



KEEPING CHILDREN SAFE IN EDUCATION: SAFEGUARDING & CHILD PROTECTION POLICY 2024-25

Safeguarding is Everyone's Business

Must be read in conjunction with Keeping Children Safe in Education 2024
Annex A and/or Annex B

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At a Glance

Safeguarding is Everyone's Business!

This means that safeguarding and promoting the mental, emotional, and physical welfare of children is everyone's responsibility who works or volunteers in OCL. Consequently, everyone who comes into contact with our children has a role to play in safeguarding and child protection. In doing so, all staff and volunteers should make sure their approach is trauma responsive and child centred. This means that they should consider, at all times, what is in the best interests of the child.

Our vision is for a culture of safeguarding within our community – a place where everyone is included, making a contribution and reaching their God-given potential. Our ethos is a statement of who we are, and it is an expression of our character. Rooted in the story and beliefs of Oasis, we describe our ethos through a particular set of values that inform and provide the lens on everything we do.

- **A passion to include.**
- **A desire to treat people equally respecting differences.**
- **A commitment to healthy, open relationships.**
- **A deep sense of hope that things can change and be transformed.**
- **A sense of perseverance to keep going for the long haul.**

It is these ethos values that we want to be known for and live by. It is these ethos values that also shape our policies. They are the organisational values we aspire to. We are committed to a model of inclusion, equality, healthy relationships, hope, and perseverance throughout all the aspects of the life and culture of every Oasis community.

Everyone who is part of Oasis needs to align themselves to these ethos values. The values themselves are inspired by the life, message, and example of Jesus but we make it clear that we will not impose the beliefs that underpin our ethos values. We recognise and celebrate the richness that spiritual and cultural diversity brings to our communities. We respect the beliefs and practices of other faiths and will provide a welcoming environment for people of all faiths and those with none.

Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses, but not limited to, issues such as:

- Staff conduct.
- Health and safety.
- Bullying.
- Child-on-child abuse.
- Sexually harmful behaviour.
- Online safety.

- Provision of intimate care.
- Building security.
- Alcohol, drugs, and substance misuse.
- Positive behaviour management.
- Physical intervention and restraint (reasonable force).

Checklist

- We will consider the contextual safeguarding our setting sits within.
- We will be mindful of emerging safeguarding & child protection topics.
- We will respond to issues of Child Criminal Exploitation.
- We will recognise and address the issues around child abuse.
- We will be aware of and address any sexually harmful behaviour.
- We will be alert for student at risk of radicalisation.
- We will fully accept our responsibilities including mandatory reporting.
- We will recruit the best staff we can.
- We will support the emotional and mental health of staff and students.
- We will appropriately manage allegations and low-level concerns.
- We will maintain confidentiality and accurate records.
- We will consider the requirements of EYFS settings within our provision.
- We will provide safeguarding contact details for the Academy.

In Brief

The central purpose of Oasis is to transform communities so that they are safe and healthy places to be and to live. We realise that we cannot make a commitment of this kind without first being committed to the safeguarding and safekeeping of our students. This safeguarding and child protection policy is intended for use across the Oasis Academies and is applicable to all Early Years, Primary, Secondary and 6th Form settings.

This policy should be followed and adhered to in all situations and circumstances when the safeguarding of our pupils is at stake.

In accordance with the relevant law and guidance, this policy sets out our procedures for safeguarding and child protection. It applies to all Oasis Community Learning staff (central and academy-based), Hub staff, contractors and agency supply staff and volunteers working within our academies and settings.

Our academies recognise that some children are living in circumstances that may make them more vulnerable to abuse, neglect, or poor outcomes. Some may need early help or intervention from other organisations in order to overcome problems and keep them safe. Special consideration is made for Looked After Children and/or those with Special Educational Needs or Disabilities.

Each academy should follow the threshold guidance of their local multi-agency safeguarding arrangements (MASA) and implement their systems and protocol for referring families for early help and reporting child protection concerns. The MASA will ensure that each academy is aware of issues within the community that are relevant to them. DSLs should ensure that all staff are aware of those issues and systems for reporting and provide local safeguarding updates.

Contextual Safeguarding Concerns

In each of our Academies we must ask, ‘**what are we protecting our children from**’ and consult with the Local Authority, Staff and Pupils for their views. This means that in our Academy all staff will be made aware of specific issues relating to locality that could impact the safety of children at the academy. Each academy will complete an annual SWOT analysis of the contextual issues faced within their community and list their response below.

5 main issues identified in our locality by the Local Safeguarding Partners, community & pupils.	Our Academy response – what we are going to do to tackle this issue.
Domestic Abuse	Operation Encompass School – notifications allow support to be put in place without delay. Play therapy delivered by Urban Devotion.
Gang Culture / County Line	Workshops delivered by West Midlands Police. The Children’s society. West Midlands Violence reduction partnership West Midlands Travel Team – children understand how to travel safely and who to report concerns too.
Substance Misuse	Partnership working with CGL. Intervention from Aquarius for children.
Mental Health	Play Therapy support offered by UBD. In-house support – ELSA sessions Compass Support National Mental Health Team – Therapy Dog.
Food Poverty / Cost of living	Food Pantry Pre-loved uniform bank Surplus food collections – Fareshare, M&S. Cosy Coats Project – Keeping children warm.

Contact Details

Principal (holding responsibility for safeguarding within the Academy):

Elaine Darnbrough

Contact email: elaine.darnbrough@oasisshortheath.org

Telephone: 0121 373 6056

Designated Safeguarding Lead: Pam Atwal

Designated Looked After Children Lead: Pam Atwal

Senior Mental Health Lead: Pam Atwal

Academy Single Point of Contact for PREVENT – Pam Atwal

Contact email: pam.atwal@oasisshortheath.org

Telephone: 0121 373 6056

Support to the Academy:

Regional Director: Dr Herminder K Channa

Contact email: Herminder.channa@oasisuk.org

Telephone: 0121 373 6056

Local Authority Designated Officer (LADO):

Contact email: ladoteam@birminghamchildrenstrust.co.uk

Telephone: 0121 675 1669

Local Authority Safeguarding contact numbers and emails are held within the academy.

Section 2: Child Protection & Child Abuse

Recognising Child Abuse

Child abuse exists where children have been physically or emotionally abused or severely neglected. This abuse can include all aspects of Child Criminal Exploitation including Sexual Exploitation, County Lines and Modern-Day Slavery.

This means that in our Academy we will all know the signs of child abuse and are aware of the procedures that we must follow to safeguard the child and any siblings.

Abuse of children who attend our settings are likely to be noticed by the Academy staff, Health Workers or Education Welfare Officers. It is essential, therefore that all those whose work bring them into contact with children and their families are trained to recognise abuse from within families or extra-familial risk.

This academy has the role of recognising and responding to potential indicators of abuse and neglect, all other action should be taken by those with statutory powers to help the child. Early contact and close liaison with such agencies are therefore regarded as essential by the academy.

In the event of an actual or suspected case of child abuse by adults, parents, or any other adult, it is the responsibility of staff to **report this to the Designated Safeguarding Lead (DSL) as an immediate action.**

A qualified Designated Safeguarding Lead (DSL) will be available to discuss any safeguarding concerns.

The Designated Safeguarding Lead (DSL) is responsible for ensuring that children are identified, and the appropriate agency is involved.

The Designated Safeguarding Lead (DSL) will attend any reviews called by the Local Authority and may call on appropriate members of staff for reports.

It is important that if staff overhear children discussing 'abuse' or 'neglect' that this information is relayed for investigation.

For those students with additional needs or who identify as LGBTQ+, we consider the increased safeguarding issues that can occur and will put in place additional pastoral support and attention, along with ensuring any appropriate support for communication is in place.

Our Staff who work directly with children will read:

- *KCSIE 24 Part 1 & Annex B*

Our Staff who don't work directly with children will read:

- *KCSIE 24 Annex A*

And we will keep records of this within our school.

All our staff will use CPOMS to record their concerns about a child but will also discuss their concerns with the DSL.

The DSL will be a member of the Academy Senior Leadership Team, and the role referenced in their job description.

During term time and normal school hours, a DSL will always be available in our Academy. For the majority of time, this will be a DSL being on site.

In exceptional circumstances during normal school hours, and for after school provision, access to the DSL may be by a phone, or Teams call. This will be clearly advertised.

During holiday club style provision run by the Academy, access to a DSL will be through a phone call or Teams call.

Safeguarding and child protection concerns should be considered when planning any off-site or residential visits.

In our Academy a list of those students taking part in any trip will be passed to the Designated Safeguarding Lead (DSL) to ensure that staff are made aware of all essential information relating to the students in their care.

A confidential register will be maintained, of all those students known to be at risk.

The Academy will maintain a list of those students deemed to be vulnerable, and this list will be reviewed weekly by the DSL Team in a 'team around the Child' meeting. Including Students on a CP plan, CiN Plan, EHCP, where a child has stepped down from a statutory plan, has previously been known to social services or where the DSL team assess a safeguarding vulnerability or risk.

The DSL team will be allocated time to identify and students who are identified as 'vulnerable'. For students assessed as needing support against the following categories moderated against the DfE and OCL descriptors of vulnerability:

- **Critical or High risk** - Students on a CP plan, CiN Plan, EHCP, where a child has stepped down from a statutory plan/edge of care or where the DSL team assess against the DfE list as High risk. – during school closure/unauthorised absence/lockdowns these students will be contacted each 1-2 days.
- **Medium risk** - Students on a CP plan, CiN Plan, EHCP or where the DSL team assess as medium risk - during school closure/unauthorised absence/lockdowns these students will be contacted every 3-5 days.
- **Low risk** but still vulnerable - Students deemed to be at low risk, but still vulnerable. – during school closure/unauthorised absence/lockdowns these students will be contacted every 5-10 days.

If students do not attend the provision or do not answer their phones on an agreed contact date:

- Staff will try all the available numbers for the family, including the emergency contact numbers.
- Following discussion between the DSL team:
 - Re-assess the risk - does the lack of contact escalate your concerns?
 - For CP/CiN children speak to their allocated social worker or social work contact arrangements?
 - Seek advice from the local Children's Social Care access provision.

Unanswered Keeping in Touch Calls (KiT) must be reviewed and logged against the risk assessment for that child.

- All unanswered KiT Calls should receive a home visit.
- For children deemed at Critical or High risk this visit must be undertaken on the same day.
- If the risk is deemed critical (i.e., risk to life) then the DSL may also need to speak to the Police and request a 'safe & well' check.
- For medium and low risk this visit must be scheduled within that working week.

If the student is a 'child in need of a social worker' a member of the DSL team should speak to their allocated social worker or social work contact arrangements to establish if any contact has already been made by them.

Academy Responsibilities

In our Academy we recognise that because of the day-to-day contact with children, academy staff and volunteers are well placed to observe signs of harm, abuse, neglect, peer-on-peer abuse, victimisation and /or exploitation. We recognise that pupils may not be ready to talk about their experiences of abuse, exploitation, or neglect as they do not see this as harmful. Therefore, we will all ensure arrangements are in place to safeguard and promote the welfare of children by:

- Maintaining an environment where all children feel secure, are encouraged to talk, and are listened to.
- Maintaining a 'Zero Tolerance' to child-on-child abuse. Including sexually harmful behaviour, racism, and homophobia (see OCL anti-bullying policy).
- Ensure all children know the adults in the academy who they can approach if they have worries.
- Teaching students to keep themselves safe from all forms of abuse, including: child sexual exploitation, criminal exploitation, female genital mutilation (<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>), forced marriage, extremism, radicalisation (<https://www.gov.uk/government/publications/channel-guidance>), and child-on-child abuse.

And we will support our staff by:

- Providing effective, ongoing training and development for all staff.
- Addressing concerns and making robust referrals to other agencies, at the earliest possible stage, including the acceptance of the regulation around mandatory reporting.
- Developing effective links with relevant agencies in all matters regarding safeguarding and child protection, proactively sharing information as early as possible to support pupils and their families.
- Monitoring and supporting children who are subject to child protection plans, contributing to the implementation of the plan.

- Keeping meticulous, written records of concerns about children, even where there is no need to refer the matter immediately (dates, times, person/s responsible and actions) ensuring all records are kept securely. Records will include:
 - A comprehensive summary of concerns.
 - Details of the concern.
 - What action was taken and any follow-up.
 - Actions taken and outcomes.
- Ensuring the suitability of all staff through safe recruitment practice.
- Ensuring all Oasis academy staff and volunteers understand their responsibilities with regard to safeguarding and child protection through annual training and CPD training events.
- Ensuring that parents and carers understand the responsibility placed on the academy and its staff for safeguarding and child protection.
- Maintaining awareness of those children who are persistently absent or missing from school, notifying the local authority in line with 'Children Missing in Education' protocols.
- Maintaining clear procedures for reporting Low Level Concerns and allegations against staff members.

Oasis recognises that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation, and some sense of blame. The academy may be the only stable, secure, and predictable element in the lives of children at risk. The academy will support all children through:

- Appropriate staff conduct, in line with the policy.
- Relevant curriculum design and implementation to teach pupils about staying safe at all times, including when they are online.
- Daily practice underpinned by the Oasis ethos, vision, values and '9 Habits' embedded within The Oasis Way.
- Consistent implementation of the Academy's Health & Safety, Anti-bullying, Safer Recruitment, Behaviour and Online safety policies and related practice.
- Close and proactive liaison with other agencies such as social services, Child and Adult Mental Health Service, the Education Welfare and Psychology Services.

In line with Government guidelines in KCSiE 2024, our Academy will where reasonably possible, hold two or more emergency contact numbers per pupil or student. This provides the academy with additional options for contacting a responsible adult when a child is missing school and is also identified as a welfare and/or safeguarding concern.

Post Incident Reviews

Within Oasis a review process of significant events is in place from September 2024, with a formal post-incident review and support process (PRISM) to address significant safeguarding incidents, unanticipated exclusion, critical incidents, and violent assaults. The meetings chaired by the Principal/Regional/National Director will review the antecedent factors, documentation, and statements, CCTV footage and any other relevant information with those relevant staff and appropriate external partners. The aim will be to ensure local and trust wide learning and review of policies and procedures can be fed back with the intention of reducing future occurrences.

Child-on-Child Sexually Harmful Behaviour

It is important that an academy can recognise that children are capable of abusing their peers, and that this abuse can include physical abuse, sexting, initiation/hazing, sexual violence, and harassment.

The Oasis values, ethos and behaviour policies provide the platform for staff and students to clearly recognise that abuse is abuse and it will never be tolerated or diminished in significance.

It should be recognised that there is a gendered nature to child-on-child abuse i.e., that it is more likely that girls will be victims and boys' perpetrators.

Academies should recognise the impact of sexual violence and the fact children/young people can, and sometimes do, abuse their peers in this way. It can happen both inside and outside of the academy.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- sexual "jokes" or taunting.

*In our academy **we will not tolerate instances of child-on-child abuse** and will not pass it off as "banter", "just having a laugh" or "part of growing up".*

Even if episodes are not reported we will work under the premise that it could happen here.

In our academy we consider all child-on-child abuse as unacceptable and will be taken very seriously.

We will always challenge behaviours that create a hostile, intimidating, degrading, or humiliating environment.

We will record incidents against three categories:

- *Category 1 – Harmful Sexual Behaviours*
- *Category 2 – Sexual Harassment*
- *Category 3 – Sexual Violence*

(See Appendix 3)

We will follow both national and local guidance and policies to support any children/young people subject to child-on-child abuse, including sexting (also known as youth produced sexual imagery) and gang violence. We will also utilise the search

- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos, or drawings of a sexual nature.
- upskirting (this is a criminal offence); and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

When referring to sexual violence this policy is referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: there is intentional penetration of the vagina, anus, or mouth of another person (B) with his penis, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina, anus, or mouth of another person (B) with a part of her/his body or anything else, the penetration is sexual, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, (B) does not consent to the touching and (A) does not reasonably believe that (B) consents.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual

and confiscation guidance produced by the DfE.

We will follow the guidance on managing reports of child-on-child sexual violence and sexual harassment in schools.

We will utilise the Oasis 'Children who pose a Risk to Children Safety Plan' for those accused of child-on-child abuse.

We will always report episodes of 'up-skirting':

- *Up-skirting is typically defined as taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.*

Our DSL team will complete the 'Children who pose a risk to children' safety plan to assess risk and manage the integration in school, including considering the needs of any siblings.

We will consider the support required by those falsely accused of child-on-child abuse.

All disclosures will be taken seriously with those making the disclosure, kept safe, their anonymity protected when appropriate, and ensuring pupils will never be made to feel like they are creating a problem for reporting abuse.

The academy will consider taking positive action to support a specific group of children and young people if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

- a child under the age of 13 can never consent to any sexual activity.
- the age of consent is 16; and
- sexual intercourse without consent is rape.

Whilst sexting (the consensual and non-consensual sharing of nude and semi-nude images and/or videos) is now common practice within teen relationships it will be dealt with seriously within our academies.

It is acknowledged that nationally the incidents of sextortion (extortion for criminal or financial gain through the possession of explicit images) is on the rise in the UK. Within Oasis we seek to support those young people involved to try to assure their safety.

Staff are aware of how these experiences can impact a child's mental health, behaviour, attendance, and progress at school.

Where images have been shared consensually this will be dealt with as part of a behaviour policy response, as a learning need with the PHSE or RSE curriculum or addressed within the inclusion work of the academy. The students involved will not be penalised.

Where sexting incidents are non-consensual or images have been shared with others, or if the participants are younger than 13 years, incidents will be discussed with the Police.

See Appendix 4

Young people who are being blackmailed are encouraged to disclose this to their parents or to the DSL.

If this is not possible then learners are encouraged to seek support from the National Safeguarding Team via safeguarding@oasisuk.org or through other national services such as the NSPCC or Internet Watch Foundation (IWF).

On receipt of a disclosure the National Safeguarding Team will support the learner to seek local help and will pursue image removal services via the IWF.

Section 3: Mental Health

Emotional Health & Well-being & Mental Health Support

Our academies have an important role to play in supporting the mental health and wellbeing of all our learners.

This means that in our academy we will:

As a trust we must ensure we 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 all of our staff are 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.

We will consider the impact of adverse childhood experiences (ACES) and acknowledge that these can have a lasting impact throughout childhood, adolescence and into adulthood.

Our staff will work in a trauma-responsive way to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem.

Any member of staff who is concerned about the mental health or wellbeing of a student should speak to the senior mental health lead in the first instance.

Using the OCL Mental Health Triage Matrix, if there is a fear that the student is in danger of immediate harm then the normal child protection procedures should be followed with an immediate referral to DSL or the principal.

If a learner presents a medical emergency, then the normal procedures for medical emergencies should be followed, including alerting first aid staff and contacting the emergency services if necessary. In either of these circumstances, the OCL care plan and "Children whose mental health poses a risk to themselves" documentation should be completed in conjunction with the learner and their parent/guardian.



Where a referral to CAMHS is appropriate, this will be led by a member of the Pastoral Team and supported by SMHL/ and/or DSL.

To support this, we will have a Senior Mental Health Lead in our Academy and staff who have the Youth Mental Health First Aid (MHFA) qualification.

The skills, knowledge and understanding needed by our students to keep themselves and others physically and mentally healthy and safe are included as part of our development of our SRE and PSHE curriculum.

The specific content of lessons in our Academy will be determined by the specific needs of our pupils but there will always be an emphasis on enabling students to develop the skills, knowledge understanding, language, and confidence to seek help, as needed, for themselves or others.

It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

The DSL will liaise with the Senior Mental Health Lead in the academy and with the appropriate Oasis mental health practitioner.

The DSL will liaise closely with Children's Social Care Services to ensure that the appropriate approach to care is taken, including child protection services.

Where appropriate our academy will provide 'in-house' emotional health and well-being support to our pupils. This will include access to the Oasis Encounter therapeutic intervention program for parents.

In the same way that pupils with physical needs have an education, health and care plan, our academy will use mental health care plans to support learners with mental health needs, and where appropriate written in conjunction with an Oasis mental health practitioner.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

This means that in our academy we will, as a minimum, deliver regular training about recognising and responding to mental health

Our school staff may become aware of warning signs which indicate a student, or a member of staff is experiencing mental health or emotional wellbeing issues.

These warning signs should always be taken seriously.

If staff have a mental health concern about a pupil that is also a safeguarding concern, immediate action should be taken.

When a student is suffering from mental health issues, it can be a difficult time for their friends. Friends often want to support but do not know how. In the case of self-harm or eating disorders, it is possible that friends may learn unhealthy coping mechanisms from each other.

issues as part of our regular safeguarding training in order to enable them to keep learners safe.

We will host relevant information on our virtual learning environment for staff who wish to learn more about mental health.

Training opportunities for staff who require more in-depth knowledge will be considered as part of our performance management process and additional CPD will be supported throughout the year where it becomes appropriate due to developing situations with one or more learner.

As an academy we will be vigilant for signs of emotional well-being concerns. These may include:

- *Physical signs of harm that are repeated or appear non-accidental.*
- *Changes in eating/sleeping habits.*
- *Increased isolation from friends or family, becoming socially withdrawn.*
- *Changes in activity and mood.*
- *Lowering of academic achievement.*
- *Talking or joking about self-harm or suicide.*
- *Abusing drugs or alcohol.*
- *Expressing feelings of failure, uselessness, or loss of hope.*
- *Changes in clothing – e.g., long sleeves in warm weather to cover limbs.*

It is the aim of our academy to keep peers safe, we will consider on a case-by-case basis which friends may need additional support. Support will be provided either in one-to-one or group settings and will be guided by conversations by the student who is suffering and their parents with whom we will discuss:

- *What it is helpful for friends to know and what they should not be told.*
- *How friends can best support.*

- *Things friends should avoid doing/saying which may inadvertently cause upset.*
- *Warning signs that their friend needs help (e.g., signs of relapse).*

Additionally, we will want to highlight with peers:

- *Where and how to access support for themselves.*
- *Safe sources of further information about their friend's condition.*
- *Healthy ways of coping with the difficult emotions they may be feeling.*

It may be shocking and upsetting for parents/carers to learn of their child's issues and many may respond with anger, fear, or upset during the first conversation even if they already have concerns from their child's behaviours at home.

In our academy we will work closely with parents and carers to support the whole family, unless to do so places the child at additional risk.

We will provide clear means for parents to contact the Senior Mental Health Lead if they have further questions and arrange a follow up meeting or phone call as parents often have many questions as they process the information.

To support parents and carers at the end of each meeting we will agree next steps and always keep a brief record of the meeting on the child's CPOMS file.

Section 4: Opportunities to Teach Safeguarding

Our academies play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares learners for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, hate focused on LGBTQ+ issues and sexual violence/harassment.

These will be underpinned by the school/college's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole Oasis curriculum.

Our curriculum delivery will be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of our children with

SEND and other vulnerabilities) and will stress that law around safeguarding is to protect not criminalise them.

The curriculum will tackle at age-appropriate stages issues such as:

- Healthy and respectful relationships.
- Body confidence and self-esteem.
- Boundaries and consent.
- Stereotyping, prejudice, and equality.
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.
- 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, honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support.

Online Safety – Filtering and Monitoring

It is essential that children are safeguarded from potentially harmful and inappropriate communications and online material.

As such, the academy ensures appropriate procedures, filters and monitoring systems are in place in accordance with the following policies:

- Oasis E-Safety Policy.
- Horizon’s Policy.
- Acceptable use of Technologies.
- Web Filtering and Device Monitoring through NetSweeper Web Filter.
- Audit of effective filtering through daily filter reports to the DSL.

Technology, and the risks and harms related to it evolve and changes rapidly. The Academy will carry out an annual review of their approach to online safety that considers and reflects the risks pupils face.

The use of Artificial Intelligence (AI) is a new and developing field and the implications within safeguarding will be closely monitored over the next year and the appropriate response will be led within the Trust.

In our Academy:

We recognise that the online risks fall into 4 main categories:

- **content:** being exposed to illegal, inappropriate, or harmful content.
- **contact:** being subjected to harmful online interaction with other users.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- **commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The designated safeguarding lead will take lead responsibility for online safety and understanding the filtering and monitoring systems in place.

All staff will receive appropriate online safety training which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.

The DSL will oversee the delivery of the e-safety curriculum ensuring safeguarding is maintained.

- *Online safety is included our curriculum provision as part of providing a broad and balanced curriculum.*
- *The Horizon’s iPads will have the Safer Schools app installed and activated.*
- *Children are taught about safeguarding, including online, through teaching and learning opportunities, with specific reference to the age-related guidance in ‘Education For a Connected World’ resources:*

Although appropriate blocking is essential, it should not restrict the students learning or lead to unreasonable restrictions as to what our students can be taught.

The number of and age range of children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risk will be considered.

We meet the Government Cyber security standards for schools and colleges.

Where children are being asked to learn online at home, Oasis will provide devices to enable this do so safely.

<https://www.gov.uk/government/publications/education-for-a-connected-world>.

- We will comply with the Oasis E-Safety Policy.
- Our E-Safety and Acceptable use of Technology Policies can be found on the OCL Policy Portal or upon request.
- Parents will sign the Horizon's Usage Agreement.

In our academy we monitor the results of our web blocking and monitoring software to ensure that our students work safely and are protected from terrorist or extremist material, cyber-bullying, cyber-crime, sexting, offensive user/trolling, vulnerable user over sharing and grooming.

We will follow the DfE filtering and monitoring standards to:

- *Review filtering and monitoring provision at least annually.*
- *Block harmful and inappropriate content without unreasonably impacting teaching and learning.*
- *Have effective monitoring strategies in place that meet their safeguarding needs.*
- *Restrict the use of iPads between 24:00-06:00 (23:00 for primary schools).*

We identify and assign roles and responsibilities to manage filtering and monitoring systems.

We identify and assign roles and responsibilities to manage filtering and monitoring systems. The National Safeguarding Team are responsible for:

- *procuring filtering and monitoring systems.*
- *documenting decisions on what is blocked or allowed and why.*

The academy senior leadership team are responsible for:

- reviewing the effectiveness of the provision.
- overseeing reports.

They are also responsible for making sure that all staff:

- understand their role.
- are appropriately trained.
- follow policies, processes and procedures.
- act on reports and concerns.

The DSL will review the standards and discuss with IT staff and service providers what more needs to be done to support us in meeting this standard.

All our staff will work to clear guidance to provide safe and effective online learning. This will be delivered through Teams Classrooms using only Oasis approved devices.

Our academy is committed to keeping children safe online and so we will include safe use of the mobile phone in our curriculum.

As a general rule the use of mobile phones will not be permitted during school hours.

Students will be encouraged to not access their phones, and where found using them the phone will be confiscated.

For emergency situations during the school day parents will be required to phone the school office for messages to be passed on.

Mobile phone use should be carefully considered including how their use could be controlled within the Academy.

Where children have unlimited and unrestricted access to the internet via mobile phone networks (i.e., 3G, 4G and 5G) as well as the risk of distraction from learning, the possibility exists for cyber-bullying, inappropriate searches and sharing images.

Child Criminal Exploitation

Child Criminal Exploitation is a coverall heading for the following issues:

- Child Sexual Exploitation.
- County Lines.
- Child Trafficking & Human Slavery.

We will view children (0-18 years) as victims of Child Criminal Exploitation and not as perpetrators and will advocate for our students to be viewed as children in all circumstances, avoiding the adultification of our older teenage students.

Child Sexual Exploitation (CSE)

CSE involves exploitative situations, contexts, and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. It is a problem that occurs for boys as well as girls.

Sexual exploitation can take many forms ranging from the completely inappropriate 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship.

The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation, or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

County Lines

Gangs use children and vulnerable people to move drugs and money. Gangs establish a base, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'.

One of the key factors found in most cases of County Lines is the presence of some form of exchange (e.g., carrying drugs in return for something). Where it is the victim who is offered, promised, or given something they need or want, the exchange can include both tangible (such as money, drugs, or clothes) and intangible rewards (such as status, protection or perceived friendship or affection).

If staff suspect that a child is a victim of County Lines exploitation, they must follow the academy's procedures for reporting child protection concerns and report to the DSL immediately. The DSL should report to the local safeguarding children's board immediately and the police if there is a risk of immediate harm.

Child Trafficking & Human Slavery

The academy keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation and access support, advice, and resources via **STOP THE TRAFFIK**, a sister company within the Oasis Charitable Trust. The resources include lesson content on:

- What is human trafficking?
- Healthy relationships and grooming.
- Online safety.
- Staff training on child trafficking.
- Assembly and lesson resources on vulnerable communities.

Through the use of these resources and others, our staff are supported to recognise warning signs and symptoms in relation to specific issues. Our staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.

The Designated Safeguarding Lead knows where to seek and get advice as necessary from the Local Authority and national specialist organisations such as STOP THE TRAFFIK. Staff are available for advice and links to relevant support with dealing with a potential trafficking situation if needed found at <https://www.stopthetraffik.org/>

Children Missing to Education and those Absent from Education

Oasis academies believe all students, regardless of their circumstances or background are entitled to a full-time education which is suitable to their age, ability, aptitude, and any special educational needs.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign. The academies response to persistently absent pupils and children missing education supports identifying abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

Academies will tackle Persistent Absentees and report on children who are persistently absent from school to the Regional Director.

Leave of absence requests will be viewed against the safeguarding vulnerabilities for including but not limited to:

- Forced Marriage (both males and females);

This means that in our academy we will:

Operate a stringent attendance tracking system that is over seen by a member of the leadership team.

We will use effective attendance management strategies that enable us to account for every child.

Our academy will hold two telephone contact numbers for the parents of each student.

In our academy we will only authorise leave of absence in exceptional circumstances.

The Principal will determine the length of time that the child can be away from the academy.

In our school our attendance staff are trained to look out for these triggers and the academy works in partnership with the

- Traveling to Conflict zones; or
- Countries with a higher prevalence of FGM.

The DSL will, as soon as a concern is established, alert the Local Authority.

Local Authority to ensure localised risks are taken note of and shared with all staff.

The safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods, includes us working with local authority children's services where school absence indicates safeguarding concerns.

Staff who have pastoral responsibility undergo training on attendance and safeguarding issues on an annual basis.

We will implement the Oasis Attendance team guidance on effective attendance to ensure effective practice in CME.

Pupil/student absence will be followed up on a daily basis as a matter of priority. Where there is no response to indicate the whereabouts of the pupil/student, immediate action is necessary.

In our academy we will:

- *Undertake a 1st day phone call or text to try to establish the child's whereabouts.*
- *Complete a home visit on the 1st day for every child who is on the academy 'vulnerable list'.*
- *Complete a home visit on the 3rd day who has a continuous period of unexplained absence of three days or more.*

When there is unexplained absence of 10 days or more, we will refer the matter to the Local Authority Children Missing Education team.

The admissions register at the academy is kept up to date.

Where an expression for Elective Home Education has been made by the parents/carer of a child the Academy will make every reasonable attempt to dissuade

The local authority will be informed of **all** deletions as soon as the grounds for deletion are met, in line with the local authority guidelines, but *no later* than deleting the pupil's name from the roll.

this position and will liaise and refer to Social Care Services if any safeguarding concerns exist as well as referring to the LA EHE team. The Local Authority EHE team will be notified of the petition for EHE as soon as possible whilst attempts are made to meet with and dissuade the parent from their action.

All school files and safeguarding records will be transferred to the LA EHE team within 5 days of coming off the academy roll as illustrated in the attendance policy & guidance, with a formal copy retained and archived as per OCL policy.

After the EHE process has been followed, the pupil becomes the responsibility of the LA EHE Team. Where a child has an EHCP, we will ensure timely information sharing to support local authorities in their review of the plan, enabling them to work closely with parents and carers.

No student will be removed from an academy roll until all safeguarding checks have been completed or the whereabouts of a pupil/student have been established.

Violence Against Women & Girls inc. Honour Based Abuse (HBA)

Where HBA affects children and young people it is a child protection issue. It is an abuse of human rights.

Children and young people who suffer Honour Based Abuse are at risk of Significant Harm through physical, sexual, psychological, emotional harm and neglect.

In some cases, they are also at risk of being killed. Some reasons that have been given for HBA are:

- Protecting family 'honour'.

In our academy we take the disclosure of HBA very seriously and act on it.

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

- To control un-wanted behaviour and sexuality (including perceived promiscuity or being lesbian, gay, bisexual, or transgender).
- Strengthening family links.
- Protecting perceived cultural and/or religious ideals.
- Preventing unsuitable relationships.
- Assisting claims for residence and citizenship in the UK.
- Perceived immoral behaviour e.g., make-up or dress; use of mobile phone; inter faith relationships.

The DSL will refer to Children’s Social Care, the Police, and the National Forced Marriage Unit promptly.

*Under **no** circumstances will we:*

- *Let the family or social network know about the concerns.*
- *Speak to the child in front of family members.*
- *Approach the family or community leaders.*
- *Attempt mediation; or*
- *Use members of the community to interpret.*

Concerns will be stored on CPOMS, but access limited to a small group within the organisation.

Female Genital Mutilation

FGM is a criminal offence – it is child abuse and a form of violence against women and girls, and therefore should be treated as such.

With effect from October 2015, all schools are subject to a mandatory reporting requirement in respect of female genital mutilation (FGM).

This means that in our academy we ensure:

Our staff are supported to talk to families and local communities about sensitive concerns in relation to their children and to find ways to address them together wherever possible.

All staff are up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.

FGM involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

Four types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris.
- Type 2 Excision – partial/total removal of clitoris and labia minora.
- Type 3 Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia.
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising, and scraping the genital area.

When a teacher¹ suspects or discovers that an act of FGM is going to be or has been carried out on a girl aged under 18, that teacher has a statutory duty to report it to the Police.

Failure to report such cases MAY result in disciplinary sanctions.

The issue of FGM and violence against women and girls' issues will be reflected in our Academy curriculum plans and, in an age-appropriate way, in incorporated into lesson plans.

As with all other safeguarding and child protection issues the DSL will lead our Academy in addressing FGM.

It is our expectation that a teacher¹ who has to report a suspicion of FGM will do this with the full support of a member of the DSL team.

If any member of our staff does suspect that a girl is at risk of or has undergone FGM they will let the designated safeguarding lead know straight away and an immediate referral will be made to the Police and to Children's Social Care Services (if there is a delay in reporting it should be no later than 1 working day after disclosure).

¹ For the purpose of FGM reporting, 'teacher' is defined as those who carry out teaching, not just restricted to those who are qualified. This then includes support staff with a teaching role.

Safeguarding Pupils who are Vulnerable to Extremism

The Prevent strategy aims to stop people becoming terrorists or supporting terrorism.

While it remains rare for children to become involved in terrorist activity, the Academy recognises some, from an early age can be exposed to terrorist & extremist influences or prejudiced views. As with other forms of safeguarding strategies, early intervention is always preferable.

OCL is aware there have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children to hold extreme views including views justifying political, religious, sexist, or racist violence,

In line with British Values and the Oasis '9 Habits' our Academy values inclusion, tolerance and the freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning healthy communities in which our Academy is based.

Both pupils and teachers have the right to speak freely and voice their opinions.

The Principal and the Designated Safeguarding Lead will assess the level of risk within the academy and put actions in place to reduce that risk.

or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them susceptible to future radicalisation.

OCL is committed to working with the local authority and other local partners, families, and communities to play a key role in ensuring young people and our communities are safe from the threat of:

- **Extremism** – such as the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.
- **Radicalisation** – such as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** – defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

All academy staff need to be alert to changes in children's behaviour which could indicate that they may need help or protection.

The academy will identify a Prevent Single Point of Contact (SPOC) who will be the lead within the academy for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism:

Actions for our school will include PREVENT related topics for consideration in the new SRE curriculum, PSHE curriculum, SEND policy, assembly content.

Risk assessment will include the use of school premises by external agencies, integration of pupils by gender and SEN, anti-bullying policy and other issues specific to the academy's profile, community, and the Oasis ethos.

All our staff will be aware that children at risk of radicalisation may display different signs or seek to hide their views.

Staff will use the OCL Prevent child specific risk assessment and their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

When any member of our staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and/or the Designated Safeguarding Lead (if this is not the same

this will normally be the Designated Safeguarding Lead.

If there is a concern that a young person is being radicalised or at risk of being drawn into terrorism refer to Children's Services as with any other safeguarding concern.

OCL will ensure that the DSL and SPOC (if different) will complete local training on the locality risks, and these will be cascaded to the academy staff.

Due diligence checks should be undertaken by the academy on any organisation that uses its facilities.

These checks will include:

- An internet search on the organisation.
- Checks with local groups.
- MASA & Local police checks.
- Local Authority checks.

Details of agreement/s will be recorded and kept on file.

person) and record their concerns on CPOMS.

In addition, links with the local Channel lead can be made by the DSL and where necessary, individual cases will be referred to the local Channel Panel for screening and assessment.

In our school this will be part of our annual CPD training programme by the DSL.

Our academy will only allow use of the premises by other organisations and/or supplementary schools if they provide:

- *An overview of what it intends to teach or provide.*
- *The ethos they promote fit easily with the 9 Habits and the Oasis ethos.*
- *Their work promotes British Values.*
- *Safeguarding requirements meet Oasis standards, including liaison with the Academy if concerns arise.*
- *They can provide evidence that they have practised safe recruitment, and their staff have the requisite DBS checks.*

Where schools are used for non-school activities, those providers are expected to meet the DfE guidance in Keeping Children Safe in Out of School Settings. Failure to comply with this would lead to termination of the agreement.

Section 5: People Management

Allegations against Members of Staff & Low-Level Concerns

All allegations of abuse made against a member of staff in relation to a student must be brought to the attention of **the Principal immediately**. These concerns will be categorized into two:

- Allegations that may meet the Harms criteria and will be referred to the LADO.
- Concerns that do not meet the Harms threshold and will be dealt with as Low-Level Concerns.

If the allegation meets Harms criteria, the Principal (or other lead person) must report it to the Local Authority Designated Officer within 1 working day. If it is alleged that a teacher or member of staff (including a volunteer) has:

- *Behaved in a way that has harmed a child or may have harmed a child.*
- *Possibly committed a criminal offence against or related to a child.*
- *Behaved towards a child or children in a way that indicates he/she is unsuitable to work with children.*
- *Behaved or may have behaved in a way that indicates they may not be suitable to work with children.*

Before contacting the LADO, the academy should conduct basic enquiries to establish the facts and to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The Local Authority's Designated Officer must be informed of all allegations that come to the Academy's attention that meet the Harm's Criteria so that they can consult police and social care colleagues as appropriate.

This means that in our Academy where the Principal considers that a referral appears to meet the LADO criteria, the Principal will inform the Local Authority's Designated Officer within 1 working day.

All LADO referrals will also be reported via the in-house recording system:

<https://forms.office.com/r/Yzee1N9AbV>

Within one working day all concerns and allegations should be raised with:

- **Staff** - allegations about a member of staff, including supply staff – should be reported to the Principal only.
- **Principal** - allegations about the Principal/Executive Principal – should be made to the Regional Director.
- **OCL National Team** - allegations about a member of an OCL national team - should be made to the Regional Director.
- **OCP HUB** - allegations about a Hub worker working for OCP – should be made to the OCP National Director.
- **Regional Director** - allegations about the Regional Director – should be made to the National Director.
- **National Director** - allegations about the National Director – should be made to the Chief Executive's Office.
- **Chief Executive Officer** - allegations about the CEO – should be made to the Oasis Board.

Where an allegation is received relating to an incident that happened when an

All alleged physical injuries must be investigated by the appropriate external agencies.

individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities), these should be reported to the Principal only using the OCL reporting procedures.

Where an allegation is made against a supply teacher, the Principal will immediately contact both the agency concerned and the LADO. Our Academy will support any investigation that is required.

The Principal will act as the 'case manager' and following the direction of the LADO will commission an investigation and liaise with the LADO as to the actions required.

During an investigation, our Academy it may be that a member of our staff could be suspended or redeployed to work that is not regulated activity.

At the conclusion of any investigation if enough evidence is gathered to have foundation, then a referral will be made to the DBS Authority as soon as possible.

Where allegations are found to be unsubstantiated or false these will not be recorded in personnel files and action will be considered against those who raised the allegation.

This means that in our Academy where the Principal considers that incident does not meet the Harms Threshold a Low-Level Concerns investigation will be initiated.

Examples of such behaviour could include:

- being over friendly with children.*
- having favourites.*
- adults taking photographs of children on their mobile phone.*

Low Level Concerns

A low-level concern is any concern that an adult has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work but does not meet the threshold of harm.

Concerns that do not meet the Harms threshold will be fully investigated within

the Academy and the appropriate actions recorded in the personnel files.

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour.
- behaviour that might be considered inappropriate depending on the circumstances; and
- behaviour which is intended to enable abuse.

- *engaging with a child on a one-to-one basis in a secluded area or behind a closed door; and*
- *using intimidating, or offensive language.*

All Low-Level Concerns will also be reported via the in-house recording system:

<https://forms.office.com/e/u5L4ULQQgc>

Suitability of Staff and Safer Recruitment

Safe recruitment practices are an essential part of creating a safe environment for children and young people. As such we will not allocate start dates for new members of staff until all pre-employment checks have been completed.

In our academy we will ensure that staff and volunteers working at the academy are suitable to do so.

We will follow the specific procedures that are outlined in:

- *OCL Recruitment & Selection Policy including the potential for online searches for shortlisted candidates as part of due diligence checks.*
- *Recruitment Toolkit.*

Keeping Children Safe in Education states that schools will be required to complete a risk assessment for each volunteer.

Where the volunteer is undertaking regulated activity, an enhanced DBS and barred list check will be undertaken.

Copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.

Where the volunteer is not in regulated activity, we will undertake an enhanced DBS but are not legally allowed to do a barred list check.

'Due Diligence' checks will be made on any speaker invited to host an assembly or speak to students during lessons.

RTW documentation must be stored for 2 years after a staff member leaves employment and then destroyed.

The Single Central Record (SCR) is an important part of the academy's commitment to Safeguarding and will be maintained by a member of the office management team.

The SCR will be held in BROMCOM and will be audited on a regular basis using the SCR oversight screen as guidance.

In addition, a high level 'completion' report of all the academy SCR's will be reported in the Safeguarding Dashboard within PowerBi.

People accessing the site will be authorised.

In our school the SCR will be overseen and directly managed by the Principal and reviewed:

- *Every half term by the Principal.*
- *By the MET Team during their visit.*
- *By the Regional Directors as part of their regular annual visit schedule.*
- *By the National Safeguarding Team as part of a systems and practice review or on request.*

This will allow us to sustain effective safeguarding at our academy.

It is expected that all staff, visitors, and contractors will:

- *Report to the academy reception on arrival.*
- *Provide proof of identity.*
- *Wear a name badge at all times with lanyards differentiating the groups:*
 - *Visitors whose DBS Status has been confirmed will wear GREEN lanyards and may be allowed to access the school unsupervised.*
 - *Visitors who do not have a DBS or has not had confirmation will wear a RED lanyard and will be supervised on-site.*
 - *Members of a National Oasis team will wear a national lanyard, or GREEN lanyard if the DBS status has been confirmed.*
- *Be made aware of the arrangements for safeguarding, health and safety.*

Confidentiality & Record Keeping

Staff, volunteers, and contractors have the responsibility to share relevant information about the protection of children with the DSL and Principal and potentially external investigating agencies.

At our school we will take any disclosure very seriously.

If a student confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tell the student sensitively that they have a responsibility to refer the matter to the Designated Safeguarding Lead (DSL) for the student's own sake.

Accurate written notes will be kept of all incidents or Child Protection concerns relating to individual pupils.

As part of their contractual arrangements any external individual or organisation with the academy, be required to work in accordance with the Academies child protection and safeguarding policy.

Working in partnership with parents is important, the academy should endeavour to do this at all times. It is recognised however that there are occasions when it is in the child's best interest for work to be undertaken and referrals made without the parents' initial consent to ensure the welfare and safety of our students.

Child Protection records must be kept secure and arrangements in the academy

We will seek to reassure our students that the matter will only be disclosed to the Designated Safeguarding Lead (DSL), who will then decide on appropriate action.

At no time should a staff member promise total confidentiality.

If a member of the academy has a safeguarding or child protection concern, they must inform the DSL or Principal as soon as possible.

These will be kept on the student's Child Protection file within CPOMS.

Any external individual or organisation contracted by the academy to work with academy students must report any child protection incidents or disclosures from students to the Principal or DSL at the earliest opportunity.

To do this our academy will:

- *Aim to help parents understand that the academy has a responsibility for the welfare of all students and has a duty to refer cases to the Local Authority in the best interests of the student.*
- *Consider the safety of the student and, should a concern arise the DSL has the responsibility to seek advice prior to contacting parents.*
- *Make all our policies available on the website and on request.*
- *Ensure a robust complaints system is in place to deal with issues raised by parents and carers.*
- *Provide advice and signpost parents and carers to other services where pupils need extra support.*

The DSL will ensure that all Child Protection records are kept separately from pupil records and stored securely.

must comply with the Data Protection Policy.

Upon receipt of any request regarding direct access to academy documentation on a Child Protection file, the Principal and DSL will be informed, and a decision taken on the appropriate way forward in accordance with the Data Protection Policy.

When a pupil transfers to another school child protection and safeguarding information will be shared with that school to ensure safe and consistent support for that child.

Information from these files will only be shared with relevant staff when it is necessary to do so and in a manner consistent with data protection legislation.

In our Academy we will monitor the progress and achievement of children in need of a social worker to ensure parity in attainment between all out pupils.

Our Academy will only release information, including to the police, on receipt of the appropriate documentation in-line with data sharing laws.

To do this our academy will:

- *Find out the name of the receiving school (and, where appropriate the Local Authority).*
- *Contact the relevant member of staff at that school to discuss the transfer.*
- *Securely send all information relating to the student to the receiving school (and where relevant the Local Authority) within 5 working days.*
- *Check with the receiving school that the student has actually arrived there on the expected day; and inform all relevant agencies of the transfer.*

Early Years Settings within OCL

As an early year's provider delivering the Early Years Foundation Stage (EYFS), the Academy aims to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance.

Including a member of staff responsible for leading on safeguarding within the early years provision.

In our academy we will ensure that all children in the nursery and reception classes, and/or two-year old provision, are able to learn, develop, be safe and healthy by providing:

- *A safe secure learning environment where children can be seen and heard at all times.*
- *A named member of staff in the DSL team.*
- *A member of staff who holds a current,*

paediatric first aid certificate who is available on the premises at all times.

- *A qualified 1st Aider accompanies children on school trips.*
- *A designated key worker who liaises with parents and carers.*
- *Routine monitoring of health and safety practices, to promote children's safety and welfare.*
- *Appropriate staffing, ratios and qualifications comply with statutory guidance and can meet the needs of all children.*
 - ***Nursery** 1:13 children with one member of staff, a qualified teacher and at least one member of staff to hold full level 3 qualification.*
 - ***Reception** class size limited to 30, led by a qualified teacher, with suitably qualified support staff).*

The Academy will promote the health of all students, including children in the Early Years.

In our school we will do this by:

- *Taking necessary steps to stop the spread of infection.*
- *Administering medicines and/or intimate care only in line with our academy policy.*
- *Taking appropriate action where students are unwell.*
- *Notifying the HSE of any serious accident, illness, or death of any child whilst at the Academy. Notifying Ofsted, in the case of children attending the early years, within 14 days.*

Section 6 - Responsibilities

Safeguarding and promoting the welfare of children is **everyone's responsibility**. Everyone who comes into contact with children and their parents or carers has a role to play in safeguarding children.

Knowing what to look for is vital to the early identification of abuse and neglect and if staff are unsure, they should always speak to the designated safeguarding lead or deputy – if in exceptional circumstances, the designated safeguarding lead (or deputy lead) is not available, staff should consider speaking to a member of the ALT and/or take advice from the Oasis National Safeguarding Team or contacting the local Children's Social Care Team. All actions that are completed in the absence of a designated safeguarding person should be shared with them at the very earliest opportunity.

The Board of Trustees will determine and keep under review safeguarding policy and practice in Oasis academies.

The OCL Trust Board has a strategic leadership responsibility for our Academies safeguarding arrangements and **must** ensure that they comply with their duties. They will ensure policies, procedures, web filtering and training in our schools are effective and comply with the law at all times.

To fulfil this duty the Board will appoint a named board member with responsibility to oversee safeguarding and child protection with clear objectives and outcomes. The Board Member will sit on the National Safeguarding Steering Group and will scrutinise the safeguarding risk register.

The Board will be assured that every member of OCL receives annual safeguarding training by an appropriate medium. This will include annual training for the Board and Executive around the strategic challenge as to the effectiveness of the support offered by our settings.

The Chief Executive Officer, as delegated by the Board of Trustees, is accountable for safeguarding children through Oasis Professional Governance and the Safeguarding Steering Group. The CEO reports to the Board on all Safeguarding issues.

The Oasis National Safeguarding Steering Group forms a fundamental part of OCL's approach to ensuring our children have the right to protection from all types of harm and abuse and the promotion of their welfare, in line with the Oasis vision.

The steering group's core purpose is to provide clear guidance so that each service within the wider Oasis family and Academy can implement effective, best policy and local procedures to safeguard children. It brings together:

The Chief Education Officer, the National Director of Safeguarding & Mental Health, the Oasis National Safeguarding and Mental Health leads, OCL service leaders from education, human resources, estates management, Oasis Community Partnerships, Oasis Restore, Oasis Housing, the NIOT and representative Principals and Designated Safeguarding Leads.

All staff working (including visiting staff) must:

- Observe and comply with the staff code of conduct.
- Attend all relevant training and development provided by OCL.
- Academy Induction training must now include the school's behaviour policy, the potential additional safeguarding needs of SEND students and the school's procedures for managing children who are missing in education, as well as the staff code of conduct, and the child safeguarding and child protection policy.
 - Staff working directly with children will read KCSIE '24 Part 1, Annex 'B'.
 - Staff who do not work directly with children will read KCSIE '24 Annex A.
- Know how to deal with a disclosure; if a pupil discloses to a member of staff that they are being abused, the staff member should refer to the flowchart and follow guidance set out in this policy.
 - Report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead, or in their absence, the Deputy DSL. This is in line with the Child Protection Procedures and legal duty for reporting FGM.
- Be alert to the signs of harm and abuse, including issues that can manifest themselves due to child-on-child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), peer-on-peer abuse and gender-based violence/sexual assaults and sexting. Further information can be found in Annex B of KCSIE '24.
- Know the Designated and Deputy Safeguarding Lead's name and contact details including telephone numbers and email.
- Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:
 - is disabled and has specific additional needs.
 - mental health concerns.
 - has special educational needs (whether or not they have a statutory education, health and care plan).
 - anti-social or criminal behaviour.
 - is a young carer.
 - is frequently missing/goes missing from care or home.
 - is misusing drugs or alcohol.
 - risk of radicalisation.
 - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or
 - has returned home to their family from care.
- All staff must be aware of the early help process; this includes identifying emerging problems, liaising with the designated safeguarding lead, sharing

information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. All early help cases should be reviewed regularly and if the situation is not improving then consideration should be given to a referral to children's social care for assessment for statutory services.

The Principal

Principals are accountable for the effective safeguarding of children in their academies and that this policy is understood and followed by all staff and therefore will:

- Be responsible for the effective safeguarding of children in the academy and for developing a culture of safeguarding in all aspects of academy and Hub working.
- Be responsible for the implementation of this and all related policies and procedures, ensuring that the outcomes are monitored.
- Undertake the OCL annual safeguarding audit, and report outcomes to their RD through the academy action plan for safeguarding.
- Ensure that whilst the activities of the designated safeguarding lead (DSL) can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out below, remains with the designated safeguarding lead.
- Meet each week with the DSL and regularly with the academy safeguarding team.
- Through the DSL team ensure that:
 - All staff are vigilant to harm and abuse, are able to identify those students for whom there are child protection concerns and can make appropriate referrals, including to early help services.
 - Encourage a culture of listening to children considering their wishes and feelings, making the most of every opportunity to gather their concerns.
 - Promote the educational outcomes and track the progress and attainment of all the vulnerable children, but specifically 'those in need of a social worker' or were previously known to social services.
 - Deliver a common approach to behaviour through the principles of the Oasis Way.
 - All staff and volunteers are trained sufficiently so they have the skills, knowledge and understanding necessary to keep children safe at all times, including on site, when attending alternative provision, educational visits off site or work-related learning. We follow the guidance on Keeping Children Safe in Out-Of-School Settings which details the safeguarding arrangements that schools and colleges should expect providers to have in place.
- Ensure that the KCSiE guidelines for effectively managing SEND and safeguarding are in place including the 2024 updates to this area.
- Appoint a designated teacher to promote the educational achievement and welfare of children who are looked after and previously looked after children, those with additional SEN needs and SEND students to ensure that this person has appropriate training.
- Communicate clearly to visitors, parents, and students so everyone understands

the Academy's safeguarding policy and procedures.

- Ensure that there is a deputy DSL in place to add capacity and ensure sustainable provision.
- Ensure consideration to the range of responsibilities the DSL undertakes e.g.; the DSL needs to have the flexibility to act immediately on a referral that requires an urgent response and time to attend lengthy meetings or case conferences.
- Ensure that contact and role details of the DSL and Deputy DSL are clearly displayed in staff areas, the staff handbook and website (along with this policy).
- Via the Critical Incident Reporting System bring to the attention the Regional Director safeguarding matters that require escalation to the National Teams as they occur.
- Ensure safe recruitment practice is followed when recruiting to posts, and ensure appropriate action is taken when an allegation is made against a member of staff.
- Ensure the academy offers a safe environment through effective implementation of the Oasis health and safety policy to meet the statutory responsibilities for the safety of students and staff at the academy.

The Designated Safeguarding Lead is responsible for:

- Maintaining both a strategic and operational approach to safeguarding.
- Being available term time during academy hours (or the deputy DSL in their absence) for staff or volunteers to discuss any safeguarding concerns.
- Ensuring that all cases of suspected or actual problems associated with child protection are referred to the appropriate agencies in line with procedures set out in this policy, keeping the Principal apprised.
- Ensuring the academy's safeguarding policy and practice is relevant and consistent with the most recent statutory guidance.
- Being aware of the latest national and local guidance and requirements and keeping the Principal and staff informed as appropriate.
- Attend accredited, enhanced training as defined by the Oasis Safeguarding Arrangements to fulfil the role every two years.
- Enrol on and complete the Oasis DSL Academy course on Leading Safeguarding.
- Ensuring that appropriate training for staff is organised according to the agreed programme with the Principal and renewed through ongoing professional development.
- Ensuring families are fully aware of the academy safeguarding policies and procedures and kept informed and involved.
- Keeping Children Safe in Education 2024 says that where reasonable possible, schools should hold more than one contact number for every child in the school in case of emergencies, and in case there are welfare concerns at home. The DSL is responsible for ensuring this is in place.
- Ensuring that effective communication and liaison takes place between the Academy and the Local Authority, and any other relevant agencies, where there is a Safeguarding concern in relation to an academy student.
- Ensuring that all staff understand child abuse, neglect and exploitation and their main indicators, including for looked after children and additional vulnerabilities

of children with special educational needs (SEN) and disabilities and being cognisant of the additional safeguarding concerns that can arise.

- Maintaining details of any looked after child's social worker and the name of the virtual school head (in the authority that looks after the child).
- Working with the Designated Teacher to ensure that the Virtual School Head delivers funding that can be best used to support the progress of looked after children at the academy and meet the needs identified in the child's personal education plan.
- Ensuring that e-safety actions promote safeguarding, including taking the lead responsibility for online safety and understanding the filtering and monitoring systems in place.
- Liaison with the Senior Mental Health Lead, Oasis Mental Health Team and the local Mental Health Services as appropriate.
- Dealing with allegations of abuse in accordance with local and statutory procedures.
- Have an awareness of the requirements around the role of the Responsible Adult under PACE requirements.
- Supporting the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate if early help is appropriate.
- Ensuring that adequate reporting and recording systems are in place.
- Ensuring relevant records are passed on appropriately when students transfer to other schools or are being educated at alternative provision or off-site education.
- Being aware of children who are or who may be living in a private fostering arrangement. The Local Authority Private Fostering Officer is known to the Academy and ensures liaison to support the welfare and safety of the child.
- Undertaking the OCL annual safeguarding audit with the Principal and Deputy DSL.
- Providing guidance and advice on the management of peer-on-peer sexual abuse incidents.
- Tracking the progress, attainment and aspirations of children known and previously known to social care.
- Ensuring accurate vulnerability recording within Bromcom & CPOMS with the submission of safeguarding data as required.

The Designated and Deputy Safeguarding Lead will meet regularly with the Principal and safeguarding leadership team to discuss safeguarding issues including outcomes and implementation of actions relating to case conferences and core groups and all current case work, including where the DSL has acted as a 'Responsible Adult' under PACE legislation. These meetings must be evidenced by minutes and/or on CPOMS. Other key staff will be invited as appropriate.

The DSL will represent the academy at the Regional Safeguarding Development Groups (RSDG replacing the RiN meetings) to influence practice within their region.

Safeguarding matters arising will be discussed routinely at each staff and/or ALT meeting and each RD visit (all critical safeguarding issues will be flagged immediately to the RD by the principal).

National Safeguarding Team:

The National Safeguarding Team is responsible for the support offered to Academies around the issues of child protection, safeguarding and mental health. This is done by:

- Keeping policies and process updated and in-line with current legislation.
- Offering advice and guidance around events, issues, and challenges.
- Providing supervision through and following critical incidents.
- Supporting the national safeguarding audit and monitoring the arising action plans.
- Undertaking system & practice reviews to evaluate safeguarding practice within an academy.
- Leading on investigations into critical incidents and supporting serious case review investigations.
- Keeping staff up to date with current practice, research, critical incident reviews.

Other National Service Teams:

Members of the national service teams are expected to abide by this policy and support our academies to offer safe environments for our students to learn. This will be done by:

- Completing the annual safeguarding training offered through the Learning & Development Zone.
- Completing the Oasis Annual Declaration form.
- Undertaking Safer Recruitment Practices and recording all staff on the National Teams Single Central Record.
- Reading the latest iteration of Appendix A or B (depending on the job role defined contact with children) of Keeping Children Safe in Education.
- Reporting any behaviours or concerns appropriately that may indicate a child is at risk.

Section 7 - Training Requirements

All staff must complete safeguarding and child protection training as part of their induction.

This means that in our Academy:

- *All academy staff will undertake annual HAYS safeguarding and child protection training monitored by the DSL. For those staff with limited contact hours, or no access to IT equipment face-to-face training will be delivered by the DSL.*
- *All staff and volunteers new to the*

All staff must access update briefings on safeguarding and child protection each year. This will include delivering the OCL sessions on the September Inset day on Safeguarding & Mental Health.

The DSL team will be appropriately trained and demonstrate attendance at Local Authority and Multi-agency Safeguarding Arrangements meetings.

Academy will be given appropriate Safeguarding training including ACES training and filtering and monitoring training as part of their induction programme to the academy.

- *Newly recruited staff will complete the online training as part of their induction and will receive academy specific training including being made aware of local risk factors for extremism.*

In addition, we will make sure that:

- *Time will be given to enable this commitment to be met.*
- *Updates will feature regularly in all staff and ALT meetings, as appropriate.*
- *Local contextual issues will be addressed through staff training.*

To achieve this in our academy we will ensure that:

- *The Designated Safeguarding Lead (DSL) and Deputy DSL will receive relevant training as per KCSIE 2024 requirements through the OCL DSL training course.*
- *The DSL will attend the Safeguarding Leadership training.*
- *The DSL will attend Local Authority network meetings as necessary and other appropriate inter-agency training.*
- *The DSL will attend locality based Prevent training as provided by the Local Authority.*
- *Where the Principal is not the DSL/DDSL they will attend training on the role of the DSL with a designated provider identified by Oasis Community Learning.*

Statutory Requirements

This policy has been developed in line with the following key documents:

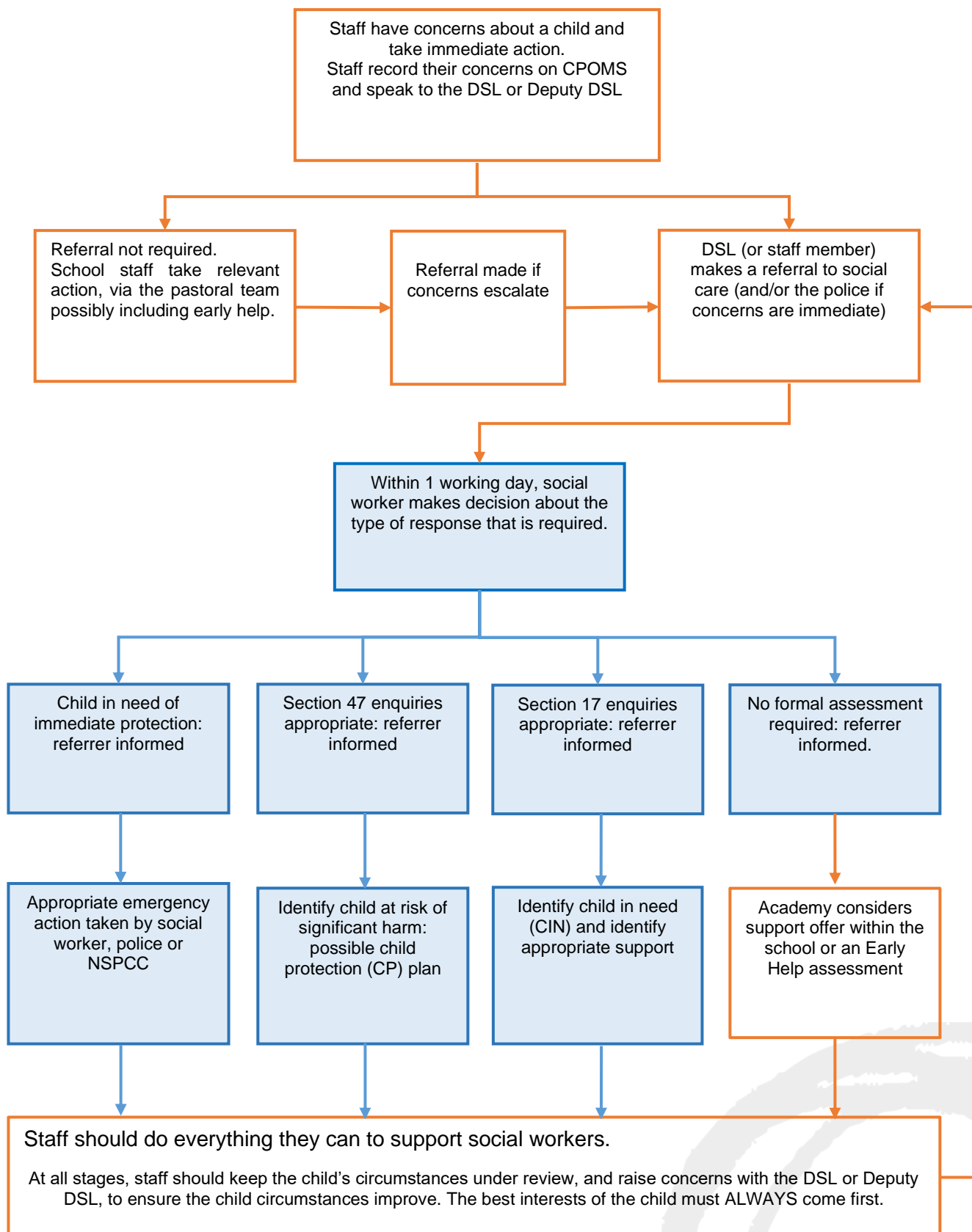
- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, updated September 2024, DfE.
- Working Together to Safeguard Children, December 2023, HM Government.

- Inspecting safeguarding in maintained schools and academies, April 2024, Ofsted.
- Mental Health & Behaviour in Schools (2018) DfE.
- The current Oasis E-Safety Policy.
- The OCL Mental Health Strategy.
- The current OCL Alternative Education policy.
- Education for a Connected World, UKCCIS 2020.
- Multi-agency Statutory Guidance on Female Genital Mutilation, July 2020, HM Government.
- Revised Prevent Duty Guidance for England & Wales, March 2024, Home Office.
- The Independent School Standards, 2019, DfE.
- The Children Act 1989 and 2004 and The Education Act 2002.

RACI Matrix

Policy Element	Leadership			ALT			National Team		Academy Staff	
	Board	OCL CEO	Regional Director	Academy Principal	DSL	Senior Mental Health Lead	Director of Safeguarding	National Safeguarding Team	Pastoral Team	Whole School
Contextual Safeguarding Concerns	I	I	C	A	R		I	I	I	I
Contact Details	I	I	I	A	R		I	I		I
Recognising Child Abuse	I	I	I	A	R		C	C	I	I
Academy Responsibilities	I	I	I	A	I				I	I
Child on Child SHB	I	I	C	A	R		C	C	I	I
Emotional Health & Well-being & MH Support	I	I	I	A		R	C	C	I	I
Online Safety	I	I	I	A	R		C	C	I	I
Child Criminal Exploitation	I	I	I	A	R		C	C	I	I
Children Missing to Education	I	I	C	A	R		C	C	I	I
Honour Based Violence	I	I	I	A	R		C	C	I	I
Female Genital Mutilation	I	I	I	A	R		C	C	I	I
Safeguarding students vulnerable to extremism	I	I	C	A	R		C	C	I	I
Allegations against members of staff and LLC's	I	I	C	A	R		C		I	I
Suitability of Staff & Safer Recruitment	I	I	C	A	R	R			R	R
Confidentiality & Record Keeping	I	I	I	A	A	A			A	A
Early Years settings within OCL	I	I	C	A	R		C	C	I	I
Responsibilities	A	R	I	R	R		R	C	I	I
Training Requirements	A	R	C	A	R		C	C	I	I

APPENDIX 1 – Flow Chart for Reporting Concerns



APPENDIX 2 – Dealing with a Disclosure of Abuse

It is important that all our staff know how to deal with a disclosure of abuse or neglect.

Remember –

If a pupil chose to confide in you, it means they trust you and want you to help them. Dealing with a disclosure may be frightening, but you should also feel privileged that the child has chosen you to talk to.

If you see or hear something that concerns:

- Don't ignore it.
- Don't feel silly – if it worries you, someone else needs to know.
- If it is related to a child being at risk – see the DSL, or Deputy DSL immediately and definitely before the child goes home that day.
- Upload all information to CPOMS (or the agreed system for recording) and seek advice immediately from your DSL.
- If it is something related to safeguarding, but not a child whose safety is immediately at risk – inform the appropriate Pastoral Leader via CPOMS, or the agreed system for monitoring.
- All staff may raise concerns directly with Children's Services. If they feel an incident is not being dealt with appropriately, or they are unable to locate relevant staff.
- Concerns about adults in the academy should be made directly to the Principal.

At this point, take the following steps:

- Explain to the student that the disclosure must be reported – emphasise your trust in them.
- Do not promise to keep the allegation secret or that 'everything will be alright'.
- Reassure by telling the student that they have done the right thing in telling you, do not offer physical reassurance.
- Do not admonish in any way e.g., 'I wish you had told me sooner'.
- Inform the DSL initially verbally.

Under no circumstances, discuss the matter with any other person - if the allegations prove to be untrue, any such discussion would be deemed defamatory.

Dealing with disclosures of abuse:

- Always listen carefully and quietly – do not press for any evidence at all.
- Remain calm and reassuring – do not dismiss the disclosure – do not show distress or concern.
- Do not refute or try to belittle the allegation.
- Show that you care through open and reassuring facial and body language.
- Do not interrogate or ask leading questions (it could later undermine a case).
- Ensure you take a written verbatim account of the child's disclosure using the appropriate academy Disclosure Form and record keeping system or, where appropriate, through CPOMS.

With the DSL, prepare a detailed report itemising: The information revealed by the student with absolutely no opinion:

- Actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported, and follow-up action taken within the academy.
- Date and sign any written record of events and action taken and keep confidential and secure.
- You must keep, in absolute confidence, a copy of the report, as will the DSL.

Don't turn a blind eye - challenge every incident

Child-on-Child abuse is serious, and what be seen by young people as 'banter' is often more harmful than they realise. It is our responsibility to challenge every incident and ensure we log concern for the following:

Category 1 – Harmful Sexual Behaviour:

Recorded on BROMCOM & CPOMS.

General single incidents of Cat 1 issues.

Including but not limited to:

- Developmentally inappropriate problematic (using the Brook Traffic Light System as a benchmark),
- Abusive sexualised behaviour on-line or off-line,
- Lewd comments/jokes,
- Creating a hostile, offensive or sexualised environment.

Category 2 – Sexual Harassment:

Recorded on BROMCOM and discussed with the DSL, recorded on CPOMS as a safeguarding issue

Two or more Cat 1 incidents, or single incidents of Cat 2 issues Including but not limited to:

- Unwanted conduct of a sexual nature,
- Up skirting
- On-line or off-line sexualised comments, remarks or observations,
- Intentional touching of person or clothing,
- Aggravated sexting,
- Behaviours likely to violate dignity, feel intimidated, degraded or humiliated
- Creating a hostile, offensive or sexualised environment.

Category 3 - Sexual Violence:

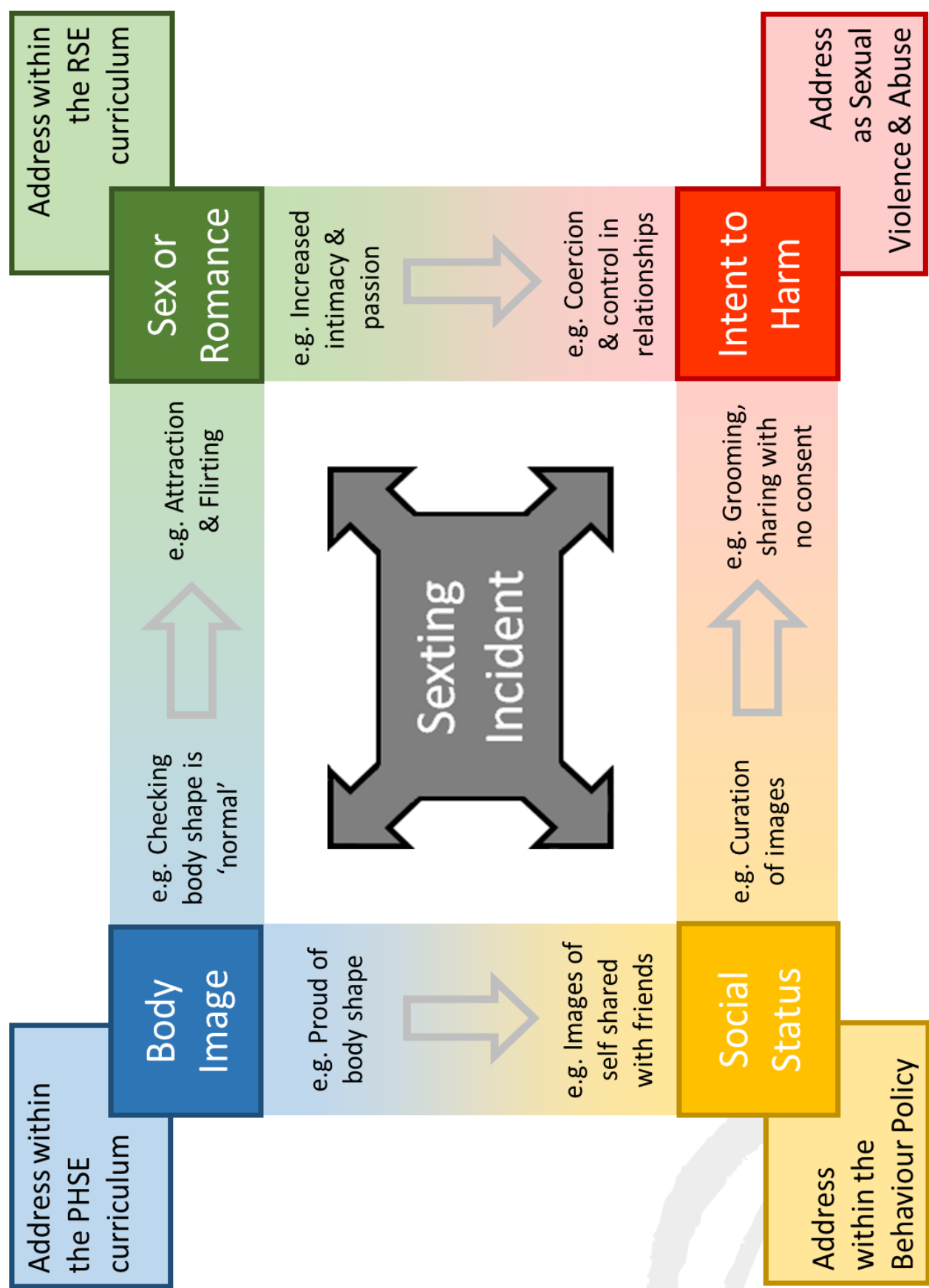
Recorded on CPOMS as a safeguarding incident, and on BROMCOM.

Including but not limited to:

- Rape,
- Assault by penetration,
- Sexual Assault (touching in a sexual way without consent),
- Grooming for sexual/criminal exploitation.



Appendix 4 – Oasis Response to Sexting Incidents



Document Control

Changes History

Version	Date	Owned and amended by	Recipients	Purpose
11.1	June 2024	J Needham		
11.2	July 2024	J Needham	Compliance Directorate	Policy for review
11.3	July 2024	J Needham	National Directors	Approved for publication

Policy Tier

- Tier 1
 Tier 2
 Tier 3
 Tier 4

Owner

Jon Needham, National Director of Safeguarding and Mental Health

Contact in case of query

Jon.needham@oasisuk.org

Approvals

This document requires the following approvals.

Name	Position	Date Approved	Version
Directors' group		15/07/24	11.3

Position with the Unions

Does the policy or changes to the policy require consultation with the National Unions under our recognition agreement?

- Yes
 No

If yes, the policy status is:

- Consulted with Unions and Approved
 Fully consulted (completed) but not agreed with Unions but Approved by OCL
 Currently under Consultation with Unions
 Awaiting Consultation with Unions

Date & Record of Next Union Review
Not applicable / Insert

Location

Tick all that apply:

- OCL website
- Academy website
- Policy portal
- Other: state

Customisation

- OCL policy
- OCL with an attachment for each academy to complete regarding local arrangements
- Academy policy
- Policy is included in principals' annual compliance declaration

Distribution

This document has been distributed to:

Name	Position	Date	Version
Sarah Graham	Head of Compliance – for publication on the Oasis Zone Policy Portal	15-7-24	11.3