

# MY OASIS

Therapeutic Alternative Provision

## Safeguarding & Child Protection Policy 2025/2026

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## Key Contacts

Table of identified persons with specific lead responsibilities in relation to Safeguarding and other key agencies

Role	Name	Telephone	Email
Designated Safeguarding Lead (DSL)	Charlotte Lowe	07734650850	<a href="mailto:info@charlottelowepsychologicalservices.co.uk">info@charlottelowepsychologicalservices.co.uk</a>
Headteacher	Charlotte Lowe	07734650850	<a href="mailto:info@charlottelowepsychologicalservices.co.uk">info@charlottelowepsychologicalservices.co.uk</a>
Deputy DSL	Julia Zielonacka	07703226261	<a href="mailto:julia@charlottelowepsychologicalservices.co.uk">julia@charlottelowepsychologicalservices.co.uk</a>
Chair of Governors	James McDonald	07540883312	<a href="mailto:jamesmcd@me.com">jamesmcd@me.com</a>

## DRAFT FORM

Children's Social Care Referrals	Duty Team	01941 828300	<a href="mailto:Professional.referrals-for-children@wigan.gov.uk">Professional referrals - for children (wigan.gov.uk)</a>
Early Help Hub	Start Well	01941 486262	<a href="mailto:EHH@wigan.gov.uk">EHH@wigan.gov.uk</a>
LADO			
If you believe a child or young person is at <b>immediate risk or significant harm or injury</b> , contact the police on: <b>999</b>			
If you wish to speak with any member of the team and are unable to reach them, please call the My Oasis landline on: <b>01257367095</b>			

## Policy Overview

My Oasis recognises our statutory responsibility to safeguard and promote the welfare of all students. We will endeavour to provide a safe and welcoming environment where young people are supported and valued.

Safeguarding is everyone's responsibility. We recognise that our provision is part of a wider safeguarding system and work closely with the Safeguarding Children Partnership and other agencies to promote the welfare of students. We maintain an attitude of 'it could happen here' and will consider the wishes of, and always, what is in the best interests of each young person.

As an Alternative Provision, we acknowledge that commissioning schools retain responsibility for safeguarding of their enrolled pupils (KCSIE). However, we maintain systems to ensure students are protected while with us.

## Policy Aims

This policy aims to:

- Promote safeguarding and child protection and to provide information about how we work to keep students safe.
- Ensure that all staff are aware of and clearly understand their statutory safeguarding responsibilities.
- Provide all members of staff with the information required to meet their safeguarding duty and protect young people from harm.
- Provide stakeholders with clear information relating to the provisions safeguarding and young person protection procedures; and to
- Ensure that we are protecting young people from maltreatment or harm.

## Policy Scope

This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff, volunteers and wider groups working in or on behalf of My Oasis. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to them mentioned unless otherwise stated.

## Definitions

According to the latest version of the *Working Together to Safeguard Children guidance (2023)*, the term "safeguarding and promoting the welfare of children" is specifically defined as the following responsibilities for practitioners and agencies:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that occurs inside or outside the home, this includes online environments
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Promoting the upbringing of children with their birth parents—or with family network/kin where appropriate
- Taking action to enable all children to have the best possible outcomes, in line with the outcomes set out in the Children's Social Care National Framework

Safeguarding and promoting the welfare of children is defined in *Keeping Children Safe in Education (2024)* as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that occurs within or outside the home, including online.

For the purposes of this policy, the term **safeguarding** refers to the full range of activities undertaken by My Oasis to keep young people safe and promote their welfare. This includes, but is not limited to:

- Supporting students' health, safety and well-being, including their mental health.
- Identifying and responding to the needs of students with special educational needs and/or disabilities (SEND).
- The appropriate use of reasonable force where necessary.

- Meeting the needs of students with medical conditions.
- Providing timely and effective first aid.
- Ensuring the safety and suitability of educational visits.
- Supporting students with intimate care needs and promoting emotional well-being.
- Ensuring online safety and addressing associated risks.
- Maintaining robust safeguarding arrangements that reflect the local context and ensure the security of the provision.
- Protecting children from harm, abuse, neglect, exploitation, and other safeguarding concerns.
- Fulfilling child protection responsibilities under statutory guidance.

**Child protection** is part of safeguarding and refers to activities undertaken to prevent young people suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a young person and may involve inflicting harm or failing to act to prevent harm. It can be perpetrated by an adult or adults known or unknown to a young person, or a young person or young people known or unknown to the young person. It can happen in person or online. Where abuse is perpetrated by another young person, it is known as ‘child on child’ or ‘child on child’ abuse. Please see our separate Child on Child Abuse Policy for more detailed information surrounding this.

**Domestic abuse** can be psychological, physical, sexual, financial, or emotional. It can impact on young people through seeing, hearing, or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

**Neglect** is a form of abuse and is the persistent failure to meet a young person’s basic physical and/or psychological needs, likely to result in the serious impairment of the young person’s health or development.

**Child-on-child abuse** refers to the abuse of a young person or young people perpetrated by another young person or young people. Child on child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.

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

**Within this policy:**

- Young people includes everyone under the age of 18.
- 'Parent or guardian' refers to birth parents and other adults in a parenting role for example adoptive parents, stepparents and foster carers.
- 'Staff' or 'members of staff' refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, volunteers and wider group members working in or on behalf of My Oasis.
- Keeping Children Safe in Education may be abbreviated to 'KCSIE'.

## Legislation and Statutory Guidance

This policy is written in accordance with the following legislation and statutory guidance, which underpin the safeguarding and child protection framework at My Oasis Therapeutic Alternative Provision.

**Primary Legislation**

Our safeguarding procedures are compliant with the following legislation:

- Children Act 1989 – Establishes key principles, including the welfare of the child being paramount, and sets out duties for local authorities and courts.



- Children Act 2004 – Introduced a statutory duty for agencies to cooperate in safeguarding and promoting the welfare of children.
- Education Act 2002 – Places duties on education providers to safeguard and promote the welfare of pupils.
- Childcare Act 2006 – Provides duties for early years providers and local authorities to improve outcomes for children.
- Sexual Offences Act 2003 – Defines sexual offences against children, including grooming and exploitation.
- Serious Crime Act 2015 – Amends the law to improve protection for victims of FGM and child cruelty.
- Female Genital Mutilation Act 2003 (as amended) – Criminalises FGM and introduces the mandatory reporting duty.
- Domestic Abuse Act 2021 – Recognises children as victims in their own right and defines abusive behaviours.
- Human Rights Act 1998 – Ensures fundamental rights and freedoms are respected in safeguarding decisions.
- Equality Act 2010 – Provides a legal framework to protect individuals from unfair treatment and promotes a fair and more equal society.
- Data Protection Act 2018 and UK GDPR – Regulates the use and protection of personal data, including sensitive safeguarding information..

### **Statutory Guidance**

This policy is informed by the following guidance:

- Keeping Children Safe in Education (KCSIE), DfE  
Statutory guidance for all schools and educational settings on safeguarding roles, responsibilities, and procedures.
- Working Together to Safeguard Children (2018, updated 2023)  
Statutory guidance for inter-agency working and safeguarding arrangements.
- What to do if you're worried a child is being abused (2015)  
Non-statutory advice to support practitioners in identifying and acting on child abuse and neglect.
- Prevent Duty Guidance for England and Wales (2015, updated 2021)  
Statutory guidance for managing the risk of radicalisation and terrorism in education settings.

- Information Sharing: Advice for Practitioners (2018)  
Non-statutory guidance outlining principles and best practice for sharing information to safeguard children.

### **Local Frameworks**

We follow the procedures set out by:

- Wigan Borough Safeguarding Children Partnership (WBSCP)
- Greater Manchester Safeguarding Children Procedures
- NSCP Protocol for Domestic Abuse – Notifications to Schools
- Local Thresholds of Need and Response Framework

We work closely with the local authority, social care, police, and other relevant agencies to ensure children receive coordinated and timely support.

### **Related Policies and Procedures**

This policy links with a range of other policies which together ensure a consistent and thorough approach to safeguarding across all aspects of our provision:

- Behaviour and Anti-Bullying Policy – Including approaches to child-on-child abuse and restorative practices.
- Child-on-Child Sexual Abuse Policy – Dedicated policy (formerly Appendix A) detailing our response to disclosures, investigation, and support.
- Safer Recruitment and Staffing Policy – Including checks, induction, supervision, and allegations against staff.
- Online Safety Policy – Covering filtering, monitoring, digital safeguarding, and remote learning.
- Health and Safety Policy – Maintaining a safe environment for all students, staff, and visitors.
- Attendance and Children Missing from Education Policy – Monitoring patterns of absence and supporting re-engagement.
- Whistleblowing Policy – Enabling staff to raise concerns about poor safeguarding practice or misconduct.
- Staff Code of Conduct – Outlining expectations around professional boundaries and staff-student relationships.
- Data Protection and Confidentiality Policy – Managing safeguarding records and sensitive data in line with legal duties.
- Complaints Procedure – Ensuring families can raise safeguarding concerns through appropriate channels.

- SEND Policy and Inclusion Framework – Recognising the increased vulnerability of children with SEND or additional needs.
- Use of Reasonable Force and Positive Handling Policy – Aligned with DfE guidance and staff training protocols.
- Preventing Extremism and Radicalisation Protocol – Outlining how we fulfil our Prevent duty.
- Mental Health and Wellbeing Strategy – Supporting children in distress and responding to early signs of harm.
- Equality and Diversity Policy – Promoting safety, dignity, and inclusion for all children and protected characteristics.
- Lone working Policy – Outlines lone working risks, responsibilities, and procedures to minimise those risks.
- Administering Medication Policy – Explains how prescribed and non-prescribed medicines are managed during the school day and on educational trips.
- Educational visits policy.
- Asthma policy – Including Asthma poster.

These documents should be read alongside this policy to fully understand our safeguarding culture and responsibilities.

## Roles and Responsibilities

All staff at My Oasis Therapeutic Alternative Provision play a key role in keeping children safe and promoting their welfare. The following outlines the specific responsibilities of staff at all levels.

### Headteacher

The Provision Lead (or Headteacher-equivalent) holds overall responsibility for operational safeguarding within the setting and will:

- Ensure that all safeguarding policies are implemented effectively across the provision.
- Support and hold the Designated Safeguarding Lead (DSL) to account.
- Ensure all staff are trained and understand their safeguarding responsibilities.
- Lead on serious incidents, allegations against staff, or escalated safeguarding concerns.
- Work closely with the proprietor and local safeguarding partners to ensure compliance and consistency in practice.

### Designated Safeguarding Lead (DSL)

The DSL is the named person with lead responsibility for safeguarding and child protection. They will:

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- Act as the first point of contact for safeguarding concerns or disclosures.
- Make timely referrals to the local authority, police, or other agencies when needed.
- Maintain accurate and secure records of concerns, actions, and outcomes.
- Ensure staff are trained and updated on safeguarding regularly.
- Attend and contribute to multi-agency meetings, including strategy meetings and case conferences.
- Ensure the provision is up to date with statutory guidance, including Keeping Children Safe in Education.
- Lead on Early Help processes and ensure vulnerable students are identified and supported.
- Liaise with parents and carers in line with safeguarding protocols and consent frameworks.

Deputy DSLs are trained to the same standard and will act in the DSL's absence.

## All Staff

All staff and volunteers at My Oasis have a duty to safeguard children. They must:

- Be alert to signs of abuse, neglect, exploitation, or contextual risks.
- Report any safeguarding concerns to the DSL or a Deputy DSL without delay.
- Record concerns factually, clearly, and promptly using the agreed internal systems.
- Understand the safeguarding policy and engage with regular training.
- Maintain professional curiosity and challenge unsafe or inappropriate practice.
- Promote a safe, respectful, and inclusive culture for all children and young people.

All staff will be made aware of our systems and documents that support safeguarding, including this policy, the staff code of conduct, the role and identity of the (DSL) and any deputies, the behaviour policy and the safeguarding response to young people who go missing from education. All staff that work directly with young people will be provided with a copy of, and must read, Part 1 and Annex B of Keeping Young people Safe in Education (September 2022) annually and will receive annually updated training on their safeguarding roles and responsibilities. Staff that do not work directly with young people will be provided with a copy of either Part 1 or Annex A of Keeping Children Safe in Education (2024) and must read this document.

Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and young person protection, there is an expectation that if staff are unclear on any aspects of the provision safeguarding policy or practice, they speak to the DSL without delay, so that additional training can be put in place.

## Procedures

All staff at My Oasis Therapeutic Alternative Provision have a duty to safeguard young people and take appropriate action where there are concerns about a child's welfare. This section sets out the process for reporting, escalating, and managing safeguarding concerns in line with statutory requirements and local procedures.

## Recognising Concerns

Abuse, neglect and safeguarding issues are rarely isolated events and can be complex, overlapping, and long-standing. All staff are trained to recognise the signs of abuse and other safeguarding concerns, including online risks, contextual risks, and peer-on-peer abuse.

Safeguarding concerns may arise from:

- A direct disclosure from the young person
- Observations of unusual behaviour or injury
- Concerns shared by another young person, parent, or member of the public
- Third-party or anonymous referrals
- Online behaviour or digital disclosures

## Anonymous Reporting Tools

To ensure that all young people feel safe and empowered to share concerns, My Oasis provides a range of anonymous reporting mechanisms.

These Include:

- QR codes displayed in key areas of the school, allowing students to submit safeguarding concerns directly and confidentially.
- Reporting boxes placed in accessible locations where written concerns can be submitted anonymously.
- Take-home leaflets that include QR codes, enabling young people or their parents/carers to report concerns from home or off-site.

All anonymous reports are monitored and reviewed by the Designated Safeguarding Lead (DSL) or a Deputy DSL. They are treated with the same seriousness and urgency as direct disclosures or referrals, and appropriate action is taken in line with safeguarding procedures.

## Responding to a Concern

If a member of staff has a concern about a young person's welfare, they must:

- Take any disclosure seriously and listen carefully, without asking leading questions.
- Never promise confidentiality; explain that the information must be passed on to help keep them safe.
- Reassure the young person that they are doing the right thing by speaking up.
- Staff must report the concern without delay to the Designated Safeguarding Lead (DSL) or, in their absence, a Deputy DSL. If the young person is in immediate danger, staff must call emergency services (999) and inform the DSL as soon as possible.

The concern must be recorded factually using our Safeguarding Incident Form or online system, following internal reporting protocols.

## Handling disclosures

The following procedures are in line with statutory guidance (see Section 4) and the Local Safeguarding Children Partnership's Threshold Guidance which can be found in the Referral and Monitoring Guidance document.

If a young person discloses that he or she has been abused in some way, the member of staff/volunteer will:

- Listen to what is being said without displaying shock or disbelief.
- Accept what is being said.
- Allow the young person to talk freely.
- Reassure the young person, but do not make promises which it might not be possible to keep.
- Never promise a young person that they will not tell anyone - as this may ultimately not be in the best interests of the young person.
- Reassure him or her that what has happened is not his or her fault.
- Stress that it was the right thing to tell.
- Listen, only asking questions when necessary to clarify.
- Not criticise the alleged perpetrator.
- Explain what has to be done next and who has to be told.
- Make a written record (see record keeping); and
- Pass the information to the DSL at my oasis or within their mainstream school without delay.

Alternatively, if appropriate, make a referral to young people's social care and/or the police directly and tell the DSL as soon as possible that you have done so.

All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

If a young person is suffering or likely to suffer harm, or in immediate danger If you think that a young person is suffering or at risk of suffering significant harm, you must report this to the DSL immediately. On occasions when the DSL is not available, it should be reported to the deputy safeguarding lead without delay or a senior member of staff.

Where possible, there should be a conversation with the DSL but a referral must be made if a young person may be suffering or at risk of suffering harm. Anyone can make a referral to young people's social care. If anyone other than the DSL makes a referral to young people's social care or to the police, they should inform the DSL as soon as possible. If you have concerns about a young person (as opposed to believing a young person is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, speak to the DSL first to agree a course of action. The DSL will decide on the most appropriate course of action and whether the concerns should be referred to young people's social care, using the threshold guidance. If it is decided to make a referral to young people's social care the parent/ guardian will be informed, unless to do so would place the young person at further risk or undermine the collection of evidence.

All concerns, discussions and decisions will be recorded in writing.

The DSL will provide guidance on the appropriate action. Options will include:

- Managing any support for the young person internally via the provision's own pastoral support processes.
- Seeking advice from the local early help co-ordinator/s
- An Early Help Assessment; or
  - A referral for statutory services where the young person is or might be in need or suffering or likely to suffer significant harm.

## Initial DSL Response

Upon receiving a safeguarding concern, the DSL will:

Review the information and decide whether it meets the threshold for referral.

Seek additional information from staff, the young person, or other agencies if appropriate.

Make a decision about the most appropriate response:

### **No Further Action at This Stage**

The DSL may decide that the concern does not meet the threshold for further action. In this case, the incident will be logged, and the young person will be monitored. Staff may be asked to continue to observe the young person and provide regular updates.

### **Early Help**

If the young person's needs are below the threshold for statutory intervention but still require support, the DSL may initiate an Early Help Assessment in partnership with the family. Early Help can include support from internal pastoral staff, education welfare officers, or external services.

Consent will normally be sought from the parent/carer for Early Help support. However, if consent is refused and the child's needs are likely to escalate without support, the DSL may escalate the concern to Children's Social Care.

### **Referral to Children's Social Care**

If the child is at risk of significant harm or in need of statutory support, the DSL will make a referral to Children's Social Care without delay. Parents will be informed unless doing so places the child at greater risk or compromises an investigation.

## Local Authority Response

When a referral is made, Wigan Children's Social Care will decide within one working day what action to take and will inform the referrer of their decision. This could include:

- No further action
- Provision of services under Section 17 (Child in Need)
- Initiation of a Section 47 enquiry (Child Protection)

Where immediate protection is required, Children's Social Care, the police or the NSPCC may take emergency action to protect the child.



If a young person is referred, My Oasis staff may be asked to contribute to the assessment, attend strategy meetings, or provide written reports.

## Action Following Referral

Following a referral, the DSL will:

- Maintain contact with social care and other involved professionals.
- Monitor the child's situation and record all developments.
- Review the provision's support in light of the referral outcome.
- Escalate concerns if the young person's circumstances do not improve.

Where Children's Social Care decide no further action is necessary, the DSL will consider whether Early Help or in-school support is appropriate.

## Early Help

Early Help is about supporting children and families at the earliest opportunity to prevent issues from escalating.

My Oasis will offer Early Help where the child's needs do not meet the threshold for statutory intervention. The DSL will lead this process, involving the child and family, and other agencies as appropriate.

Early Help support might include:

- Therapeutic interventions within the provision
- Mental health support (e.g. CAMHS referral)
- Parenting programmes
- Family support services
- Educational welfare involvement

All Early Help actions will be recorded, reviewed, and monitored.

## Consent and Information Sharing

Wherever possible, My Oasis will seek the consent of parents or carers before making a referral to an external agency, including for Early Help.

However, consent is not required to make a referral to Children's Social Care when:

- The child is at risk of significant harm
- Seeking consent would increase risk

- It is not feasible to obtain consent in a timely manner

The DSL will make this decision on a case-by-case basis. Where consent is sought and refused, and the DSL believes the child is at risk of harm, a referral will still be made in the child's best interests.

All information will be shared in accordance with:

- Keeping Children Safe in Education (2024)
- Working Together to Safeguard Children (2018, updated 2023)
- Data Protection Act 2018 and UK GDPR

Staff are expected to understand that data protection is not a barrier to sharing safeguarding information. If unsure, staff must consult the DSL.

## Allegations Against Staff or Adults

Where there is a concern that a member of staff, volunteer, or contractor has:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against, or related to, a child
- Behaved in a way that indicates they may not be suitable to work with children

...this must be reported to the DSL immediately. The DSL will refer the concern to the Local Authority Designated Officer (LADO) within one working day.

Where the allegation involves the DSL, the concern must be reported to the Headteacher or Proprietor.

My Oasis follows its Allegations Management policy and Wigan's LADO procedures.

## Recording and Confidentiality

Safeguarding records are maintained securely and separately from the child's academic records.

Records include details of the concern, conversations, decisions made, and actions taken.

Access is restricted to the DSL, Deputy DSLs, and relevant senior staff.

Information will only be shared on a "need to know" basis.

## Escalation and Professional Challenge

If the DSL disagrees with the response or inaction of another agency, they will escalate their concerns using Wigan's Professional Disagreement and Escalation Policy. The welfare of the child remains paramount.

## Training and Support

The provision is committed to continuous professional development and all staff undergo rigorous and ongoing safeguarding training. We strive to ensure that staff fully understand their safeguarding responsibilities, that training promotes a culture of safeguarding and equips staff with the skills to identify any signs of abuse, neglect or harm.

### Staff Training

- All staff members will undertake safeguarding and young person protection training at induction (including online safety and whistle-blowing procedures) to ensure they understand the provision's safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.
- All staff will have training on the government's anti-radicalisation strategy Prevent, to enable them to identify young people at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and young person protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least monthly.
- Volunteers will receive appropriate training, as applicable.
- Teachers will receive training to ensure that they can manage behaviour effectively to ensure a good and safe educational environment, and they should have a clear understanding of the needs of all students.

### DSL and Deputy Training

- The DSL and Deputy DSLs will undertake young person protection and safeguarding training at least every 2 years via the local authority, alongside internal annual refresher training.

- In addition, they will update their knowledge and skills at regular intervals and at least termly (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They will also undertake Prevent awareness training and online safety training.

## Safer Recruitment Training

At least one person conducting any interview for a post at the provision will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, KCSIE, and will be in line with local safeguarding procedures.

## Specific Training

Staff will also receive specific training on the following issues and action will be taken if the provision suspects that a young person is at risk of or is the victim of:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Young person sexual exploration
- Young person criminal exploitation (including involvement in county lines)
- Domestic abuse
- Fabricated or induced illness
- Gangs or youth violence
- Female genital mutilation
- Forced marriage
- Gender-based violence
- Online safety
- Child on child abuse
- Radicalisation
- Relationship abuse
- Serious violence
- Hate
- Sexual violence or sexual harassment
- So-called 'honour-based' abuse
- Faith-based abuse

- Trafficking and modern slavery
- Neglect

All staff will be made aware that safeguarding incidents and/or behaviours can be associated with factors outside the provision and/or can occur between young people outside of these environments. All staff will be expected to consider whether young people are at risk of abuse or exploitation in situations outside their families (extra-familial harm).

Staff will also be made aware of the additional safeguarding vulnerabilities of:

- Young people in the court system
- Young people missing from education
- Young people with family members in prison
- Young people who are homeless
- Young people who have or have had a social worker
- Young people who are young carers
- Young people looked after or previously looked after; and
- Young people with mental health problems.

## Early Help

We recognise that providing Early Help is more effective in promoting the welfare of children than reacting later. Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. It is about supporting children and families to prevent problems escalating or becoming entrenched.

We understand that any professional can provide Early Help and that all staff within the provision are well-placed to identify emerging needs and concerns at an early stage. We are committed to working collaboratively with other professionals, parents and carers, and children themselves to ensure that children and families receive the right support at the right time.

The Designated Safeguarding Lead (DSL) will lead on Early Help processes and work in accordance with the Wigan Safeguarding Partnership's Threshold of Need and Early Help Offer.

Where there is concern about a child's wellbeing that does not meet the threshold for child protection, staff will raise the concern with the DSL or Deputy DSL. The DSL will consider whether the

concern requires an Early Help response and will liaise with the family to gain consent to engage with relevant services and professionals.

Early Help may include support provided within the provision by our team or external support via a coordinated Early Help Assessment and a Team Around the Family (TAF) approach.

Examples of situations where Early Help may be appropriate include (but are not limited to):

- Persistent absence from education
- Difficulties in mental health and emotional wellbeing
- Exposure to or risk of domestic abuse
- Housing instability or financial stressors
- Substance misuse within the family
- Parental mental ill health
- Caring responsibilities as a young carer
- Relationship breakdown within the family
- Behavioural concerns or developmental delays
- Contextual risks (such as exploitation or online vulnerability)
- Children who are from Gypsy, Roma or Traveller backgrounds, refugees, asylum seekers or those from newly arrived migrant families
- Those experiencing discrimination or social exclusion

Children not engaging well with education but not yet reaching a threshold for statutory involvement  
Staff are aware that children and families may be reluctant to seek or accept help, and so must be persistent and sensitive in how concerns are raised and addressed. The DSL will coordinate any Early Help process and ensure that appropriate records are kept, concerns are monitored, and escalation is made where necessary.

Where children and families would benefit from coordinated support from more than one agency (e.g. health, education, housing, police), the DSL will consider a referral into the local Early Help Hub to initiate an Early Help Assessment. My Oasis staff may contribute to or lead Team Around the Family meetings depending on the circumstances and professional involvement.

If Early Help is not effective, or if there is an escalation of concern, the DSL will consider whether the situation now meets the threshold for a referral to Children's Social Care under child protection procedures. This will be done in accordance with the procedures outlined in this policy and in consultation with the child and family wherever safe and appropriate.

Staff are trained to recognise when a child may benefit from Early Help and are encouraged to discuss any concerns with the DSL promptly.

## Referrals

All staff have a statutory duty to act on concerns where a child may be at risk of harm. Any safeguarding concern must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, a Deputy DSL. No member of staff should ever assume that someone else will take action or share information that might be critical to keeping a child safe.

The DSL is responsible for deciding whether a concern meets the threshold for a referral to Children's Social Care or other external safeguarding agencies. Referrals will be made in line with Wigan Safeguarding Partnership procedures, including through the Integrated Front Door (IFD) or equivalent referral pathway.

Where a child is at immediate risk of harm, and the DSL is unavailable, staff must not delay in contacting emergency services (999) or the local authority directly. The child's welfare is paramount and must take priority over all other considerations.

If it is appropriate to refer the case to local authority young people's social care or the police, the DSL will make the referral or support staff to do so. If you make a referral directly you must tell the DSL as soon as possible. Young people's social care assessments should consider where young people are being harmed in contexts outside the home, so the provision will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The local authority will decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome.

The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

The DSL will:

- Make referrals without delay to Children's Social Care where a child is suffering or is at risk of significant harm.

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- Consult with the Local Authority Designated Officer (LADO) where there is an allegation against a member of staff.
- Liaise with the police if a criminal offence is suspected or the child is in immediate danger.
- Follow up any referral where no response has been received to ensure appropriate action has been taken.
- Record all referrals, decisions, and outcomes clearly and accurately, and retain these securely in line with record-keeping protocols.

The DSL will inform parents or carers of any referral being made, unless doing so would:

- Place the child at increased risk of harm;
- Compromise a police investigation; or
- Place others at risk (e.g. siblings or staff members).

In such cases, the decision not to inform parents will be recorded and justified in the safeguarding file.

Staff must always act with professional curiosity and escalate concerns if they feel a child remains at risk. If any staff member believes that appropriate action is not being taken by the DSL or external services, they must follow the escalation procedures outlined in this policy.

Where concerns do not meet the threshold for immediate statutory intervention, the DSL may initiate an Early Help response (see Early Help section of this policy).

If the young person's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the young person's situation improves. The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel/PMAP programme where there is a radicalisation concern. Safeguarding Referrals must be made in one of the following ways:

- By telephone contact to the Multi-Agency Safeguarding Hub (MASH): using the numbers in the 'Key Contacts' section.
- By using the online referral form. Web address located in the Referral and Monitoring Guidance document.
- In an emergency outside office hours, contact young people's social care out of hours team on the out of hours number listed in 'Key Contacts'.



- If a young person is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999.

## Specific Safeguarding Issues

Safeguarding concerns can present in many forms. While abuse and neglect are categorised under physical, emotional, sexual abuse and neglect, My Oasis acknowledges that young people also face a broad range of additional risks that fall under the scope of safeguarding.

Detailed guidance on specific types of abuse - including child sexual exploitation (CSE), child criminal exploitation (CCE), domestic abuse, serious violence, cybercrime, so-called honour-based abuse (including FGM and forced marriage), radicalisation, and online abuse - can be found in Appendix B: Definitions and Categories of Abuse. These remain specific safeguarding issues and are briefly referenced here, but full definitions, indicators and procedural guidance are signposted to the appendix to ensure clarity.

Likewise, our approach to child-on-child abuse, including child-on-child sexual harassment and violence, can be found in Appendix A: Child-on-Child Abuse Policy, which forms part of this document and should be read alongside this section.

In addition to the abuse types detailed in Appendix B, we recognise that some safeguarding issues relate to vulnerability and context rather than a specific form of abuse. These are listed below and require careful consideration and action by staff.

## Students with a Social Worker

Some students have an allocated social worker due to safeguarding or welfare concerns. Their lived experiences including trauma, neglect, family instability or placement in care, can leave them more vulnerable to harm, exploitation, and poor educational outcomes.

The DSL maintains oversight of all students known to have social workers and uses this information to inform safeguarding decisions, identify unmet needs, and plan appropriate support. Where necessary, individual contact plans are maintained to ensure regular communication, particularly in times of disruption (e.g. illness, remote learning, absence from provision). All staff are expected to remain vigilant to safeguarding concerns and ensure this information informs practice and response.

## Children Looked After (CLA) and Previously Looked After Children

CLA and previously CLA students face additional safeguarding vulnerabilities. These may arise due to experiences of loss, attachment difficulties, or exposure to neglect and abuse before or during time in care.

My Oasis has appointed a Designated Teacher for CLA who is responsible for overseeing their educational achievement and working in partnership with the DSL and the Virtual School. Relevant staff will be informed of a student's legal status, care arrangements and contact plan, as well as the name and contact details of their social worker. The DSL will ensure that any safeguarding concerns are managed in line with local protocols, and that students receive consistent, sensitive and effective support.

## Students with Special Educational Needs and Disabilities (SEND)

Students with SEND face additional safeguarding challenges. These may include:

- Communication barriers and difficulty disclosing concerns
- Greater social isolation
- Misinterpretation of indicators of abuse as being part of a disability
- Increased likelihood of being targeted by peers or adults
- Dependency on others for care or supervision

My Oasis ensures that all staff receive training on the additional vulnerabilities faced by students with SEND and provides appropriate therapeutic, academic and safeguarding support. Staff are expected to exercise professional curiosity and take appropriate action if they have concerns, even where behaviour or presentation may be explained by a student's diagnosis.

Further information can be found in the SEND Policy and through the local authority's Local Offer.

## Mental Health

Mental health concerns can be both a symptom of abuse and trauma, and a safeguarding issue in their own right. Staff must remain alert to changes in behaviour, mood, or presentation which may indicate a young person is struggling with their mental health.

Where concerns arise, staff will inform the DSL, who will consider whether the issue meets a safeguarding threshold and coordinate appropriate support. Where the concern does not meet that threshold, the DSL will liaise with parents, carers and therapeutic staff to put appropriate support in place.

Mental health education is embedded within our curriculum, and we work with students and families to raise awareness, reduce stigma and improve access to services. Our therapeutic model enables us to provide many interventions available through CAMHS and our Mental Health and Wellbeing Policy offers further guidance.

## Young People at Greater Risk of Harm

We acknowledge that some young people may be more vulnerable to abuse, exploitation or neglect due to their life experiences, circumstances, or identity. These groups include, but are not limited to:

- Young carers
- Young people with a history of trauma or ACEs
- Young people from Gypsy, Roma, Traveller, asylum-seeking, or migrant backgrounds
- Young people facing family instability, bereavement or imprisonment of a parent
- Young people involved in the youth justice system
- Young people who are homeless or at risk of homelessness

Staff are expected to be aware of these vulnerabilities and to report any safeguarding concerns immediately. The DSL will ensure early identification of risk and coordinate support through Early Help or statutory services where appropriate.

# Safeguarding Young People with Special Educational Needs and Disabilities (SEND)

All staff are expected to respond to concerns about abuse in young people with SEND in the same way as they would for any young person, while being mindful that signs may be less obvious.

This includes:

- Making time to listen carefully and without interruption.
- Avoiding assumptions about the young person's experience based on their disability.
- Clearly recording any disclosures, behavioural changes, or concerns, no matter how small they may seem.

Protecting young people with SEND also involves:

- Knowing each student well to recognise changes in behaviour or wellbeing.
- Working closely with other professionals through multi-agency collaboration.
- Engaging with parents/carers.
- Ensuring all young people are treated equally and not singled out.

Further guidance can be found in the SEND Policy and local authority resources such as the Local Offer.

## Record Keeping

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.

When a young person has made a disclosure, the member of staff/volunteer should:

- Record as soon as possible after the conversation.
- Not destroy the original notes in case they are needed by a court;
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the young person, preferably using the My Oasis safeguarding form;
- Record statements and observations rather than interpretations or assumptions.

All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

The DSL will ensure that all safeguarding records are managed in accordance with the Education (Student Information) (England) Regulations 2005. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.

**Records will include:**

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved; and
- A note of any action taken, decisions reached and the outcome.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with our records retention schedule.

If a young person for whom the provision has, or has had, safeguarding concerns moves to another provision, the DSL will ensure that their young person protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving provision and provide information to enable them to have time to make any necessary preparations to ensure the safety of the young person.

## Safer Working Practice

We work to create and embed a culture of openness, trust and transparency, in which the provision's values and expected behaviour (as set out in the staff code of conduct) are constantly lived, monitored and reinforced by all staff. We expect all staff to always act with professionalism. To reduce the risk of unsafe or harmful practice, all staff should receive training on safer working practice and should be familiar with the guidance contained in the staff handbook. This will:

- Ensure staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others through effective training.
- Empower staff to share any low-level safeguarding concerns.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage; and

- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.

Staff are expected to always adhere to the staff Code of Conduct. In the event of any concerns or allegations, the provision will deal with them promptly, in line with local guidance and KCSIE.

#### **Staff use of mobile phones**

Staff are allowed to bring their personal phones to My Oasis for their own personal use, however this will be limited to times when they are not in contact with students. Staff members' personal phones will remain in their bags or locked filing cabinet during contact time with students. Staff will not take pictures or recordings of students on their personal phones or cameras.

If they do, they must transfer these immediately to an approved device and demonstrate to their manager that the data/images have been deleted. Digital cameras are provided to the provision to prevent personal phones being used as this should be avoided at all costs.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the provision.

## **Safeguarding Concerns and Allegations**

### **Allegations Against the Head of Provision**

If an allegation arises against the Head of Provision, it must be immediately reported to the connecting provision's Designated Safeguarding Lead (DSL). If there is a conflict of interest, or the governance structure means the same individuals oversee the Head of Provision, concerns must be directly escalated to the Local Authority Designated Officer (LADO).

### **Allegations Against Staff Members (including Supply Staff)**

All allegations that may meet the harm threshold will be managed according to Part 4, Section 1 of Keeping Children Safe in Education (KCSIE) and Local Authority Safeguarding Partnership guidance. These allegations include behaviours where staff have:

- Harmed a young person or potentially caused harm.
- Possibly committed a criminal offence involving a young person.

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- Behaved in a manner indicating unsuitability to work with young people.

Such allegations apply to all staff, including permanent, temporary, and supply teachers, volunteers, and any adults working within My Oasis, paid or unpaid, and regardless of employment status.

Concerns must be immediately reported to the Head of Provision and should not be discussed directly with the individual involved.

Upon receiving an allegation, the Head of Provision will assess if it meets the threshold for referral to the Local Authority Designated Officer (LADO), which must occur within 24 hours. If the allegation involves suspected criminal activity or immediate risk to a young person, the police and the Multi-Agency Safeguarding Hub (MASH) will also be informed immediately.

In cases involving supply staff, while My Oasis is not the direct employer, we retain responsibility for addressing any allegations swiftly and appropriately. The Head of Provision will:

- Ensure the LADO is informed within 24 hours.
- Work closely with the supply agency, clearly outlining roles and responsibilities.
- Fully cooperate with any investigations or enquiries initiated by the LADO, police, or social care.
- Take immediate steps to safeguard students, including ceasing use of the supply staff member's services where necessary.
- Maintain accurate and detailed records of allegations, actions taken, and outcomes.

If allegations are substantiated and lead to removal or dismissal (or resignation before dismissal), My Oasis will ensure a referral is made to the Disclosure and Barring Service (DBS) and inform the relevant employment agency immediately.

## Low-Level Concerns

Concerns below the harm threshold ('low-level' concerns) must also be promptly reported. Such concerns involve behaviour:

- Inconsistent with the staff code of conduct (including inappropriate behaviour outside of work).
- Not reaching the threshold of formal allegations requiring referral to the LADO.

Low-level concerns must be reported to the Head of Provision. Reports must detail the nature of the concern, context, identity of the reporter (anonymity respected if requested), and any immediate actions taken.

The Head of Provision will discuss concerns directly with the individual involved and take necessary follow-up actions, including further training, disciplinary actions, or closer supervision. Detailed, secure records of all low-level concerns will be maintained and regularly reviewed for patterns, ensuring a proactive safeguarding culture.

Low-level concern records will be retained for one year post-employment or assignment, ensuring accurate information for future references or disclosures.

## Complaints

### Complaints Against Staff

Complaints against staff that indicate a potential child protection concern or safeguarding issue will be managed strictly in accordance with our established procedures for addressing allegations or low-level concerns, detailed earlier in this policy (see Safeguarding Concerns and Allegations section).

### Other Complaints

All other safeguarding-related complaints or concerns, which do not involve direct allegations against staff, will be managed in line with our Complaints Policy. This policy provides clear processes for raising, investigating, and resolving concerns swiftly and fairly.

## Whistleblowing

My Oasis maintains a robust culture of safeguarding vigilance. Any staff member or volunteer who has concerns about poor, unsafe, or inappropriate practice, or potential failures in safeguarding arrangements, should refer to the Whistleblowing Policy. This policy clearly outlines procedures for confidential reporting and the protections available to whistleblowers.



## Appendices

### Appendix A: Child on Child Abuse

Child-on-child abuse is any form of physical, emotional, sexual or coercive behaviour directed at one young person by another. At My Oasis, we take a zero-tolerance approach to all forms of child-on-child abuse. This policy outlines how we prevent, identify, respond to and support those affected by these incidents.

My Oasis will:

- Create a culture of safety, openness and trust
- Treat all disclosures seriously, without shame or minimisation
- Take action promptly and in line with safeguarding procedures
- Support both the victim and the alleged perpetrator
- Promote protective behaviours through the curriculum
- Embed staff confidence to challenge inappropriate behaviour

#### **Definitions of Child-on-Child Abuse**

- Child-on-child abuse may include, but is not limited to:
- Bullying (including cyberbullying and discriminatory bullying)
- Abuse in intimate relationships between peers
- Physical abuse (e.g. hitting, kicking, biting)
- Sexual violence (rape, assault by penetration, sexual assault)
- Sexual harassment (e.g. comments, jokes, online remarks)
- Coercion into sexual activity
- Consensual or non-consensual sharing of nude/semi-nude images
- Upskirting
- Hazing/initiation rituals involving harassment, abuse or humiliation

Girls are statistically more likely to be victims, and boys more likely to be perpetrators, though this is not exclusive. Abuse may happen face-to-face or online.

#### **Staff Training and Awareness**

All staff:

- Receive training on recognising and responding to child-on-child abuse
- Are made aware of the different forms this abuse can take

- Understand how to report and record concerns
- Know not to downplay behaviour (e.g. "just banter" or "boys being boys")
- Are encouraged to intervene early, even in "low-level" incidents

#### Prevention and Culture

At My Oasis, we:

- Promote a clear, zero-tolerance culture in policies, staff training, and student work
- Use PSHE and wellbeing sessions to teach about respectful relationships, consent, boundaries, and safety
- Run targeted sessions for vulnerable students (e.g. protective behaviours, social skills)
- Provide multiple ways to report concerns (verbal, written, email)

#### Additional Vulnerabilities

Some groups are more vulnerable to child-on-child abuse:

- SEND students
- CLA and previously CLA students
- LGBTQ+ students or those questioning their identity
- Students who have previously experienced trauma or abuse

These students may face extra barriers to disclosure or recognition.

#### **Student Reporting and Voice**

Students can disclose concerns:

- In person to any trusted adult
- In writing
- By email:
  - [charlotte@my-oasis.uk](mailto:charlotte@my-oasis.uk)
  - [julia@my-oasis.uk](mailto:julia@my-oasis.uk)
  - [info@charlottelowepsychochemicalservices.co.uk](mailto:info@charlottelowepsychochemicalservices.co.uk)

Students are reminded that abuse is never their fault, and that they will be believed and supported.

#### Procedures for Responding to Child-on-Child Abuse

When a report is made:

- The DSL is informed immediately
- The report is recorded in writing using the safeguarding form
- A risk and needs assessment is completed promptly

- Decisions are based on the victim's wishes, severity, context, and level of harm
- We may:
  - Refer to social care
  - Contact the police
  - Hold a multi-agency meeting
  - Provide internal pastoral support
  - Involve external services
  - Use behaviour plans or safety agreements

### **Risk and Needs Assessment**

When an allegation involves sexual violence or serious harm:

- A risk assessment is completed by the DSL
- This considers:
  - The victim
  - Alleged perpetrator
  - Any other students affected
  - Staffing needs
  - Use of space and supervision
- Reviewed regularly and updated as needed

### **Supporting Victims of Abuse**

- Students are listened to, believed and supported
- Support is tailored based on their needs and wishes
- Support may include:
  - Therapeutic intervention
  - Mentoring
  - Adjustments to timetable or environment
  - Ongoing safeguarding contact
- Their routine is preserved as far as possible
- They will never be made to feel at fault for what happened

### **Supporting Alleged Perpetrators**

- Alleged perpetrators are also supported, especially if they are themselves vulnerable
- They will receive a suitable education — this may include remote learning or alternative arrangements

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- Behaviour is addressed proportionately
- Risk assessments and behaviour plans are put in place
- If a crime has been committed, the DSL will liaise with the police
- Where appropriate, we refer for early help or social care support

### **Sanctions and Next Steps**

Sanctions are determined on a case-by-case basis, and may include:

- Pastoral interventions
- Behaviour management strategies
- Temporary changes to provision
- Disciplinary actions in line with the Behaviour Policy

### **Whole-School Learning and Review**

Following any incident:

- Records are reviewed to identify patterns
- Policies are updated if needed
- Additional staff training may be scheduled
- Extra student sessions or targeted education may be provided
- Student voice is gathered to improve practice

### **Parental Involvement**

Parents/guardians are:

- Informed unless this puts the young person at further risk
- Encouraged to work with the school on safety and support
- Signposted to further help if needed

### **Linked Policies and Guidance**

- Safeguarding and Child Protection Policy
- Behaviour and Anti-Bullying Policy
- SEND Policy
- Mental Health and Wellbeing Policy
- Online Safety Policy
- KCSIE
- DfE: Sexual Violence and Sexual Harassment (2021)

### Local Safeguarding Context

My Oasis adheres to the local safeguarding arrangements outlined by [Insert Local Authority Name] and its Safeguarding Children Partnership.

We work with social care, police, education settings and health partners to manage risk, provide support, and ensure student safety.

## Appendix B: Definitions and Categories of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple safeguarding concerns will overlap. At My Oasis, all staff are trained to recognise the range and complexity of safeguarding risks that young people may face, and we are committed to identifying concerns early and taking swift, appropriate action.

Physical Abuse	May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person. Staff are alert to these risks, particularly where patterns of injury or unexplained symptoms appear.
Emotional Abuse	The persistent emotional maltreatment of a young person in a way that causes severe and adverse effects on their emotional development. Emotional abuse may occur on its own or alongside other forms of abuse. It may involve conveying to a young person that they are worthless, unloved, or inadequate, or only valued insofar as they meet the needs of another person. It includes denying young people opportunities to express their views, deliberately silencing them, mocking their communication, or exposing them to interactions beyond their developmental capacity. Emotional abuse may also involve overprotection, preventing exploration or social interaction, seeing or hearing the ill-treatment of others, and experiencing serious bullying (including cyberbullying) or exploitation. As all forms of maltreatment involve some level of emotional abuse, it is imperative that staff observe both behavioural and contextual indicators.
Sexual Abuse	Involves forcing or enticing a young person to take part in sexual activities, whether or not they are aware of what is happening. This can include both physical contact, such as assault by penetration (including rape or oral sex) and non-penetrative acts (e.g., masturbation, kissing, touching over clothing),

	<p>as well as non-contact activities. These non-contact forms may include exposure to or involvement in producing sexual images, watching sexual activities, encouraging sexualised behaviour, or grooming a young person for future abuse, including through digital means.</p> <p>Sexual abuse is not exclusively perpetrated by adult males—females and other young people may also be responsible. Staff are trained to recognise that young people who are victims may not always disclose and may not realise they are being abused, particularly where grooming has taken place.</p>
Neglect	<p>Is the persistent failure to meet a young person's basic physical and/or psychological needs. This failure is likely to result in serious impairment of health or development. Neglect may occur during pregnancy due to maternal substance misuse and, once born, may manifest as a parent or guardian failing to provide adequate food, clothing, and shelter (including exclusion from the home), to protect the young person from physical and emotional harm or danger, or to ensure appropriate supervision and access to necessary medical care or treatment. Neglect also encompasses failure to meet a young person's emotional needs or to provide appropriate stimulation and support for healthy development.</p>

## Young People Missing from Education

A young person going missing from education, particularly on a repeated basis, can be a significant warning sign of a range of safeguarding issues. These may include abuse, neglect, sexual abuse or exploitation, criminal exploitation, mental health problems, substance misuse, radicalisation, female genital mutilation (FGM), or forced marriage.

Although there are many different circumstances in which a young person may become missing from education, some young people are more vulnerable than others. These include those who are at risk of harm or neglect, at risk of forced marriage or FGM, from Gypsy, Roma or Traveller families, from families of service personnel, those who go missing from home or care, young people supervised by the youth justice system, young people who cease to attend My Oasis or their mainstream school, and young people from new migrant families.

At My Oasis, we follow our procedures for unauthorised absence and for managing cases where young people go missing from education, particularly where this occurs repeatedly. These

procedures help us to identify safeguarding concerns such as exploitation and abuse, and to implement early interventions that may prevent future risk. We will always follow up directly with parents or guardians when students are not present at the provision. For this reason, we require at least two current emergency contact details for all students and ask families to notify us promptly of any changes.

In line with statutory guidance, we are committed to sharing information with the local authority where a young person leaves our provision without a new placement being confirmed, or when we remove a young person's name from our admission register at a non-standard transition point. Staff are trained to understand the warning signs and triggers associated with young people missing from education, including the potential links with travelling to conflict zones, risk of FGM, or forced marriage.

Where a staff member suspects that a young person may be suffering harm or neglect, we follow local child protection procedures without delay. This includes making reasonable enquiries and, where necessary, an immediate referral to children's social care and/or the police if the young person is at risk of significant harm or is in immediate danger.

## Child Criminal Exploitation (CCE)

Child criminal exploitation is a form of abuse where individuals or groups take advantage of an imbalance of power to coerce, control, manipulate or deceive a young person into criminal activity. This may be in exchange for something the young person needs or wants, for the financial gain or status of the perpetrator, or through violence or threats. The power imbalance may be due to a range of factors, including age, gender, cognitive ability, status, or access to resources.

CCE can be perpetrated by males or females, adults or other young people. It can occur as a single incident or through repeated exploitation over time. The abuse can range from opportunistic to highly organised and may or may not involve physical contact. It can also occur entirely online.

Forms of CCE include young people being forced or manipulated into transporting drugs or money (for example, as part of county lines), working in cannabis factories, shoplifting or pickpocketing, committing vehicle crime, or engaging in serious violence. Victims may be threatened or entrapped in debt, manipulated into carrying weapons, or made to believe they are choosing to participate, even though coercion is present.

Young people often become trapped in exploitation and may feel unable to leave. Perpetrators may threaten their families, create dependencies, or instil fear. Because young people may commit crimes

while being exploited, their vulnerability is often overlooked. It is essential that staff recognise their status as victims, even when their behaviour appears criminal or consensual.

It is important to understand that the experience of girls who are criminally exploited can differ significantly from that of boys. Indicators of exploitation may be less obvious, but girls are equally at risk. Both girls and boys who are criminally exploited may also face an increased risk of sexual abuse.

Indicators of CCE may include a young person:

- Appearing with unexplained gifts or new possessions
- Associating with other young people known to be involved in exploitation
- Suffering from changes in emotional wellbeing or mental health
- Misusing drugs or alcohol
- Going missing for periods of time or regularly returning home late
- Regularly missing provision or school
- Failing to engage in education or training

Any member of staff who suspects that a young person may be at risk of CCE will raise this with the Designated Safeguarding Lead (DSL) without delay. The DSL will follow local safeguarding procedures, including making a referral to children's social care and the police where appropriate.

## County Lines

The term county lines is used to describe gangs and organised criminal networks that export illegal drugs, primarily crack cocaine and heroin, into one or more importing areas (usually from urban to rural locations) using dedicated mobile phone lines or other deal lines.

Exploitation is a central feature of county lines activity. Young people and vulnerable adults are used to transport, store, and distribute drugs and money. Offenders typically use coercion, intimidation, threats of violence, sexual violence, and weapons to ensure compliance and control.

Young people can easily become trapped in this form of exploitation. County lines gangs often entrap victims by creating drug debts and threatening serious violence or kidnap, not only against the victim but also against their family members. Once involved, it can be extremely difficult for the young person to extract themselves from the network.



Staff at My Oasis are trained to recognise the signs of county lines exploitation and understand that this form of abuse may be hidden behind poor attendance, withdrawal from education, or the presence of seemingly unrelated risk factors. All concerns are escalated to the DSL immediately for assessment and referral where necessary.

## Serious Violence

There are a number of indicators that a young person may be at risk from, or involved with, serious violent crime. These include:

- Increased absence from provision
- A change in friendships or associations with older individuals or groups
- A significant decline in performance or engagement
- Signs of self-harm or a notable change in emotional wellbeing
- Unexplained injuries or signs of assault
- Possession of unexplained gifts or new belongings

These indicators may suggest that a young person has been approached by, or is involved with, individuals connected to criminal networks or gangs. This includes situations where young people may be coerced into criminal activity or experience violence as part of their exploitation.

There are known risk factors that increase the likelihood of a young person becoming involved in serious violence. These include being male, having a history of persistent absence or permanent exclusion from education, a background of maltreatment or neglect, or prior involvement in offending behaviour such as theft or robbery.

All staff at My Oasis are trained to be alert to these risk factors and understand that early intervention is essential. Where any concern is identified, the DSL is informed without delay. The DSL will follow local safeguarding procedures and, if appropriate, refer the young person to the local authority's children's social care team and/or the police for further action and support.

## Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person into sexual activity. This may be in exchange for something the victim needs or wants, or for the financial gain or increased status of the perpetrator or facilitator. The abuse may, or may not, involve violence or threats of violence.

CSE can be perpetrated by males or females, and by adults or other young people. It may involve a single incident or a sustained pattern of abuse. It can occur offline (in person), online, or both, and can range from seemingly 'consensual' relationships to serious organised exploitation.

All young people can be affected by CSE, including those aged 16 or 17 who can legally consent to sexual activity. The law makes clear that even where a young person appears to consent, coercion or manipulation undermines that consent. Some young people do not realise they are being exploited and may believe they are in a genuine, loving relationship.

CSE includes both physical sexual contact (such as penetrative and non-penetrative acts) and non-contact abuse. It may involve persuading or forcing a young person to send sexual images, participate in sexual conversations via text or messaging, or take part in webcam activity. CSE may also occur without the victim's knowledge — for example, through videos or images being shared without their consent.

In addition to the indicators associated with child criminal exploitation, further signs of CSE may include:

- A young person having an older boyfriend or girlfriend
- A young person contracting sexually transmitted infections or becoming pregnant

Any staff member who suspects that a young person may be a victim of CSE will speak with the DSL immediately. The DSL will follow local safeguarding procedures and refer to children's social care and the police as appropriate.

## Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a young person from a parent or carer who has legal responsibility. It can be committed by family members, acquaintances, or strangers. Community safety incidents in the vicinity of the provision, such as unknown adults loitering, engaging in inappropriate conversations with young people, or suspicious activity, can also raise safeguarding concerns.

At My Oasis, any concern related to abduction or community safety is taken seriously. If a staff member has any concerns, they must inform the DSL immediately so that appropriate steps can be taken in line with local safeguarding procedures.

## Cybercrime

Cybercrime refers to criminal activity committed using computers and/or the internet. It can be broadly divided into two categories:

- Cyber-enabled crime - traditional crimes that can be increased in scale or reach using computers or networks (e.g. fraud, bullying, or abuse).
- Cyber-dependent crime - offences that can only be committed using technology or computer networks.

Examples of cyber-dependent crime include:

- Unauthorised access to computer systems (illegal hacking), such as attempting to access a school's network to change grades or obtain assessment answers
- Denial of service (DoS) or distributed denial of service (DDoS) attacks, which attempt to overwhelm or crash a network or website by flooding it with traffic
- Creating, supplying or obtaining malware (malicious software) with intent to commit further crimes — including spyware, ransomware, remote access trojans, and botnets

Some young people, particularly those with strong interests or skills in computing, may inadvertently or deliberately become involved in cybercrime. It is important that staff understand the potential signs of this involvement and take proactive steps to respond appropriately.

Where there are concerns that a young person may be at risk of being drawn into cyber-dependent crime, the DSL (or deputy) will consider a referral to the Cyber Choices programme, which is a national police initiative supported by the Home Office and led by the National Crime Agency. Cyber Choices works in partnership with regional and local police forces to offer preventative interventions.

## Domestic Abuse

Domestic abuse (DA) is recognised as a safeguarding concern and all staff at My Oasis are aware of the impact it can have on young people's wellbeing. The Keeping Children Safe in Education (KCSIE) guidance states that domestic abuse:

- May be psychological, physical, sexual, financial or emotional
- May affect young people through witnessing or experiencing the abuse directly
- May be experienced in the home or in the young person's own intimate relationships

Domestic abuse is defined as any incident or pattern of controlling, coercive, threatening behaviour, violence, or abuse between individuals aged 16 or over who are, or have been, intimate partners or family members. This definition is inclusive of all genders and sexualities. The abuse may involve:

- Psychological control or emotional manipulation
- Physical violence
- Sexual coercion or assault
- Financial control
- Threats, intimidation, or isolation

Young people can be harmed by domestic abuse as witnesses to the behaviour of adults in their household or through direct experience in their own relationships. Exposure to such abuse may result in serious, long-lasting emotional and psychological effects, including anxiety, depression, self-blame, or trauma. Some young people may need to leave their home environment as a result.

Older young people may also be directly involved in abusive or controlling intimate relationships with their peers. These risks are covered in more detail in the provision's Child-on-Child Abuse Policy (see Appendix A).

At My Oasis, we participate in Operation Encompass, a national scheme that enables the police and local authorities to notify schools of incidents of domestic abuse affecting their students. Where the DSL receives a notification, they will determine the most appropriate form of support, which may be silent (e.g. increased monitoring) or overt (e.g. targeted pastoral input).

All information is shared and stored securely and in accordance with the 'NSCP Protocol for Domestic Abuse – Notifications to Provisions'.

The DSL is responsible for maintaining accurate records, delivering appropriate support, and liaising with relevant external services where required to safeguard and support the young person.

## Homelessness

Being homeless or at risk of becoming homeless presents a real and serious threat to a young person's safety and welfare. The experience or fear of homelessness may impact on a young person's emotional wellbeing, educational engagement, and ability to form or maintain trusting relationships. The Designated Safeguarding Lead (DSL) and deputy DSLs are aware of local referral routes and contact information for the housing authority, and will use these pathways to raise or escalate

concerns where appropriate. This includes working in partnership with agencies to ensure families receive support before a crisis point is reached.

Where it is believed that a young person is at immediate risk of harm due to homelessness — including risk of rough sleeping, family rejection, trafficking, or criminal exploitation — the DSL will make a referral to children's social care without delay. We remain alert to the impact that housing instability can have on a young person's safety and mental health, particularly when other vulnerabilities are also present.

## So-Called 'Honour-Based' Abuse (HBA)

So-called honour-based abuse (HBA) encompasses a range of violent criminal offences which are committed to protect or defend the perceived honour of a family and/or community. This includes female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

HBA often involves a wider network of family or community pressure and control and may include multiple perpetrators. Offences committed in the name of 'honour' are a violation of a young person's rights, autonomy, and bodily integrity, and can have lifelong physical and psychological consequences.

All forms of HBA are considered safeguarding concerns. Staff at My Oasis are trained to be alert to the possibility that a young person is at risk of such abuse or has already been affected. If any member of staff has concerns relating to HBA, they must speak to the DSL immediately, who will activate local safeguarding procedures.

## Female Genital Mutilation (FGM)

FGM involves the partial or total removal of external female genitalia or other injury to the female genital organs for non-medical reasons. It is a criminal offence and a form of abuse with long-lasting physical and emotional consequences.

The DSL will ensure that all staff have access to appropriate training to help them identify young people at risk of FGM and to know how to respond appropriately.

Indicators that FGM has already occurred include:

- A student disclosing directly that FGM has taken place
- A parent or family member disclosing FGM

- The student or family being known to social care in connection with other safeguarding concerns
- A girl having difficulty walking, sitting, or standing
- Spending longer than usual in the toilet or bathroom
- Recurrent urinary, menstrual, or stomach issues
- Avoidance of physical exercise or PE
- Being absent from provision for extended periods
- Noticeable change in behaviour, such as withdrawal or emotional distress
- Reluctance to undergo medical examinations
- Speaking about pain or discomfort between her legs

Potential indicators that a girl may be at risk of FGM include:

- Family history of FGM
- Known FGM practice in the girl's community or country of origin
- Parents stating that the girl will undergo a "special procedure" or ceremony
- Plans for a long holiday abroad, especially to countries with high prevalence of FGM
- Mother, sister, or cousin having undergone FGM
- Lack of integration into UK society
- A girl asking for help but being vague or guarded
- Sections missing from the girl's 'red book' or visits to travel clinics

These signs are not exhaustive, and staff must trust their professional instincts. If any staff member suspects FGM, including where they believe an act has been carried out, the DSL will make a referral to children's social care and the police as required.

## Forced Marriage

A forced marriage is one in which one or both parties do not (or cannot) consent to the marriage and where violence, threats, or coercion are used to pressure the person into the marriage. Forcing someone to marry is a criminal offence.

Threats can be physical or emotional and psychological and may include shaming, isolation, or financial control.

At My Oasis, staff are trained to recognise the signs of potential forced marriage. These may include references to upcoming travel, family arrangements that raise concern, or changes in the young person's behaviour or engagement.

If a staff member suspects a student may be at risk of forced marriage, they must:

- Speak with the student in a secure and private environment
- Refer to the DSL immediately

DSL will activate safeguarding procedures and refer to the local authority's designated officer

Seek support and guidance from the Forced Marriage Unit (020 7008 0151 / [fmufco.gov.uk](mailto:fmufco.gov.uk))

Refer the student to an appropriate pastoral or safeguarding support lead (e.g. mentor, wellbeing team)

## Private Fostering

A private fostering arrangement is one made privately (without the involvement of a local authority) for the care of a young person under the age of 16 (or under 18 if disabled), by someone who is not their parent or a close relative, in that person's own home, with the intention that the arrangement will last for 28 days or more.

A close relative is defined as a grandparent, brother, sister, uncle or aunt (including half-siblings and step-parents). It does not include great-aunts/uncles, great-grandparents, or cousins.

Parents and private foster carers have a legal duty to inform the relevant local authority at least six weeks before such an arrangement is due to begin. Failure to do so is a criminal offence.

While many private fostering arrangements are positive and well-managed, privately fostered children are a potentially vulnerable group and require monitoring by the local authority. This is especially important for children who have arrived from overseas and may be at risk of abuse, neglect, trafficking, exploitation or modern-day slavery.

Provisions have a statutory duty to notify the local authority if they become aware, or suspect, that a student is being cared for under a private fostering arrangement. Although there is no legal duty for private foster carers or social workers to inform a school, My Oasis will take proactive steps to identify and act upon such situations.

If a member of staff becomes aware of a possible private fostering arrangement, they must inform the DSL, who will speak to the family to check if they are aware of their legal duty to inform the local authority. The DSL will also inform the local authority themselves, regardless of the family's awareness or willingness to do so.

At the point of admission to My Oasis, steps will be taken to verify the relationship between the registering adult and the young person to identify any undisclosed private fostering scenarios.

## Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Staff must be aware of the Prevent Duty, which places a responsibility on all educational settings to prevent young people from being drawn into terrorism. Extremism is defined as vocal or active opposition to fundamental British values — including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. It also includes calls for the death of members of the armed forces.

Terrorism is defined as any action that:

- Endangers or causes serious violence to a person or people
- Causes serious damage to property
- Seriously interferes with or disrupts an electronic system
- These actions must be intended to influence government or intimidate the public and be in pursuit of a political, religious, or ideological cause.

The DSL will undertake Prevent training and ensure staff have access to appropriate awareness materials. Risk assessments are in place to monitor the likelihood of young people being exposed to extremist views, and staff receive training to spot signs of vulnerability and influence.

For more information on how we address concerns related to radicalisation and extremism, please refer to our Prevention of Radicalisation Policy.

## Missing Students

My Oasis is committed to the safety and wellbeing of all students, and we have clear procedures in place to respond when a student goes missing. Our aim is to ensure that every young person is located and returned to safe, effective supervision as quickly as possible.



Any concerns that a student has gone missing, either from education or from home, must be reported immediately to the DSL. Where there are any safeguarding concerns, such as risk of exploitation, abuse, or going missing from care, we act in accordance with local safeguarding procedures.

Our approach links closely with our Behaviour and Anti-Bullying Policy, which outlines how we support young people at risk of disengagement, withdrawal, or harm.

## Appendix C: Safer Recruitment

### **Safer Recruitment Policy**

My Oasis Therapeutic Alternative Provision adheres strictly to Part 3 of Keeping Children Safe in Education (KCSIE) at all times. Safeguarding considerations underpin every stage of our recruitment processes, from defining and advertising roles through to appointment and induction.

### **Pre-appointment Safer Recruitment**

All job advertisements clearly state our commitment to safeguarding and promoting the welfare of children and young people, explicitly confirm that rigorous safeguarding checks will be undertaken, outline safeguarding responsibilities within job descriptions and person specifications, and confirm if the post is exempt from the Rehabilitation of Offenders Act 1974 and related amendments.

Roles involving regulated activity explicitly inform applicants that it is an offence to apply if barred from engaging in regulated activity.

All applicants receive a recruitment pack containing:

- Safeguarding and Child Protection Policy and procedures
- Right to Work in the UK guidance

### **Application Requirements**

Applicants must provide comprehensive personal details, including current and former names, current address, and national insurance number. They must also provide:

- Employment history (including reasons for any gaps)
- Qualifications, awarding bodies, and award dates
- Contact details for referees
- A supporting statement aligned to the person specification

Curriculum vitae alone are not accepted; a completed application form must be submitted.

### **Shortlisting and Selection**

At least two staff members carry out shortlisting and scrutinise applications for inconsistencies or gaps in employment history. Shortlisted candidates must complete a self-declaration of criminal records or other concerns about suitability, aligning fully with Part 3 of KCSIE.

References are sought prior to interviews for all shortlisted candidates and scrutinised carefully for safeguarding concerns. Questions explicitly address the candidate's suitability for work involving children and young people.

### **Appointment Procedures for New Staff**

Upon appointment, My Oasis will:

- Verify candidate identity, including checking birth certificates where available
- Conduct enhanced DBS checks (including children's barred list information for roles involving regulated activity)
- Obtain separate barred list checks if employment starts before DBS completion
- Verify mental and physical fitness for the role
- Confirm right to work in the UK
- Conduct additional checks for candidates who have lived or worked overseas
- Verify professional qualifications
- Confirm no prohibition orders are in place for teaching roles
- Check for any prohibition from management (section 128 direction) for management roles

All recruitment records and checks are accurately documented in the single central record (SCR), with copies retained securely according to data protection requirements.

### **Existing Staff**

Concerns about an existing staff member's suitability trigger a review and potentially the same checks as for new appointments. Any staff member who is dismissed or resigns before dismissal due to safeguarding concerns will be referred promptly to the Disclosure and Barring Service (DBS).

### **Agency, Contractors, and Third-Party Staff**

Written confirmation of completed safer recruitment checks is required from agencies or third-party organisations. Identity checks are carried out on all third-party staff upon arrival. Contractors must hold appropriate DBS checks based on their level of contact and activity, and identity is always verified.

### **Trainee Teachers**

Salaried trainee teachers undergo identical checks to employed staff. For fee-funded trainees, written confirmation of checks by the training provider is required before placement.

### **Volunteers**

Volunteers never work unsupervised unless enhanced DBS checks with barred list information have been completed. A risk assessment is conducted for those not in regulated activity, and these assessments are documented.

### **Visitors**

All visitors must verify their identity on arrival and are required to securely store personal belongings, including mobile phones. Visitors for professional purposes (e.g., educational psychologists) must produce photo identification before accessing students. Other visitors are always accompanied by staff and rigorously checked to ensure no extremist views are disseminated.

### **University Students on Work Experience**

Work experience placements are rigorously planned with clear safeguarding procedures. Barred list checks for supervising adults are considered depending on the nature and frequency of supervision.

### **Staff Compliance with Safer Recruitment and Safeguarding Expectations**

All staff at My Oasis are required to actively comply with our safer recruitment processes and ongoing safeguarding expectations. This includes:

- Promptly reporting any safeguarding concerns or allegations
- Adhering fully to our Staff Code of Conduct and safeguarding policies
- Completing all required safeguarding and safer recruitment training

Any non-compliance may lead to disciplinary action and possible referral to external safeguarding authorities. Regular reviews and audits ensure full adherence to safeguarding best practice.

## **Appendix D: How the Provision Responds to Allegations That May Meet the Harms Threshold**

This section applies to allegations against all current staff members, including supply staff and volunteers, who have:

- Behaved in a way that has harmed a young person or may have harmed them.
- Possibly committed a criminal offence against or relating to a young person.

- Behaved towards young people in a manner suggesting they pose a risk of harm.
- Behaved in a way that indicates unsuitability to work with young people.

These procedures apply irrespective of whether the alleged incident occurred at My Oasis or elsewhere. Historical allegations or allegations against former staff will be immediately referred to the police.

We will handle allegations promptly, fairly, and consistently, ensuring the protection of young people and offering appropriate support to staff involved. All decisions and actions will be based on common sense, professional judgement, and consultation with relevant safeguarding bodies.

### **Suspension Procedures**

Suspension is not a default response and is used only if:

- There is reasonable suspicion of potential harm to young people.
- The severity of the case could constitute grounds for dismissal.

Alternatives to suspension will always be explored, including:

- Redeployment to a role without direct student contact.
- Supervised work arrangements.
- Temporary transfer to a different location within My Oasis or an associated provision.

All decisions around suspension will be documented clearly, noting considered alternatives and justifications for their rejection. Written confirmation of suspension, including named contacts for support, will be provided to the individual concerned within one working day.

### **Definitions of Investigation Outcomes**

- Substantiated: Evidence supports the allegation.
- Malicious: Allegation disproven with deliberate intent to deceive.
- False: Evidence disproves the allegation.
- Unsubstantiated: Insufficient evidence to conclude definitively (does not imply guilt or innocence).
- Unfounded: No supporting evidence or credible basis for the allegation.

### **Allegation Management Procedure**

Upon receiving an allegation meeting the threshold criteria, the proprietor (the designated 'case manager') will:

1. Immediate Consultation:  
Promptly consult the Local Authority Designated Officer (LADO) regarding the allegation's nature, context, and required actions. Immediate police involvement may precede LADO consultation if an immediate risk or criminal act is evident.
2. Notification to Individual:  
Inform the accused of the allegation and proposed actions promptly, following agreement with LADO, police, or Children's Social Care.
3. Suspension or Alternative Arrangements:  
Decide on suspension or alternative measures based on advice from LADO, police, and/or social care. Document clearly the rationale and decisions made.
4. Support Provision:  
Appoint a named support person for the accused to offer consistent guidance and emotional support during the investigation.
5. Parent/Guardian Communication:  
Inform parents/guardians promptly about allegations, maintaining confidentiality and clearly advising them of their responsibilities regarding confidentiality during the investigation.
6. Referral to DBS/Regulatory Bodies:  
Refer substantiated concerns or dismissals related to safeguarding to the Disclosure and Barring Service (DBS). Teaching staff dismissals or concerns must be referred to the Teaching Regulation Agency (TRA).
7. Police Cooperation:  
Request from the police consent to use statements and evidence in subsequent internal disciplinary processes, if necessary.

#### **Additional Considerations for Supply Staff**

For allegations involving supply staff, My Oasis will lead the investigation, working closely with the relevant agency. The agency will be fully informed and involved, particularly in decisions around suspension, redeployment, and information sharing about previous allegations or concerns.

#### **Timescales**

- Immediate resolution (within one week) for clearly unsubstantiated or malicious allegations.
- Action within three working days if formal disciplinary measures are not required.
- Disciplinary hearings within fifteen working days if no further investigation is necessary.

#### **Actions Post-Criminal Investigation or Prosecution**

Post-investigation discussions with LADO will determine the necessity and approach of any further internal disciplinary action.

#### **Returning to Work Post-Suspension**

Consideration will be given to facilitate the return of staff members following a suspension, including managing contact with involved young people.

#### **Malicious Allegations**

Where allegations are deliberately fabricated or malicious, disciplinary action may be taken against the responsible party, including possible police involvement.

#### **Confidentiality**

Every effort will be made to maintain confidentiality throughout the investigation. Advice will be taken from the LADO and police regarding managing speculation, leaks, and potential press interest.

#### **Record-Keeping**

Comprehensive records of allegations and actions taken will be securely maintained in personnel files. Records of substantiated, false, unsubstantiated, or unfounded allegations will be retained at least until the individual's retirement or ten years from the allegation. Malicious allegations will be removed promptly.

Specific records related to sexual abuse allegations will be preserved in line with the Independent Inquiry into Child Sexual Abuse (IICSA) guidelines.

#### **Employer References**

References will not include allegations proven to be false, unsubstantiated, or malicious.

#### **Learning from Allegations**

Post-case reviews will be conducted with the LADO after substantiated cases to identify potential improvements in provision practice or procedure, including evaluations of suspension decisions and their justifications.

## **Appendix E: Online Safety**

Ensuring the safety of students when using online platforms and digital technology is a fundamental component of safeguarding at My Oasis Therapeutic Alternative Provision. Our aim is to protect

students from potentially harmful and inappropriate online material through a comprehensive and integrated approach involving students, parents/guardians, and staff.

### **Our Approach to Online Safety**

Online safety considerations permeate all aspects of our work, including:

- Curriculum planning, including Relationships, Sex and Health Education (RSHE)
- Continuous staff training and professional development
- Clear roles and responsibilities, particularly of the Designated Safeguarding Lead (DSL)
- Proactive parental engagement and sharing of relevant resources

This appendix should be read alongside our dedicated E-Safety Policy, which provides more detailed guidance. Staff are required to read the E-Safety Policy in conjunction with the Staff Code of Conduct, specifically regarding personal online behaviours. Online safety training forms an essential part of staff induction and is reinforced through regular updates and formal annual training.

### **Role of the DSL in Online Safety**

The DSL holds lead responsibility for online safety, regularly undertaking specialist training to maintain current knowledge and effectively address evolving online risks. This training ensures that the DSL and deputies are fully equipped to identify, manage, and mitigate risks to young people online.

### **Recognising and Managing Online Risks**

Online risks to young people typically fall into four key categories, which guide our planning and intervention strategies:

- Content: Exposure to illegal, inappropriate, or harmful material, such as pornography, fake news, extremist ideologies (including racism and anti-Semitism), self-harm, or suicide-related content.
- Contact: Harmful interactions online, including peer pressure, inappropriate commercial advertising, or grooming by adults posing as peers or trusted adults.
- Conduct: Personal behaviours that increase vulnerability or cause harm, such as sharing explicit imagery (consensual or otherwise), online bullying, or engagement with harmful online groups.
- Commerce: Risks relating to financial exploitation, such as online gambling, phishing scams, or inappropriate targeted advertising.

Our provision takes proactive steps to educate students and staff about these risks, embedding prevention and awareness strategies throughout our curriculum and pastoral support systems.

### **Filtering and Monitoring Systems**

To safeguard students effectively, we employ robust filtering and monitoring mechanisms managed by an external IT provider. All digital devices used within My Oasis are equipped with filtering software to prevent access to harmful content. Immediate adjustments can be made through the provider should inappropriate content be identified. Additionally, students do not use digital devices unsupervised, further mitigating online safety risks.

In balancing safety and education, we remain mindful of the risk of overly restrictive filtering. Regular assessments, informed by our obligations under the Prevent Duty, ensure our filtering approach remains proportionate, supporting robust educational opportunities alongside safeguarding.

### **Mobile Phones and Remote Learning**

Detailed information regarding the appropriate use of mobile phones by staff and students is covered in Section 16 of our overarching safeguarding policy. Additionally, our E-Safety Policy provides clear guidelines and safety measures specifically addressing remote learning scenarios, ensuring robust safeguarding standards are maintained at all times.

### **Reporting Online Safety Concerns**

Students, parents, guardians, and staff are encouraged to promptly report any online safety concerns or disclosures directly to the DSL or Deputy DSL. Full contact details for these safeguarding leads are provided clearly in the Key Contacts section of this policy. Prompt reporting allows for timely intervention and support.

### **Regular Review of Online Safety Practices**

Recognising that online risks and technologies evolve rapidly, My Oasis undertakes annual reviews of our online safety policies, supported by comprehensive risk assessments that reflect local, regional, and national contexts. These reviews ensure that our approach remains current, responsive, and effective in mitigating online risks.

### **Further Information**



## DRAFT FORM

For further guidance and information regarding online safety, staff should refer to Annex D of Keeping Children Safe in Education (2024), which provides comprehensive guidance on effective practice and safeguarding obligations.

## Appendix F: Flowchart of procedures for responding to safeguarding concerns

# FLOWCHART OF PROCEDURES FOR RESPONDING TO SAFEGUARDING CONCERNS

The Local Authority Designated Officer (LADO)

Name:

Contact Details:

Designated Safeguarding Lead (DSL)

Name:

Contact Details:

Local Safeguarding Children Partnership

Name:

Contact Details:

Staff member/volunteer has a safeguarding concern about a child

Concern is reported to the DSL/DDSL and a Safeguarding Incident Report Form is completed

DSL reviews the report

No Referral

DSL decides a referral is not required. My Oasis takes relevant action e.g. early help and monitors the situation within an agreed timescale

Referral Required

DSL makes a referral to children's social care and contacts police if appropriate

Referral is made if things escalate

Social care will decide what response is required within one working day

The child is in need of immediate protection

The referrer will be informed of this

Appropriate emergency action is taken by a social worker, the police or the NSPCC

A section 47 enquiry is required by social care if they have reasonable cause to suspect a child is suffering or likely to suffer significant harm

The referrer will be informed of this

Child is identified as being at risk of significant harm

Child protection plan is drawn up if required

A section 17 enquiry is required if social care believes the child needs extra help from professionals or services

The referrer will be informed of this

Child is identified as being as child in need

Appropriate support that the child needs are identified

No formal assessment is required

The referrer will be informed of this

My Oasis considers pastoral support, an early help assessment and accessing universal services and other support

If the concern is about a member of staff at My Oasis, the DSL should refer this to the LADO who will determine the best route of action to take

All concerns and correspondence will be kept in a secure, confidential file. The child's circumstances will be kept under review at all stages and a referral will be made again if it is appropriate for improving the child's circumstances. The child's best interests must always come first.