

Annex: Low-Level Concerns



Child Protection and Safeguarding Policy

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Policy lead staff member:	Hannah Atkinson
Policy link governor:	Helen Hogan
Signed:	_____

Phase of school this policy relates to *(please highlight)*

Early Years	Primary	Upper	Whole School ☒
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1. Intent & Introduction

Open Air Education whole-school Child Protection Policy aims to provide clear direction to staff and others about expected codes of behaviour in dealing with child welfare concerns. This policy also aims to make explicit the school's commitment to the development of good practice and sound procedures to keep children safe in our school. This policy recognises that all forms of harm/abuse including extra familial harm can occur in all communities and contexts (home, school, online and local area) and that all staff have a responsibility and the opportunity to support children, in sharing concerns and worries in school to feel safe.

The whole school culture of vigilance in Open Air Education creates a safe space where children are supported, listened and responded to effectively, as well as valued in what they choose to share and that ALL staff act immediately with the necessary level of intervention to create the most effective outcome for every individual child.

The purpose of this policy is, therefore, to ensure that our children's welfare is of paramount importance, early and additional help is offered to prevent escalation and where child protection concerns are identified, referrals are handled confidentially, sensitively and professionally and in ways that support the needs of the child's well-being.

Our Governing Advisory Board (GAB) and Proprietor are committed within Open Air Education to keeping children safe by safeguarding and promoting the welfare of children in our care through all our policies, procedures and practices. We expect all our students', parents and visitors to share this commitment and understanding.

Introduction

Open Air Education fully recognises the contribution it can make to keeping children safe and supporting the students in its care. There are four main elements to Open Air Education's Child Protection Policy:

- **Prevention:** positive school atmosphere, careful and vigilant teaching, pastoral care, support to students, providing good adult role models and the identification of early and additional support/services to children and families and recognising and reducing risks to children including, but not limited to, harassment, bullying/cyber-bullying, prejudice-based and discriminatory bullying, victimisation, sexual abuse (including sexual harassment/violence and exploitation), domestic abuse in their own

intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation (extremism and terrorism) and issues such as 'Honour' - Based Abuse, Female Genital Mutilation and Forced Marriage.

- **Protection:** following agreed procedures, ensuring all staff respond appropriately and sensitively to child protection concerns and that every member of staff has regular training and updates at least annually and are supported to refer their concerns to the Designated Safeguarding Lead Caroline Taylor Garrett or Deputy Designated Safeguarding Lead Hannah Atkinson or the First Contact Service (03000 267 979) directly IF NECESSARY. In certain specific cases such as Female Genital Mutilation (mandatory reporting of FGM from October 2015), radicalisation or Forced Marriage there are SPOCS/named teams and individuals within the police who can be contacted.
- **Reconsideration:** following and challenging the progress of new referrals and existing cases to ensure that individual cases are reconsidered if there remains no improvement to a child's circumstance.
- **Support:** for students and school staff and for children who may be vulnerable due to their individual circumstances or extra-familial harm and taking action to enable all children to have the best outcomes.

All staff have the added responsibility of recognising that there may be children with additional vulnerability who remain at higher risk of harm or abuse because of their existing vulnerability. All school staff will be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation

- is at risk of being radicalised or exploited
- has a family member in prison or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'Honour'-Based Abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day.

(KCSIE 2025)

All staff have a responsibility to recognise child abuse, neglect, exploitation and child-on-child abuse in its many forms by exercising professional curiosity at all times. This means that ALL staff will take a 'zero-tolerance' approach to any unacceptable behaviour including 'banter' and will seek to prevent, challenge and take action so that all children understand that any concerns regarding their welfare and safety will be taken seriously. This will encourage and promote a culture of acceptable behaviour and a safe educational environment for all children. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Additional guidance on how our school supports the following areas of additional need or harm are provided in the hyperlinked documents in Appendix 1 of this Child Protection Policy and includes the full list taken from Keeping Children Safe in Education 2024.

Where Open Air Education has created an additional policy because of any specific area of need, this is to be read in conjunction with this Child Protection Policy.

Broadly the areas taken from Keeping Children Safe in Education, 2024 Annex B, include

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County Lines
- Children in the court system
- Children missing from education
- Children with family members in prison
- Cybercrime
- Domestic Abuse
- Homelessness
- Mental Health

- Modern Slavery and the National Referral Mechanism
- Preventing Radicalisation
- The Prevent Duty
- Channel
- Sexual violence and sexual harassment between children in schools and colleges
- Serious Violence
- So called 'Honour' - Based Abuse inclusive of Female Genital Mutilation (FGM) and Forced Marriage.
- FGM
- FGM mandatory reporting duty for teachers
- Forced Marriage
- Additional advice and support*

(KCSIE 2025)

**AS STATED, THE FULL LIST OF ADDITIONAL ADVICE AND SUPPORTIVE HYPERLINKS CAN BE FOUND IN APPENDIX 1 OF THIS POLICY*

In the event of any of the above issues being recognised, information should be shared directly with the Designated Safeguarding Lead (or Deputies) which will result in the situation being recorded, evaluated and support offered in school or the student/s being referred to specific services.

This policy applies to Open Air Education's whole workforce.

2. Framework and Legislation

No school operates in isolation. Keeping children safe from significant harm is the responsibility of all adults, especially those working with children. The development of appropriate procedures and the monitoring of good practice are the responsibilities of Durham Safeguarding Children Partnership, which includes the partnership of several agencies who work with children and families across the area.

Open Air Education is committed to keeping children safe and safeguarding all children in accordance with Child Protection: Durham Safeguarding Children Partnership <https://durham-scp.org.uk/> and partner agencies in all cases where there is a concern about significant harm.

Significant Harm is defined in The Children's Act 1989 as the ill-treatment (including sexual abuse and physical abuse) or the impairment of health (physical or mental) or development (physical, intellectual, emotional, social or behavioural) as compared to a similar child.

Note: harm now includes the impairment of a child's health or development as a result of witnessing the ill treatment of another person.

(Adoption and Children Act 2002)

Local Authorities have a duty to investigate (under S47 of the Children Act 1989). Where a Local Authority is informed that there is a child who is living, or is found, in their area and they have reasonable cause to suspect that child is suffering or is likely to suffer significant harm they must make such enquiries as necessary to promote or safeguard the child's welfare. The First Contact Service undertakes this responsibility on behalf of the Local Authority once a referral has been made. Keeping Children Safe in Education September 2025 contains information on what schools and colleges should do and sets out the legal duties with which schools and colleges must comply. It should be read alongside Working Together to Safeguard Children 2018 which applies to all schools, including maintained nursery schools. The Children Act 1989 sets out the legal framework.

3. Roles and Responsibilities

a. For All Staff

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting ALL children from maltreatment and abuse inside or outside of the family home; (including in addition to the four categories of harm, issues such as sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), child criminal exploitation (CCE), child sexual exploitation (CSE), county lines and serious youth violence, 'Honour' - Based Abuse (HBA) inclusive of Female Genital Mutilation (FGM) and Forced Marriage, radicalisation, (extremism, radicalisation and terrorism), harassment, bullying including cyber-bullying, prejudice-based and discriminatory bullying and victimization, preventing impairment of children's health (physical and mental health) or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. This includes everyone under the age of 18.

Everyone who comes into contact with children and their families has a role to play in safeguarding children. Due to regular contact with children all staff at Open Air Education hold a particularly important role in safeguarding as they are in a position to identify concerns early, provide help for children and to prevent concerns from escalating. Children can make disclosures or show signs of harm, abuse or neglect or exploitation at any time and to any individual and safeguarding incidents can occur within schools. Therefore, through a thorough induction process and the sharing of this policy with all staff, students and volunteers, it is important that ALL staff:

- Ensure that they clearly understand the school's systems and procedures for sharing information to safeguard and promote the welfare of children as shared in this policy.
- Ensure that they listen to and reflect on the voice of the child at ALL times (taking the child's wishes and feelings into account) and reassure them that they will take seriously any concerns raised to them by the child and both support them and keep them safe. This will include determining what action to take and what services to provide on behalf of the child in need (for non-safeguarding concerns).
- Ensure that they report ANY concerns of harm to any child to the Designated Safeguarding Lead (or Deputies) immediately and consistently promote a culture of vigilance in school, where concerns are shared and dealt with as soon as possible. (However, ALL staff can refer their concerns directly to the First Contact Service if necessary and the police in the stated incidents above and all staff should be aware of their local referral process to Local Authority children's social care. They will inform the Designated Safeguarding Lead (or Deputies) as soon as possible if they have reported concerns directly).
- Ensure that they immediately share with the Designated Safeguarding Lead (or Deputies) information shared with them by a child or directly observed/witnessed and record it. This could include sharing information on behalf of the Designated Safeguarding Lead with other agencies. All discussions, decisions and reasons for them should be recorded in writing adhering to Open Air Education's Recording and Information Sharing Policy/Procedure. Staff should never let fears of sharing information stand in the way of the need to safeguard and promote the welfare of children.
- Ensure that they feel confident in reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- Ensure that they are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Therefore, all staff should ensure that they exercise their professional curiosity and speak to the Designated Safeguarding Lead if they have concerns about a child. This also means considering how best to build trusted relationships with children and young people which facilitate communication.
- Ensure that they maintain an attitude of 'it could happen here' in respect of any safeguarding issues and report any concerns regarding the behaviour of a child, an adult/staff member in school directly to the Designated Safeguarding Lead/headteacher.
- Ensure that they feel able to raise concerns about poor or unsafe practices of staff and potential failures in the school's safeguarding regime through whistleblowing procedures and the Staff Behaviour/Code of Conduct inclusive of 'Low-Level' Concerns Policy.
- Ensure that they receive appropriate safeguarding and child protection training (including online safety which amongst other things, includes an

understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. This training will be regularly updated. In addition, all staff will receive updates as required and at least annually to support them in recognising the signs and symptoms of abuse, particularly in support of early identification of needs of children to prevent an escalation of need or risk to the child.

- Ensure from the 1st July 2015 for schools, (or 18th September 2015 for Colleges) that under the Counter Terrorism and Security Act, April 2015, that the school has 'due regard to Prevent' and to assess risk of children and young people being radicalised or drawn into extremism/terrorism (based upon potential risks in local area and that clear protocols are in place for all visitors so that their views are appropriate and not an opportunity to influence others).
- Ensure from October 2015 that there is mandatory reporting to the police in all cases where teachers discover that an act of FGM appears to have been carried out.
- Ensure that they understand, through online safety training, that technology is a significant component in many safeguarding and well-being cases and the additional risks for students online and continue to promote the school's Online Safety Policy/Mobile and Smart Technology (Acceptable Use Policy) in the protection of all students. This includes the management of internet access via children's own mobile phones or electronic devices that can allow them unlimited access to the internet without any restrictions using their own data allowance (3G, 4G, 5G). It is clear in Open Air Education's Online Safety Policy/Mobile and Smart Technology/Acceptable Usage Policy/Procedure, the expectations of students regarding their own devices whilst on school site and the consequences of any evidence of inappropriate use of the internet. This includes not using their mobile phones or smart technology to sexually harass, share indecent images (consensually or non-consensually) and view and share pornography and other harmful content.
- Ensure that they remain vigilant whilst visitors are on site and continue to promote the school's commitment to keeping children safe through reminding visitors and parents of the school's appropriate use of personal mobile phones/devices whilst they are on school premises. This includes staff understanding and adhering to the Staff Behaviour Policy inclusive of use of mobile phones and electronic devices.

Open Air Education will work with Local Authority children's social care, the police, health services and other services to promote the welfare of children and protect them from harm.

b. The Designated Safeguarding Lead

Open Air Education has appointed from our SLT Caroline Taylor-Garrett to be the Designated Safeguarding Lead. This person has the overall responsibility for safeguarding and child protection (including online safety and understanding the

filtering and monitoring systems and processes in place), a role which carries a significant level of responsibility. The Designated Safeguarding Lead has the appropriate status and authority within the school to carry out the duties of the post and is given the additional time, funding, training, resources and support needed to carry out the role effectively. The Designated Safeguarding Lead will also provide advice and support to other staff on child welfare, safeguarding and child protection matters. This person is able to take part in strategy discussions and inter agency meetings and to support other trained staff to do so as well as contribute to the assessment of children. The Designated Safeguarding Lead (and any Deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns (KCSIE 2025).

Role of the Designated Safeguarding Lead

At Open Air Education we have appointed the following Deputy Designated Lead, Hannah Atkinson, who, along with the DSL form the Safeguarding Team. These individuals are trained to the same standard as the Designated Safeguarding Lead. Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies the ultimate LEAD RESPONSIBILITY for child protection will not be delegated and remains with the Designated Safeguarding Lead.

Any deputies will be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.

The Designated Safeguarding Lead has a very detailed role, (see below).

However, if there is an IMMEDIATE safeguarding concern and the Designated Safeguarding Lead (or Deputy) are unavailable please seek immediate support via The First Contact Service (03000 267 979).

The broad areas of responsibility for the Designated Safeguarding Leads are identified here:

Availability

During term time the Designated Safeguarding Lead (or a Deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the Designated Safeguarding Lead (or Deputy) will be available in person or in exceptional circumstances availability may be by phone or other means.

At Open Air Education we will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage Referrals

The Designated Safeguarding Lead is expected to refer cases:

- Of suspected abuse to the First Contact Service and support staff who make referrals to the First Contact Service

- To the Channel Programme where there is a radicalisation concern as required and support staff who make referrals to the Channel Programme.
- Where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
- Where a crime may have been committed to the police as required.

Work with others

- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners (Durham Safeguarding Children Partnership)
- Liaise with the headteacher to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirements for children to have an Appropriate Adult (PACE Code C 2019).
- As required liaise with the case manager (headteacher, or where the headteacher is the subject of the allegations, the Chair of Governors or Proprietor of an Independent School) and the Designated Officer, for child protection concerns in cases which concern a staff member.
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians and SENCOs or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the Senior Mental Health Lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school.
- Ensure that we know the cohort of children, who have or have had, a Social Worker and understand their academic progress and attainment, maintaining a culture of high aspirations for this cohort.
- Support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a Social Worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information Sharing and Managing the Child Protection File

The Designated Safeguarding Lead is responsible for ensuring that child protection files are kept up to date.

Information will be kept confidential and stored securely. Good practice is to keep concerns and referrals in a separate child protection file for each child.

Records will include:

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

The Designated Safeguarding Lead will ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice.

Where children leave school (including in-year transfers), the Designated Safeguarding Lead will ensure their child protection file is transferred to the new school as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This will be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt will be obtained. Receiving schools and colleges should ensure key staff such as Designated Safeguarding Leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the Designated Safeguarding Lead will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The Designated Safeguarding Lead will:

- Ensure each member of staff has access to and understands the school's Child Protection Policy and procedures, especially new and part-time staff.
- Ensure the school's Child Protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with Governing Bodies or Proprietors regarding this.

- Ensure the Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Link with the Durham Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding and
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a Social Worker, are experiencing with teachers and school leadership staff.

Training, Knowledge and Skills

The Designated Safeguarding Lead (and any Deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The Designated Safeguarding Lead (and Deputies) will also undertake Prevent Awareness Training. This training will provide Designated Safeguarding Leads with a good understanding of their own role, how to identify, understand and respond to specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly Local Authority children's social care, so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and Local Authority children's social care referral arrangements.
- Have a working knowledge of how Local Authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Understand the importance of the role the Designated Safeguarding Lead has in providing information and support to Local Authority children's social care in order to safeguard and promote the welfare of children.
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and well-being, and what is needed in responding to this in promoting educational outcomes.
- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.
- Understand the importance of information sharing, both within the school and with the safeguarding partners (Durham Safeguarding Children Partnership), other agencies, organisations and practitioners.
- Understand and support the school with regards to the requirements of the Prevent Duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.

- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other Designated Safeguarding Leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training will support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- Ensure that staff are supported during the referrals process;
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that children feel heard and understood. Therefore, Designated Safeguarding Leads will be supported in developing knowledge and skills to:

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them;
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

Designated Safeguarding Leads are equipped to:

- Understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners,

- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and
- Be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Taken from Keeping Children Safe in Education, 2025: Annex C.

In addition, the DSL & DDSL:

- Ensure each member of staff has access to and understands the school's suite of safeguarding policies particularly the Child Protection Policy and Child-on-Child Abuse Policy and the Staff Behaviour/Code of Conduct (inclusive of 'Low Level' Concern, allegations against staff and whistleblowing) Policy, especially new or part-time staff who may work with different establishments.
- Be aware of all school excursions and residentials and clarify with the educational visit co-ordinator/group leader(s) their role and responsibility in connection with safeguarding/child protection.
- Ensure that a Professional Supervision Policy is in place for all Designated Safeguarding Leads/Deputies and is a well embedded process in school, that allows for critical and reflective practice to promote the educational outcomes and improved mental health and wellbeing of all vulnerable children.
- Ensure that a whole school policy for induction is in place for all new starters including members of the workforce and volunteers, to induct them thoroughly into all key aspects of their role and responsibility in school.
- Ensure a whole school policy about managing behaviour effectively is in place to ensure a good and safe educational environment for all children. This means that ALL staff will take a 'zero-tolerance' approach to any unacceptable behaviour including 'banter' and will seek to prevent, challenge and take action so that all children understand that any concerns regarding their welfare and safety will be taken seriously. This will encourage and promote a culture of acceptable behaviour and provide a safe educational environment for all children. This policy includes bullying/cyber-bullying, prejudiced-based and discriminatory bullying inclusive of measures to prevent all forms of bullying among students. This policy should additionally include the use of reasonable force. There are circumstances when it is appropriate for staff in schools to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive

physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom. When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, we will consider the risks carefully and recognise the additional vulnerability of these groups. We will also consider the duties under the Human Rights Act 1998, Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and the Public Sector Equality Duty.

- Ensure an effective whole school policy against bullying/cyber-bullying, prejudiced-based and discriminatory bullying inclusive of measures to prevent all forms of bullying among students, is in place, as a stand-alone policy but also covered in the Behaviour Policy.
- Ensure that an effective Record-Keeping Policy regarding information on children's welfare is in place. This details the school's procedures and applications for recording information including use of CPOMS/My Concerns, what data will be recorded and for what purposes, who in school will have access to this information, how it will be shared and transferred and the school's retention schedule.
- Inform LA of any student to be deleted from school admission register and follow missing from education protocols.
- Inform the LA of any student who fails to attend school regularly, or has been absent without school's permission for a continuous period of 10 days or more.

c. Responsibilities of Open Air Education Governing Advisory Board and Proprietor

The Governing Advisory Board or Proprietors at Open Air Education has strategic leadership responsibility for Open Air Education safeguarding arrangements and will ensure that the school complies with its duties under legislation including the obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018 (UK GDPR) and their local multi-agency safeguarding arrangements.

The Governing Advisory Board or Proprietor will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Keeping Children Safe in Education, 2025 including confirming that all policies and procedures adopted by the Governing Advisory Board or Proprietor (particularly those concerning referrals of cases of suspected abuse and neglect) are understood, and followed by all staff. The Governing Advisory Board or Proprietor will also ensure that all Governors receive appropriate safeguarding and child protection (including online which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training will equip

them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in Open Air Education are effective and support the delivery of a robust whole school approach to safeguarding.

The Governing Advisory Board and Proprietor has a senior board level (or equivalent) lead to take leadership responsibility for Open Air Education safeguarding arrangements.

At Open Air Education the senior lead governing advisory board member for safeguarding is Helen Hogan.

The role of this individual is to:

- Ensure that the allocation of additional time, funding and resource is sufficient to meet the current safeguarding/child protection activity and challenge and test its effectiveness.
- Ensure the self-assessment tool and Designated Safeguarding Lead report demonstrates fully and accurately the safeguarding arrangements and any action to progress areas of weakness or development.
- Ensure that all the Governing Advisory Board or Proprietors receive training to clarify their statutory role in keeping children safe to support their quality assurance of those statutory arrangements.
- Ensure that the Governing Advisory Board or Proprietors are aware of their Local Safeguarding Children Partnership arrangements and the need for the school to understand their role in effective multi-agency working under the new arrangements.

In Open Air Education the Chair holds these additional responsibilities as they do not hold the safeguarding portfolio.

- Ensure that they liaise with the Local Authority and/or partner agencies on issues of child protection and in the event of allegations of abuse being made against the headteacher or Proprietor of an independent school.
- Ensure that any allegation of abuse made against a member of staff (including supply staff, volunteers and contractors) or the headteacher is reported directly to the Designated Officer (DO). Therefore, ensuring effective whistleblowing procedures are in place.
- Ensure that the appointed member of the Governing Advisory Board for safeguarding holds the headteacher to account on all matters involving safeguarding through an effective Child Protection Policy that is embedded and followed by the entire workforce in all of the above raised areas.
- Ensure that all staff receive regular safeguarding and child protection updates including online safety (which, amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) (for example, via email, e-bulletins, staff

meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Governors will also ensure that this training is integrated, aligned and considered as part of Open Air Education safeguarding approach and culture of vigilance.

- Ensure that the school has appropriate filtering and monitoring systems in place to limit children's exposure to potentially harmful and inappropriate online material. This includes ensuring that an effective whole school approach to online safety is in place to empower the school to protect and educate students, students and staff in their use of technology and establish mechanisms to identify, intervene in and escalate any concerns where appropriate. This also means confirming that staff, students and visitors to their site follow Open Air Education Online Safety/Mobile and Smart Technology/Acceptable Use Policy (which reflects the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (ie., 3G, 4G and 5G). Governors will also ensure that this is regularly reviewed and risk assessed to keep up with evolving cyber-crime technologies and that parents and carers are communicated with to reinforce the messages of children staying safe online (inclusive of online sites that children access and who, from the school, they talk to online, for example remote education).
- Ensure that children are taught about safeguarding, keeping themselves and others safe, including online safety through Relationships Education (Primary) or Relationships and Sex Education (Secondary) and that this approach to teaching is tailored to meet the specific needs and vulnerabilities of individual children and how they identify, including children who are victims of abuse, children with special educational needs or disabilities and children who identify as lesbian, gay, bi or trans (LGBT).
- Ensure that a Designated Teacher is appointed to promote the educational achievement of looked after children, including working with the Local Authority's virtual school headteacher and discuss how student premium funding for looked after children will be used.
- Ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Ensure that the Child Protection Policy reflects the fact that additional barriers can exist when recognising abuse and neglect for children with Special Educational Needs. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; being more prone to peer group isolation than other children; the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.
- Ensure that where children may need to learn online at home, there are clear, safe and effective protocols and provisions in place.

- Ensure that Open Air Education premises are rented or hired to organisations or individuals that have appropriate safeguarding and child protection policies and procedures in place to keep children safe and that appropriate liaison occurs between organisations and school on any safeguarding matters. 'Guidance on keeping children safe in out-of-school settings' (DfE) details the safeguarding arrangements that schools and college should expect these providers to have in place.

4. Filtering and Monitoring

4.1 Roles and Responsibilities

At Open Air Education, we are committed to providing a safe digital environment for our students. Our governing advisory board and school leadership ensure that robust filtering and monitoring systems are in place to protect students from harmful online content.

The Designated Safeguarding Lead (DSL) oversees the implementation and regular review of these systems, ensuring compliance with *Keeping Children Safe in Education (KCSIE)* guidelines.

4.2. Regular Review and Assessment

- We review our filtering and monitoring provisions at least annually to assess their effectiveness and relevance.
- Our assessment includes student risk profiles, considering emerging digital risks such as generative artificial intelligence (AI) and new online threats.

4.3 Filtering Standards

Our filtering systems are designed to block harmful and inappropriate content while allowing necessary access for educational purposes. We ensure that:

- Safe search features are enabled on all search engines and browsers used by students.
- Clear policies are in place for devices without filtering (e.g., personal or offline devices).
- Bring Your Own Device (BYOD) policies include filtering and monitoring measures.
- We stay informed about new circumvention methods that could bypass filtering systems and take proactive steps to mitigate them.

4.4 Monitoring Standards

At Open Air Education, we use a combination of technical and human oversight to monitor online activity in a way that supports student safety without infringing on privacy unnecessarily. Our approach includes:

- Technical solutions, such as keyword detection and AI-based monitoring tools, to identify potential risks.
- In-person monitoring, where appropriate, to detect concerns that may not be flagged by digital systems.
- A clear incident response policy, outlining how concerns raised by monitoring systems are managed.
- Regular reporting and review of monitoring data to identify patterns, trends, and areas requiring further intervention.

5. Information for Parents

At Open Air Education, the Governing Advisory Board and Proprietor are committed to keeping our children safe and will take any reasonable action to safeguard and promote their welfare. In cases where Open Air Education has reason to be concerned that a child may be suffering significant harm, ill treatment, neglect or other forms of harm, staff have no alternative but to follow Durham Safeguarding Children Partnership and inform the First Contact Service or police of their concern.

Procedures

The Designated Safeguarding Lead (or Deputy) will be informed immediately by an employee of the school, student of the school, parent of the school or other persons, in the following circumstances:

- Suspicion that a child is being harmed
- There is evidence that a child is being harmed

The threshold of significant harm is defined in the Children Act 1989 Section 31 (9) as:

- Ill-treatment
- Impairment of health (as compared to a similar child)

Note: harm now includes the impairment of a child's health or development as a result of witnessing the ill-treatment of another person (Adoption and Children Act 2002).

6. Categories of harm

Working Together defines the categories of harm as:

Physical Abuse

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

Neglect

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

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

*The sexual abuse of children by other children is a specific safeguarding issue (also known as Child-on-Child Abuse) in education and ALL staff should be aware of it.

** It is more likely that girls will be victims and boys perpetrators, but all Child-on-Child Abuse is unacceptable and will be taken seriously.

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving

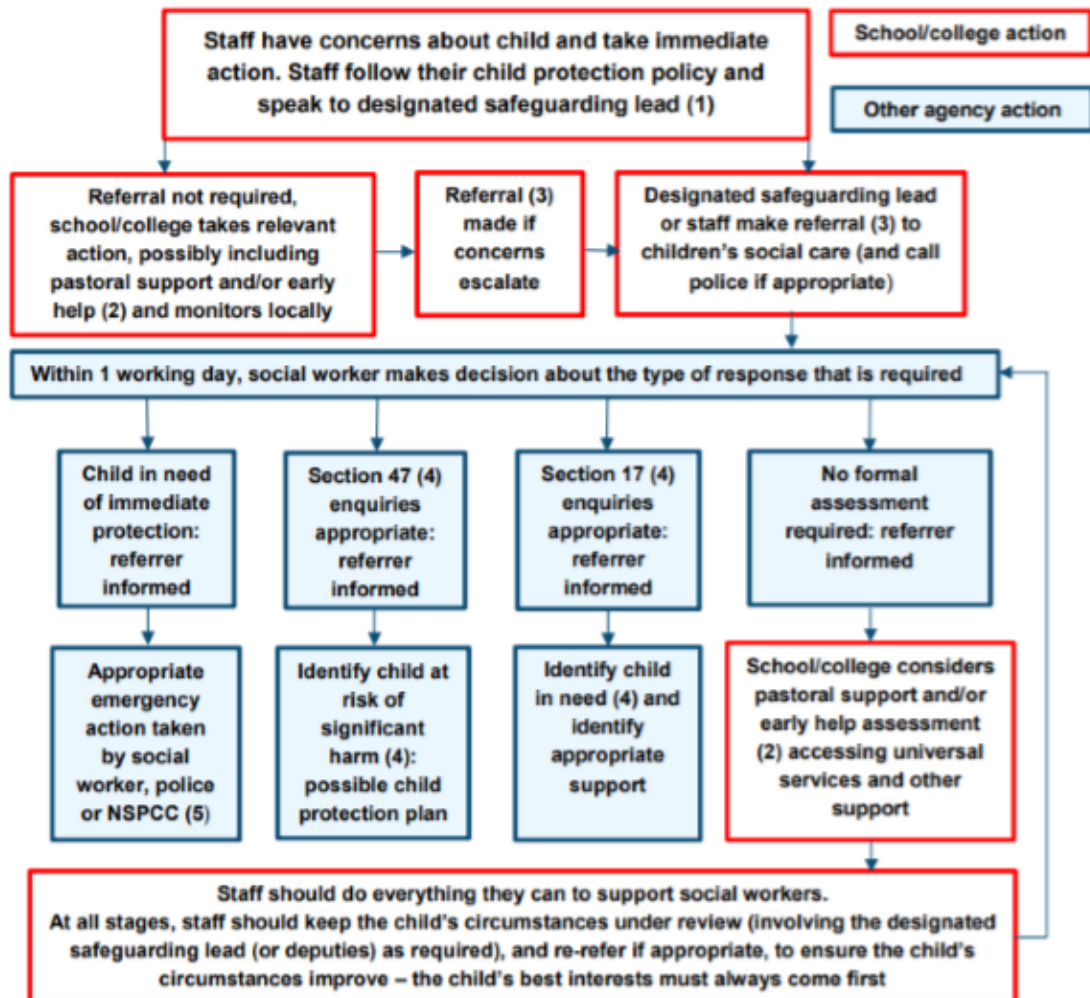
the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child though it may occur alone.

7. Children potentially at greater risk of harm

Children may need a Social Worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local Authorities children's social care have clear duties to share the fact a child has a Social Worker, and the Designated Safeguarding Lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (and Deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms (contextual safeguarding) take a variety of different forms and children can be vulnerable to multiple harms. Staff should be aware that experience and indicators of girls who are criminally exploited can be very different to boys but for both boys and girls being criminally exploited they maybe at higher risk of sexual exploitation. Staff should also be aware of the indicators that signal a child is at risk from or involved in serious violent crime, for example being missing from education, changing friendships, a decline in school performance, self-harming and unexplained gifts and possessions. Staff should be able to recognise the risk factors that increase the likelihood of involvement in serious violence, such as being male, being absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending such as theft or robbery.

The Designated Safeguarding Lead will keep a full record of concerns raised and make referrals to the First Contact Service, if necessary. These records may be either handwritten or electronic but will be stored via a secure system. The headteacher will be kept informed at all times.

8. Actions where there are concerns about a child



9. Safe Schools, Safe Staff

Open Air Education Governing Advisory Board and Proprietors have agreed and ratified the following policies, procedures, processes or systems which must be read and considered in conjunction with this policy:

Whistle Blowing

Open Air Education Whistle Blowing Policy provides guidance to staff, volunteers and contractors on how they can raise concerns and receive appropriate feedback on action taken, when staff have concerns about any adult's behaviour.

Management of a safeguarding concern or allegation about an adult that does or does not meet the harm threshold:

If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff, volunteers and contractors) harming or posing a risk of harm to children, then this should be referred to the Headteacher where there are concerns/allegations about the Headteacher this should be referred to the Chair of Governors, or Proprietor of an independent school and in the event of concerns/allegations about the headteacher, where the headteacher is also the sole Proprietor of an independent school, this should be reported directly to the Designated Officer(s) at the Local Authority.

Consultation without delay with the Designated Officers Helpline: Louise Brooks/Sharon Lewis, Tel: 03000 268 835 will determine what action follows. A multi-agency strategy meeting may be arranged to look at the complaint in its widest context, the headteacher/senior member of school staff will attend this meeting, which will be arranged by the Designated Officer. All issues will be recorded on the allegation management form and the outcome reached will be noted to ensure closure.

<https://durham-scp.org.uk/>

Where this concern does not meet the harm threshold, all staff should continue to follow their Staff Behaviour/Code of Conduct Inclusive of 'Low-Level' Concerns Policy and share information with the headteacher. This concern may be where an adult's behaviour is inconsistent with the staff code of conduct, including inappropriate behaviour outside of work but does not meet the allegation threshold.

Open Air Education is fully aware of its statutory duty to refer individuals to the Disclosure and Barring Service (DBS) where a person has:

- Harmed a child, or put a child at risk of harm;
- Been dismissed (or would have been dismissed) due to safeguarding concerns; or
- Resigned during an investigation where they may have otherwise been dismissed for such conduct.

The Headteacher and Designated Safeguarding Lead (DSL) are trained in this duty and understand the referral process under the Safeguarding Vulnerable Groups Act 2006. This is reflected in our Safeguarding and Staff Disciplinary policies. We understand that failure to make a referral to the DBS when required is a criminal offence.

We also understand the parallel duty to consider referral to the Teaching Regulation Agency (TRA) where relevant.

Training and Support

All staff members will be made aware of the systems within their school which support safeguarding and these will be fully explained to all new staff as part of their induction into the school to ensure they can discharge their responsibilities effectively. This includes: The Child Protection Policy, the policy and procedures to deal with Child-on-Child Abuse; the Behaviour Policy (which includes measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying), the Staff Behaviour/Code of Conduct (inclusive of 'Low Level' Concern, allegations against staff and Whistleblowing) Policy, the Safer Working Practice Document, the safeguarding response to children who go missing from education and the role and identity of the Designated Safeguarding Lead and their deputies.

All staff members receive appropriate safeguarding and child protection training (including online safety) which is regularly updated. Our CPD for staff is integrated, aligned and considered as part of our whole school safeguarding approach, wider staff training and curriculum planning. The Governing Advisory Board or Proprietor decides the frequency and content of this CPD. At Open Air Education our whole school training is held annually. In addition, all staff members receive regular safeguarding and child protection updates via staff meetings held regularly or internal CPD as required but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively and allow them opportunities to contribute to reviewing and shaping the safeguarding arrangements in school inclusive of, the Child Protection Policy.

Professional Confidentiality

Confidentiality is an issue which needs to be understood by all those working with children, particularly in the context of safeguarding. This means only involving those who need to be involved, such as the Designated Safeguarding Lead (or Deputies) and Local Authority children's social care. Open Air Education recognises that the only purpose of confidentiality in this respect is to benefit the child. Durham Safeguarding Children Partnership <https://durham-scp.org.uk/>

Record Keeping

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

Well-kept records are essential to good safeguarding practice. Open Air Education is clear about the need to record any concerns, discussions held, decisions made and reasons for those decisions about a child or children within its care. All records 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 (Purpose, Action, and Outcome). All

staff will follow the schools Information Sharing and Recording Policies to ensure record keeping is compliant and in line with the General Data Protection Regulations 2018 and Data Protection Act 2018.

Following a child leaving our school we follow the appropriate transfer procedures and retention guidelines and information regarding children who have required statutory intervention at any point in their school career will automatically be shared with the receiving school. This is to ensure that all children are given the right support and intervention and information is shared strictly on a need to know basis.

Safeguarding recording within Open Air Education is held electronically through a secure management system of Famly/Toddle and all staff have received training in the recording expectations and retention. At Open Air Education we started electronic recording from opening.

Attendance at Safeguarding Conferences

In the event of Open Air Education being invited to attend child protection conferences, the Designated Safeguarding Lead (or Deputies), will represent the school and/or identify the most appropriate trained member of staff to provide information relevant to child protection conference (initial/review). In the event that those staff members cannot attend, the following trained members of staff may attend:

Supporting Children

Open Air Education recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. Open Air Education may be the only stable, secure and predictable element in the lives of some of the children in its care. The school, therefore, recognises that such children might exhibit challenging and defiant behaviour and will take careful note of the context of such behaviour.

As an Operation Encompass partner we work closely with the Operation Encompass Lead with regards to domestic violence incidents and offer wellbeing checks to our students if we are contacted following an incident which has occurred in one of our students homes.

Open Air Education also recognises that children are capable of abusing other children. Child-on-Child Abuse can take many forms and any concerns raised will be investigated and dealt with appropriately as part of our school's zero tolerance approach to unacceptable behaviour. No Child-on-Child Abuse should be tolerated or minimised as part of growing up and all those involved will be provided with an appropriate level of support. It is understood that those students who have experienced abuse in their own lives may in turn abuse others. This requires a considered and sensitive approach in order that the child can

receive appropriate help and support. See Child-on-Child Abuse Policy for detailed information.

Therefore Open Air Education will endeavour to support all its students through a clear set of values and standards upheld and demonstrated throughout all aspects of school life:

- The curriculum encourages self-esteem, self-motivation, self-protection.
- The school ethos, which promotes a positive, supportive and secure environment and which gives all students and adults a sense of being respected and valued.
- Approaches which allow children and young people to develop critical thinking, literacy skills and digital literacy skills.
- A curriculum that provides preventative education which explores human rights, equality, democracy and tolerance and prepares children and young people fully for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- A curriculum where children develop personal resilience, understand and can take appropriate risks or have personal strategies/safety plans that allow them to manage their own safety both on and offline. This can include topics covered as part of Relationships, Relationships and Sex Education and Health Education as well as Fundamental British Values and the SMSC Curriculum which cover harm, abuse, positive and healthy relationships and crime. Such a curriculum will be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities) and will include; healthy and respectful relationships; boundaries and consent; stereo typing, prejudice and equality; body confidence and self-esteem; how to recognise an abusive relationship, including coercive and controlling behaviour; the concepts of, and laws relating to-sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called 'Honour' - Based Abuse such as Forced Marriage and Female Genital Mutilation (FGM) and how to access support and; what constitutes sexual harassment and sexual violence and why these are always unacceptable.
- A whole school approach to online safety that considers the four areas of risk: Content; being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism. Contact; being subjected to harmful online interaction with other users; for example, child to child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial and other purposes. Conduct; personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending

and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying). Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

- A coherent management of Positive Behaviour Policy & Procedures inclusive of the Use of Reasonable Force.
- Liaison with other professionals and agencies who support children and parents.
- A commitment to develop productive, supportive relationships with parents whenever it is in the child's interest to do so.
- The development and support of a responsive and knowledgeable staff group whose role it is to respond appropriately in all safeguarding situations.

Open Air Education recognises that, statistically, children with behavioural difficulties and disabilities are the most vulnerable to abuse. School staff who work, in any capacity, with children with profound and multiple disabilities, sensory impairment and/or emotional and behavioural problems will need to be particularly sensitive to signs of abuse. School staff will give consideration to children who are subject to a statement of special needs, an education health and care plan or have a medical condition, as these can mask safeguarding issues and may often be attributed to the medical condition rather than that a child may be being harmed.

Concerns such as changes in behaviour and presentation (both physical and mental), mood or injury will be considered for each individual child and their own circumstances and will not be dismissed. Children with SEND and certain medical conditions are often more prone to peer group isolation than other children and there is greater potential for children with SEND and certain medical conditions being disproportionally impacted by behaviours such as bullying (including prejudice-based bullying), without outwardly showing any signs.

Therefore, time will be taken to ensure that the full circumstances of any child who has additional needs and requires support around language and communication is shared at the point of referral to ensure the best possible outcome for the child is always achieved and their voice through any form of communication is always heard.

To address these additional challenges, Open Air Education will consider extra pastoral support for children with SEND and certain medical conditions. Open Air Education also recognises that in a home environment where there is domestic violence, drug or alcohol misuse or mental health issues children may also be vulnerable and in need of support and protection.

This policy MUST be read in conjunction with other related school policies.

- We have a robust School Recruitment and Selection Policy - inclusive of safer recruitment guidance and regulation, a Single Central Record which demonstrates the pre-appointment checks for all staff (e.g. identity, professional qualifications, right to work in the UK, further checks on people who have lived or worked outside the UK, for the workforce who are in regulatory activity (enhanced DBS, children's/adult barred list, prohibition from teaching check, section 128 check for management positions) and supervision of those who don't meet this requirement.
- Clear recruitment procedures which embed keeping children safe across every aspect from vacancy to conditional appointments, induction and an on-going safeguarding culture of vigilance.
- Trained panel members who ensure that the policy works in practice in all recruitment and selection within the school.
- School Staffing (England) Regulations 2009, Regulation 9: require Governing Bodies or Proprietors of maintained schools to ensure at least one member of a recruitment panel must undertake safer recruitment training to satisfy all requirements in the statutory guidance Keeping Children Safe in Education 2025 and Working Together 2018.
- School's HR policies and procedures.
- Staff Behaviour Policy (code of conduct) inclusive of 'Low Level' Concerns, allegations against staff, Whistleblowing Policy and Safer Recruitment Consortium Guidance for Safer Working Practices for those working with young people in education settings, 2022. Open Air Education will ensure that all staff and volunteers are aware of the need for maintaining appropriate and professional boundaries in their relationships with young people and agree to work within all policies and procedures to safeguard both children and adults.
- Open Air Education will ensure that staff and volunteers are aware that sexual relationships with students aged under 18 are unlawful and could result in legal proceedings being taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).
- Positive Behaviour Policy - inclusive of the Use of Reasonable Force/positive handling and confiscating and searching.
- Anti-Bullying Policy (including online bullying).
- Online Safety Policy/Camera and Mobile Phone Policy inclusive of appropriate usage documentation (covering the use of mobile phones, cameras and all other technology within the school or setting and appropriate filtering and monitoring on school devices and school networks.)
- Remote learning Policy inclusive of all expectations for children learning at home.
- Record-Keeping Policy inclusive of all procedures around the recording, storing and transferring of information regarding children
- Equality, Diversity and Inclusion & Special Education Needs Policy.

- The Visits and Visitors Policy (reviewed annually) reflects the consideration we give to the safeguarding of our children both within the school environment and when away from the school, when undertaking school trips, visits or students being creatively educated.
- Child-on-Child Abuse within the Child Protection and Safeguarding Policy.
- Mental Health and Wellbeing Process/Plan
- Data protection and Privacy / Information Sharing Policy with parental consent forms annually signed.
- First Aid Policy inclusive of administration of medicines procedures with trained staff who manage this.
- Policy details students with medical needs Policy and implications for the workforce, students and partnership with parents.
- Attendance Policy/Children who are absent from education - school management for attendance including children being absent from education for prolonged periods and/or repeat occasions (persistently absent) and the partnership with the LA in reporting children missing from education and those deleted from the school's admission register. This includes the need for two emergency contact details for every student, where possible.
- Attendance Policy - inclusive of runaways, missing, and children missing from education, ensuring appropriate safeguarding responses.
- Complaints Procedure
- Disqualification Policy inclusive of allegation management procedures.
- Confidentiality procedures/Privacy Policy and Whistle Blowing Policy.
- Information Sharing Policy (internal and external exchange of information)
- Looked After Children protocols inclusive of named Looked After Teacher whose role is to champion the achievement of looked after children in your school and work closely with the Designated Safeguarding Lead and the Virtual headteacher within the LA who has responsibility for the LAC.
- Intimate Care Policy inclusive of procedure to support students who have an accident and either wet, soil or menstruate and need assistance - care plan details.
- Unaccompanied travel to and from school procedure to ensure students safety as part of Minibus Policy.
- Single Equality Scheme.
- Spiritual, Moral, Social and Cultural Curriculum inclusive of awareness of Female Genital Mutilation, Domestic Abuse, Child Sexual Exploitation, Mental Health and Well-Being and Fundamental British Values.
- Relationship Education Policy (Primary) inclusive of Health Education content.
- Relationship and Sex Education (RSE) Policy (Secondary) inclusive Health Education content.

Upper School

Contextual Safeguarding and Adolescent Risk

As children move into adolescence, they may be at greater risk from peer-on-peer harm, online exploitation, substance misuse, and unhealthy relationships. Staff are trained to identify early signs of vulnerability and respond in line with contextual safeguarding principles.

Peer-on-Peer Abuse and Harmful Sexual Behaviour

Peer-on-peer abuse, including sexual harassment, image-based abuse, coercive relationships and online exploitation, is never tolerated. Staff receive training to recognise and report concerns, and incidents are recorded, assessed and addressed promptly under both safeguarding and behaviour procedures.

Online Safety and Digital Behaviour

Older students are at increased risk of online harms, including contact with strangers, grooming, and harmful content. The school provides age-appropriate education on online safety, and monitors digital behaviour through Acceptable Use Agreements, filtering systems, and staff vigilance.

Mental Health and Emotional Wellbeing

Staff are trained to identify emerging concerns related to emotional wellbeing, including signs of anxiety, self-harm, and eating difficulties. The DSL works closely with families and external professionals to ensure timely, sensitive intervention.

Student Voice and Trusted Adults

Key Stage 3 students are encouraged to identify their trusted adults and to seek help when needed. Regular check-ins, student surveys and wellbeing circles provide safe avenues for disclosure and early support.

Supervision and Site Safety

While supervision remains appropriate to age and risk, KS3 students are supported to develop independence safely. Clear boundaries, visual cues, and age-specific risk assessments are in place, especially during off-site activities or unstructured time.

Training and Procedures

All staff receive annual safeguarding training that includes specific guidance on supporting students aged 11-14. This includes recognising harmful sexual behaviour, contextual risks, and supporting disclosure with age-appropriate communication.

Record Keeping and Referral

Safeguarding records identify students by key stage. For KS3 students, patterns over time (e.g. emotional distress, conflict, peer issues) are reviewed regularly by the DSL to ensure joined-up, timely support.

10. Annex: Low-Level Concerns

1. Definition of a Low-Level Concern

A low-level concern refers to any behaviour by a staff member, volunteer, or other individual working with children that does not meet the threshold for immediate safeguarding action but may still be inappropriate, cause unease, or have the potential to escalate into a more serious issue. These concerns often stem from subtle boundary-blurring behaviours that, if unaddressed, could compromise the safety and well-being of children.

2. Examples of Low-Level Concerns

Low-level concerns can take various forms, including but not limited to:

- Excessive familiarity with certain students.
- Giving preferential treatment or having "favourites."
- Inappropriate physical contact (e.g., excessive hugging, patting, or other forms of touching).
- Engaging in private conversations with students in isolated areas.
- Sharing personal information with students beyond professional boundaries.
- Using inappropriate language or tone with students.
- Making suggestive comments or jokes.
- Excessive social media interaction with students.
- Taking photographs of students without proper authorisation.

3. Reporting Procedures

All staff and volunteers have a responsibility to report low-level concerns to maintain a safe and professional environment. The reporting process includes:

- Reporting the concern to the Designated Safeguarding Lead (DSL), headteacher, or line manager.
- Providing a factual account of the concern, avoiding assumptions or personal judgements.

- Utilising an anonymous reporting option if necessary.
- Ensuring concerns are recorded and documented in line with school policies to facilitate appropriate monitoring and follow-up.
- Encouraging staff self-reporting, where individuals recognise and disclose their own potential breaches of professional boundaries. Self-reporting demonstrates integrity, allows for early intervention, and prevents concerns from escalating.

4. Investigative Approach

Upon receiving a low-level concern, the following steps may be taken:

- Initial informal discussion with the staff member involved to clarify the concern and gather information.
- Monitoring of interactions between the staff member and students to assess patterns of behaviour.
- Further investigation if the concern persists, escalates, or appears to indicate a breach of safeguarding principles.

5. Supportive Measures

Addressing low-level concerns is not solely punitive; it also involves support and professional development. Potential measures include:

- Providing training on professional boundaries and safeguarding best practices.
- Offering coaching or mentoring to help staff refine their professional conduct.
- Referring individuals to relevant support services where needed.
- Fostering a culture of openness, where staff feel empowered to discuss concerns without fear of stigma or disciplinary action. Encouraging open dialogue ensures that issues are addressed early and constructively.

6. Importance of Addressing Low-Level Concerns

Proactively managing low-level concerns is crucial for:

- Preventing escalation into more serious safeguarding issues.
- Ensuring a safe and positive learning environment for all students.
- Fostering a culture of openness and accountability, where staff members are encouraged to reflect on their behaviour and seek guidance where necessary.

By integrating this annex into the Child Protection Policy, Open Air Education reinforces its commitment to upholding the highest standards of safeguarding

and professional conduct, ensuring that every child remains safe and protected within our educational environment.

11. Links to Legislation & Guidance

This policy has been informed by the following legislation and national & local guidance

Apprenticeships, Skills, Children and Learning Act 2009 (as amended)

<https://www.legislation.gov.uk/ukpga/2009/22/section/ZA2>

Children Act 1989/2004

<http://www.legislation.gov.uk/ukpga/2004/31/contents>

CP Referral Form

<https://durham-scp.org.uk/download/form-childrens-services-safeguarding-referral-form/>

Data Protection Act 2018

<http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

DfE Statutory framework for the Early Years Foundation Stage (EYFS) Sept 2024

<https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>

Education Act 2002 Section 175

www.legislation.gov.uk/ukpga/2002/32/section/175

Education (Independent School Standards) Regulations 2014

<http://www.legislation.gov.uk/uksi/2014/3283/schedule/made>

Education and Training (Welfare of Children) Act 2021

<https://www.legislation.gov.uk/en/ukpga/2021/16/enacted>

Equality Act 2010

<https://www.gov.uk/guidance/equality-act-2010-guidance>

General Data Protection Regulations, 2018

<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

Human Rights Act, 1998

<https://www.equalityhumanrights.com/en/human-rights>

Information Sharing: Advice for Practitioners providing safeguarding services

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

Freedom of Information Act 2000

http://www.legislation.gov.uk/ukpga/2000/36/pdfs/ukpga_20000036_en.pdf

Keeping Children Safe in Education 2024

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Keeping children safe in out-of-school settings

[Keeping children safe in out-of-school settings: code of practice - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice)

Non-Maintained Special Schools (England) Regulations 2015

<http://www.legislation.gov.uk/uksi/2015/728/made>

https://dera.ioe.ac.uk/16086/1/public_sector_equality_duty_guidance_for_schools_in_england_final.pdf

<http://www.legislation.gov.uk/ukpga/2006/47/contents>

<https://www.gov.uk/government/publications/school-attendance>

<http://www.legislation.gov.uk/ukpga/2003/42/contents>

<https://durham-scp.org.uk/>

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

<https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>

This policy must be ratified by the Governing Advisory Board signed/dated by both the headteacher and Chair.

Children and Young People

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Review Date	Changes made	Ratification Date by Governing Advisory Board

Appendix 1

Abuse or Safeguarding Issue	Link to Guidance/Advice	Source
Abuse	<u>Supporting practice in tackling child sexual abuse - CSA Centre</u>	Centre of Expertise on Child Sexual Abuse
	<u>What to do if you're worried a child is being abused</u>	DfE advice
	<u>Domestic abuse: Various Information/Guidance</u>	Home Office (HO)
	<u>Faith based abuse: National Action Plan</u>	DfE advice
	<u>Forced marriage resource pack</u>	
	<u>Disrespect NoBody Campaign</u>	Home Office website
	<u>Tackling Child Sexual Abuse Strategy</u>	Home Office Policy Paper
	<u>Together we can stop child sexual abuse</u>	HM Government campaign
Bullying	<u>Preventing bullying including cyberbullying</u>	DfE advice
Children missing from education	<u>Children missing education</u>	DfE statutory guidance

n, home or care		
	<u>Child missing from home or care</u>	DfE statutory guidance
	<u>Children and adults missing strategy</u>	Home Office strategy
Children with family members in prison	<u>National Information Centre on Children of Offenders</u>	Barnardo's in partnership with HM Prison and Probation Service
Child Exploitation	<u>Trafficking: safeguarding children</u>	DfE and HO guidance
	<u>Care of unaccompanied and trafficked children</u>	DfE statutory guidance
	<u>Modern slavery: how to identify and support victims</u>	HO statutory guidance
	<u>Child exploitation disruption toolkit</u>	Home Office
	<u>County Lines Toolkit For Professionals</u>	The Children's Society
	<u>Multi-agency practice principles for responding to child exploitation and extra-familial harm</u>	Non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme
Confidentiality	<u>Gillick competency Fraser guidelines</u>	NSPCC

Drugs	<u>Drug Strategy 2021</u>	Home Office strategy
	<u>Information and advice on drugs</u>	Talk to Frank website
	<u>Drug and Alcohol education – teacher guidance & evidence review</u>	PSHE Association website
(So-called) ‘Honour’ - Based Abuse” including FGM and forced marriage	<u>Female genital mutilation: information and resources</u>	Home Office guidance
	<u>Female genital mutilation: multi agency statutory guidance</u>	DfE, DH and HO statutory guidance
	<u>Forced Marriage</u>	FMU
	<u>Forced Marriage</u>	Home Office
	<u>FGM Resource Pack</u>	Home Office
Health and Well-Being 9	<u>Rise Above: Free PSHE resources on health, wellbeing and resilience</u>	Public Health England
	<u>Supporting students at school with medical conditions</u>	DfE statutory guidance
	<u>Mental health and behaviour</u>	DfE advice
	<u>Overview – Fabricated or induced illness</u>	NHS
Homelessness	<u>Homelessness code of guidance for local authorities</u>	Ministry of Housing, Communities & Local

		Government guidance
Information Sharing	Government information sharing advice	DfE
	Information Commissioner's Office: Data sharing information hub	ICO
Online safety-advice	Childnet	Childnet
	Educateagainsthate	Educate Against Hate
	London Grid for Learning	London Grid for Learning
	NSPCC E-safety for schools	NSPCC
	Safer recruitment consortium	Safer Recruitment Consortium
	Searching screening and confiscation	DfE
	South West Grid for Learning	SWGFL
	Use of social media for online radicalisation	DfE & Home Office
	Online Safety Audit Tool	UK Council for Internet Safety
	Online safety guidance if you own or manage an online platform	DCMS
	A business guide for protecting children on your online platform	DCMS
	UK Safer Internet Centre	UK Safer Internet Centre

Online Safety – Remote Education, Virtual Lessons & Live Streaming	<u>Guidance Get help with remote education</u>	DfE
	<u>Departmental guidance on safeguarding and remote education</u>	DfE
	<u>London Grid for Learning</u>	LGFL
	<u>National cyber security centre</u>	National Cyber Security Centre
	<u>UK Safer Internet Centre</u>	UK Safer Internet Centre
Online Safety – Support for Children	<u>Childline</u>	Childline
	<u>UK Safer Internet Centre</u>	UK Safer Internet Centre
	<u>CEOP</u>	National Crime Agency Command
Online Safety – Parental Support	<u>Childnet</u>	Childnet
	<u>Commonsensemedia</u>	Common Sense Media

	<u>Government advice</u>	
	<u>Internet Matters</u>	Internet Matters
	<u>How Can I Help My Child?</u>	Marie Collins Foundation
	<u>Let's Talk About It</u>	Let's Talk About It
	<u>London Grid for Learning</u>	London Grid for Learning
	<u>Stopitnow</u>	Lucy Faithfull Foundation
	<u>National Crime Agency/CEOP Thinkuknow</u>	CEOP
	<u>Parentzone</u>	Parent Zone
	<u>Talking to your child about online sexual harassment: A guide for parents</u>	Children's Commissioner
Private Fostering	<u>Private fostering: local authorities</u>	DfE statutory guidance
Radicalisation	<u>Prevent duty guidance</u>	Home Office guidance
	<u>Prevent duty: additional advice for schools and childcare providers</u>	DfE advice
	<u>Educate Against Hate Website</u>	DfE and Home Office advice
	<u>Prevent for FE and Training</u>	Education and Training Foundation (ETF)
	<u>Extremism and Radicalisation Safeguarding Resources</u>	LGfT
	<u>Manging risk of radicalisation in your education setting</u>	Dfe Guidance

Serious Violence	<u>Serious violence strategy</u>	Home Office Strategy
	<u>Factors linked to serious violence and how these factors can be used to identify individuals for intervention</u>	Home Office
	<u>Youth Endowment Fund</u>	Home Office
	<u>Gangs and youth violence: for schools and colleges</u>	Home Office advice
	<u>Tackling violence against women and girls strategy-</u>	Home Office
	<u>Violence against women and girls: national statement of expectations for victims</u>	Home Office
Sexual Violence & Sexual Harassment	<u>Barnardo's</u>	
	<u>Lucy Faithful Foundation</u>	
	<u>Marie Collins Foundation</u>	
	<u>NSPCC</u>	
	<u>Rape Crisis</u>	
	<u>UK Safer Internet Centre</u>	
Harmful Sexual Behaviour	<u>Rape Crisis (England & Wales) or The Survivors Trust</u>	
	<u>NICE guidance</u>	
	<u>HSB toolkit</u>	Lucy Faithfull Foundation

	<u>NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework-</u>	
	<u>Contextual Safeguarding Network – Beyond Referrals (Schools)</u>	Contextual Safeguarding Network
	<u>Preventing harmful sexual behaviour in children - Stop It Now</u>	Stop It Now
Support for Victims	<u>Anti-Bullying Alliance</u>	
	<u>Rape Crisis</u>	
	<u>The Survivors Trust</u>	
	<u>Victim Support</u>	
	<u>Childline</u>	
Toolkits	<u>ask AVA</u>	
	<u>NSPCC</u> Online self-assessment tool	
	<u>NSPCC</u> - Resources which help adults respond to children disclosing abuse.	
	<u>NSPCC - Harmful sexual behaviour framework</u>	
	<u>Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire.</u> This resource provides practical guidance for schools and colleges on how to prevent, identify early and respond appropriately to child-on-child abuse.	
	<u>Contextual Safeguarding Network</u>	

	<u>Childnet - STAR SEND Toolkit</u>	
	<u>Childnet - Just a joke?</u>	
	<u>Childnet - Step Up, Speak Up</u>	
	<u>NSPCC - Harmful sexual behaviour framework</u>	
	<u>Addressing child on child abuse: a resource for schools and colleges</u> – Farrer & Co	
Sharing Nudes & Semi-Nudes	<u>London Grid for Learning-collection of advice</u>	
	<u>UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people</u>	
Support for Parents/Carers	<u>National Crime Agency's CEOP CEOP Education Programme</u>	CEOP
	<u>#AskTheAwkward</u>	