- Encouraging the self-esteem and self-assertiveness of all pupils through the curriculum so that the pupils themselves become aware of danger and risk and what is acceptable behaviour and what is not
- Ensuring pupils are taught about keeping themselves safe, including online safety as part of providing a broad and balanced curriculum. This may include covering relevant issues through Personal, Social, Health and Economic (PSHE) education and Relationships, Sex and Health (RSH) Education. See our healthy living RSE policy.
- Working in partnership with other safeguarding services and agencies
- Displaying posters that detail contact numbers for ChildLine
- Always following 'safer recruitment' procedures when appointing colleagues
- Welcoming visitors in a safe and secure manner (all visitors must sign in electronically, read key safeguarding information and wear a visitor's badge)

- Undertaking risk assessments when planning out-of-school activities or trips

Lambeth Duty Team (London sites)	0207 926 5555
Essex Duty Team (Essex sites)	0345 603 7627
Lambeth LADO Team OHS London sites	0207 926 4679 lado@lambeth.gov.uk
Essex LADO Team OHS Essex sites	0333 0139 797 lado@essex.gov.uk

SAFEGUARDING & CHILD PROTECTION IN SPECIFIC CIRCUMSTANCES

SAFEGUARDING PUPILS WITH ADDITIONAL VULNERABILITIES

All pupils deserve the opportunity to achieve their full potential and the purpose of all intervention is to safeguard and promote the welfare of the child. We are aware that our pupils, all of whom have special educational needs and/or disabilities (SEND) are more vulnerable to isolation and may be subject to abuse, neglect and exploitation. For example, there could be a reluctance to believe pupils with SEND are being abused, limited opportunities for these pupils to seek help from someone else or a lack of access to support services. Pupils may not feel ready or know how to tell someone that they are being abused.

We are committed to identifying, supporting and protecting pupils who may be at increased risk of harm, disadvantage or reduced access to support. We understand that vulnerability can take many forms and may include, but is not limited to, mental health difficulties, pupils requiring emotional wellbeing support, being young carers, pupils who are experiencing poverty or deprivation, pupils who are affected by domestic abuse, children who are missing education, pupils who are at risk of exploitation, have unmet health needs, and pupils facing challenges relating to identity, discrimination or belonging.

Octavia House Schools recognise that children's mental health and safeguarding are closely connected. We will ensure that concerns relating to a child's emotional wellbeing, behaviour, self-esteem, anxiety, distress or mental health are taken seriously and considered alongside wider safeguarding information. Colleagues will

be alert to changes in presentation, attendance, relationships, learning, behaviour or communication that may indicate a pupil requires additional help or protection. We recognise the important role that young carers undertake and understand that caring responsibilities may affect a pupil's education, health and emotional wellbeing. We will work sensitively with young carers and their families to identify needs, reduce barriers and ensure appropriate support is provided.

Safeguarding practice at Octavia House Schools is inclusive and child-centred. We are also committed to anti-discriminatory practice, ensuring that all decision-making is informed by an awareness of potential bias and actively addresses disproportionality in safeguarding outcomes. Colleagues can also recognise bias and disproportionality, understanding how factors such as race, disability and poverty can affect risk. They are aware that a pupil's behaviour, mood or injuries may indicate possible abuse, rather than being attributed solely to their SEND. Our pupils may have a higher risk of being isolated from their peers, left out of group activities or bullied. As schools, we strive to help safeguard these pupils by ensuring that they are heard, have plentiful access to therapeutic support and liaise with external support services on the family's behalf.

INTIMATE CARE

- We do not provide intimate care for pupils and therefore do not have or follow a separate intimate care policy. However, there may be occasions where pupils require assistance with toileting, such as due to their age or anxiety. Our main aim is to ensure pupils are safe and have dignity in circumstances where they require support with toileting. We encourage pupils to be as independent as possible with their personal care. Colleagues will provide instructions, guidance, and reassurance to pupils; however, they will not be involved in direct intimate care. Where possible, two colleagues will always be present when providing support and guidance to pupils. Pupils will be encouraged to talk to colleagues about their toileting needs and when they are aware that they need assistance, and also to let their parent/carer and/or a trusted adult know if they have any concerns or feel uncomfortable. We ask that families ensure that they provide all relevant information to school, as soon as possible, so that the needs of their child can be met. It is important that families ensure that they work towards their child achieving the maximum possible level of independence at home.

CHILDREN QUESTIONING THEIR GENDER

- Octavia House Schools recognises that some children and young people may experience questions about their gender identity or how they wish to express themselves. Any pupil who raises concerns, shares uncertainty, or seeks support in relation to their gender will be listened to respectfully and treated with dignity, care and compassion.
- Our school approach is centred on safeguarding and the individual needs and circumstances of each pupil. Decisions relating to any form of social transition, including changes to names, pronouns, uniform, facilities or other aspects of

school life, will be considered carefully on a case-by-case basis. Such decisions will not be made automatically or in isolation; they will involve appropriate consideration of the pupil's wellbeing, age, developmental stage, individual circumstances, family context and any potential safeguarding implications.

- In line with the updated statutory safeguarding guidance, including Keeping children safe in education (KCSIE), the school will ensure that any support provided is consistent with its duty to safeguard and promote the welfare of children. Colleagues will consider whether a pupil's request or presentation may indicate wider vulnerabilities, pressures, distress or risks, and will discuss with the DSL where concerns arise.
- Colleagues will work collaboratively with the pupil, parents or carers (where appropriate and consistent with safeguarding responsibilities), and relevant professionals to ensure that decisions are made thoughtfully and with the pupil's best interests at the centre. We will avoid making assumptions about a pupil's needs and will provide appropriate support while ensuring that all actions align with current statutory guidance and legal duties.
- Octavia House Schools will maintain separate single-sex toilet and changing facilities to safeguard pupils' privacy, dignity and safety. Pupils will use facilities designated for their biological sex. Where a pupil requires additional support or does not wish to use the facilities available to them, alternative arrangements will be considered based on what is accessible at that particular site, such as access to a single-user toilet, where appropriate.
- All of our sporting activities are co-educational where pupils of different sexes are educated together; therefore, pupils should not face any issues that may arise from single-sex participation. We will always seek to ensure that all pupils have appropriate opportunities to participate in physical education and sport while maintaining safe and fair arrangements for all participants.
- Colleagues know to seek advice from the DSL where a pupil raises questions about their gender or where there are concerns about a pupil's wellbeing, safety or wider circumstances.
- It is important to note that being lesbian, gay, bisexual or gender questioning is not in itself an inherent risk factor of harm; however, pupils may be at risk, for example, of being vulnerable to discriminatory bullying by other pupils. It is, therefore, essential that all of our pupils have a trusted adult that they can approach and talk to if necessary. Trusted adults aim to reduce the additional barriers faced by these pupils by providing a safe space for them to talk or share any concerns that they have.

CONTEXTUALISING SAFEGUARDING

- Colleagues are aware that safeguarding incidents and/or behaviours may be a result of factors within or outside the home, including online, e.g. in the

community, peer groups, extended family members. All colleagues but especially the DSLs (and deputies) are aware that issues such as mental health, CCE, CSE, gang culture, serious crime and child on child abuse can have an adverse impact on children and young people, and families may have little influence over these contexts. It is important that colleagues recognise the signs of abuse and understand that pupils are vulnerable to abuse beyond their front doors, therefore acting quickly to safeguard pupils is imperative.

MENTAL HEALTH & SELF HARM

- We cater for pupils with complex needs, adverse childhood experiences (ACEs) and experiences of toxic stress. We provide a specialist therapeutic programme tailored to individual pupils in order to be able to support their emotional well-being, self-esteem and development (see our 'what we do' policy). Colleagues are aware that mental health problems can, in some cases, be an indicator that a pupil has suffered or is suffering from abuse, neglect or exploitation. School colleagues are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of a concern.
- At times, pupils can display self-harming behaviours and express suicidal ideation as a result of their trauma and inability to express their emotions by using adaptive coping strategies.
- School colleagues know which pupils are at risk and preventative measures are highlighted in pupils' individual risk assessments and discussed in morning and afternoon briefings as part of the set agenda.
- Pupils who display self-harming behaviours or suicidal ideation are at greater risk of harming themselves, including via ligature points.
- School colleagues all receive in-house ligature training and know what actions they should take if a pupil attempts to harm themselves, which includes seeking support from leaders.
- School colleagues are trained to know how to make dynamic risk assessments, which may include the removal of any possible items that could be used as a ligature when dysregulated.
- The Director of Safeguarding has completed specialist anti-ligature training. Anti-ligature training features explicitly in induction, refresher and annual training sessions.
- The DSL or a senior leader will immediately make contact with families and call 999 or arrange for them to be taken to A&E by a parent or carer, if required. Safety advice is always given to any parent/carers when there is a risk of harm.
- There are always first aiders present on site who will administer any first aid that is required.

- All our schools have an anti-ligature kit stored in the designated medical rooms.
- Colleagues know they are to use Team Teach techniques if required to keep a pupil safe.
- The overall ligature risk across our day schools is low as pupils are always supervised, CCTV is in place in almost all areas and rooms, and rooms not in use are locked at all times.
- Our pupils are vulnerable to mental health needs and conditions. Our systems and processes to identify possible mental health concerns are robust and we work closely with CAMHS and other external agencies in order to provide additional support. We receive pupil information from their EHCPs, which is followed by a welcome interview with the family in order to gain more context and information. All pupils' mental health needs are clearly outlined and reviewed in the therapy tracker, and their individual risk assessments.
- Any relevant incident must be referred to the DSL as soon as possible; the concern will be logged on the schools' online safeguarding portal. The DSL will discuss the concern with a lead therapist and a referral will be made to social care services and CAMHS, as appropriate.

CHILDREN ABSENT FROM, AND CHILDREN MISSING, EDUCATION

We know that a pupil's unexplained and or persistent absence from school could mean that they are at risk of harm and can lead to a child becoming missing from education. We pay regard to the latest statutory '[Working together to improve school attendance](#)' (July 2026) guidance, and have a separate attendance policy.

- Our classes and schools are small, and thus attendance is easily tracked closely. Any pupil who is absent for prolonged periods and/or on repeat occasions will always get immediate attention from the head of school and DSL, our senior attendance champion.
- We know that pupils who are absent from education for prolonged periods of time and/or on repeat occasions can act as a vital warning sign to a range of safeguarding concerns and can eventually lead to pupils being missing in education.
- Colleagues are trained to be alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM, forced marriage and Child Sexual Exploitation (CSE).

- We will always seek to clarify the reason for a pupil's absence from school with the pupil's parent or carer as soon as is practicable on the first day; the reason for absence is recorded on the register. If we are unable to obtain the reason for a pupil being absent, we will attempt to contact the pupil's emergency contacts. We ask for at least two emergency contacts for every pupil. At this stage, if we have been unable to contact the family or emergency contacts, a home visit will be carried out. As a last resort, if the school has not been able to ascertain where a pupil is after following the steps above, the pupil will be classed as a 'missing child' and they will be reported to the police.
- We will also always report an unexplained absence of a pupil with a Child Protection Plan to the pupil's social worker on the same day.
- We will always report a continued absence (10 or more school days) about which we have not been notified by the parent or carer to the Local Authority's SEND Team and Education Welfare Service.
- We will always report to the local authority the name of any pupil who has been newly registered to attend our school but does not arrive on the expected day.
- We will always report to the relevant local authority's attendance support team the continued absence of a pupil known or thought to have been taken overseas if the pupil does not return to school on the expected return date.
- We maintain accurate attendance and admission registers (all pupils are on both), in line with statutory requirements. This includes paying careful attention to off-rolling pupils in association with the local authority and knowing, and recording, pupil destinations consistently on the admission register. Where a pupil destination is unknown, and unable to be sought after significant follow-up, the local authority, education welfare service and/or social care services will be informed.
- We do not 'delete' pupils from the admission register. We alert the pupil's local authority immediately if:
 - the pupil has been taken out of school by their parents and are being educated outside the school system e.g. home education
 - the pupil has ceased to attend school
 - the pupil has been certified as medically unfit to attend school
 - the pupil is in custody.

Keeping local authorities up to date is crucial so that they can check if pupils of compulsory school age are missing education, and therefore might be in danger of not receiving an education and be at risk of abuse, neglect or exploitation.

On the rare occasions that we suspend pupils for a fixed-term (usually one day), we put this in writing to both the family and the placing local authority. While we provide the pupil with work to complete during their external suspension, we cannot be responsible for the pupil's safety and welfare during their time at home.

On the rare occasion that we are unable to meet a pupil's needs, an Interim Annual review (IAR) meeting will be called with the local authority in order to mutually agree an educational offer and an appropriate transition until a new provision for the pupil is confirmed. The educational offer will consist of learning and therapy sessions, contact with a trusted adult and home visits, where feasible.

ALLEGATIONS FROM PUPILS AGAINST OTHER PUPILS ('CHILD ON CHILD ABUSE', INCLUDING HARASSMENT AND VIOLENCE)

In most instances, negative conduct of pupils towards each other will be covered by our 'what we do', behaviour and anti-bullying policies, which reflect the [DfE's 'behaviour in schools' guidance](#). However, some allegations may be of a more serious nature and raise safeguarding concerns. Allegations made against another pupil may include physical abuse (e.g. violence, particularly pre-planned; forcing the use of drugs or alcohol), emotional abuse (e.g. bullying, cyber-bullying, prejudiced based and discriminatory bullying, blackmail, extortion, threats, intimidation, initiation/hazing-type violence and rituals, abuse in intimate personal relationships between peers), sexual abuse (e.g. indecent exposure, touching, sexual violence and sexual harassment, nudes and semi-nudes, forcing the watching of pornography or upskirting, which is a criminal offence and typically involves someone taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm and/or sexual exploitation (e.g. photographing or videoing indecent acts). Colleagues are aware that child on child abuse can happen both inside and outside of school or online, even if there are no reports disclosed in school it does not mean that it is not happening.

MINIMISING THE RISK

It is inevitable in our schools that some pupils will present a safeguarding risk to other pupils. A robust induction system ensures that we are informed as to whether a pupil arrives or re-joins presenting a safeguarding concern, for example after coming back into school following a period in custody or having experienced serious abuse themselves. Intelligent timetabling, groupings, supervision and personalised risk assessments, including daily dynamic risk assessments, are central to the effective management of safety in our schools. Colleagues also actively teach pupils about forms of abuse and how to keep themselves and others safe as part of the curriculum; it is embedded in our values, PSHE and RSH lessons, assemblies etc. In itself, this dramatically reduces the possibility of negative conduct against other pupils, and therefore of allegations.

MANAGING ALLEGATIONS AGAINST OTHER PUPILS

School colleagues know the importance of challenging inappropriate behaviours between peers and know never to downplay certain behaviours as "banter" or "part of growing up" as it can normalise violent and abusive behaviours.

We are aware that girls are more likely to be victims of abuse and boys are more likely to be perpetrators, however any and all allegations will be taken seriously as we have a zero-tolerance approach to abuse. Even if there are no reported cases, it doesn't mean that child on child abuse is not happening.

When an allegation is made by a pupil against another pupil, colleagues should consider whether the complaint raises a safeguarding concern.

If there is a safeguarding concern:

- The DSL will be informed and it will be logged via the schools' online safeguarding portal.
- A factual record will be made of the allegation, but no attempt at this stage should be made to investigate the circumstances
- The DSL will contact social care services to discuss the case. It is possible that social care services are already aware of safeguarding concerns around the pupil. The DSL will follow through the outcomes of the discussion and make a social care services referral where appropriate
- The DSL will make a record of the concern, the discussion and any outcome will be logged on the pupil's online safeguarding portal profile
- If the allegation indicates a potential criminal offence has taken place, the police will be contacted at the earliest opportunity and parents informed (of both the pupil being complained about and the alleged victim)
- It may be appropriate to exclude the pupil being complained about for a period of time, as per our behaviour and anti-bullying policies
- Where neither social care services nor the police pick up the case, a thorough school investigation will take place in any case, using our internal procedures
- In situations where the DSL considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan which will be monitored and evaluated with all adults working with the pupil. Individual risk assessments will also be amended accordingly.
- All victims will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward and share the concern. This also includes any abuse that has taken place outside of school.
- Colleagues will explain that the law is in place to protect young people rather than criminalise them. Both the victim(s), perpetrator(s) and any other affected pupil(s) will be supported by the school, what this looks like may vary depending on the case, however it may include: additional therapeutic support, home visits,

personalised timetable, family support and ongoing communication with external agencies.

- Colleagues will reassure and explain to the victim and alleged perpetrator how they will be kept safe and supported.

MISOGYNY, SEXUAL VIOLENCE & SEXUAL HARASSMENT

Octavia House Schools recognises that misogyny, sexist attitudes, discriminatory language and behaviours can contribute to a culture in which harmful sexual behaviour may develop or escalate. In line with the expectations set out in Keeping children safe in education (KCSIE), we take a proactive approach to identifying, challenging and preventing all forms of physical violence and conflict, racism, misogyny, sexism, sexual harassment, sexual violence and harmful sexual behaviours.

Sexual violence and sexual harassment may occur between two pupils of any age and sex. It may occur though a single pupil or group of pupils sexually harassing or being sexually violent towards another pupil or group of pupils, it may happen both physically or verbally, online or offline. It can take many different forms; inappropriate sexual play, harmful sexual behaviour, making or sharing nudes and semi-nudes, including those generated by AI, grooming etc.

We continually advise colleagues to maintain an attitude of 'it could happen here' and to 'think the unthinkable' as we have a zero-tolerance approach to sexual violence and sexual harassment. It is never acceptable, however [Ofsted's review of sexual abuse in schools and colleges](#) revealed how prevalent sexual harassment and online abuse are for pupils.

We are also aware that pupils with SEND are three times more likely to be abused than their peers. School colleagues will always address inappropriate behaviour as it can be an important intervention that helps prevent abusive and/or violent behaviour in the future.

Sexual violence, as per the Sexual Offences Act 2003, can be defined as:

- Rape - intentional penetration by a male of the vagina, anus or mouth using a body part or other item, if the person being penetrated does not consent and the person penetrating does not reasonably believe that they consent
- Assault by penetration – intentional penetration by person of the vagina or anus using a body part or other item, if the person being penetrated does not consent and the person penetrating does not reasonably believe that they consent
- Sexual assault – intentionally touching another person in a sexual way if the person being touched does not consent and the person touching does not reasonably believe that they consent. Sexual assault covers a wide range of

behaviours, an act of a single kiss to someone who does not consent or touching someone's genitalia without consent can still constitute sexual assault.

- Causing someone to engage in sexual activity without consent – if a person intentionally causes another person to engage in an activity, the activity being sexual, that they did not consent to. This could include forcing someone to strip, touch themselves or engage in sexual activity with a third party.

The Sexual Offences Act 2003 states that the age of consent is 16 years of age. Consent is only given freely by someone who has the capacity to make that choice. Consent to one sexual act does not imply consent to another and consent can be withdrawn at any time. Sexual intercourse without consent is rape. Pupils under the age of 13 years of age cannot consent to sex.

Colleagues are expected to recognise that behaviours which may appear to be "low-level" including sexist jokes, degrading comments, sexualised language, objectification, unwanted comments about appearance, or the normalisation of harmful gender stereotypes, can be indicators of wider safeguarding concerns. Such behaviours will not be dismissed, minimised or accepted as "banter". Colleagues will respond consistently, record concerns appropriately on MyConcern and take proportionate action to prevent escalation.

Sexual harassment includes behaviours such as:

- Sexual comments, lewd comments, telling sexual stories
- Sexual jokes or taunting
- Physical acts, such as deliberately brushing against someone or interfering with their clothes
- Displaying sexual pictures, photos or drawings of a sexual nature
- Online sexual harassment, such as sharing sexual images/videos (making or sharing nudes and semi-nudes, including those generated by AI)
- inappropriate sexual comments on social media, via the use of AI, exploitation, coercion and threats
- Sharing unwanted explicit content
- Upskirting
- Sexualised online bullying

If not challenged, sexual harassment can normalise inappropriate behaviours and create a culture that may lead to sexual violence.

Characteristics of healthy sexual behaviour include:

- A mutual interaction
- Consensual
- Exploratory and age-appropriate behaviour
- No intent to cause harm
- Fun and humorous
- No power differential between participants

Characteristics of problematic sexual behaviour include:

- Behaviours that are not age appropriate e.g. young pupils using sexual swear words
- Some 'one off' low level incidents of low-key behaviour e.g. touching over clothing
- The behaviour is spontaneous rather than planned
- Behaviours are driven by peer pressure
- Where there are other balancing factors such as a lack of intent to cause harm, or a lack of understanding in the young person and the behaviours, or there is some remorse
- The targeted pupil may feel aggrieved with the behaviour but does not feel scared, and feels free to tell someone

Characteristics of harmful sexual behaviour include:

- Behaviours which are not age or developmentally appropriate
- Power differentials between young people such as age, size status and strength
- Elements of planning, secrecy or force
- Incidents increase in frequency and the young person's interest in them is disproportionate to other aspects of their life
- Where the young person does not take responsibility for the behaviour and blames others or feels a strong sense of grievance
- The targeted pupil feels fearful, anxious and/or distressed

Evidence suggests that girls, pupils with SEND and LGBT pupils are at greater risk. It is important that all disclosures are taken seriously and never considered as 'banter', victims are supported and there is a clear message that it is never acceptable. It is important to consider that pupils who are displaying harmful sexual behaviours have often experienced their own abuse and trauma and it is essential that they are offered appropriate support.

Octavia House Schools is committed to early intervention and preventative education. Through relationships, sex and health education (RSHE), personal development programmes, assemblies, curriculum opportunities and pastoral support, pupils are taught about respect, equality, consent, healthy relationships, online behaviour, boundaries and the impact of harmful attitudes and behaviours on others.

Any experience of sexual violence and sexual harassment is likely to have a significant impact on a pupil's emotional well-being and adversely affect their educational attainment.

MANAGING INCIDENTS OF SEXUAL VIOLENCE & HARASSMENT

Pupils may not be able to tell school colleagues about their abuse verbally, they may try to alert them by showing signs or acting in a certain way, or it may be overheard or a third-party disclosure. Colleagues need to be mindful that the initial response to a report from a pupil is very important as it can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. However, the starting point of any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment, it is never acceptable and it will not be tolerated. We remind colleagues to **'see it, hear it, believe it, do something'**.

Colleagues must listen carefully, share any concerns about a pupil to the DSL and log a factual report on the schools' online safeguarding portal.

The DSL will be best placed to advise on the initial response and will consider what the investigation will look like, including any necessary action. Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. The victim will be given as much control as possible over the decisions regarding how the investigation will proceed and any support they will be offered. This will, however, be balanced with the schools' safeguarding duty to protect other pupils
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed
- The ages of the pupils involved
- The developmental stages and SEND of the pupils involved
- Any power imbalance between those involved
- If the alleged incident is a one-off or a sustained pattern of abuse
- That sexual violence and harassment can take place within intimate personal relationships between pupils
- Importance of understanding intra-familial harms and whether support needs to be sought for siblings
- Are there going to be any ongoing risks to the victim, pupils or school colleagues?
- Are there any further concerns or related issues, such as child sexual exploitation?

If the pupil discloses sexual abuse or sexual abuse is suspected, the pupil must not be questioned until it has been reported to the police, and social care services and the Child Abuse Investigation Team (CAIT) has been informed and advice given. At the point of referral to social care or Police, generally the parent(s) or carer(s) will be informed, unless it is going to put the pupil at additional risk. Any such decision should be made with the support of social care. Usually the alleged perpetrator(s) will be informed after the DSL seeks advice on next steps from the relevant agency, however immediate action will be taken if needed to safeguard the victim and/or other pupils. Emotional support will be made available for both parties. Depending on the outcome of the investigation, action will be taken in conjunction with our anti-bullying, 'what we do' and behaviour policies.

An immediate risk assessment should be carried out in order to establish what protection and support is needed for those involved. Usually, the incident will either be handled internally, referred to children's social care and the police. As schools, we will be part of the wider discussion with statutory safeguarding partners when thinking about next steps. Whatever the response, it will be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment.

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the pupil who made the allegation needs additional support or may have been abused by someone else. In such circumstances, a referral to children's social care may be appropriate. Alternatively, disciplinary action may be appropriate against the individual who made it as per our behaviour policy.

Further guidance can be found within 'Keeping children safe in education' (September 2026).

The NSPCC has set up a dedicated helpline to support anyone who has experienced sexual abuse in educational settings – 0800 136 663. The Lucy Faithfull Foundation now offers a [confidential chat service](#) supporting young people who are concerned about their own or someone else's sexual thoughts and behaviours.

MAKING OR SHARING NUDES AND SEMI-NUDES, INCLUDING THOSE GENERATED BY AI

The DfE produced guidance on 'Sharing nudes and semi-nudes: how to respond to an incident' (March 2024), along with the UK Council for Child Internet Safety (UKCCIS) on how to tackle making or sharing nudes and semi-nudes, including those generated by AI, and 'youth produced sexual imagery' as sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives.

This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose

them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to child sexual exploitation.

Making or sharing nudes and semi-nudes, including those generated by AI, refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams, via mobiles or over the internet.

If any devices need to be seized and passed onto the police, then the device(s) will be confiscated, and our safer schools police officer will be contacted. The device will be turned off and placed in the safe until the police are able to come and retrieve it.

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). Specifically, it is an offence to possess, distribute, show and make indecent images of children. The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

Although the production of such imagery will likely take place outside of school, these issues often manifest in schools working with children and young people. Colleagues respond swiftly and confidently to ensure that pupils are safeguarded, supported and educated and are aware of the following:

- Never view, copy, print, share, store or save the imagery, or ask a pupil to share or download – this is illegal.
- If they have already viewed the imagery by accident (e.g. if a young person has shown it before you could ask them not to), report this to the DSL (or DDSL) as soon as possible and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the pupil or pupils who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or DDSL).
- Do not share information about the incident with other colleagues, the pupil(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any pupil involved.
- Do explain to the pupil(s) that you need to report it and reassure them that they will receive support and help from the DSL (or DDSL).

The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of the young people involved.

- All incidents involving making or sharing nudes and semi-nudes, including those generated by AI, and youth produced sexual imagery will be responded to in line with the schools' online safeguarding portal
- The DSL will hold an initial review meeting with appropriate school colleagues
- There will be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately
- In many cases, education settings may respond to incidents without involving the police, for example where an incident can be defined as 'experimental' and there is no evidence of abusive or aggravating elements. The police may, however, need to be involved in some cases to ensure thorough investigation, including the collection of all evidence (for example, through multi-agency checks). Where there are abusive and/or aggravating factors, incidents will always be referred to the police through the Multi-Agency Safeguarding Hub (MASH). Even when the police are involved, a criminal justice response and formal sanction against a child or young person would only be considered in exceptional circumstances.

CHILD SEXUAL EXPLOITATION (CSE)

- Child Sexual Exploitation (CSE) is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, touching outside of clothes. It can take many forms from the seemingly 'consensual' relationship where sex is exchanged for attention/affection, accommodation or gifts, to serious organised crime and child trafficking. What marks out exploitation is an imbalance of power within the relationship, to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. The perpetrator always holds some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops. It can be committed by an individual or an organised network, and most sexual abuse is committed by those previously known to the

victim. Octavia House Schools attempts to identify young people who are vulnerable to, or at risk of, sexual exploitation and who need services and interventions to keep them safe. Colleagues will alert the DSL and log any concerns around CSE on the schools' online safeguarding portal. We will pass on any information about CSE issues affecting the schools, for example concerns about adults hanging around the school, to the police.

DOMESTIC ABUSE (INCLUDING TEENAGE RELATIONSHIP ABUSE)

Domestic abuse can be defined as any incident or pattern of incidents of coercive control, 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
- emotional.

Pupils can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own relationships (teenage relationship abuse).

Octavia House Schools is part of the national 'Operation Encompass' scheme, which operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to pupils who are experiencing domestic abuse.

Contact will be made prior to the start of the next school day, when a child or young person has been exposed to, or involved in, any domestic incident.

The Police will liaise with the DSL if an incident occurs and will use the information that has been shared, in confidence, while ensuring that the school is able to make provision for possible difficulties experienced by pupils, or their families, who have been involved in, or exposed to, a domestic abuse incident.

Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to local authority children's social care will be made if there are concerns about a pupil's welfare.

Operation Encompass provides an advice and helpline service for all colleagues from educational settings who may be concerned about pupils who have experienced domestic abuse. The helpline is available 08.00 to 13.00, Monday to Friday on 0204 513 9990 (charged at local rate).

The current UK definition of domestic violence includes incidences between people aged 16 or over, but it is important to note that violence and abuse can occur in relationships between children and young people at any age.

School colleagues will look out for the signs of domestic abuse, including relationship abuse and educate pupils about what healthy relationships look like and what abusive relationships are.

Where concerns exist that a pupil may be at risk of domestic abuse or experiencing relationship abuse, the DSL will be informed as soon as possible and the concern will be logged on the schools' online safeguarding portal. The DSL will alert the relevant agencies and work with other professionals in order to safeguard the pupil.

Colleagues are also aware that Refuge runs a national domestic helpline (0808 2000 247) which provides guidance and support for potential victims, as well as those who are worried about others.

FORCED MARRIAGE & HONOUR-BASED ABUSE

A 'forced' marriage is distinct from a consensual 'arranged' marriage because it is without the valid consent of both parties and where duress is a factor. A child who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse.

Since February 2023, it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced-marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Information about a forced marriage may come from the pupil themselves, of the pupil's peer group, a relative or member of the pupil's local community or from another professional. Forced marriage may also become apparent when other family issues are addressed, e.g. domestic violence, self-harm, abuse, neglect or exploitation. Forced marriage may involve the child being taken out of the country for the ceremony, is likely to involve non-consensual/under-age sex and refusal to go through with a forced marriage has sometimes been linked to 'honour killing'. Honour-based abuse is an ancient cultural tradition that encourages abuse and violence towards family members who are considered to have dishonoured their family. It is rooted in domestic violence and is often a conspiracy of family members and associates, meaning victims are a risk for their parents and families.

School colleagues should respond to suspicions of a forced marriage or honour-based abuse by alerting the DSL who will make a referral to children's social care services and if the risk is acute, to the Police Child Abuse Investigation Team. School colleagues should not treat any allegations of forced marriage or honour-based abuse as a domestic issue and send the pupil back to the family home. It is not unusual for families to deny that forced marriage is intended, and once aware of

professional concern, they may move the pupil and bring forward both travel arrangements and the marriage. For this reason, colleagues should not approach the family or family friends, or attempt to mediate between the pupil and family, as this will alert them to agency involvement. Further information and advice can be obtained from the Forced Marriage Unit www.fco.gov.uk/forcedmarriage or 0207 008 0151 and the Honour Based Violence Helpline 0800 599 9247. **Again, as with all concerns, please alert the DSL as soon as possible.**

MODERN SLAVERY

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We consider our pupils' risks in relation to modern slavery to be low, however colleagues will raise the concern with the DSL as soon as possible and log any information relating to modern slavery on the schools' online safeguarding portal. Social care services will be contacted, as well as the police, if it is deemed that the pupil is at immediate risk of harm.

FEMALE GENITAL MUTILATION (FGM)

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. Female Genital Mutilation affects girls particularly from North African countries, including Egypt, Sudan, Somalia and Sierra Leone. Although our schools have no pupils from these backgrounds and consider our small number of girls in our schools to be safe from FGM, we will continue to review our policy annually and to include it in annual update training for all colleagues.

School colleagues should be alert to the following indicators:

- The family comes from a community that is known to practise FGM
- A pupil may talk about a long holiday to a country where the practice is prevalent
- A pupil may confide that she is to have a 'special procedure' or to attend a special occasion
- A pupil may request help from a teacher or another adult
- Any female pupil born to a woman or has a sister who has been subjected to FGM must be considered to be at risk, as must other female children in the extended family

It is illegal in the UK to allow girls to undergo FGM either in this country or abroad. It is important to note that all colleagues have a duty to report personally any concerns they may have about girls at risk of FGM to the police. Any concerns must be

immediately shared with the DSL and teachers are aware that they have a mandatory duty to report known cases of FGM.

BULLYING (ALL FORMS, INCLUDING CYBER BULLYING)

We understand that bullying, including cyber-bullying, is harmful to pupils. We have an 'anti-bullying' policy that sets out our aim of ensuring no pupil becomes a victim of any form of bullying and the work that we carry out in school to foster an environment where bullying behaviour is known to be unacceptable. We will always take seriously any reports of bullying and respond appropriately.

We understand that bullying may take different forms and may include, as examples, racist, sexist, homophobic, transphobic and biphobic behaviours. All colleagues are clear about the Protected Characteristics, as prescribed in the Equality Act 2010 (see our equality policy). Any such reported or observed incident will be dealt with in accordance with our anti-bullying strategy and online safety policy.

ONLINE SAFETY, INCLUDING FILTERING & MONITORING SYSTEMS

We recognise that pupils' use of the internet is an important part of their education but that there are risks associated with its use, including risks arising from the use and misuse of artificial intelligence (AI), including generative AI. It is a prevalent issue; colleagues recognise that a lot of our pupils are extremely vulnerable and require a lot of guidance. Octavia House Schools will take a risk-based, proportionate approach to the safe and effective use of AI by pupils and colleagues, balancing educational benefits with safeguarding, privacy, security, ethical and wellbeing considerations. We work closely with our safer schools' officer, and teach online safety across the curriculum. The DSLs take lead responsibility for online safety, ensuring that all colleagues understand and are aware of the filtering and monitoring systems in place across the schools.

We have an online safety policy that is based on the [DfE's 'teaching online safety in school' guidance](#) (June, 2019) and the [DfE's filtering and monitoring standards](#). It addresses how we seek to minimise these risks in our schools and teach pupils how to stay safe when using the internet at home and outside of school.

Adhering to the schools' online safety policy, which actively considers the '4Cs' as outlined in ['Keeping children safe in education'](#): content, contact, conduct, and commerce, including teaching pupils about the misuse of technology, relevant legislation, and how to safely and appropriately use modern technology for positive purposes through our PSHE education and computing curriculums.

We also recognise that all colleagues must always be mindful of the need to follow our policy of acceptable use of our IT equipment.

New technologies have become integral to the lives of children and young people in today's society, both within schools and in their lives outside of school. The requirement to ensure that children and young people are able to use the internet

and related communications technologies appropriately and safely is addressed as part of our wider duty of care to which all who work in schools are bound. The use of these exciting and innovative tools in school and at home has been shown to raise educational standards and promote achievement.

Unfortunately, the use of these new technologies can put pupils at risk within and outside the school; pupils are not allowed to have any mobile device on them during the school day; this helps to safeguard pupils and ensure they are not accessing any inappropriate material on their personal devices.

We have a filtering system provided by Fortigate, which prevents pupils from accessing harmful and inappropriate content. We also have a pro-active monitoring system, provided by Senso, which allows us to monitor all internet use and provides information such as violations and blocks, as well as urgent notifications when a pupil attempts to access or search for harmful and inappropriate material. This is in addition to physical monitoring by colleagues supervising screens of pupils and live supervision managed via a console through Senso. The software systems we use provide urgent notifications and the system is regularly reviewed to ensure we have effective monitoring strategies in place to meet the needs of the schools. While filters should not over block, as it may place unreasonable restrictions on what pupils can be taught, it is also fundamental to be aware of some of the potential dangers that the internet can pose, including:

- Access to harmful, inappropriate or illegal AI generated images, video games or other content such as pornography, self-harm, extreme sexual or physical violence, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- Unauthorised access to/loss of/sharing of personal information
- The risk of being subject to grooming, including AI-enabled bullying, harassment, coercion, grooming, manipulation and exploitation
- The sharing/distribution of personal images without an individual's consent or knowledge
- Inappropriate communication/contact with others, including strangers
- The creation, possession, sharing or distribution of nude or semi-nude images, including AI-generated or digitally altered images, audio or video, including deepfakes, deep nudes and AI-generated nude or semi-nude images involving children
- Implications of geolocation (being able to track someone's location via a mobile phone or internet-connected computer)
- Cyber-bullying, including being pressured into criminal online activity without understanding the consequences

- Risks from Artificial Intelligence (AI) - particularly AI-assisted exploitation
- Harmful online challenges and online hoaxes – [see further guidance](#)
- An inability to evaluate the quality, accuracy and relevance of information on the internet
- The potential for excessive use which may have a negative impact on the social and emotional development and learning of the young person.

Octavia House Schools uses the Ripple tool which intercepts harmful suicide-related online searches and redirects pupils to mental health support and crisis helplines.

Where AI tools are used by colleagues or pupils, Octavia House Schools will:

- establish clear and approved educational purposes for their use;
- assess the safeguarding, data protection, cyber-security, equality, intellectual-property and educational risks before adoption;
- comply with relevant age restrictions and the provider's terms of use;
- use appropriate supervision, safeguards, filtering and monitoring when pupils access AI;
- ensure that personal, confidential or sensitive information is not entered into AI systems unless the use has been appropriately assessed and authorised;
- require colleagues and pupils to critically evaluate and fact-check AI-generated information and recognise that AI outputs may be inaccurate, biased, misleading or inappropriate;
- make expectations for acceptable AI use clear within the acceptable-use and curriculum arrangements;
- provide training so that colleagues understand both the safeguarding risks and appropriate educational uses of AI;
- provide pupils with age-appropriate education in AI literacy, misinformation, deepfakes, digital consent, privacy, critical evaluation and responsible use;
- engage parents and carers where appropriate so that they understand the school's expectations and how to support children to use AI safely.

Colleagues responsible for filtering and monitoring understand how AI-related risks may present through prompts, searches, generated content, images, audio, video and online communications. Any concern that a pupil has been harmed, threatened

or exploited through AI-generated or AI-manipulated content will be treated as a safeguarding concern and will be shared with the DSL and logged on our online safeguarding portal. Colleagues will not require a pupil to forward, download or show them an intimate image as evidence. Concerns involving sexual images, deepfakes/deepnudes or other potentially criminal material will be escalated to the DSL and, where appropriate, reported to the police or other relevant agencies. The DSL will consider the impact on both the child depicted and any child involved in creating or sharing harmful material, recognising that AI-generated content can cause significant emotional, reputational and safeguarding harm even where the depicted image is not authentic.

We are a mobile phone-free environment; pupils are discouraged from bringing mobile phones and smart watches into school but if they do they must hand them to the school offices for safe keeping until the end of the school day. Adults are not to use mobile phones during the school day, with the exception of calling the school or the emergency services if an emergency situation arises whilst off-site (e.g. school trips). They are not encouraged or expected to use personal mobile phones in any situation where their mobile phone number or other personal details may be revealed to a child or parent/carer. Unauthorised or covert use of a mobile phone or other electronic device, to record voice, pictures or video is strictly prohibited. Colleagues are also reminded that they should never provide current or former pupils or families with their personal contact details or communicate on social media platforms.

The sending or forwarding of text messages deliberately targeting a person with the intention of causing them distress, 'cyber-bullying', will be considered a disciplinary matter for pupils and adults alike. The same is the case for other inappropriate use of mobile technology, such as making or sharing nudes and semi-nudes, including those generated by AI or inappropriate communication.

Teaching pupils about the safe use of technology is embedded throughout the curriculum and pupils are taught about online safety and risks as part of a whole school approach. School colleagues know to report and log any online safeguarding concerns via our online safeguarding portal and to the DSL. Please refer to our online safety policy and 'what we teach' policy.

Material published by pupils and colleagues in a social context which is considered to bring the schools' reputation into disrepute or considered harmful to, or harassment of, another pupil or member of the organisation will be considered a safeguarding issue and a breach of conduct and behaviour and treated accordingly, as per our behaviour policy, equality, anti-bullying and/or colleague conduct policies/procedures.

EXTREMISM & RADICALISATION (THE 'PREVENT' DUTY AND CHANNEL)

Since 2010, when the Government published *the 'Prevent Strategy'* (the key prevention aspect of *Contest*), there has been an awareness of the specific need to safeguard children, young people and families from extremism. The Prevent duty

requires all schools to “have due regard to the need to prevent people being drawn into terrorism” under the Counter-Terrorism and Security Act 2015. The duty covers all types of extremism, whether political, religious or ideological.

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

Extreme Right Wing (ERW) is the overall term that encompasses all activity for Right Wing Extremism (RWE) and Extreme Right-Wing Terrorism (ERWT), whereby the ideological motivation is based on one of three ideologies.

- Cultural nationalism (beliefs that ‘western culture’ is under threat from mass migration into Europe/lack of integration by certain ethnic and cultural groups/‘watering down’ of Britishness/see it as a cultural/religious issue, not a race issue, often includes Islamophobia).
- White nationalism (focus is on race - concern is mass migration from the ‘non-white world’ - threat to the ‘white race’ - belief in great replacement/displacement theory ‘we are being swamped/taken over’ (was inspiration for the New Zealand Mosque attack) - e.g. campaign about white people being a ‘minority’ in England by the 2060s)
- White supremacy (the belief that the ‘white race’ are superior/Neo Nazi - currently thriving on the internet, particularly with younger people, usually vulnerable boys aged 15 to 20).

Incel is a shortening of the term “involuntarily celibate”, this term has been adopted by a growing number of predominantly white males who share misogynist and violent views about women which they have as a result of feeling rejected by them. These views are usually shared by a common language which is used to speak in derogatory and dehumanising ways about mainly women, but also men who have sexual relationships with women. It is seen to have links to the far-right.

Octavia House Schools values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society’s values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. The key objective is to ‘tackle the ideological causes of terrorism’, therefore, pupils are encouraged to discuss and learn whilst building resilience to radicalisation through the curriculum they access, including school values that promote fundamental British values. Colleagues try to reduce and limit permissive environments that pupils may access and in turn expose

them to radicalising narratives, this includes teaching them about issues such as misogyny, consent, online safety and how to report concerns of radicalisation.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people susceptible to future manipulation and exploitation. Octavia House Schools is clear that exploitation and radicalisation is viewed as a safeguarding concern. Colleagues are alert to changes in pupil's behaviour, which could indicate that the pupil may need help or protection. Colleagues use their judgement when identifying pupils who might be susceptible to radicalisation and act proportionately which will include logging the concern on the schools' online safeguarding portal, and may include making a Prevent referral (national referral form). Any relevant information about engagement with, and/or outcome of, Channel is securely transferred within the child protection file when a pupil leaves the school.

All colleagues at Octavia House Schools complete Prevent and Channel training as part of their induction and receive regular briefings and update training. Further information can be found in the [Prevent duty guidance: England and Wales](#), last updated in March 2024, and ['the use of social media for online radicalisation' guidance](#).

GANGS/CHILD CRIMINAL EXPLOITATION (CCE) (INCLUDING 'COUNTY LINES' AND SERIOUS VIOLENCE)

Within the 'criminal exploitation of children and vulnerable adults: county lines' guidance (September 2018), the UK Government defines county lines as a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Child criminal exploitation (CCE) is broader than just county lines, and includes, for instance, children forced to work on cannabis farms or to commit theft.

CCE is a geographically widespread form of harm that is a typical feature of county lines criminal activity; drug networks or gangs groom and exploit children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Children as young as 12 years old have been exploited or moved by gangs to courier drugs out of their local area, however children aged 15–16 is the most common age range.

Both males and females can be vulnerable to exploitation and it is thought that white British children are being targeted more because gangs perceive that they are more likely to evade police detection, however a person of any ethnicity or nationality may be exploited. Gangs often use social media to make initial contact with children and young people.

Gangs are known to target vulnerable children and adults; some of the factors that heighten a person's vulnerability to exploitation and chances of being involved in serious violence include:

- having prior experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- social isolation or social difficulties
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other people involved in gangs
- having a physical or learning disability
- having mental health or substance misuse issues;
- being in care (particularly those in residential care and those with interrupted care histories)
- being excluded from mainstream education

In some of our schools' localities of South London, gangs are prevalent and our pupils (some with gang membership pasts) are extremely vulnerable to gang membership or re-membership. Older pupils may also attempt to recruit younger pupils using any or all of the above methods. It is also well documented that pupils suffering from sexual exploitation themselves may be forced to recruit other young people, under threat of violence.

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Colleagues know to act immediately if there is, or a risk of, serious violence. The concern will be reported immediately to the DSL and Headteacher. A 999 call will be made if there is immediate danger and the DSL will lead on conducting a risk assessment, exploring the reasons behind why a pupil is threatening to, or is carrying a weapon, including whether they themselves are being exploited, threatened or drawn into violence.

Colleagues are aware that a key indicator to look out for is missing episodes; if a pupil has periods of going missing it is possible that they have been trafficked for the purpose of transporting drugs or are involved in serious crime. This is another reason as to why our absence procedure is so important; we inform the police if we have been unable to obtain a reason for a pupil's absence as the pupil is classed as

a 'missing child'. Colleagues also know that a pupil who has an unexplained amount of money on them, a new mobile phone or new clothing is an indicator that a pupil may be involved in county lines/CCE.

Like other forms of abuse, neglect and exploitation, serious violence and CCE can affect any child under the age of 18. It can still be exploitation even if the activity appears consensual; there is usually some form of power imbalance in favour of those perpetrating the exploitation. It can also involve force and/or enticement-cased methods of compliance and is often accompanied by violence or threats of violence. Other indicators may include a change in relationship groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

School colleagues know to raise the concern with the DSL as soon as possible and log any information relating to serious violence or CCE on the schools' online safeguarding portal. Social care services will be contacted, as well as the police, if it is deemed that the pupil is at immediate risk of harm.

SEARCHING, SCREENING & CONFISCATION

All pupils at our secondary sites are screened for weapons, on arrival and exit, using a hand-held metal detector (wand). This is also carried out on a 'as required' basis at our primary sites, e.g., as part of a dynamic risk assessment if a pupil states that they plan to bring in a weapon.

Searching can be necessary in order to ensure a safe environment for both school colleagues and pupils. Senior leaders have a statutory power to search a pupil or their possessions, whereby there are reasonable grounds to suspect that the pupil may have a prohibited item listed below:

- knives and weapons
- alcohol
- illegal drugs
- stolen items
- tobacco and cigarette papers
- fireworks
- pornographic images

and/or any item that a colleague reasonably suspects has been, or is likely to be used:

- to commit an offence, or
- to cause personal injury to, or damage property of; any person (including the pupil themselves).

Only the heads of school and above may carry out a search, however they may also authorise individual colleagues to search for specific items.

Under common law, colleagues have the power to search a pupil for any item if the pupil agrees. Therefore, it is imperative that the colleague ensures the pupil understands the reason for the search and how it will be conducted so that the pupil's agreement is informed.

Before any search takes place, it should be explained to the pupil why they are being searched and how and where the search is going to take place. Pupils should also be given the opportunity to ask any questions.

The search should be carried out in an appropriate location, ideally away from other pupils. It should be carried out by a person of the same sex and there should always be another colleague present to witness the search.

The only exception to this rule is if it is believed that there is an immediate risk of serious harm if the search is not carried out immediately. If a member of the opposite sex carries out a search, and/or without another colleague present, this should be reported to the DSL as soon as possible.

A colleague may search a pupil's outer clothing, pockets and/or possessions. The pupil is not to remove any clothing other than outer clothing and a metal detector may be used to assist with the search. At no point should a strip search be carried out by any of our schools' colleagues.

While the decision to undertake a strip search itself and its conduct are police matters, school colleagues retain a duty of care to the pupil(s) involved and should advocate for pupil wellbeing at all times.

Any item found as a result of a search can be confiscated if there are reasonable grounds for suspecting there is a risk to pupils or colleagues if the item is prohibited, or is evidence in relation to an offence. All items, aside from alcohol, tobacco or fireworks which should be safely disposed of, should be delivered to the police.

Parents should always be informed of any search for a prohibited item and the outcome of the search as soon as is practicable, informing them of what, if anything, has been confiscated and the resulting action leaders have taken, including any sanctions applied.

Any search that reveals a safeguarding concern should be logged immediately via the schools' online safeguarding portal and the appropriate action is to then be taken, including referrals to social care services.

Further guidance, in particular around strip searches, can be found within [the DfE's 'Searching, Screening & Confiscation' guidance \(July 2023\)](#).

HOMELESSNESS

A pupil's welfare can be affected if they are homeless or at risk of becoming homeless. The DSL will be able to assist families in getting them support; in addition

to discussions and supporting letters that can be provided to the Local Housing Authority, it may be deemed necessary to make a referral to children's social care if the child has been harmed or is at risk of harm.

It should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or carers, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL will ensure appropriate referrals are made based on the pupil's circumstances.

Indicators that a family may be at risk of homelessness includes household debt, rent arrears, domestic abuse and anti-social behaviours as well as the family being asked to leave a property.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to support to help them retain their accommodation or find a new place to live.

DRUGS & SUBSTANCE MISUSE

Pupils are at risk from a range of both legal and illegal substances. The school is committed to the health, safety and welfare of pupils and will take action to help safeguard their well-being as well as providing support, advice and education about drugs and substance misuse as appropriate. The schools will never condone the misuse of substances, and the possession or supply of illegal drugs, and it will be viewed as a safeguarding concern.

FABRICATED OR INDUCED ILLNESS

Fabricated or induced illness is a rare form of child abuse. It occurs when a parent or carer exaggerates or deliberately causes symptoms of illness in the child. Where concerns exist about fabricated or induced illness, it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child's signs and symptoms of illness. Like other safeguarding concerns, it will be logged on the schools' online safeguarding portal and the DSL will inform relevant agencies as soon as possible.

CHILDREN & THE COURT SYSTEM

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children (5 to 11 and 12 to 17) available on the government's website that explains the process and support that are available. Making child arrangements via the family courts following a relationship breakdown can be an extremely stressful time for the whole family. The Ministry of Justice has an online child arrangements information tool which families may find helpful as it offers clear information in the dispute resolution service.

CHILD EMPLOYMENT

Only children over the age of 13 may be employed to do light work. Regulations determine the type of work and restrict the hours a child may be employed for. Children working in the UK who are still of compulsory school age are required to have a work permit if required by local bylaws. Different regulations apply to children in entertainment, where children under thirteen may be licensed to perform in commercial performances under strict guidelines and controls. Further information on children in employment can be found at <https://www.gov.uk/child-employment>

PRIVATE FOSTERING

A private fostering arrangement is one that is made privately, without the involvement of a Local Authority, for the care of a child under the age of 16 years of age by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. Each party involved in the private fostering arrangement has a duty to refer it to the Local Authority at least six weeks before the arrangement is due to begin, and not to do so would be an offence. The school has a duty to inform social care services if we become aware of a private fostering arrangement that has not been shared with the Local Authority. Although there is no duty for the school to be informed of private fostering arrangements it would be helpful if the family could pass on the information to ensure support can be put in place. Further information on private fostering can be found at <https://childlawadvice.org.uk/information-pages/private-fostering/>

HEALTH & SAFETY

We have separate risk assessment and health and safety policies which demonstrate the consideration we give to minimising risks to pupils when on the school premises and when undertaking activities out of school under the supervision of our colleagues.

Whilst we make no use of any alternative provision (AP), we know that if this were to ever change, the school remains responsible for the safeguarding of pupils attending any AP. This would include responsibility for risk assessment, site visits and securing written confirmation from the AP that they have completed all the required vetting and barring checks on their colleagues.

The school acknowledges its responsibility to safeguard all pupils in potentially vulnerable situations such as changing rooms, while also acknowledging pupils' right to privacy. A professional judgement is made based on the age and the developmental needs of the pupils; appropriate supervision is achieved by colleagues being in close proximity to the changing room and pupils should be aware of this, knowing that adults will enter the room if necessary. On-site showers are available for pupils to make use of if required. Pupils may be encouraged to do so in order to improve their personal hygiene and/or to reinforce the importance of cleanliness and regular washing. Risk assessments are in place to ensure the safety of both pupils and colleagues.

To ensure that the safety of our pupils there are procedures in place that allow colleagues to search pupils using a metal detector wand; this is to make sure that pupils are not bringing inappropriate materials or dangerous weapons into school. There will normally be two colleagues present during the search, one who will wand the pupil. We will always try to accommodate a pupil's request of a same-sex member or in exceptional circumstances, if there is a risk of serious harm to a person if the search is not carried out straight away, a pupil may be searched by a person of the opposite sex and without another colleague present.

WORKING WITH PUPILS' FAMILIES

PUPILS' INFORMATION

We recognise the importance of keeping up-to-date and accurate information about pupils. We will regularly ask all families to provide us with the following information and to notify us of any changes that occur:

- Names and contact details of persons with whom the pupil normally lives
- Names and contact details of all persons with parental responsibility
- Emergency contact details
- Details of any persons authorised to collect the pupil from school (if different from above)
- Any relevant court orders in place including those which affect any person's access to the pupil (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- Name and contact detail of the pupil's general practitioner
- Any other factors which may impact on the safety and welfare of the pupil

TRANSFER OF CHILD PROTECTION FILES AND SAFEGUARDING INFORMATION

- If a pupil moves to a new education setting, before the end of year 11, the relevant DSL will ensure that child protection and safeguarding information is transferred securely via Royal Mail's recorded delivery service, promptly and in accordance with statutory guidance, including Keeping children safe in education (KCSIE)
- Child protection files will be transferred separately from the pupil's main educational record and will be sent securely to the receiving school. The transfer will take place as soon as possible, with confirmation of receipt obtained. For in-year transfers, this will be completed within five school days, where practicable (e.g. where the placing local authority has provided confirmation of the pupil's next destination)
- The relevant DSL will ensure that relevant safeguarding information is shared with the receiving school to support the child's safety and wellbeing. This will include details of current safeguarding concerns, significant historical concerns where they remain relevant, ongoing support or intervention, and any information that may indicate a risk to the child or to others

- Where there are significant safeguarding concerns, including concerns relating to harmful behaviour, serious incidents, violence, exploitation, or behaviours that may present a risk to other pupils or members of the school community, the relevant DSL will ensure that appropriate information is shared directly with the DSL at the receiving school. This may include a direct conversation to provide context, clarify risks and ensure continuity of safeguarding support
- Information shared during the transfer process will be proportionate, relevant and shared on a need-to-know basis. The relevant DSL will ensure that safeguarding information is appropriately contextualised and used to support effective safeguarding arrangements, rather than to unfairly label or disadvantage a pupil
- The receiving school will be asked to ensure that transferred safeguarding information is reviewed by appropriate safeguarding colleagues and that relevant colleagues are made aware of any necessary actions, support arrangements or risk management measures
- All sharing of safeguarding information will comply with data protection legislation and safeguarding duties, recognising that protecting children from harm is the primary consideration.

CONFIDENTIALITY

Information about pupils given to us by the pupils themselves, their parents or carers, or by other agencies will remain confidential. Colleagues will be given relevant information only on a 'need to know' basis in order to support the pupil if that is necessary and appropriate. We are, however, under a duty to share any information which is of a child protection nature. We understand that this is in the best interests of the pupil and overrides any other duties we have regarding confidentiality and information sharing. We have a duty to keep any records which relate to child protection work undertaken by us or our partner agencies and to ensure that these are kept apart from the main pupil record, stored securely and only accessible to key colleagues. We also have a duty to send copies of these records to any school to which the pupil transfers.

REFERRALS TO OTHER AGENCIES

We will always seek to gain consent for referrals where possible. However, if we have good reason to be concerned about the welfare of a pupil, colleagues will share information without consent if such sharing of information will enhance the safeguarding of a pupil in a timely manner, or if gaining consent would place the pupil at risk.

SAFER RECRUITMENT AND VETTING PROCEDURES

SAFER RECRUITMENT

Octavia House Schools does not use agency, supply or cover staff. We do not facilitate work placements, work experience or deploy any form of temporary worker. Should the school engage agency or supply staff in future, Octavia House Schools will obtain written confirmation from the supply agency that all required checks have been completed in accordance with KCSIE.

PREPARATION

We will always consider the vacancy that has arisen within the context of safeguarding pupils and ensure that we include the responsibility to safeguard children within the requirements of the role. We always consider carefully the knowledge, skills and experience required to safeguard pupils and include these within a person specification.

ADVERTISING

All vacancies that are open to external applicants are advertised on our website. When using the services of a third-party advertising site/agency, we endeavour to advertise our vacancies in a manner that is likely to attract a wide range of applicants (e.g. on a nationally recognised website, such as TES Jobs). The advertisement will always include a statement about our commitment to safeguarding children and our expectation that all applicants will share that commitment. The advertisement will state that the post is subject to all relevant statutory vetting checks.

APPLICATIONS

Through whichever route an employee joins us, they *must* complete an application form in full. Our application form enables us to gather information about a candidate's suitability to work with children by asking specific and direct questions. We scrutinise all completed application forms and do not accept CVs alone. The candidates indicate that they understand that they will be subject to vetting checks, including a barred list check, an enhanced DBS check (if in regulated activity), the prohibition from teaching check and, if appropriate, the s128 prohibition from management check.

The recruitment process for leadership roles follows the typical structure; once a pre-determined closing date has passed, leaders shortlist candidates on the basis of the application forms submitted and invite successful applicants to attend interviews. Non-leadership vacancies, however, are far more frequent and usually recruited for within a shorter time-frame; as a result, it is not practical to adhere to the same recruitment protocol. For teaching, therapy and administration roles, therefore, candidates are invited to an initial meeting with the relevant leader on the strength of their CV, as and when we receive them. After a successful initial meeting, a

candidate will be invited to complete an application form before attending a trial day, followed by a formal interview. Candidates will also be asked to complete a self-disclosure form which they are to bring in a sealed envelope. Self-disclosure information is considered alongside, but does not replace, DBS checks.

INTERVIEWS

- We always conduct a face-to-face interview.
- Our interview panel always includes at least two colleagues, from the leadership team and People Team, and all interviewers are safer recruitment trained.
- Interview questions will seek to ensure that we understand the candidate's values and beliefs that relate to children.
- All candidates will be asked to bring original documents, which confirm their identity, qualifications, right to work in the UK and any overseas checks.
- An interview pack which consists of a set of general interview questions (including on safeguarding), interviewers' grades and the decision to appoint/not to appoint, is kept in the employee's personnel file.
- We complete an online search on all shortlisted candidates, about which candidates are informed at the application stage. Any concerns arising from an online search will be addressed and documented at interview.

SELECTION

The interview panel will consider all the evidence gathered before making its choice, whereupon a verbal offer of the post will be made to the successful candidate. On acceptance of the post, candidates are given a formal offer letter which states that their appointment is subject to receipt of two satisfactory professional references, the completion and return of all relevant paperwork and successful completion of all the relevant statutory vetting checks. Unsuccessful candidates are informed of the outcome of their application and feedback is available upon request.

REFERENCES

- We do not accept open references, letters of recommendation or testimonials.
- We always take up at least two references, which must be signed off by the People Team before employment commences. It is our strong preference that references are received prior to the interview and completed on our own form; where this is not possible, a reference will only be accepted if key areas, including competency and history of safeguarding concerns and disciplinary action, are satisfactorily addressed.

- Our reference form includes questions specifically intended to reveal safeguarding concerns, such as enquiring about the candidate's previous competency when working with children, asking if the candidate was ever subject to disciplinary action and if the referee knows of any reason why the candidate is not suitable to be working with children.
- We verbally verify all successful candidates' references. Verification checks are also carried out whenever a referee is deemed to have given insufficient, ambiguous or concerning information, or if the reference is returned from an email address that is not recognisably professional or that does not obviously belong to the person/organisation to whom the original reference request was sent. Such checks can include confirming the identity of the referee by phone, as well as the validity of the reference they have submitted, and might also take the form of online 'investigation' into the person and company behind the reference.
- We verify previous employment history, where necessary.

VETTING CHECKS RECORDED ON OUR SINGLE CENTRAL REGISTER

- We arrange for an enhanced DBS check to be processed for all new colleagues, unless they are able to evidence an original DBS certificate that is subscribed to the DBS update service and which we can gain consent to complete a DBS update status check to confirm it remains current and accurate. All colleagues for whom we arrange to have a DBS check processed are required to subscribe to the DBS update service. We gain consent from all colleagues to re-check the status of their DBS at any time; typically, this is carried out annually – although we are aware that this is not necessary.
- All colleagues engaging in regulated activity relating to pupils require an Enhanced DBS check with children's barred list information.
- Under Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), regulated activity regarding children involves either paid or unpaid work that includes teaching, training, instructing, caring for, supervising, driving a vehicle solely for children, or offering advice on their physical, emotional, or educational well-being, as well as any other paid work in specified establishments like schools and colleges that allows contact with children.
- To qualify as regulated activity, work in these categories must be performed frequently (more than 3 days in a 30-day period) or overnight; however, relevant personal care (such as assisting with eating, drinking, toileting, washing, bathing, or dressing due to age, illness, or disability) and healthcare delivered or supervised by a regulated health professional are always considered regulated activities regardless of frequency.

- Conversely, occasional and temporary paid work at specified places that does not involve direct teaching, care, supervision, or guidance is not classed as regulated activity.
- A DBS check and a barred list check is always undertaken *before* colleagues commence their duties at Octavia House Schools.
- All members of the Quality & Standards Committee are subject to an Enhanced DBS check; a barred list check is not carried out as they are not in regulated activity.
- If a candidate declares at the interview stage that their DBS certificate will or might not be clear (particularly if it includes any relevant unspent convictions, adult cautions or other matters which may affect their suitability to work with children), the People Team, Director of Safeguarding and Headteacher will assess whether or not the disclosure should preclude the candidate from working at Octavia House Schools. If the candidate's application is allowed to proceed, the People Team will complete a risk assessment for the individual, which will be kept securely and confidentially in their employee file.
- If a candidate fails to declare at the interview stage that their DBS certificate will or might not be clear, and this proves to be the case, the candidate will not be appointed as a colleague.
- We verify, where necessary, that the successful applicant has all the academic or work-related qualifications claimed and request the original academic & professional qualifications and certificates, including proof of qualified teacher status (QTS); we do not accept photocopies.
- We verify the successful candidate's identity and right to work in the UK; again, only original documents are accepted. We try to adhere to best practice by checking an individual's name on their birth certificate, where this is available.
- We verify that the candidate has the health and physical capacity for the job using a standard medical questionnaire. This form is completed *after* the interview process, so does not affect the appointment decision. It is, however, possible that a medical condition or health complaint could prevent an otherwise successful candidate from being able to meet the requirements of our conditional offer of employment. This will only apply if the health issue/concern renders the candidate unable to fulfil the requirements of the role, as laid out in the job description.
- Any candidate who has lived or worked in a foreign country (anywhere outside of the United Kingdom) for three months or more, during the past ten years, will be required to undertake overseas checks (confirming no criminal convictions or cautions and/or their good conduct whilst resident there). The nature, accessibility and speed of these checks may vary from country to country, but no candidate will be able to commence employment at an Octavia House School

until these checks are evidenced (in writing on their personnel file) as underway. Further checks will be carried out as the schools deem appropriate.

- All colleagues who have been appointed to carry out teaching work or who will have regular access to pupils in classrooms will have a 'prohibition from teaching' check undertaken before they can commence employment.
- A Section 128 'prohibition from the management of independent schools' check is carried out on all leaders (including Assistant Heads of School and 'leads'), quality & standards committee members and proprietor body members.

AFTER APPOINTMENT

The successful candidate will be given a formal offer letter and issued with a contract in due course.

All offers of employment are dependent on the satisfactory completion and return/clearance of all requested forms and checks. The school may withdraw an offer of employment or terminate employment immediately if the colleague does not provide complete, accurate and consistent information on the application and self-disclosure forms.

- Newly appointed colleagues are issued with a copy of the OHS Handbook and shown where to find our key policies; they must sign to confirm they have read and understood these documents
- All new colleagues complete an onboarding process with their People Manager and a safeguarding induction with the appropriate DSL which includes reading 'Keeping children safe in education' (KCSIE) (September 2026), before they start working with pupils. The safeguarding induction covers who key colleagues are – Director of Safeguarding, DSL/DDSLs, how to report a concern and key policies and procedures including whistleblowing, online safety and managing child on child abuse (including harassment and violence).
- All colleagues have access to KCSIE on our website and must read it and sign to say they have done so. Similarly, colleagues must sign to declare that they have received a safeguarding induction, have read, understood and agree to adhere to our policies and procedures and have sought clarity on anything that remains unclear to them. This is recorded on the learning and development tracker and retained in the employee's file.
- We will refer to the Disclosure & Barring Service any person whose checks reveal that they have sought work when barred from working with children.

VOLUNTEERS

Whilst voluntary work in Octavia House Schools is rare, we occasionally welcome volunteers who provide canine-assisted therapy or other therapeutic activities.

Before a volunteer starts, Octavia House schools undertakes a written risk assessment to determine the suitability, the nature of their role, the level and frequency of their contact with pupils, and the appropriate pre-appointment checks required.

All volunteers undertaking regulated activity with pupils must have an enhanced Disclosure and Barring Service (DBS) check, including children's barred list information, before commencing regulated activity. Volunteers will not be permitted to undertake regulated activity until the required checks have been completed.

Octavia House Schools will determine the appropriate checks for volunteers whose roles do not constitute regulated activity, in accordance with current DBS eligibility requirements and the outcome of the risk assessment. The level of DBS check required will depend on the volunteer's duties and the applicable eligibility criteria.

The required information for volunteers undertaking regulated activity will be recorded on the Single Central Record (SCR), in accordance with KCSIE. Other relevant recruitment and safeguarding records will be maintained as appropriate.

CONTRACTORS

Octavia House Schools may use, or third parties may employ, contractors to undertake building work, routine maintenance and/or emergency repairs, including inspections of school premises. This may also include cleaning services or consultants such as a career guidance practitioner or an IT technician. Depending on the work that they undertake a decision about the checks required is made by the OHS Leadership Team.

Any contractor who visits the school premises for a one – off maintenance service will be treated as a visitor and always be accompanied while on site, therefore we will not record them on our SCR. Visitors are required to sign in and out, as well as wear a school visitor lanyard whilst on the school premises.

For those contractors who have no contact with pupils but have regular access to school premises - outside of school hours, such as the cleaners, a third-party organisation will undertake the required vetting checks and will share these details with us as part of our verification process. These details will be on the schools' SCR and Octavia House Schools will obtain a letter of assurance from the organisation who employs the individuals to state that they have carried out the required vetting checks and that there are no concerns about the individual's suitability.

Where contractors have access to pupils e.g. yoga teacher, Octavia House Schools will ensure the contractor is on our SCR with the required checks undertaken. A previous DBS certificate will be accepted if the individual is on the update service and they are able to produce the original certificate. Otherwise, a new DBS will be applied for.

SUPERVISION OF COLLEAGUES AND THE MANAGEMENT OF ALLEGATIONS OF ABUSE AGAINST COLLEAGUES, INCLUDING 'LOW-LEVEL' CONCERNS

We will always supervise school colleagues and act on any concerns that relate to the safeguarding of pupils. All our schools are covered by CCTV throughout and colleagues are closely monitored at all times, within reason. Further information can be found in our CCTV policy.

Our procedures for managing allegations of abuse against colleagues, including unqualified (trainee) teachers and volunteers, are simple and clear, and apply to allegations against both pupils and other adults – the quick resolution of any allegation is an absolute priority. Put simply, allegations made should be reported straight away, as per the table below. The school must then involve the Local Authority Designated Officer (LADO) if the allegations meet the harm threshold and require investigation.

In response to an allegation, suspending the colleague is not the default response, unless there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded by the relevant senior leader and the individual notified of the reasons. This decision must be discussed with the Headteacher, Director of Safeguarding and Director of People and Culture.

Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious will not be referred to in employer references. Pupils who have made malicious allegations are likely to have breached the schools' behaviour policy and will receive an appropriate sanction in line with the school's behaviour policy.

Allegations may indicate that someone 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 and/or behaves in a manner that discriminates against a child on the basis of one or more of their protected characteristics.

Allegations of abuse against other adults will also fall under this procedure.

The procedures for dealing with allegations should be applied with common sense. However, it is important that even 'low-level' concerns that appear less serious are always shared with the Headteacher, recorded and followed up appropriately.

A low-level concern is any concern—no matter how small—that an adult working in our school may have behaved in a way that is inconsistent with the colleague code of conduct but does not meet the harm threshold for referral to the Local Authority

Designated Officer (LADO). These concerns will still be recorded and will be considered because patterns of behaviour can emerge over time.

We encourage a culture of openness and transparency so colleagues know they can talk about anything that may be concerning them, even if deemed 'low level'.

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

- humiliating, intimidating and shaming pupils through language or behaviour
- being overly friendly with pupils
- displaying inappropriate behaviour, which could include having 'favourites'
- taking photographs of pupils on a personal device
- engaging with a pupil on a one-to-one basis in a secluded area or outside of school without good reason
- giving a pupil a lift in a personal car or accompanying a pupil off site without prior authorisation
- communicating with pupils through personal social media or messaging apps
- sharing personal information or discussing inappropriate personal topics with pupils
- using unprofessional, offensive, or sexualised language
- ignoring school safeguarding procedures, such as failing to report concerns promptly
- frequently seeking unnecessary physical contact or invading a pupil's personal space
- repeatedly arranging to be alone with a particular pupil when it isn't necessary
- behaving outside work in a way that could call professional judgement into question if it affects suitability to work with children.

Whilst the above behaviours can be seen to be on a wide spectrum, it is important to consider whether they are a result of absent-minded actions or behaviour that may look to be inappropriate but has a reasonable explanation, through to that which is ultimately intended to be abusive.

Low-level concerns may arise in a number of ways and leaders may be alerted to them via various means, including: suspicion; complaint; disclosures; or a result of undertaking vetting checks. It can also include self-referral; colleagues can report an incident that they may feel concerned about or feel may be perceived differently to how they were intended.

Any allegation or low-level concern will be logged on our online safeguarding portal, Confide.

At Octavia House Schools, the Headteacher is the ultimate decision-maker in respect of low-level concerns, however decisions are always made in collaboration with the Director of Safeguarding and Director of People and Culture.

Our procedure is as follows.

1. The recipient of an allegation must report it to the Headteacher as soon as possible as per the table below, and never try to investigate it themselves (report to the Director of Safeguarding is not available)
2. A record of the report must be made by the Headteacher (depending on point 1) on Confide, which will note the date and time. The Headteacher, Director of Safeguarding and People Team will meet to decide who will investigate – it may be delegated to an appropriate member of the extended leadership team
3. If the allegation is serious and credible and alleges that a colleague has a) behaved in a way that has harmed or may have harmed a child, b) possibly committed a criminal offence against or related to a child, or c) behaved towards a child/ren in a way that indicates he/she may pose a risk of harm to children d) behaved or may have behaved in a way that indicates he/she may not be suitable to work with children (for example, if there is an incident outside of school which did not involve children but could have an impact on their suitability to work with children e.g. an incident of domestic abuse), or e) behaved in a manner that discriminates against a child on the basis of one or more of their protected characteristics, the Headteacher or Director of Safeguarding will inform the Local Authority Designated Officer (LADO) on the same day
4. If unsure, call the LADO in any case to request a consultation in order to discuss the allegation
5. Such consultation in point 3/4 will enable the LADO and the school leader to consider the nature, content and context of the allegation and agree a course of action
6. If this leads to a decision that no further action is to be taken this decision and the reasons for it should be recorded by both the schools' senior leader and the LADO. Both should then consider the action that should follow in respect of that individual and also the person (or persons) who made the allegation
7. If it is decided that the allegation warrants further action the school and the LADO will work together in order to take this forward
8. The relevant leader will inform the colleague about the allegation(s) made against them as soon as possible, this will be after consulting the LADO about whether this is appropriate at this stage and what information can be given to the person
9. Consideration must be given as to whether it is necessary to remove the colleague subject to the allegations from contact with pupils at the schools, pending investigations and procedures arising from the allegations. Suspension should not be automatic, but should be considered if:

- a. there is cause to suspect a child is at risk of significant harm,
 - b. the allegations warrant investigation by the police, or
 - c. the allegations are so serious that it might provide grounds for dismissal
- 10. Any decision to suspend is likely to be taken after consultation with the LADO. It will take into account the safety of the pupil or pupils involved and the impact on any investigation
- 11. Where it has been deemed appropriate to suspend a colleague, written confirmation should be dispatched within 24 hours, giving the reasons for the suspension. The person will be informed of their named contact within the organisation, who will also act as their wellbeing contact
- 12. The subject of the allegations (whether suspended or not) shall be:
 - a. advised to contact her/his trade union or professional association,
 - b. treated fairly and honestly and helped to understand the concerns expressed, processes involved and possible outcomes,
 - c. kept informed of the progress of the case and of the investigation,
 - d. clearly informed of the outcome of any investigation and the implications for disciplinary or related processes and
 - e. provided with suitable support as appropriate
- 13. The relevant leader shall be responsible for continuing liaison with Lambeth/Essex LADOs and all communication between the schools and other agencies that may be involved in processes following an allegation will be logged on Confide
- 14. Confidentiality is essential and information about an allegation must be restricted to those who have a need to know (likely to include the individual's People Manager, the Headteacher, DSL, Director of Safeguarding and the People Team in order to manage risk and offer support) in order to:
 - a. protect pupils,
 - b. facilitate enquiries,
 - c. avoid victimisation,
 - d. safeguard the rights of the person about whom the allegation has been made and others who might be affected and
 - e. manage disciplinary/complaints aspects

SUMMARY TABLE OF WHO WILL INVESTIGATE ALLEGATIONS

Allegation about...	Who to report to...
----------------------------	----------------------------

Any colleague (s) (in schools and/or in the Head Office), excluding members of the OHS Leadership Team – see below.	Headteacher London – Elysia Agius eagius@ohs.uk Essex – Ashley Witherington awitherington@ohs.uk
A member of the OHS Leadership Team – see below.	Will Goodwin CEO wgoodwin@ohs.uk
The CEO or a member of the proprietor body and/or a member of the OHS Board	Local Authority Designated Officer (LADO) (as listed on page 2)
Members of the OHS Leadership Team: Alex Ward, Ashley Witherington, Elysia Agius, Emily Rattenbury-Barlow, Hero Slinn, Joanne Evans, Juliet Harris, Kief Ho & Rui Loureiro.	

Please also see our Whistleblowing Policy and Disciplinary, Conduct, Performance Improvement and Grievance Policy and Procedures, which outline the procedures in more detail.

OUR DUTY TO REFER TO EXTERNAL AGENCIES, INCLUDING THE DISCLOSURE & BARRING SERVICE (DBS) AND THE TEACHING REGULATION AGENCY (TRA)

We have a legal duty to refer a person who is deemed unsuitable to work with children to the DBS. Specifically, we refer to the DBS any colleague who:

- has harmed, or poses a risk of harm, to a child
- has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence
- is dismissed or receives disciplinary action because of misconduct relating to a child
- leaves their employment during an investigation related to misconduct relating to a child.

The DBS will then consider whether to bar the person. Referrals will be made as soon as possible after the resignation or removal of the individual.

If the colleague concerned is a teacher, as per our disciplinary procedures a referral will also be made to the TRA if their conduct raises concerns that may result in a prohibition order.

SAFE PRACTICE

We ensure that all colleagues are clear about the expectations we have of their behaviour towards all pupils and that any incident that falls below our expected standards will be dealt with appropriately, as per our Discipline, Conduct, Capability and Grievance Procedures.

All colleagues are Team Teach trained (see our Team Teach physical intervention policy) and receive very regular training on working with our pupils who have complex social, emotional & mental health difficulties.

CHILDCARE DISQUALIFICATION

Octavia House Schools is fully aware of the legislation relating to childcare disqualification which can be (for example) for inclusion on the Children's Barred List, being cautioned for specific offences against children/adults, grounds related to the care of children, having childcare/children's home registration refused or cancelled and/or for being disqualified from private fostering. However, as we do not offer childcare provision and no employees at Octavia House Schools undertake childcare in their roles, it is unlawful for us to ask employees about childcare disqualification.

QUALITY AND STANDARDS COMMITTEE - MONITORING & REVIEWING POLICY & PRACTICE

The Education (Independent School Standards) Regulations apply a duty to proprietors of independent schools to ensure that arrangements are made to safeguard and promote the welfare of children.

Octavia House Schools uses an advisory body (quality & standards committee) consisting of industry experts to help us externally monitor different facets of the schools, providing the proprietor body and the leadership team with feedback regularly. The proprietor body ensures that they comply with their duties under legislation and fulfil their duty to remedy any weaknesses that are identified.

A Section 128 'prohibition from the management of independent schools' check is carried out on anyone who joins either body.

Duties and responsibilities include ensuring that:

- Policies and procedures are effective and comply with the law.
- High-quality training is provided to all colleagues, at all levels. This includes induction training, annual whole school safeguarding training, and regular safeguarding training throughout the year.
- All colleagues have read and understood the child protection and safeguarding policy, code of conduct policy, and part one of the latest 'Keeping children safe in education' statutory guidance.
- Members of the Leadership Team have been appointed to the role of Director of Safeguarding and DSLs. DSLs have overall responsibility for safeguarding and child protection across the sites, with deputy designated safeguarding leads in place at each of the school sites. The Quality & Standards Committee is responsible for monitoring the Director of Safeguarding and DSLs and holding them to account.
- The Director of Safeguarding continually monitors our child protection and safeguarding practices and brings to the notice of the Quality & Standards Committee any weaknesses or deficiencies at the termly Quality & Standards Committee meetings, via an oral report which is minuted.
- The Director of Safeguarding and DSLs have a termly meeting with the Quality and Standards Committee member with responsibility for safeguarding, who is responsible for ensuring effective safeguarding practices and compliance with the relevant Independent School Standards, including in relation to online safety and the effectiveness of the schools' filtering and monitoring systems, making sure that the '[Filtering and monitoring standards for schools and colleges](#)' guidance is met in full. Checks and visits are sometimes unannounced.
- The school contributes to multi-agency working in line with statutory guidance 'Working Together to Safeguard Children', working very closely with external agencies such as social care services, the police and health services to promote the welfare of pupils, and to protect them from harm.
- Strong relationships are built with families, and appropriate support put in place.
- The proprietor and members of the Quality & Standards Committee ensure that appropriate filters and monitoring systems are in place, across all of the schools' sites, to ensure that pupils are safeguarded from potentially harmful and inappropriate material, including AI-related online safety risks. Their effectiveness is regularly reviewed, at least annually, in collaboration with the schools' IT consultants, Quality and Standards Committee member with responsibility for safeguarding, Director of Safeguarding and DSL (who takes lead responsibility for filtering and monitoring). These reviews thoroughly consider whether the current filtering and monitoring systems are meeting the

needs of the schools and whether any action is required, including if there are any emerging threats.

- The proprietor and the Quality & Standards Committee ensure that pupils are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- The proprietor and the Quality & Standards Committee are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 and their local multi-agency safeguarding arrangements.
- The proprietor and the Quality & Standards Committee utilise the experiences of colleague team when shaping safeguarding policies and provide regular opportunities for colleagues to contribute to and shape the schools' safeguarding arrangements and policy.

APPENDIX 1

INFORMATION & GUIDANCE FOR COLLEAGUES

Below is a set of guidelines that colleagues take on board when dealing with individual/small groups of pupils.

It is important to be mindful at all times of your behaviour in relationship to individual/small groups of pupils and of the potential risk of an allegation.

Colleagues take necessary precautions in order to minimise the opportunity for an allegation to be made against them. This is generally about exercising common sense, but all colleagues specifically take note of the following:

- even though all classrooms and therapy rooms at OHS are covered by CCTV, whenever possible try not to be alone in a room with a pupil, regardless of gender. If you are on your own with a pupil, leave the door open and inform a colleague if possible. Always keep an appropriate distance between you and the pupil
- do not engage in conversations about your personal life with pupils
- keep boundaries very clear between you and pupils, *particularly* if the conversation involves relationships, emotions, and sexual content
- banter is never acceptable behaviour; colleagues are in a position of trust and should maintain professional boundaries at all times
- never exchange mobile phone numbers with pupils. If possible, do not have your mobile phone out when dealing with an individual pupil, on and off site

- do not accept current or former pupils (or their family members) as 'friends' or links on social networking websites or mobile phone apps
- if a pupil wishes to disclose personal information to you, ensure that they understand that you cannot guarantee confidentiality. Do not probe them about their personal life unless they approach you. Avoid giving advice to pupils about their relationships.

APPENDIX 2

DEFINITIONS AND CATEGORIES OF CHILD ABUSE

All children have fundamental needs that should be met to support their health, safety, wellbeing and development. These include:

- Appropriate physical care, protection and supervision
- Love, affection, security and emotional warmth
- Opportunities for learning, play and positive stimulation
- Consistent, age-appropriate boundaries and guidance
- Support to develop confidence, independence, resilience and self-esteem
- Access to education, healthcare and opportunities to achieve their potential.

Every child has the right to grow up in a safe environment free from abuse, neglect and exploitation.

Safeguarding concerns should always be considered in the context of the individual child.

Colleagues should not attempt to determine whether abuse has occurred but should recognise possible indicators, record concerns accurately and report them promptly to the Designated Safeguarding Lead (DSL).

A Child Protection Plan may be implemented following an Initial Child Protection Conference where it is determined that a child is suffering, or is likely to suffer, significant harm. The categories below provide a framework for understanding the primary forms of abuse, although children may experience more than one type simultaneously.

NEGLECT

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy through maternal substance misuse and may involve a parent or carer failing to:

- Provide adequate food, clothing or suitable shelter
- Protect a child from physical or emotional harm or danger
- Ensure appropriate supervision
- Access necessary medical care or treatment
- Meet a child's emotional needs
- Ensure a child receives an appropriate education.

Possible indicators of neglect

No single sign confirms neglect. Colleagues should consider patterns of concern, including:

- Consistently poor personal hygiene
- Clothing unsuitable for the weather or repeatedly unwashed
- Frequent hunger or persistent tiredness
- Poor attendance or repeated lateness
- Untreated medical or dental conditions
- Delayed physical, emotional or social development
- Frequent accidents or injuries due to inadequate supervision
- Withdrawal, low self-esteem or excessive attention-seeking.

Contributing family circumstances

Although these factors do not in themselves indicate abuse, they may increase vulnerability:

- Parental mental or physical health difficulties.
- Domestic abuse within the household.
- Drug or alcohol misuse.
- Financial hardship or housing instability.
- Social isolation.
- Learning disabilities affecting parenting capacity without appropriate support.

PHYSICAL ABUSE

Physical abuse involves deliberately causing physical harm to a child. It may include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. It may also occur when a parent or carer fabricates or induces illness in a child.

Possible indicators

Indicators should always be considered alongside the child's explanation, developmental stage and the surrounding circumstances.

These may include:

- Injuries that are unexplained or inconsistent with the explanation provided
- Bruises, burns, bite marks or fractures that appear unusual in location or pattern
- Multiple injuries at different stages of healing
- Frequent injuries or repeated attendance for medical treatment
- Reluctance to change clothes for physical education where there is no reasonable explanation
- Flinching, fear of physical contact or extreme watchfulness
- Delays in seeking medical attention for significant injuries
- A child or parent providing inconsistent or changing explanations.

Colleagues should never assume that an injury is accidental or non-accidental without appropriate assessment by the DSL and the pupil's wider professional network.

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities. The activities may or may not involve physical contact and the child may not fully understand what is happening.

Sexual abuse includes:

- Sexual assault or rape
- Penetrative and non-penetrative sexual activity
- Touching over or under clothing
- Causing or encouraging a child to engage in sexual activity
- Grooming for sexual purposes
- Child sexual exploitation
- Online sexual abuse
- Producing, possessing or sharing indecent images of children
- Exposing children to sexual acts or sexual material

Abuse may be perpetrated by adults or by other children.

Possible indicators

Possible indicators include:

- Age-inappropriate sexualised behaviour or language
- Sudden changes in behaviour, mood or emotional wellbeing
- Anxiety, depression or self-harm
- Withdrawal from friends or activities
- Reluctance to be with a particular individual
- Running away or going missing
- Changes in school attendance or performance
- Pregnancy or sexually transmitted infections
- Persistent physical symptoms without an obvious medical explanation
- Avoidance of changing for PE or medical examinations

None of these indicators alone is sufficient to confirm sexual abuse.

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child that causes severe and persistent adverse effects on the child's emotional development.

It may involve:

- Conveying to a child that they are worthless, unloved or inadequate
- Imposing age or developmentally inappropriate expectations
- Preventing a child from expressing their views
- Silencing or ridiculing a child
- Serious bullying, including online bullying
- Causing a child frequently to feel frightened or in danger
- Exploiting or corrupting a child
- Persistent rejection, humiliation or scapegoating

Emotional abuse is present to some degree in all forms of abuse but may also occur on its own.

Possible indicators

Indicators may include:

- Low self-esteem or lack of confidence
- Excessive withdrawal or isolation
- Extreme compliance or excessive need to please
- Anxiety or excessive fearfulness
- Developmental delay without medical explanation
- Difficulties forming relationships
- Persistent sadness or low mood
- Self-harm or suicidal thoughts
- Significant changes in behaviour or emotional regulation.

Important Considerations

Colleagues should remember that:

- Abuse rarely presents with a single sign or symptom
- Children may experience more than one form of abuse simultaneously
- The presence of risk factors does not necessarily mean abuse has occurred
- Concerns should always be viewed in the context of the child's overall circumstances
- Colleagues should never investigate concerns themselves or question a child in detail beyond obtaining sufficient information to establish that a safeguarding concern exists
- Any concern about a child's welfare must be reported immediately to the DSL or, if the concern involves the DSL, to the Headteacher.