Malden Oaks
School & Tuition service

Making the MOST of everyday

Safeguarding & Child Protection Policy

Status	Statutory
Review Frequency	Annual
Last Reviewed	Autumn 2026
Next Review Due	Autumn 2027
Responsible for review	DSL
Approval by	Management Committee

In developing and reviewing this policy, the school has had regard to the following legislation and guidance, together with other relevant considerations:

Legislation	Education Act 2002
Official Guidance	Keeping children safe in education statutory guidance (KCSIE), Working Together to Safeguard Children statutory guidance and Prevent duty guidance.

Malden Oaks will publish our safeguarding and child protection policy on our website.

Hard copies will be available on request from the school office.

Key Personnel

Role/ Organisation	Name & Contact Details
Designated safeguarding lead (DSL)	Ayse Meliz
Deputy DSLs *This role also encompasses the Designated Teacher for Children Looked After and Previously Looked After*	Surbiton: Sarah Bann Hayley Jeffcoate Ben Worsley Haml:/ Carly Briggs Kelly Anderson Paul Caswell 6 Oaks: Bryan Molin Jacquey Martin Jenny Mosely Monika Bilewicz Kingston: Sarah Pfutzner Samira Gani Tracy Atiase Hampton Hill Nicky McLachlan Jennifer Thornton Bradbury Sara Hunt MO Discover: James Cawthorn Annie Donovan Matthew Nott Central Services Sam Axbey Nick Smith
The provision DDSLs also share the roles for Designated Teacher for both Looked After Children and Young Carers	
Single Point of Access	0208 547 5008 | Out of hours: 02028 770 5000
Local authority designated officer (LADO)	07774 332675 | lado@achievingforchildren.org.uk | LADO referral form
Kingston and Richmond Safeguarding Children's Partnership (KRSCP)	Email: lscb-support@kingrichlscb.org.uk
Nominated Management Committee Member for Safeguarding & CP	Stuart Holmes
Chair of Management Committee	Julie Key
CAMHS Crisis Line: 0800 0516 171	Channel helpline: 020 7340 7264

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1. Introduction and policy aims

Maintaining the physical and emotional safety and wellbeing of all children across Malden Oaks School and Tuition Service is our top priority. We have a duty to keep children safe. This includes how we protect children from harm and how we respond when we suspect or confirm that a child is being harmed. Children are at the centre of everything we do at Malden Oaks. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. Adults in our school know that keeping children safe is everybody's responsibility and that all children regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion, and home circumstances have equal rights to protection and opportunities.
Malden Oaks operates a number of provisions across a number of sites, listed below. Malden Oaks also provides a home tuition service for students with medical conditions that prevent them from accessing school. Safeguarding responsibilities remain with the home school for these students and our staff will pass on concerns and if invited, will join the home school in attending relevant safeguarding meetings as appropriate. Malden Oaks staff do not lead on safeguarding for medical students. Further information can be found in Provision and Procedures for Students with Medical Needs at Malden Oaks

Provision	Site(s)	Head of School
Surbiton	Alpha Road	Sarah Bann
Ham	Dukes Centre	Carly Briggs
6 Oaks	Dukes Centre	Bryan Molin
Kingston	St John the Baptist	Sarah Pfutzner
Hampton Hill	Norman Jackson	Nicky McLachlan
MO Discover	Southwood & Petersham & Ham Seascouts	James Cawthorn

We fully recognise our moral and statutory responsibility to safeguard and promote the welfare of all children who attend Malden Oaks. This Safeguarding and Child Protection Policy is one of a range of documents that set out the safeguarding responsibilities of the whole school. We wish to create a safe, welcoming and vigilant environment for our students where they feel valued and are respected.

Safeguarding information is published throughout the school and all our students know who they can talk to in school.

We recognise that the school may provide the only stability in the lives of our students who have been abused or who are at risk of harm. We are aware that their behaviour, whether they present as aggressive or withdrawn, can be a sign of this. We always view behaviour and presentation as a form of communication.

We are able to play a significant part in the prevention of harm to our students by providing them with good lines of communication with trusted adults, supportive friends and an ethos of protection.

This policy provides information regarding our safeguarding responsibilities and details how these responsibilities should be carried out and how we operate to protect our students from harm.

This policy will be updated as and when required and annually as a minimum. This may require our policy to be published 'pending Management Committee ratification'.

Malden Oaks ensures that:

- Staff are properly trained in recognising and reporting safeguarding issues
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Appropriate action is taken in a timely manner to safeguard and promote students welfare
- We keep track of children known or thought to be at risk of harm as well as appropriate logs and records.
- We communicate well with all those involved when there is a concern about a child, including parents/carers, students, staff and agencies. This includes sharing information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time.

2. Definitions

Safeguarding means the process for protecting children from harm and abuse, whether that is within or outside the home or online. This includes:

- providing help and support to meet the needs of children as soon as problems emerge
- taking action to ensure that children have the best outcomes
- making sure that the way children grow up is consistent with providing safe and

acceptable care

- preventing barriers to children's mental and physical health or the way they develop

Child protection means the processes carried out to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, and in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, Management Committee, supply staff and self-employed staff.

Safeguarding team is used here to refer to the designated safeguarding lead (DSL) and deputy DSL(s) as a whole. The DSL is the Senior Deputy Headteacher; a member of the senior leadership team who has the lead responsibility for safeguarding and child protection (including online safety). The day to day safeguarding at each provision is managed by a small team of DDSLs in each provision, typically the HOS and their deputy(ies) with oversight from the DSL.

Child means anyone under the age of 18. We are also conscious that our students who are over 18 may still need additional support on account of their additional needs.

Parent means birth parents or other adults who are in a parenting role, for example guardians, step-parents, foster carers and adoptive parents.

Statutory means that we have to follow what has been decided or is controlled by the law and government guidance.

The local safeguarding children partnership has three safeguarding partners:

1. the chief officer of police for an area falling within the local authority (police)
2. the local authority (children's services), and
3. the Integrated Care Board for an area within the local authority (health)

In Kingston and Richmond, the local safeguarding children partnership (KRSCP) considers education as the fourth safeguarding partner. Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them. Our safeguarding arrangements are guided by and align with the KRSCP's local arrangements and London Child Protection Procedures and Practice Guidance, sometimes referred to as local safeguarding arrangements in this policy.

3. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. The Key Personnel table at the start of this policy identifies the DSL and DDSLs. This policy applies to all staff and Management Committee Members in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for life in modern Britain, and a culture of zero tolerance of disability discrimination, sexism, misogyny/misandry, homophobia, biphobia and sexual violence/ harassment. This will be underpinned by our:

- Relationships & Communication: An Alternative Behaviour Policy
- Equalities Policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, 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 violence such as forced marriage and female genital mutilation (FGM) and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

3.1 All staff

All staff will:

- Sign a declaration at the beginning of each academic year to say that they have read and understood the necessary guidance . For both Teaching Staff & Non-Teaching staff, this is Part 1 and Annex A of Department for Education's Statutory Safeguarding Guidance, Keeping Children Safe in Education 2026and this policy.
- Report any safeguarding concerns to the DDSL assigned to their site.
- Understand that they should follow up concerns they think have not been adequately addressed whilst being mindful that the DSL may not be able to give them very much feedback.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for all students, including those who may need special consideration (as listed above) or who are LGBTQ+ to speak out and share their concerns
- Signpost students/ families to possible avenues of support as detailed on the school website

All staff will be aware of:

- Our systems which support safeguarding, including this Child Protection and Safeguarding policy, the Staff Code of Conduct, the role and identity of the designated safeguarding leads (DSL), the Behaviour & Anti Bullying Policy, the Equalities Policy and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals and not promising the student they will keep any secrets

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) LGBTQ+ can be targeted by other children
- A student being trans+ is not inherently a safeguarding concern on its own
- What to look for to identify children who need help or protection

3.2 The designated safeguarding lead (DSL) & deputy safeguarding leads (DDSLs)

The DSL is a member of the senior leadership team. Our DSL is Ayse Meliz, Deputy Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school. In addition to the DSL, the Heads of each provision are Deputy Designated Safeguarding Leads and together with the other Deputy Designated Safeguarding Leads, are responsible for the day to day safety and well being of the students attending their site. The DSL will always have the ultimate responsibility for keeping students safe.

The full responsibilities of the DSL and the deputy DSL(s) are listed in their job descriptions. The DSL's responsibilities include, but are not limited to

- reading and following KCSiE
- always being available during school hours for staff in school to discuss any safeguarding concerns, or arrange appropriate cover for any out of hours or out of term activities
- working together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise
- contributing to the assessment of children, including taking part and/or supporting other staff to take part in strategy discussions and meetings between multiple agencies
- working together with and supporting parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of Malden Oaks' role in making referrals about suspected abuse and neglect

- understanding the importance of sharing information, including referring cases to relevant agencies (for example, children's services, the police, the Channel Programme and/or the Disclosure and Barring Service (DBS)) when appropriate, and supporting staff who make referrals directly
- understanding and following AfC's and KRSCP's safeguarding procedures, in addition to attending the termly DSL forums provided by KRSCP to ensure they are acting in line with the local safeguarding arrangements
- keeping the headteacher up to date with safeguarding issues
- having the lead responsibility for online safety, and oversight and checking the effectiveness of filtering and monitoring systems and their reports
- being aware of the requirement for children to have an Appropriate Adult when speaking with police, as described in PACE Code C 2019
- working with the 'case manager' and LADO for child protection concerns that involve a staff member
- making sure child protection files are up to date
- making sure all staff have access to this policy (and the wider safeguarding procedures) and that the policy is available publicly and reviewed annually
- making sure that all staff (including third-party staff and contractors) have an adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read the relevant part of KCSiE
- working alongside the Management Committee and headteacher to update and review procedures and how they are being implemented, including jointly completing an annual safeguarding self-audit and submitting it to KRSCP
- promoting the educational outcomes of students who have or had a social worker, by sharing information about child protection issues with teacher and leadership staff
- encouraging a culture of listening to children, taking into account their wishes and feelings when any plans are put in place to protect them.
- If a member of staff needs to discuss any safeguarding concerns about a student, they should go to the Head of Provision that the student access in the first instance. The DDSLs may discuss cases with each other or with the DSL and will be given the time, funding, training, resources and support to carry out their role. The contact details for the Deputy Designated Safeguarding Leads are as follows:

	Head of School	Other DDSLs		
Surbiton	Sarah Bann 02031372674	Hayley Jeffco… 02031372674	Benjamin Wor… 02031372674	

Ham	Carly Briggs 0208 289 4665	Kelly Anderson 0208 289 4665	Paul Caswell 0208 289 4665	
6Oaks	Bryan Molin 0208 289 4665	Monika Bilew… 0208 289 4665	Jacquey Martin 0208 289 4665	Jenny Mosely 0208 289 4665
Kingston	Sarah Pfutzner 07939937442	Tracy Atiase 020 3879 5510	Samira Gani 07852 327848	
Hampton Hill	Nicky McLachlan 07852327846	Sara Hunt 07852327846	Jennifer Thornton Bradbury 07496 341457	
MO Discover	James Cawthorn 07375887976	Annie Donovan 07983532062	Matthew Nott 07377048253	
If you cannot reach the correct DDSL, try the following people Ayse Meliz Nick Smith Sam Axbey				

3.3 The Management Committee

The Management Committee have the following specific safeguarding responsibilities:

Ensuring that:

- the school is promoting an inclusive, anti-discriminatory culture where discriminatory behaviour is recognised, challenged and addressed as part of its safeguarding responsibilities
- Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the school does. Everyone at the school is involved in the whole school approach to safeguarding and online safety is a theme throughout.
- The school's policies, procedures and training follow the local safeguarding partnership arrangements and the law, including the school's duties under the Human Rights Act 1998, UK GDPR and Data Protection Act 2018, and the Equality Act 2010.
- The school's leadership team are held to account for the school's safeguarding arrangements.
- The school submits the safeguarding self-audit to the local safeguarding children partnership annually.
- Safeguarding is a standing item on the agenda for the Education Subcommittee

- There is an appointed designated safeguarding lead (DSL) who has appropriate time, resources and funding to carry out their role.
- A Safeguarding Link member is appointed from the Management Committee for the leadership of safeguarding.
- There is an appointed designated teacher for looked after children who is appropriately trained.
- The Management Committee takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect affecting children with special educational needs and disabilities (SEND).
- Child protection files are maintained as set out in Annex C of KCSiE.
- The school adds to multi-agency working and shares information appropriately and in a timely manner.
- All staff receive regular safeguarding information, updates and in-depth training.
- Staff read the appropriate part of KCSiE.
- Students are taught about keeping themselves and others safe, including when online.
- The school does all that it reasonably can to limit student's exposure to online risks from the school's online IT systems and assign a member of the senior leadership team and a Management Committee Member to ensure standards are met.
- Appropriate safer recruitment processes and procedures are in place.
- There is a procedure in place to identify and address children absent from education, particularly where this is happening repeatedly and there are also safeguarding concerns for the student.
- Procedures are in place to manage any safeguarding concerns about staff and how concerns should be reported. The Chair of the Management Committee will manage any allegations against the headteacher.
- Before the site is hired/let, effective safeguarding arrangements would be put into place,
- Alcohol is not consumed by staff on school trips or events on site without the Headteacher's permission..
- All members of the Management Committee receive safeguarding training at induction, which is regularly updated.
- All Management Committee members sign to say they have read and understood KCSiE and this policy.

3.4 The Management Committee safeguarding link

Stuart Holmes - stuartholmes@maldenoaks.rbksch.org

- They meet regularly with the DSL and visit the school asking questions, which allows them to monitor how the school's safeguarding policies and procedures are being put into practice.
- Each year, they are part of the annual safeguarding audit, led by the DSL and headteacher, and make sure it is submitted to the KRSCP.
- They are the Management Committee's safeguarding specialist, feeding back their findings following school visits and meetings with the DSL.
- They attend appropriate training that guides them in how to monitor and progress any areas of weakness in the school's safeguarding arrangements.
- They keep up to date with the KRSCP's safeguarding arrangements and guidance.

3.5 The headteacher

Samantha Axbey - stsam@maldenoaks.rbksch.org

This policy and other safeguarding-related policies and procedures (such as the Staff Code of Conduct) are shared at induction, understood by all staff, including temporary staff and volunteers, and are being followed at all times.

- Staff receive regular safeguarding training, which is updated regularly.
- Parents and carers are aware of this policy and where they can access a copy.
- The DSL has sufficient time, training, support and resources to carry out the role and there is cover by an equivalently trained deputy if the DSL is absent.
- Visitors are appropriately supervised or escorted, where necessary.
- Systems are in place for children to express their views and give feedback, which are used to inform the whole school approach to safeguarding.
- They become the 'case manager'when an allegation is raised about a member of staff (see Appendix 2) and make the final decision regarding all low-level concerns.
- appropriate arrangements are put in place for the supervision of staff who have contact with children and families

3.6 IDEA Team

- maintains the filtering and monitoring systems
- providers filtering and monitoring reports to the DSL on a monthly basis
- completes actions following concerns or checks to the system

3.7 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of students with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

4. The law (legislation) and statutory guidance

Among other things, the Education Act 2002 places a duty on schools to keep children safe and promote their welfare. This policy is informed by statutory guidance and legislation including but not limited to the Keeping children safe in education statutory guidance (KCSIE), Working Together to Safeguard Children statutory guidance and Prevent duty guidance.

5. Managing safeguarding concerns about a child

Identifying a child who may be in need of support or protection

It is essential that children can tell us how they are feeling and know we will take their concerns seriously. We aim to create an environment full of 'reachable moments' that encourages children to feel safe enough to open up about their concerns. Malden Oaks has systems in place for children to confidently report abuse. Children are regularly reminded of these systems, including through conversations with staff, the curriculum, posters around the school site. Children can confidently report any worries they have by:

- speaking to a safe adult
- reporting anonymously online here

Malden Oaks knows that disclosing harm requires immense courage, making a positive first interaction with a safe adult crucial. Staff are trained to handle disclosures sensitively and non-judgementally. They will reassure the child that they have done the right thing, while explaining they cannot promise secrecy if it impacts their safety or wellbeing as information must be shared with those who can help. Staff know the importance of sharing any information that might help build a picture of what is happening for a child, no matter how small the concern may seem, only involving those who need to be involved.

Disclosures are only one method used to identify children who may be in need of support or protection. Staff are trained to stay alert to other indicators like shifts in behaviour, attendance, or physical and emotional wellbeing. Monitoring behaviour and presentation is particularly vital for those with communication differences for us to understand their lived experience. We adopt a safeguarding-first approach to behaviour concerns, considering if the child is communicating an unmet need or whether they are experiencing harm.

Responding to concerns about a child's welfare

Staff know the importance of identifying and sharing concerns as soon as a problem becomes visible so we can provide support to families to reduce the chance of a problem getting worse. We are aware any child may benefit from early help, but staff who work directly with children will be particularly alert to circumstances that potentially increase the need for early help.

Staff will follow this policy if they have a concern about a child, speaking to a member of the safeguarding team as soon as is practically possible. We clearly advertise the names of the DSL and deputy DSLs around the school. A member of the safeguarding team should always be available for staff to discuss safeguarding concerns. We will have cover arrangements in place if the DSL is unavailable due to illness, leave or other circumstances.

Staff will report their concerns to one of the DDSLS in their provision before recording it on CPOMS.The DSL will decide on the appropriate course of action based on locally-set thresholds and with guidance from the neglect toolkit where neglect is suspected. The options available to them include arranging community-based early help support, requesting targeted early help level support from the local authority's Family Help service, or making a referral to statutory children's services for child in need (CIN) or child protection support. The police will also be contacted if necessary. We have a duty to share information and work together with relevant external agencies to ensure a child's safety and welfare.

The school may take the lead in organising non-school services to provide early help support for the family. Early help support will be kept under constant review. We will consider making a referral to children's services if the child's situation doesn't appear to be improving or is worsening, however we will continue to provide support and contribute to assessments and plans organised by children's services.

If we believe that a family needs targeted early help to meet multiple and/or complex needs we will recommend to the family that they accept support from the local authority's Family Help team where a qualified lead practitioner will put a plan in place to support the family. Early help services require the family's consent to receive support and their services.

We will make an immediate referral to children's services, and if appropriate the police, where we believe a child is suffering, or is likely to suffer from harm. The safeguarding team will seek advice from children's services whenever they are unsure if the threshold for a referral has been met. If a referral is needed then a member of the safeguarding team should make it. Referrals to children's services will be made through the relevant local authority's procedures who will then make a decision about next steps and the type of response required. The police will notify the school of any domestic abuse incidents they attend that concern a student under the Operation Encompass duty.

We will call the police on 999 if we believe an individual is in immediate danger. The school will also inform the police if we become aware that a crime has been committed. We are aware that children can be criminalised for actions they take whilst under coercion, such as actions they take while being exploited, abused or trafficked. We will treat these children as victims recognising that they are also vulnerable and experiencing abuse. Staff will report concerns about a child carrying or using a weapon (or expressing intent to do so) to the safeguarding team who will assess the risk, take appropriate action and, depending on the risk, put a safety and support plan in place. Malden Oaks will follow the local School Related Weapons or Potential Weapons Incidents Protocol.

If in exceptional circumstances none of the DSSLs in their provision are available for staff to report a concern, staff will not delay taking appropriate action. Instead, they will inform the DSL or a DDSL in another provision. Anyone, including children, can make a referral. If for whatever reason a staff member thinks a referral to children's services is appropriate but hasn't been made, they will consult with Single Point of Access (SPA) and make a referral themselves. In these circumstances, any action taken by that staff member will be shared with the safeguarding team as soon as is practically possible.

If after a referral, we are dissatisfied with the response from our safeguarding partners and/or the child's situation does not appear to be improving, the referrer will press for re-consideration to ensure their concerns have been addressed and, most importantly, the child receives the support they need. The safeguarding team will use the local resolving professional differences procedure where necessary. The safeguarding team meets regularly to monitor children who we are concerned about to make sure each child's situation is improving in good time and the right support is in place to meet their needs and address our concerns.

We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. We ask our staff to approach our safeguarding team if they need any support during or following a safeguarding incident. Our safeguarding team has on demand

access to non-managerial supervision.

Confidentiality and information sharing

Personal information about children and their families will be processed fairly, lawfully, and securely. Data protection laws tell us how to protect personal data and give us legal powers to share information to keep children safe and promote their welfare. Staff receive regular data protection training where we make them aware of their duty to receive and share safeguarding information confidentially. This means only with professionals who need to know to keep the child safe, such as the DSL, safeguarding team in that provision, children's services or the police.

We'll share important information as soon as possible whether that's within the school or with outside partners, such as children's services, so we can quickly get the right support sorted out. We work transparently with parents wherever possible, informing them of our duty to share information and refer suspected abuse or neglect to external agencies. While we seek consent from parents when safe and appropriate, we will share information without consent if necessary to safeguard a child, such as when obtaining consent is impossible, cannot be reasonably expected, or would place the child at risk.

Record keeping

The DSL is responsible for keeping detailed, accurate and secure written records of safeguarding concerns, discussions, decisions made (including the rationale for those decisions), and the outcome. This will include instances where the decision is made that a referral to another agency is not necessary. Safeguarding concerns and referrals are kept in a separate safeguarding file for each child. Access is limited to those who need it.

When a child leaves Malden Oaks, the DDSLs in that provision will ensure their safeguarding file is transferred to the new school or college separately from their main file and within 5 days for an in-year transfer or within 5 days of the start of a new term. A confirmation of receipt will be kept. Where appropriate, the DSL will share additional information in advance of a child leaving, particularly where the information would support an assessment of risk to others as well as the individual student and help the setting put in place the right support.

When a child starts our school, we will review any safeguarding information provided making sure key staff are aware of the risk and need as soon as possible. If Malden Oaks is the last school that the child attends, we will securely store their safeguarding file until their 26th birthday is reached, when it will be securely disposed of.

If a child has experienced or is at risk of female genital mutilation

Female genital mutilation (FGM) involves removal, part removal or injury to the female

genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'. FGM is illegal in England. As with other safeguarding concerns, staff will speak to the safeguarding team if they suspect that FGM has been carried out on a child or believe that the child is at risk of FGM.

FGM Reporting Duty

If a teacher (i.e. an individual who is employed or engaged to carry out teaching work in our school) comes to know in the course of their work that a child has experienced FGM by:

- Seeing physical signs of FGM (no Malden Oaks staff are ever expected to examine children's genitals and so this scenario should never occur)
- A disclosure from the child (whether using the term FGM or otherwise)

they must directly report it to the police on 101 unless they know that a member of Malden Oaks staff has already done so. Failure to do so will result in disciplinary sanctions.

Teachers may seek support from a DDSL in making the report.

The FGM Reporting Duty is **in addition** to the normal safeguarding process and does not replace the need for staff to report safeguarding concerns including FGM to a DSL.

Concerns about extremism and radicalisation

Malden Oaks complies with the Prevent duty, a legal requirement that obligates agencies including schools to prevent people from becoming terrorists or supporting terrorism. We recognise our role in protecting individuals from extremist ideologies and intervening early to prevent radicalisation. The school undertakes a Prevent duty risk assessment to assess the risk of children being drawn into terrorism, including online, which is informed by the local profile and context.

Protecting children from extremism and being drawn into terrorism is treated the same as any other safeguarding harm. Staff will be alert to changes in a child's behaviour which could indicate that a child may be in need of help or protection. They will report any concerns in line with the school's safeguarding procedures detailed above.

The DSL will follow the local Prevent referral pathway where they become aware of a Prevent concern. They may first seek advice from the local council's Prevent lead and children's services. If appropriate, they will make a referral to the police Prevent team who will consider with other agencies whether the child would best be supported under the Channel programme. The DSL will report knowledge of online material promoting terrorism or extremism via the Government's service.

Kingston Prevent referral pathway **OR** Richmond Prevent referral pathway

Students will be provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views. We are responsible for the content and messaging delivered to our students. We will ensure that any external speakers, resource materials, or learning tools do not undermine core British values, which include democracy, individual liberty, the rule of law, and mutual respect and tolerance for those with different faiths and beliefs. Promoting these values helps us defend children against extremist ideologies while building a more united and harmonious community.

Concerns about mental health

If staff are concerned that a child's mental health is also a safeguarding concern, they will speak to a member of the safeguarding team as per this policy. We will consider whether support from the Child and Adolescent Mental Health Service (CAMHS) is necessary. If we feel that a child is in danger, we will call 999 or arrange for the child to be taken to A&E immediately by a parent or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, we will seek advice from NHS 111 online or call 111 and select the mental health option.

Child-on-child abuse, including harassment and violence

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen at school, outside of school or online. Staff are made aware of the important role we have to play in preventing child-on-child abuse and responding when we believe a child may be at risk. For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys the instigators, but we make it clear to students that all child-on-child abuse is unacceptable behaviour, we will take it seriously and how they can report to us that they have experienced or witnessed it.

We do not downplay any form of child-on-child abuse. Staff are trained to challenge inappropriate behaviour between children that is abusive in nature. Our staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. We all maintain an attitude of 'it could happen here'.

Examples of child-on-child abuse can include, but are not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, anti-LGBTQ+ hate, faith-targeted abuse and other prejudice-based incidents
- abuse between children in an intimate relationship (teenage relationship abuse)

- physical assault and harm (including when a child encourages or threatens physical abuse online) or the threat of harm with a weapon
- harmful sexual behaviour, including misogyny/misandry, sexual violence and sexual harassment (such as sexual comments, jokes and online sexual harrassment)
- sharing or making of nude and semi-nude images and/or videos including those generated using AI (deepfakes)
- 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
- 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
- initiation/hazing type violence and rituals

Child-on-child abuse is preventable. Malden Oaks puts measures in place to minimise the risk of child-on-child abuse, including

- ensuring staff are thoroughly trained to recognise the signs that a child is or may be experiencing it, challenge inappropriate behaviour between children and follow the school's procedures for reporting and responding to it
- creating opportunities in and beyond the curriculum to teach children how to keep themselves and others safe, including how to respect each other, deal with conflict and how they can confidently report inappropriate or abusive behaviour
- having a transparent Relationships & Communication (behaviour) policy that makes clear our expectations for behaviour and mutual respect, as well as the procedures for responding to unacceptable or abusive behaviour
- regularly analysing safeguarding data on child-on-child incidents to identify emerging risks and trends for students, particularly children with protected characteristics, taking action to make the school site safer
- being particularly alert to when children might be at highest risk around the school day (for example immediately after school)
- offering regular opportunities to gather feedback from students and their parents

about what more we can do to make our school a safer environment for them

Responding to allegations of child-on-child abuse

Staff will report concerns or confirmed incidents of child-on-child abuse using the school's safeguarding reporting and recording procedures described above. The DDSLs in the provision will determine the best course of action from the available options ranging from internal management of the concern to making a referral to children's services and/or the police. We will inform the police if a criminal offence is committed. The safeguarding team will work closely with the police to ensure the decisions the school makes to protect children and about discipline does not impact the criminal process.

Records will be kept of all concerns, how they were investigated and any outcomes reached on the child's safeguarding file. The DSL will contact the parents of children involved at the earliest opportunity so long as it is appropriate to do so. Where the DSL, children's services and/or the police decide the concern should be handled by the school internally, we will thoroughly investigate the concern following our behaviour policy and safeguarding processes.

If a safeguarding risk is established, the safeguarding team will assess the necessity of a safety plan or risk assessment in consultation with the external agencies involved. Individual safety plans will be subject to regular monitoring and will include input from both the student concerned and their parents. The course of action taken by the school for each child will be discussed solely with that child's parents.

Child-on-child abuse is a safeguarding issue for both children who display the behaviour and the children who are affected by it. Support will be extended to every child affected by the incident. The support offered to each child will be appropriate to their age and stage and take into consideration their additional needs.

Harmful sexual behaviour, including harassment and/or sexual violence

Harmful sexual behaviour exists on a continuum (see diagram below). Our safeguarding team will have a good understanding of harmful sexual behaviour to inform how they respond to concerns. The PSHE curriculum will include topics aimed at preventing harmful sexual behaviour. We will always consider harmful sexual behaviour in a safeguarding context. Staff are made aware of the importance of addressing the early signs of inappropriate sexual behaviour, including misogyny, to prevent it escalating into sexual violence and/or sexual harassment.

Hackett continuum of sexual behaviour tool

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected Socially acceptable Consensual, mutual, reciprocal Shared decision making	Single instances of inappropriate sexual behaviour Socially acceptable behaviour within peer group Context for behaviour may be inappropriate Generally consensual and reciprocal	Problematic and concerning behaviours Developmentally unusual and socially unexpected No overt elements of victimisation Consent issues may be unclear May lack reciprocity or equal power May include levels of compulsivity	Victimising intent or outcome Includes misuse of power Coercion and force to ensure victim compliance Intrusive Informed consent lacking, or not able to be freely given by victim May include elements of expressive violence	Physically violent sexual abuse Highly intrusive Instrumental violence which is physiologically and/ or sexually arousing to the perpetrator Sadism

Malden Oaks knows that sexual violence and sexual harassment can happen between two children of any age or sex, online or in person. It can occur also through a group of children to a single child or towards another group of children. We will not dismiss sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”, because this can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in the worst case scenario normalise abuse and stop children from coming forward to report it.

Responding to allegations

When responding to harmful sexual behaviour, including sexual harassment and sexual violence, Malden Oaks follows the guidance set out in Part Five of KCSIE. We treat incidents that occur online or outside the school setting with the same gravity as in-school incidents. All incidents are responded to using the thresholds set out in the Hackett tool, drawing upon the DSL’s professional judgement and following local safeguarding procedures:

Hackett Inappropriate: Manage internally using the behaviour policy and pastoral support.

Hackett Problematic: Early help response used for non-violent harmful sexual behaviour to prevent escalation.

Hackett Abusive: Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.

Hackett Violent: Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the When to call the police guidance.

Handling cases of harmful sexual behaviour is highly complex. Where appropriate, the DSL will seek the advice of the police and/or children's services to decide next steps and what information can be disclosed to others, in particular the child alleged to have caused harm, their parents and staff. The DSL will also consider which specialist services are best placed to support the children involved.

When assessing incidents of harmful sexual behaviour, we will take into account the ages and developmental stages of the children involved. Any power imbalance between children, such as differences in age, maturity, social status and if any of the children have a disability or learning difficulty, will be taken into account. We will consider whether immediate measures need to be put in place to support and protect the children impacted by harmful sexual behaviour, including witnesses and the child who displayed harmful sexual behaviour.

An immediate risk and needs assessment will be carried out and recorded following a report of sexual violence and on a case by case basis for reports of sexual harassment. The DSL will regularly review the assessment, using it to inform ongoing safeguarding decisions. At all times, we will be actively considering the risks posed to all students and staff, and put adequate measures in place to protect them and keep them safe. Our risk assessment will support and be informed by risk assessments carried out by other professionals involved.

Our staff know to reassure any child who reports they have been a victim of sexual violence or sexual harassment that they will be taken seriously, supported and kept safe. We will further reassure those affected that the law exists to protect children, not criminalise them. Experiencing sexual violence and sexual harassment will, in all likelihood, negatively affect a child's educational attainment and be worsened if the child who caused the abuse attends the same school. We will work hard to minimise the impact on their educational outcomes. Wherever possible, the child, if they wish, will be able to continue in their normal routine. Our priority will be to make the child's daily experience as normal as possible, so that our school is a safe space for them.

Malden Oaks recognises that children who display harmful sexual behaviour may have experienced their own abuse and trauma. At the same time as considering disciplinary action, we will provide the child with, or find, the right support to stop them from re-offending and address any underlying trauma that may be causing their behaviour. In all scenarios, decisions and actions are regularly reviewed and relevant policies are updated to reflect lessons learnt.

Balancing confidentiality requests with safeguarding duties

The DSL will give the child affected by harmful sexual behaviour as much control as reasonably possible regarding how an investigation will be progressed and what support they are offered. If the child asks for confidentiality and opposes a referral being made to external services, the DSL will assess the situation case-by-case, balancing their wishes against the school's duty to protect them and others. A referral should be made to children's services if a child has suffered harm, faces a risk of harm, is in immediate danger or poses a threat to another person. Additionally, reports involving crimes such as rape, sexual assault, or assault by penetration should be reported to the police. Decisions to refer against the child's wishes will be handled with care.

If an allegation of sexual harassment or sexual violence enters the criminal justice system, the DSL will have a general understanding of the criminal process, witness support, and the importance of anonymity requirements. Every reasonable effort will be made to safeguard the anonymity of all children involved in a report. This includes evaluating what information staff members need to know and establishing appropriate support. The school will also consider the role of social media in spreading rumours and potentially exposing a child's identity.

Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person making the allegation needs support or may have been abused by someone else, and this was a cry for help. If so, a referral to local authority children's services may be appropriate. If a report is proven to be deliberately false or malicious, we will consider taking action against the individual in line with our behaviour policy.

Concerns about the sharing or making of nudes or semi-nudes

For the purposes of this policy, 'sharing or making nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves or taken or created by another

person. Images may be digitally altered or wholly generated using artificial intelligence, usually referred to as 'deepfakes'.

Our staff will be trained to carefully handle and manage reports of these incidents. Staff reserve the right to confiscate a device in the possession of a child if they have concerns that the device is involved in the sharing or making of nudes or semi-nudes. This is consistent with the Searching, screening and confiscation: advice for schools guidance. Staff will not view, download, forward or delete illegal images of a child. Staff will be aware of what to do when viewing an image is unavoidable.

Incidents will require a proportionate safeguarding response, regardless of whether they are consensual or not, that considers any elements of coercion, exploitation or vulnerability. The DSL will first hold an urgent meeting to establish, among other things, the level of risk to the children involved, if a referral is needed in line with our safeguarding procedures, whether there is a need to view the image to safeguard the child and whether action should be taken to delete or remove the image. The review meeting will likely include the staff member(s) who heard the disclosure and the wider safeguarding team.

The decision to view and delete imagery will be based on the professional judgement of the safeguarding team, guidance from the police (where necessary) and in line with the government's Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance.

The DSL will make an immediate referral to the police and children's services if:

- the incident involves an adult
- there is reason to believe that a child or young person has been coerced, blackmailed or groomed or there are concerns about their capacity to consent (for example, owing to special educational needs)
- what they know about the image suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent
- the images involves sexual acts and any child in the images or videos is under 13
- they have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example if they are presenting as suicidal or self-harming
- they become aware of a computer-generated explicit image of a child

It will not always be necessary to involve the police or children's services. In these cases, the DSL will be confident that they have enough information to assess the risk to any child involved and that the risks can be managed within our school's pastoral support, behaviour procedures and, if appropriate, the local network of support. We may escalate the concern to safeguarding agencies later on as a result of becoming aware of further information or wider concerns.

Discrimination

We recognise that discrimination is a harm in its own right. It can cause trauma and negatively impact a child's welfare, wellbeing, sense of belonging and safety. Some students face greater risks of harm or bullying from issues like disability, sexual violence or homophobic, biphobic, transphobic, faith- or race-based discrimination. Children may also be targeted due to their perceived or actual LGBTQ+ identity. We have a duty to protect individuals from and eliminate unlawful discrimination, harassment and victimisation. We prioritise fostering good relations between those who share protected characteristics and those who do not, ensuring equal opportunities for everyone.

This is part of the school's duty to promote an inclusive, anti-discriminatory culture as part of our safeguarding responsibilities. This duty is a priority when making policies and decisions that impact our school community. Malden Oaks works hard to foster a sense of belonging for all students, creating opportunities to celebrate diversity through our curriculum and wider school activities. We know that taking timely action helps prevent concerns from escalating into bullying.

We aim to provide a safe, open space for our community to share concerns. Discrimination is firmly addressed under our safeguarding procedures and behaviour policy, and may involve referrals to children's services and/or the police. We will communicate with parents in line with this policy. Support and check-ins will be offered to the student who has been targeted. We challenge discriminatory attitudes, making it clear this behaviour is unacceptable. Students who discriminate against others receive the support and education they need to reduce the risk of this behaviour happening again. We report all discrimination incidents, including those not involving children, to the local authority, on a termly basis.

6. Specific safeguarding considerations

Certain children are at a higher risk of experiencing abuse, whether online or offline, and may face further obstacles in identifying or reporting it. For this reason, there are some circumstances we give a specific safeguarding focus to.

Children who need a social worker

Malden Oaks recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm and face additional barriers to attendance, learning, mental health and behaviour. Children may need a social worker to help the family address safeguarding risks or welfare needs. Children's services will tell the school if a student has a social worker. This helps us to make decisions in the child's best interest, such as how we adjust our response to unauthorised absence or the child missing education. We will work with the social worker, the child, and their family when deciding on the extra help we can provide in school to support the child's welfare.

Children looked after and previously looked after

Staff will have the skills and knowledge to keep children looked after and previously looked after safe. We will give appropriate staff the information they need in relation to a looked after child, for example their legal status, who has parental responsibility, who is not permitted to have contact, who is not permitted to know where the child is being educated and the level of decision-making power the local authority has given the carer.

Given the high numbers of children looked after, the HOS and their deputies will take on the role of designated teacher specific students in their provision. They have the training and experience to understand the unique needs of these children and are well placed to know how they can best be supported to have the same opportunities as their peers. This will include the designated teacher working closely with AfC's Virtual School accessing the training and forums on offer. The designated teacher will also work closely with the children's services and Virtual School involved to put funding to best use to improve the child's educational outcomes. The designated Management Committee member for children looked after is Stuart Holmes.

Kinship carers are family or friends who step up, often during an unexpected crisis, to care for a child when their parents aren't able to. We encourage kinship carers of students to make the school aware of their caring arrangement so we can establish whether there is any support we can offer or seek advice for.

Private fostering occurs when a child under 16 (or 18 if disabled) is cared for by someone other than a parent or close relative for 28+ days. By law, those arranging this care must notify children's services as soon as possible. If they haven't, the school has a duty to inform children's services, though we also encourage parents to report it.

Young carers

Malden Oaks is alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, academic achievements, behaviour and wellbeing. We aim to identify young carers early so we make sure young carers receive the right support at the right time by the right services. This may include additional support from safeguarding partners, including the local authority and health services.

Children requiring mental health support

We have an important role to play in supporting the mental health and wellbeing of our students, particularly as many of our students have experienced difficulties with positive mental health in the past; supporting mental wellbeing is a high priority for our school. We firmly believe that Malden Oaks' attachment aware, trauma informed environment together with our 4 A's Programme effectively supports our students mental health. The importance for our students of having an accessible education offer delivered by experienced and knowledgeable staff should not be underestimated. Further information can be found in our Mental Health Policy.

Our staff are aware that mental health problems can develop into safeguarding concerns and can also be an indicator that a child is experiencing or at risk of experiencing harm. Staff are well placed to observe children day-to-day and identify early those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff are aware that only appropriately trained professionals should attempt to diagnose a mental health problem.

Children with special educational needs, disabilities and health issues

Each of our Heads of School is both the SENCo for their provision and a DDSL. This means that our most vulnerable students have one key adult who knows and understands them and their needs which leads to more effective safeguarding. Malden Oaks makes sure that staff are aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges, both online and offline, such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours, such as bullying, without outwardly showing any signs

- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand what is happening to them is abuse
- the need for intimate care or that these children are isolated from others, and that these children are more likely to be dependent on adults for care
- issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so

We will consider additional pastoral support for these children and ensure we put appropriate measures in place to best support communication. We will make a referral to children's services where an incident highlights that a child might be at increased risk of harm because of their medical condition, for example if the child is repeatedly sent to school without essential medication. Usually, we expect a child's reported medical needs to be verified by UK medical professionals.

Children who are absent from education

Malden Oaks recognises issues with attendance can be a warning sign to a range of safeguarding issues and/or worsen existing safeguarding concerns. The school's attendance procedures assist the safeguarding team with identifying and responding to children persistently absent or missing from education, acting early to prevent absent children from becoming a child missing education in the future.

Where a parent expresses their intention to educate their child at home (also known as elected home education), we will work together with the parent and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly important for children who have SEND, a social worker and/or other vulnerabilities.

Children who are trans, non-binary, or gender questioning

This section applies where a child or their parent has requested that the school make changes or put support in place in order to facilitate social transition. The KCSIE guidance states what our responsibilities are in this area and what we should consider when making decisions about a request. We will keep a clear record of our decision-making. Malden Oaks will balance the impact of agreeing the child's request against the impact of refusing their request, taking into account all the relevant factors. We will use our judgment about whether supporting social transition is in the child's best interests and the best interests of other children. We will do this by working together with the child and the child's parents (unless the

latter is unsafe to do so), considering clinical evidence or advice and involving the safeguarding team in that child's provision. The DSL will also be involved in cases where a child has socially transitioned but staff and school friends are unaware. We will offer in-school support and signpost to community-based organisations where appropriate or requested.

7. Safeguarding at 6Oaks, Post 16 provision

In 6Oaks there is a cohort of under-18s (legally children) and over-18s (legally adults) the The Care Act 2014 does not replace standard education policies; rather, it bridges the gap via Transitional Safeguarding.

While Keeping Children Safe in Education (KCSIE) strictly mandates protection for the under-18s, the Care Act 2014 applies to students aged 18 and over who have care and support needs.

Definition of adult at risk

According to the Care Act 2014, an adult at risk is anyone over the age of 18 who:

- has needs for care and support,
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs are unable to protect themself against the abuse or neglect or the risk of it.

Not all students at 6Oaks will automatically fall under the category of being adults at risk. However, any student who will be referred to DDSLs will likely fall under this category.

An 'adult at risk' may therefore be a person who:

- is elderly and frail due to ill health, physical disability or cognitive impairment has
- learning disability
- has a physical disability and/or a sensory impairment
- has mental health needs including dementia or a personality disorder
- has a long-term illness/condition
- misuses substances or alcohol
- is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse

- is unable to demonstrate the capacity to decide and needs care and support

Actions where there are concerns about an adult at risk

Safeguarding will apply to any adult who:

- Has needs for care and support (whether the authority is meeting any of those needs)
- Is experiencing, or is at risk of, abuse or neglect, and;
- As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Abuse: Abuse is a form of maltreatment of a person. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm.

In deciding whether to refer or not, the DSL or DDSL Lead should consider:

- the adult's wishes and preferred outcome
- whether the adult has mental capacity to make an informed decision about their own and others' safety
- the safety or wellbeing of children or other adults with care and support needs
- whether there is a person in a position of trust involved
- whether a crime has been committed

This should inform the decision whether to notify the concern to the following people:

- the police if a crime has been committed and/or
- the Adult Safeguarding Team for possible safeguarding enquiry or relevant regulatory bodies such as Care Quality Commission, Ofsted, Charities commission or service commissioning teams or family/relatives as appropriate (seek advice from adult social service)

Sharing of Information with parents

Parents and carers may find the adult safeguarding system perplexing; there is no presumption of parental consent or even a responsibility to discuss concerns with them. If the DDSL does want to speak to parents, they have to consider whether the informed consent of the learner is required.We will always try to nurture an environment where adult students feel safe to include their parents in any discussions about their safety and wellbeing.

Staff Reporting Concerns

Staff that receive any information regarding a child protection issue, or suspect that a student might have a problem, should pass the information on to the designated person only. It is not the responsibility of general staff to investigate suspected cases of abuse. The designated person is responsible for making the judgement on a child protection issue, and whether to pass that information on to the appropriate authorities for investigation. This affects all students regardless of age.

A unified policy for 6Oaks integrates adult safeguarding across the four key areas:

1. E-Safety: Child Protection shifts to adult autonomy, with consent being at the heart of decision making

For Under 18s (KCSIE): Malden Oaks acts *in loco parentis*. E-safety filters, proactive monitoring, and strict technical interventions are mandatory to prevent child sexual exploitation, online radicalisation, and cyberbullying and apply to all students, regardless of age.

For Over 18s (Care Act 2014): The threshold changes to safeguarding adults at risk. If an 18+ student is targeted by online scams, sextortion, or financial control, it is handled under the Care Act's "Making Safeguarding Personal" framework. Staff must respect the adult student's autonomy, meaning actions require their consent unless they lack mental capacity or others are at risk. Please note that the litmus test for mental capacity is a complex area of law that can shift over time. The Mental Health Act 2005, with its 5 key principles, can act as a guide in decision-making.

2. Attendance: a shift towards welfare rather than statutory duty

For Under 18s: For students up to year 11, missing education triggers rapid "Children Missing Education" (CME) protocols and local authority early help pathways, as persistent absence is treated as potential neglect or a marker of external threat. This is not strictly true for under 18 students in 6Oaks as post year 11 attendance is no longer statutory. For example, the local authority will reject Single Point of Access (SPA) referrals for attendance (we can still refer for welfare purposes), as attendance at 6Oaks is not compulsory, it is a case of “should attend” rather than “must”. The implication is that students could be working, in training and/or in education.

For Over 18s: The Care Act 2014 dictates that a sudden drop in attendance for an adult student with care needs must be evaluated as a potential indicator of abuse, self-neglect, or modern slavery. Instead of a standard absence procedure, it potentially triggers a welfare check focused on the individual's physical and mental well-being. Appropriate referrals can be made to the relevant Adult Social Care Kingston and Richmond have separate referral pathways. Richmond Single Point of Access (SPA) service is a central point of access for all adults referred to community mental health services in the borough. Kingston has their own equivalent.

3. Transgender and Gender Questioning Students

For Under 18s: Following KCSIE guidance schools generally must involve parents in requests for social transition (e.g., changing names or pronouns) unless doing so poses a distinct safeguarding risk.

For Over 18s: An 18+ student has full legal autonomy. Under UK GDPR and the Care Act's well-being principle, 6Oaks cannot disclose a student's trans identity to parents without the adult student's explicit consent. The e-safety policy must also aggressively target transphobic cyberbullying as hate-related adult abuse.

4. Holistic Safeguarding: The Split Pathway

6Oaks operates a dual-pathway system handled by the Deputy Designated Safeguarding Lead (DDSL):

Scenario	Under-18 Students (KCSIE)	Over-18 Students (Care Act 2014)
Referral Endpoint	Local Authority Children's Social Care (SPA)	Local Authority Adult Social Care via a Section 42 enquiry.
Consent	Not required to make a child protection referral. Parental consent is ideal, but not required.	Explicit consent required from the student unless they lack capacity or public safety is compromised.
Peer-on-Peer Harm vs Adult-on-child Harm	Classified as Child-on-Child abuse, follows the Malden Oaks policy	If an 18+ student harms an under-18 student, it is a child protection matter. If both are 18+, it falls under adult safeguarding.

8. Online safety and the use of smart devices

This section is a summary of the core aspects of Malden Oaks's separate online safety policy that sets out our whole school approach, including the use of smart technology (e.g. mobile phones and smart glasses). Malden Oaks understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety and the four main categories (4Cs) of online risk when making decisions for our school:

Content: exposure to illegal, inappropriate or harmful content, for example pornography, discrimination, self-harm, suicide, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this, for example peer to peer pressure, and adults posing as children with the intention to groom or exploit children for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images, including those generated using AI and online

bullying.

Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

We have online safety processes in place that aim to protect children and set clear expectations for the acceptable use of technologies and how we will respond to online safety incidents. We fulfil our aims by:

- making sure our whole school approach is reflected in all relevant policies
- regularly training staff on online safeguarding risks and how to protect children
- making sure children, staff and parents sign an accessible acceptable use agreement that covers our expectations for how they should use the school's IT systems and the consequences for not following the agreement
- educating children to learn how to keep themselves safe when online, what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety
- engaging parents with keeping children safe online and making parents, children and staff aware that staff can search an electronic device they have confiscated
- ensuring appropriate filtering and monitoring systems are in place on the school's network and devices

Technology and risks and harms associated with it evolve and change rapidly. We will carry out an annual review of the school's approach to online safety, supported by an annual risk assessment that considers and reflects the risks our students may face. The school's staff code of conduct and online safety policy details acceptable use of technologies.

Mobile phones and smart technology (including smart devices)

Our school is a mobile phone-free environment meaning children will not have access to their mobile phone (or other smart technology with similar functions) throughout the school day, including during lessons, the time between lessons and breaktimes if they are in KS3 or KS4. 6Oaks students will have access to their phones during non lesson time. There are special circumstances where there are exceptions to this rule, such as if a child requires their mobile phone to monitor a medical need. Staff and visitors are expected to not use personal devices around children.

Media recordings, including audio, images and videos

We will only take images, videos or recordings of children if we have the child's and parent's consent. We will make sure the child is appropriately dressed. All children are encouraged to tell us if they are worried about any media that has been taken of them. We make careful decisions about how and where we publish images, videos and recordings of children online, recognising the increasing risk that individuals can use artificial intelligence to manipulate the image to cause harm.

Filtering and monitoring systems

Our school has strong and effective filtering and monitoring systems in place to help limit children's exposure to online risks from our school's IT systems. In line with the DfE's Meeting digital and technology standards in schools and colleges guidance, we will make sure that, among other things,:

- we assign a member of the senior leadership team and a Management Committee member to oversee filtering and monitoring arrangements and ensure that appropriate systems are in place to meet these standards
- the effectiveness of our filtering and monitoring systems is reviewed at least annually, and more frequently where there is a significant change or issue, led by the designated SLT member responsible for filtering and monitoring, with support from the DSL and our IT support/provider
- we check that filtering works across all internet-connected devices and a record is kept of these checks
- the systems are effective for the number of and age range of our children and consider children who are potentially at greater risk of harm
- specific staff have assigned roles and responsibilities to manage these systems
- staff and students know about the systems in place and how to raise concerns
- when we block online content it does not impact teaching and learning
- we have monitoring strategies in place that meet our school's safeguarding needs

Generative artificial intelligence

Generative artificial intelligence (Gen AI) refers to artificial intelligence that creates new content (e.g. text, code and images). Our school is aware that using Gen AI can be hugely beneficial, but also harmful if used inappropriately. We will use the Department for

Education's advice and guidance on using Gen AI in education to ensure we integrate Gen AI tools safely and with children's best interests at the centre. Safeguarding concerns that arise through an individual's use of artificial intelligence will be responded to in line with our safeguarding policies. Our school's approach to using Gen AI is detailed in our online safety policy that can be found on the school's website.

Remote education

We will stay in regular contact with the parent of a student being taught remotely, making sure they are aware of:

- the importance of children being safe online and offering advice on how to do so
- what systems our school uses to filter and monitor online use
- what their child is being asked to do online, including the sites they will be asked to access and who from the school their child will be interacting with online

Information security and access management

We understand that cyber security is a safeguarding issue, particularly because we hold sensitive data about students and staff. We will take measures to help keep personal information safe, ensuring we have appropriate cyber security systems in place to help protect against cybercrime (i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly). We will follow the government's Cyber security standards guidance. Our systems are reviewed regularly to keep up with the constant changes to cybercrime technologies.

9. Adults who work with children or at our school

Safer recruitment

Malden Oaks expects all staff, volunteers and third parties who spend time at our school to share our commitment to keeping children safe. We have tight and robust recruitment procedures in place to deter, identify and prevent people who are unsuitable to work with children from securing employment or volunteering opportunities at our school. We will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. All offers of employment are conditional upon the successful completion of pre-employment vetting checks that are listed in Part Three of KCSIE.

We require written confirmation from third-party and supply staff agencies that they have completed appropriate safer recruitment checks on their employees. We will always check

the individual's identification. We will also check the suitability and identification of external visitors and individuals or organisations wishing to hire our site. The headteacher makes the decision on whether a visitor needs to be supervised or escorted.

We will make sure safeguarding arrangements are in place to keep children safe when activities or services that take place on our site are not provided by our school or under the direct supervision or management of our staff, regardless of whether the children attending are students at our school or not. We will end our agreement with the individual or provider if they fail to follow the safeguarding requirements listed in the agreement. See our separate safer recruitment and lettings policies for full details of these processes.

Social media checks are completed at the same time staff complete or renew their DBS with us.

Extended school and off-site arrangements

We continue to be responsible for the safety and wellbeing of students who attend an alternative provision. We know that children who attend alternative provisions often have complex needs and we are aware of the additional risk of harm that these children may be vulnerable to. We will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the provision, i.e. checks that we would otherwise perform on our own staff.

We follow the statutory guidance for alternative provision and Achieving for Children's alternative provision policy. The written agreement between the school and the provider will be clear that the provider must inform us of any arrangements that may put the child at risk and where the child is at all times during school hours (including addresses). We will regularly review the placement to satisfy ourselves that it can meet the child's needs. We will carry out an immediate review of the placement if safeguarding concerns arise and reserve the right to end the arrangement if concerns are not adequately addressed.

Where extended school activities are provided and managed by the school, our own safeguarding policies and procedures apply. When our children attend off-site activities, including work experience placements, we will ensure that effective safeguarding arrangements and thorough risk assessments are in place.

Concerns or allegations about adults in our school

Malden Oaks remains vigilant beyond the recruitment and vetting process. We maintain an environment that deters and prevents abuse and challenges inappropriate staff behaviour. This includes creating a culture of openness and transparency so that staff feel comfortable to report staff behaviour that may impact on keeping children safe. The headteacher and

Chair of Management Committee will receive training on how to manage allegations against adults working at our school.

Our staff are trained to identify inappropriate or harmful staff behaviour and the procedures to follow if they have a safeguarding concern about an adult at our school. This includes information about appropriate and inappropriate physical contact between staff and students and the strict conditions under which it is appropriate to restrict a child's movement, use reasonable force or seclude a child from others for safeguarding purposes in line with the restrictive interventions guidance. All our staff are trained in de-escalation and emotion coaching.

Staff will report low-level concerns (behaviour that sits outside of the staff code of conduct) and allegations (that a member of staff presents a risk to children) to the headteacher as soon as practically possible. This includes concerns that occurred in school, out of school, online or offline. Staff are always expected to provide a written account of their concern. If the concern is about the headteacher, staff will contact the chair of the Management Committee, whose details are at the start of this policy.

If the staff member feels unable to report to the headteacher or chair of the Management Committee, either because they are not available or because they believe that there is a conflict of interest, they will share their concerns with the local authority designated officer (LADO) whose details are at the start of this policy. The LADO is responsible for giving advice and organising the response to concerns that an adult who works with children may have caused them or could cause them harm.

10. Whistleblowing

All staff will be made aware of the duty to 'whistleblow' certain types of wrongdoing. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Concerns should first be raised with the senior leadership team who will take them seriously.

There are other options available where staff feel unable to raise a concern with the senior leadership team or feel that their genuine safeguarding concerns are not being addressed. For example, they can make contact with the NSPCC via their whistleblowing advice line on 0800 028 0285 or email (help@nspcc.org.uk). Malden Oaks has a separate whistleblowing policy that lists our full procedure, available on our website.

11. Site safety

The school has security measures and response plans in place to keep each of the sites secure and help protect children, staff, volunteers and visitors from external threats to the school. School leaders will organise for regular drills, both with and without student involvement, to ensure staff are best prepared to manage a critical incident. We will regularly seek the views of students, parents and staff to find out if there are areas of the school site where children feel unsafe or at risk of harm. Our Kingston site is based in the grounds of St John the Baptist Primary School. We communicate with them and work together to ensure we both have the information needed to make decisions about keeping everyone safe.

A member of the senior leadership team will make the police aware if we have information of concern about the local area that could affect students' safety. If we are concerned about areas where gangs or anti-social behaviour are present, we will also inform the local authority's contextual safeguarding team.

12. Training

Staff build up expertise by managing safeguarding concerns on a daily basis, therefore staff have the opportunity to contribute to and shape staff training and this policy. All staff receive core safeguarding and child protection training (including online safety) at induction that is minimally updated every two years or sooner if required. The training provided covers what staff should know as set out in the KCSIE and EYFS statutory guidance. In addition, staff receive regular safeguarding updates (for example, via email, e-bulletins and staff meetings) so they have the information they need to keep children safe, as required and at least annually. Staff sign to confirm they have read and understood Part One of the latest version of KCSIE. Some staff members will be expected to attend additional safeguarding training specific to their roles.

All Management Committee members receive safeguarding and child protection (including online) training at induction that prepares them for testing and challenging the school's procedures and policies making sure they are working as they should be. Their training is updated annually. The safeguarding link Management Committee member will refresh their knowledge more regularly and receive additional training so they are equipped for their role and stay alert to changes to the safeguarding context. This might include the safeguarding link governor attending the termly AfC safeguarding link governor forum.

The safeguarding team will attend regular training to prepare and assist them in leading the school's safeguarding response and strategy. The board will ensure that the training

undertaken complies with Annex B of KCSIE statutory guidance. Additional training or research may be required as local and school-specific safeguarding issues arise. The safeguarding team will attend level 3 multi-agency local safeguarding training and Prevent awareness training within 12 weeks of starting the role that they will refresh every two years.

We make sure that staff provided by external agencies and third parties, for example colleagues working at Sports England,are aware of this policy, our school's safeguarding procedures, and have received appropriate safeguarding training.

13. Teaching and learning

At Malden Oaks, we recognise how important it is that we teach and role-model to children how to keep themselves and others safe. Our relationships, sex and health education policy sets out how we do that, making sure the 'keeping safe' curriculum is woven through all aspects of school life and it meets the needs of all children. This curriculum will have flexibility so we can adapt it to cover specific safeguarding issues that arise during the school year. We will vet the external visitors we plan to use to deliver any of this subject's content to ensure they are suitable for our school and align with our safeguarding expectations. They will follow this policy when managing any disclosures of harm made when delivering this subject.

14. Reviewing our safeguarding processes

At Malden Oaks, we regularly review the success of what we are doing to keep children safe. This includes reflecting on what we can learn from safeguarding concerns and incidents taking any action needed to improve our practice. The impact of safeguarding policies, systems and processes is kept under continual review. We are open to challenge and actively seek opportunities to learn how we can improve. For example, we

- regularly seek and listen to the views and experiences of students, staff and parents
- utilise safeguarding monitoring visits from Management Committee members
- report the impact of our safeguarding arrangements to the management committee
- undergo external safeguarding reviews
- submit an annual self-audit to the KRSCP
- seek external expert advice to help us make decisions
- review the effectiveness of staff training

15. Linked policies

This policy is only one of a range of documents that set out what our safeguarding responsibilities are and how we carry them out. This policy is complimented by and should be read alongside the following policies:

- Communication and Relationships policy (behaviour)
- Attendance
- Equalities Policy
- Staff/code of conduct
- Whistleblowing
- Health & safety
- Supporting students with medical needs
- Online safety
- Supporting Social Transition forTransgender, Non-Binary, and Gender Questioning Students

Malden Oaks policies can be found here

Appendix A: flowchart for responding to concerns about a child

If staff have concerns about a child's welfare, they must act on them immediately by following the procedures below.

