



# **SAFEGUARDING & CHILD PROTECTION POLICY 2025-26**

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## Section 1 - At a glance

Oasis Community Learning (OCL) is part of the wider Oasis family with a shared vision for community, a place where everyone is included, contributing and reaching their God-given potential.

At OCL, safeguarding is at the heart of everything we do. We believe that every child and young person deserves to learn, grow, and thrive in a safe, supportive, and nurturing environment. Our commitment to safeguarding reflects our core ethos: that every individual is valued and capable of achieving their full potential, regardless of their background or circumstances.

This safeguarding policy is underpinned by the Oasis 9 Habits—compassionate, considerate, forgiving, honest, hopeful, humble, joyful, patient, and self-controlled. These habits guide our daily interactions and help create a culture where kindness, respect, and integrity flourish. By living out these values, we actively promote the safety, dignity, and wellbeing of every member of our academy community.

Safeguarding is everyone's responsibility. Through this policy, robust procedures, and a shared moral purpose, we work collaboratively to ensure that all children are protected from harm and empowered to speak up, be heard, and stay safe.

### Checklist

OCL is committed to a comprehensive approach to safeguarding:

- We acknowledge that harm can occur in various domains, including our academies, and will be proactive to address risk.
- We strive to adopt a holistic approach to safeguarding which includes deliberately teaching our children how to be safe.
- We will work in partnership with children, their families and partner agencies to a common goal of safety and best interests of the child.
- We will be proactive in our support of children's emotional wellbeing and mental health.
- We will ensure there are clear roles and responsibilities in relation to safeguarding children.
- We will provide high quality safeguarding training to all staff and ensure those with a safeguarding role get the specialist training they need.
- We will fulfil the statutory obligations placed on us to keep children safe and promote their wellbeing.

## In brief

This safeguarding and child protection policy applies across all Oasis Academies, covering Early Years to Sixth Form, and must be followed in all safeguarding situations.

The policy outlines how we aim to promote the safety and wellbeing of children in line with current laws and guidance and applies to all OCL staff, including volunteers and contractors. The policy also acknowledges that harm is experienced differently by everyone so therefore is not prescriptive in processes but instead insists on a specific approach and culture which is child-focussed and trauma-informed.

Each academy must also follow local safeguarding procedures through their Multi-Agency Safeguarding Arrangements (MASA), ensure proper reporting systems, and keep staff informed and updated on relevant local safeguarding concerns.

## Contextual Safeguarding

In each of our academies we must ask, ‘what are we protecting our children from’ and consult with the Local Authority, staff, and children 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 must complete an annual risk reduction analysis of the contextual issues faced within their community and list their response below.

Contextual Safeguarding Concern	Our Academy Response
Mental Health	<p>Our academy ethos and values are designed around providing a holistic approach to our children, their wellbeing, and opportunities for them to fulfil their potential.</p> <p>We have a Senior Mental Lead and designated Mental Health First Aiders, and, along with the pastoral team, they empower children to talk openly and honestly about their feelings and any worries or anxieties they might have, working towards improving and maintaining positive mental health.</p> <p>Our staff are sensitive to the needs of our children and take a non-judgmental approach towards children and parents, showing empathy and offering support and signposting where required.</p> <p>CompassGo and an independent counsellor come into the academy to work with specific children who need additional support.</p> <p>We empower all of our students to have a voice and</p>

	<p>encourage them to speak to any member of staff about their worries and concerns. The pastoral team support children daily.</p> <p>Awareness is embedded into the curriculum with targeted SMSC lessons and delivered through tutor sessions and assemblies.</p> <p>Staff attend any relevant training throughout the academic year.</p>
Neglect and deprivation	<p>The DSL and Deputy DSL attend Child Protection, Child in Need and Multi-Agency meetings, representing the academy's views and the safeguarding concerns that students have.</p> <p>We embed the 9 habits, our ethos and values into everyday academy life and encourage our children and families to think about what they mean. We provide children and parents with information on staying healthy and safe.</p> <p>We signpost parents and families to outside agencies that can support their needs and work with them to break destructive cycles.</p> <p>We empower all our students to have a voice and encourage them to speak to any member of staff about their worries and concerns.</p> <p>Staff attend any relevant training.</p>
Child Criminal and Sexual Exploitation	<p>The DSL and Deputy DSL attend Child Protection, Child in Need and Multi-Agency meetings, representing the academy's views and the safeguarding concerns that students have.</p> <p>Our safeguarding team provide support to any child who may be at risk of, or who is involved in, CCE/CSE. They work closely with parents and other agencies including the local PCSOs.</p> <p>Awareness is embedded into the curriculum with targeted SMSC lessons and delivered through tutor sessions and assemblies.</p> <p>E-Safety is promoted through the Horizons Project and the Safer Schools app which strengthens and enhances our academy safeguarding practices. Relevant and credible resources are provided by the app to ensure correct and accurate information is received by staff, children, and their families.</p> <p>We empower all of our students to have a voice and encourage them to speak to any member of staff about</p>

	<p>their worries and concerns.</p> <p>Staff attend any relevant training.</p>
Domestic abuse	<p>The DSL and Deputy DSL attend Child Protection, Child in Need and Multi-Agency meetings, representing the academy's views and the safeguarding concerns that students have.</p> <p>Our ethos and values include a commitment to healthy, open relationships and therefore, the Principal, DSL and Pastoral Team strive to build and maintain open and honest relationships with our parents and families to ensure the safety of all involved.</p> <p>Awareness is embedded into the curriculum with targeted SMSC lessons and delivered through tutor sessions and assemblies.</p> <p>Our safeguarding team are committed to ensuring our children, parents and families know that we are here to help and support, them and to signpost them to outside agencies who can help to keep them safe.</p>
Child-on-Child abuse	<p>All incidents are taken seriously, investigated appropriately, and recorded on CPOMs. The Academy takes a zero-tolerance approach to this and has a clear policy in place. Children are spoken to and supported to change their behaviours.</p> <p>Awareness is embedded into the curriculum with targeted SMSC lessons and delivered through tutor sessions and assemblies.</p> <p>We encourage our children and families to build positive relationships.</p> <p>The Pastoral Team is diligent in encouraging positive friendships with our children, empowering them to make positive choices and providing a high level of support to them and their families.</p>



## Contact Details

### **Principal (holding responsibility for safeguarding within the Academy):**

Contact email: Sara Rowe

Telephone: 01469 576599

### **Designated Safeguarding Lead:**

Contact email: Paul Manarin

Telephone: 01469 576599

### **Designated Looked After Children Lead:**

Contact email: Donna Churches

Telephone: 01469 576599

### **Senior Mental Health Lead:**

Contact email: Paul Manarin

Telephone: 01469 576599

### **Academy Single Point of Contact for PREVENT**

Contact email: [Paul.Manarin@oasisimmingham.org](mailto:Paul.Manarin@oasisimmingham.org)

Telephone: 01469 576599

### **Support to the Academy:**

#### **Regional Director:**

Contact email: [Heidi.Stennett@oasisuk.org](mailto:Heidi.Stennett@oasisuk.org)

Telephone: 07774 336761

### **Local Authority Designated Officer (LADO):**

Contact email: [lado@nelincs.gov.uk](mailto:lado@nelincs.gov.uk)

Telephone: 01472 326118

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



In the event of a significant safeguarding event during periods of academy closure or when escalation is required, please contact the National Safeguarding Team – [safeguarding@oasisuk.org](mailto:safeguarding@oasisuk.org)

## Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions.
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after.
- Are missing from education for prolonged periods and/or repeat occasions.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

## Section 2 – Child Safeguarding Practice

### Recognising Harm

At OCL, we recognise that safeguarding is everyone's responsibility, and that harm can manifest in a variety of ways. All staff play a crucial role in identifying early signs that a child may be at risk and in taking appropriate action to safeguard their wellbeing.

Staff must read Keeping Children Safe in Education 2025, Part 1 & Annex B, which supports their ability to identify types of harm. Staff are also trained in trauma-informed and relational practice via the Oasis Way which further supports staff to recognise change in students which may indicate harm or enhances a student's ability to disclose.

We understand that children and young people may face risks in a variety of social environments beyond the home, including at school, in peer groups, in the community, and online. Contextual safeguarding recognises that a child's experiences outside of the home can significantly influence their safety and wellbeing and that harm can occur in settings such as parks, shopping centres, social media platforms, or within peer relationships.

As part of our safeguarding approach, OCL considers the full context in which concerns arise. We work closely with external agencies, families, and local safeguarding partners to build a comprehensive picture of the child's lived experience and address risks both inside and outside of the school environment.

### Responding to Harm

All staff have a duty to respond promptly and appropriately to any concerns or disclosures of harm. We understand that a child may choose to disclose abuse directly, or staff may observe signs that give cause for concern. In all cases, the safety and wellbeing of the child is our top priority. Appendix 1 is a helpful guide for staff in responding to disclosures.

The key steps for responding to concerns about harm are:

#### **Listen and Reassure**

- Remain calm and listen carefully without interrupting.
- Take what the child says seriously and offer reassurance that they have done the right thing by telling you.
- Do not promise confidentiality - explain that you must share the information to help keep them safe.

#### **Record and Report**

- Record the concern or disclosure as soon as possible on CPOMS, using the child's own words.

- Include key details: time, date, what was said or observed, and any actions taken.
- Report the concern immediately to the Designated Safeguarding Lead (DSL) or another member of the academy safeguarding team.
- Do not investigate.
- Staff must not question the child further or attempt to investigate the concern themselves.
- The role of staff is to listen, record, and refer. Further assessment or investigation will be led by the DSL and, where appropriate, children's social care or the police.

### **Follow-Up and Support**

Our safeguarding teams are trained to respond to harm in the ways outlined in Keeping Children Safe in Education (KCSIE) and local Multi-Agency Safeguarding Arrangements (MASA). The DSL will lead on ensuring the child is safe and will determine the next steps, including making referrals and offering support. This might include referrals to statutory services such as police or social care or referrals to early help services. Academy safeguarding staff should use Appendix 2 to aid their decision making.

Our academies may offer families targeted early help support and with their consent make referrals of local organisations who can help or to local Oasis services available via our community hubs. There is also the option for academies to refer to our therapeutic intervention for parents, Oasis Encounter.

Ongoing pastoral care and support will be provided as needed, with regular communication with relevant staff and parents/carers (where appropriate).

All concerns about harm, regardless of perceived severity, will be taken seriously and managed in accordance with statutory guidance, local MASA and the current evidence based best practice. Academy safeguarding teams can seek advice and support from the Oasis National Safeguarding Team when required.

### **Discussing Concerns with Parents**

We recognise the importance of working in partnership with parents and carers to safeguard and promote the welfare of children.

- Where appropriate, concerns about a child's safety or wellbeing will be discussed with their parents or carers. This will typically be undertaken by the DSL following a disclosure or where there is a suspicion of harm.
- Other staff members must not engage in safeguarding discussions with parents or carers without first consulting with the DSL.

- In situations where informing parents or carers may place a child at further risk, the DSL will seek advice from the local authority children's social care team before making contact.
- Where there are allegations of abuse involving other children (child-on-child abuse), the academy will usually inform the parents or carers of all children involved. Information sharing will be handled sensitively and in accordance with guidance from the police and/or children's social care, to ensure that the rights and privacy of all individuals are respected.

## **Child Voice**

We are committed to creating a culture where children feel safe, listened to, and taken seriously. We actively seek to understand and consider students' wishes and feelings in all aspects of safeguarding and child protection.

Staff are trained to listen to children attentively and respectfully, recognising the importance of what they say - verbally or through behaviour. The DSL ensures that children's voices are considered when making decisions that affect their safety, wellbeing, and support, in line with statutory guidance.

Safeguarding teams are trained to gather child voice, wishes and feelings using a range of direct work tools. Where appropriate, these views of the child will be used to inform referrals, plans, and interventions, while always maintaining a focus on their best interests and welfare.

## **Recognising & Responding to Online Risk**

We recognise that the online world presents both opportunities and risks for children and young people. Online harm can take many forms, including cyberbullying, grooming, exposure to inappropriate content, online exploitation, and misinformation. We are committed to educating and protecting our pupils from these risks as part of our safeguarding responsibilities.

Types of online harm may include cyberbullying, trolling, or online harassment, sharing of indecent images or sexting, online grooming or radicalisation, access to harmful content, including self-harm or extremist material or exploitation through gaming or social media platforms.

As Artificial Intelligence (AI) technologies become more integrated into education and everyday life, the academy recognises both their benefits and potential safeguarding risks. Staff will remain alert to how students may use AI, especially in ways that could impact online safety, data privacy, or wellbeing. This includes emerging risks such as AI-generated bullying - for example, the creation of fake images (deepfakes), harmful content using chatbots, or AI-edited videos designed to harass, humiliate, or target individuals.



Whilst we aim to prevent harm through the effective implementation of filtering and monitoring systems, our staff are also trained to identify signs of online harm and concerns relating to online safety must be reported to the DSL, whether the incident occurred inside or outside of school.

Children who experience online harm are supported through pastoral care, and where necessary, incidents are referred to external agencies such as social care, the police, or CEOP.

Children who may be causing technology-assisted harm to others will also be supported via pastoral care and provided the opportunity to engage with additional education into the impact of their behaviour. Safety plans will also be considered to prevent further incidents which will include consideration about the academy issued iPad.

We take proactive steps to educate pupils through the curriculum, assemblies, and workshops on how to stay safe online. By promoting digital resilience and responsible online behaviour, we ensure that pupils are better equipped to recognise, avoid, and report online harm.

### Recognising & Responding to Sexual Harassment & Violence

*This section should be read in conjunction with Keeping Children Safe in Education (2025), Part 5.*

At OCL, we have a zero-tolerance approach to all forms of sexual harassment and violence. We recognise that these behaviours are never acceptable and can have a lasting impact on a child's wellbeing, safety, and ability to learn.

Sexual harassment and violence can occur between peers, as well as between adults and pupils, and may take place in person or online. This includes unwanted sexual comments or jokes, sharing of sexual images or videos without consent, physical acts of a sexual nature without consent or pressuring someone into sexual activity.

Our staff are trained to recognise the signs of sexual harassment and violence and understand that disclosures must be taken seriously. Any concern, disclosure, or allegation must be reported immediately to the DSL and recorded appropriately.

The academy follows guidance set out in Keeping Children Safe in Education and Sexual Violence and Sexual Harassment Between Children in Schools and Colleges. Victims are supported with care and sensitivity, ensuring they are listened to and offered appropriate support. Safety plans are completed as needed to ensure the safety and wellbeing of all pupils involved and where necessary, referrals are made to children's social care or the police.

OCL have bullying classifications (Appendix 3) to support safeguarding teams understand the severity of an incident. These classifications should be applied in all

incidents of harmful sexual behaviour and those which meet the level of category three must be reported via the Critical Incident System. Appendix 4 also provides helpful guidance in understanding the context of harm, specifically for digital sexual communication.

Through a whole-school approach that promotes respect, healthy relationships, and open discussion, OCL works to prevent sexual harassment and violence and ensures a safe, respectful environment for all.

### Recognising & Responding to FGM

*This section should be read in conjunction with Keeping Children Safe in Education (2025) paragraph 42 & page 162.*

KCSIE explains that Female Genital Mutilation (FGM) comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.”

FGM is illegal in the UK and is a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting,’ ‘circumcision’ or ‘initiation.’

Indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in KCSIE.

**Any teacher** who either:

- Is informed by a girl under eighteen that an act of FGM has been conducted on her; or
- Observes physical signs which appear to show that an act of FGM has been conducted on a girl under eighteen and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth.

Must immediately report this to the police, personally. This is a mandatory statutory duty, and they can be supported by the DSL or Principal to report this.

**Any other member of staff** who discovers that an act of FGM appears to have been conducted on a pupil under eighteen must speak to the DSL without delay and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been conducted. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has

a victim of FGM should speak to the DSL and follow local safeguarding procedures.



been conducted or discovers that a pupil aged eighteen or over appears to have been

a victim of FGM should speak to the DSL and follow local safeguarding procedures.

## Recognising & Responding to Exploitation

*This section should be read in conjunction with Keeping Children Safe in Education (2025) paragraphs 34-40 and page 150-152.*

We are committed to safeguarding pupils from all forms of exploitation, including Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), county lines activity, and trafficking. We understand that exploitation can happen to any child or young person, regardless of background, and often involves coercion, manipulation, or deception.

Possible indicators of exploitation may include unexplained gifts, money, or possessions, changes in behaviour, such as aggression, secrecy, or becoming withdrawn, regularly going missing or being found in areas far from home, involvement in crime or substance misuse or relationships with older individuals or controlling adults.

Any concerns relating to exploitation are treated as safeguarding issues and must be referred promptly to the DSL. The DSL will assess the situation and make referrals to appropriate safeguarding partners or specialist services as needed. Support is offered to the young person throughout, with a focus on safety, empowerment, and recovery. Safeguarding teams have access to the OCL Youth Violence and Exploitation Matrix which must be used in incidents of youth violence and exploitation concerns to inform decision making and aid multi-agency collaboration.

We acknowledge that incidents of Financially Motivated Sexual Extortion, known as Sextortion, can be a sensitive topic and children experience many barriers to disclosing this. At OCL we have a protocol to allow for children to contact the national safeguarding team directly for support which is advertised within our academies.

At OCL, we are proactive in raising awareness, educating pupils about the risks of exploitation, and working in partnership with external agencies, to protect and support those affected, including Stop the Traffik who are part of the Oasis Family.

## Recognising and Responding to Radicalisation and Extremism

*This section should be read in conjunction with Keeping Children Safe in Education (2025) page 157-159.*

We are committed to protecting pupils from the risks of radicalisation and extremism as part of our wider safeguarding responsibilities. We recognise that children and young people can be vulnerable to extremist ideologies and radicalisation, both online and offline.

We fulfil our duties under the Counter-Terrorism and Security Act 2015, including the Prevent Duty, which requires schools to have due regard to the need to prevent people from being drawn into terrorism.

We will achieve this by ensuring our staff receive training to help them identify signs of radicalisation including being alert to changes in behaviour, language, or attitudes that may indicate a child is being influenced by extremist ideologies.

Concerns about radicalisation are treated as safeguarding issues and must be reported immediately to the DSL. The DSL will assess the risk and, where appropriate, refer to the local Prevent team, Channel programme, or other external agencies for support. The DSL should also make use of the Oasis Prevent Safety Plan unless an alternative multi-agency plan is in place.

By fostering an inclusive environment that promotes respect, diversity, and critical thinking, OCL helps build students' resilience to radicalisation and supports their personal development and safety.

### Recognising and Responding to Gendered Harm

OCL recognises that gendered harm - abuse or discrimination that is rooted in gender norms, roles, or inequalities - can significantly impact the safety, wellbeing, and development of children and young people.

We specifically recognise Violence Against Women and Girls (VAWG) as a serious safeguarding concern. VAWG encompasses a range of harmful behaviours which disproportionately impact women and girls, including domestic abuse, sexual violence, harassment, coercive control, female genital mutilation (FGM), forced marriage, and so-called 'honour'-based abuse.

We are committed to fostering a culture of zero tolerance towards all forms of VAWG. Staff are trained to identify indicators of abuse and to respond sensitively and appropriately, ensuring the safety and wellbeing of affected students. All concerns are recorded and acted upon in line with statutory safeguarding guidance and our internal procedures.

We also recognise that toxic masculinity - the enforcement of rigid and harmful ideologies around male behaviour, such as dominance, suppression of emotions, and aggression - can contribute to VAWG related concerns and wider safeguarding concerns. It may underpin bullying, gender-based violence, homophobia, transphobia, and the marginalisation of students who do not conform to stereotypical gender expectations.

We are committed to challenging harmful gender norms and promoting a culture of respect, inclusion, and emotional wellbeing for all students. Staff are alert to behaviours rooted in toxic masculinity that may pose a risk to individual pupils or the wider school environment. Where concerns arise, they will be addressed swiftly and in line with our safeguarding procedures, with a focus on education, early intervention, and support.

Preventative education is integrated into the curriculum to promote respect, equality, and healthy relationships. The academy works in partnership with families, external agencies, and the wider community to support affected pupils and to challenge harmful attitudes and behaviours.

### Recognising and Responding to Vaping & Substance Misuse

OCL does not tolerate the use, possession, or distribution of vapes, tobacco, alcohol, or illegal substances on academy grounds or during any school-related activity. Vaping and substance use pose serious health risks and may indicate wider safeguarding concerns such as exploitation.

Staff are to remain vigilant and report any signs of substance misuse, including vaping, or concerns that arise outside of school. This may include information disclosed by students, observations in the community, or concerns raised by parents or external agencies.

Preventative education is provided through the curriculum and pastoral support to inform students of the risks and support healthy choices. Our academies will also work with local health and support services to offer early intervention and targeted support where appropriate.

Where there are reasonable grounds to suspect a student is in possession of a prohibited item, a search may be conducted by authorised staff in line with the DfE Search and Screen guidance and the OCL Behaviour Policy. Any incidents will be reported to the DSL and managed in accordance with safeguarding and behaviour procedures which focus on educating and empowering children to make healthy choices.

### Safeguarding within Early Years Settings

We recognise that safeguarding in the Early Years Foundation Stage (EYFS) requires particular attention due to the age and vulnerability of the children. We are fully committed to creating a nurturing, safe, and responsive environment that promotes the physical, emotional, and developmental wellbeing of all our youngest pupils.

OCL is committed to ensuring that all children in our Nursery, Reception, and Two-Year-Old Provision are safe, healthy, and able to learn and develop in a secure environment. To achieve this, we ensure:

- A safe and secure learning environment where children are visible, supervised, and always listened to.
- A named person responsible for safeguarding in the Early Years setting.
- At least one member of staff with a current paediatric first aid certificate is always present on site.
- A qualified first aider accompanies children on all off-site visits.

- Each child has a designated key worker to provide consistent care and maintain effective communication with parents and carers.
- Routine monitoring of health and safety practices to promote the ongoing safety and welfare of all children.
- Staffing ratios and staff qualifications comply with statutory requirements and are sufficient to meet the individual needs of each child.
- Staff will be aware of the Intimate Care Policy and leaders will ensure that this can be followed.

### Safeguarding within Post-16 Settings

We acknowledge that in our academies with post-sixteen provision there will be occasions where students will turn eighteen and therefore legally become adults. We recognise that although 18-year-olds are legally adults, they may still be vulnerable and require safeguarding support, particularly within an educational setting. We maintain our duty of care and apply the same robust safeguarding principles to all students, regardless of age.

Any concerns about the welfare of an 18-year-old will be addressed with the same level of seriousness and in line with our safeguarding procedures, with additional consideration given to their legal rights as adults. Academies will also ensure they are aware of and use local adult safeguarding arrangements where necessary.

### Learning from Safeguarding Incidents

Whilst we strive to provide the best possible level of care and support to our students, we acknowledge that on occasions it does not always go right. It is important we pause and reflect on these incidents.

Within OCL a review process of significant events 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.

## Section 3 – Attendance and Children Missing from Education

*This section should be read in conjunction with Keeping Children Safe in Education (2025) page 153.*

OCL recognises that regular school attendance is essential for children to achieve their full potential and is a key indicator of their safety and wellbeing. Persistent absence or unexplained patterns of absence can be a safeguarding concern and will be treated as such. All staff are expected to be alert to the link between absence and potential safeguarding concerns.

### **Attendance Monitoring:**

- The academy records attendance daily using its management information system.
- Absence is followed up promptly by staff, and patterns of persistent or unexplained absence are reported to the DSL.
- Attendance concerns are addressed early through supportive engagement with pupils and families.

### **Children Missing Education (CME):**

- Any child who is absent for ten consecutive school days without explanation, or earlier if there are significant safeguarding concerns, will be referred to the Local Authority in line with Children Missing Education (2024) guidance.
- The DSL is responsible for ensuring that such cases are recorded as safeguarding concerns where appropriate and escalated in accordance with local protocols.

### **Safeguarding Considerations:**

The DSL will be alerted to any attendance concerns, particularly where there are known safeguarding risks. Non-attendance or sudden withdrawal from school can be indicators of abuse, neglect, exploitation, or other risks such as Female Genital Mutilation (FGM), forced marriage, or trafficking. The academy will always consider the context of a child's absence and will work with external agencies, including the Education Welfare Service and social care, as necessary.

More information about how attendance and concerns relating to attendance are managed can be found in the Oasis Attendance Policy.

## Section 4 – Emotional Wellbeing and Mental Health

*This section should be read in conjunction with Keeping Children Safe in Education (2025) paragraphs 43 – 45 and page 156.*

OCL academies play a vital role in supporting the mental health and emotional wellbeing of students. Clear systems are in place to identify concerns, escalate issues, and ensure accountability. Staff are trained to spot warning signs and to act when mental health issues also raise safeguarding concerns.

Mental health and emotional wellbeing education is embedded in the RSE and PSHE curriculum to help students develop the knowledge and skills to stay healthy and safe.

While only trained professionals should diagnose mental health conditions, all concerns must be taken seriously. Staff, friends, and parents may find it challenging to respond, especially in cases like self-harm or eating disorders. Support is available for everyone involved, including peers and families, to ensure a compassionate, informed response.

This means in our academies we will ensure there is access to a trained Senior Mental Health Lead and trained Mental Health First Aiders, integrate emotional wellbeing education into the curriculum, actively promote open conversations about emotional well-being and ensure staff access training in mental health awareness to help identify and support students in need.

This also means OCL will provide the academies with high quality information, advice, and guidance from the National Mental Health Team to support staff in safety planning, case consultation and developing a whole-school approach to emotional wellbeing. The National Mental Health Team will also provide an assessment and time-bound intervention to those referred and accepted to the service following the application of the mental health matrix.

## Section 5 – Opportunities to Teach Safeguarding

*This section should be read in conjunction with Keeping Children Safe in Education (2025) paragraphs 128 - 133*

Our academies are committed to preventative education that prepares students for life in modern Britain and promotes a zero-tolerance culture towards sexism, LGBTQ+ discrimination, and sexual violence or harassment.

This is supported by the school's behaviour policy, pastoral care, and a well-planned, evidence-based RSE Relationships and Sex Education (RSE) curriculum. Lessons

are inclusive and age-appropriate, especially for students with SEND or additional vulnerabilities, and focus on safeguarding as a form of protection, not punishment.

Key topics include:

- Healthy relationships and consent
- Body confidence and self-esteem
- Equality, stereotyping, and prejudice
- Recognising and addressing abuse and coercion
- Understanding laws related to sexual exploitation, grooming, FGM, and domestic abuse.
- How and where to seek support

This means each academy will teach children to be safe by creating a supportive environment where safeguarding is embedded across the curriculum and daily life and through the lens of the Oasis 9 Habits. Regular assemblies, workshops, and collaboration with external experts can further equip students with the knowledge, confidence, and skills to protect themselves and others in a variety of situations.

OCL will ensure our academies have access to a high-quality personal development curriculum and provides academies with the scope to be responsive to local need. OCL will also support in providing the resources for targeted awareness activities, such as Mental Health Awareness Week, ensuring they are aligned with the Oasis ethos and 9 Habits and current best practices.

## Section 6 – Leadership of Safeguarding

### Working in Partnership & Information Sharing

*This section should be read in conjunction with Keeping Children Safe in Education (2025) paragraphs 114 - 122.*

Safeguarding is most effective when it is underpinned by strong partnerships and robust, timely information sharing. We are committed to working collaboratively with children, parents, carers, external agencies, and safeguarding partners to protect and promote the welfare of all pupils.

We foster an open, honest, and supportive relationship with parents and carers, encouraging them to share any concerns they have about their child's wellbeing, and engage with a range of agencies including children's social care, health services, the police, and local safeguarding partners to ensure a coordinated approach to safeguarding concerns.

The academy also works in partnership with other schools, educational settings, and community organisations to support transitions and safeguard pupils beyond our own setting. We will specifically work closely with provisions where our children attend as part of an alternative provision arrangement or off-site direction and will retain overall responsibility for their safeguarding.

We recognise that clear and timely information sharing is vital to identifying, assessing, and responding to safeguarding concerns. All staff understand that safeguarding concerns must be shared with the DSL, and that fears about sharing information should not stand in the way of protecting a child.

Our DSLs are trained, and have agency, to make informed decisions about when to make referrals to partner agencies in line with their local multi-agency safeguarding arrangements and threshold guidance.

Information is shared in line with the principles set out in Working Together to Safeguard Children and Keeping Children Safe in Education, with the appropriate individuals and agencies on a 'need-to-know' basis and in a secure and professional manner, respecting confidentiality and data protection laws (including UK GDPR, Data Protection Act 2018 and Data Use and Access Act (DUAA) 2025).

### Confidentiality and Record Keeping

Safeguarding children requires a culture of trust, transparency, and accountability. All staff must be aware that safeguarding information is confidential and handled with care, in line with data protection laws and statutory guidance.

**Confidentiality:** Safeguarding concerns should only be shared with those who need to know to take appropriate action. Information must not be discussed publicly or shared unnecessarily. Staff must never promise a child that they will keep a disclosure secret, and should explain when information will be shared, with whom, and why in child focussed way.

**Record Keeping:** All safeguarding concerns, discussions, decisions, and actions must be recorded clearly and promptly using the academy's CPOMS. Records must be:

- Accurate, factual, and objective
- Updated in a timely manner as new information arises.
- Include child voice at every opportunity.

**Storage and Transfer:** Safeguarding records are stored securely with restricted access. When a child transfers to another school or setting, their safeguarding file will be transferred confidentially and directly to the new DSL, in line with DfE guidance.

**Data Sharing:** Safeguarding records will only be shared in line with Oasis's Data Protection Policy and Subject Access Request Policy. When statutory agencies, such

as police, request safeguarding information from us it will only be processed on the receipt of appropriate documentation and with the authorisation of either the National Director of Safeguarding & Wellbeing or OCL's Data Protection Officer

The DSL is responsible for ensuring records are maintained in accordance with national and local guidance and that staff are trained in appropriate information handling practices.

### Filtering and Monitoring

*This section should be read in conjunction with Keeping Children Safe in Education (2025) paragraphs 140 – 146.*

At OCL, we recognise the importance of providing a safe and secure digital environment for all pupils and staff. Effective filtering and monitoring are key components of our safeguarding strategy to protect children from harmful online content, including radicalisation, grooming, cyberbullying, and access to inappropriate material.

All staff are trained to understand the importance of digital safeguarding and how to report concerns related to online activity. Pupils are also educated about online safety through the curriculum, helping them develop critical thinking and responsible online behaviour.

Our academies use a robust, age-appropriate internet filtering and monitoring system to block access to harmful or unsuitable content and to track and log online activity on the school network and devices, ensuring any concerning behaviour or attempts to access inappropriate material can be quickly identified and addressed. Safeguarding teams will be proactive in responding to concerns raised and use the daily filtering report to inform the whole-school strategy for online safety.

Filtering and monitoring systems are regularly reviewed and updated to respond to emerging threats, changes in pupil usage, and updates in guidance. The Designated Safeguarding Lead works closely with the IT team and National Safeguarding Team to oversee filtering and monitoring practices.

OCL's filtering and monitoring system applies to all devices connected to the academy's network, including academy-owned devices and, where appropriate, personal devices used on-site. Our system will also work on academy devices used on external networks.

## Section 7 – Maintaining a Safe Workforce

### Safer Recruitment

*This section should be read in conjunction with Keeping Children Safe in Education (2025) Part 3*

As part of our commitment to safeguarding and ensuring the safety of our students we adhere to robust safer recruitment processes set out within Keeping Children Safe in Education.

Through these measures, we strive to ensure that everyone who works in our academies is suitable to do so and understands their responsibility in safeguarding the children in our care.

All staff are expected to complete an annual declaration confirming they remain suitable to work with children through the course of their employment.

More information regarding our safer recruitment processes can be found within the current OCL Recruitment and Selection Policy.

### Concerns about Staff, Visitors or Contractors

At OCL, we are committed to creating a culture of openness, trust, and accountability. We recognise that it is essential to have clear procedures in place to manage any concerns or allegations about adults working with children, whether they are members of staff, volunteers, supply staff, or contractors.

All concerns, no matter how minor they may seem, must be reported immediately to the principal, or if the concern involves the principal, it must be reported to the Regional Director. If the concern is about the Regional Director or member of regional or national staff, then the concern must be reported to the relevant service director.

The principal will act as the ‘case manager’ and following the direction of the Local Authority Designated Officer (LADO) will commission an investigation and liaise with the LADO as to the actions required.

The types of concerns may include:

- Behaving in a way that has harmed a child or may have harmed a child.
- Possibly committing a criminal offence against or related to a child.
- Behaving towards a child in a way that indicates they may pose a risk of harm.
- Violating professional boundaries or showing signs of inappropriate behaviour, even outside of school.

All concerns will be taken seriously and managed promptly in line with KCSIE, local safeguarding procedures and internal OCL policies.

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 LADO 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.

It is important to note that suspension is not automatic but may be considered where there is cause to suspect a child is at risk of harm or the allegation warrants formal investigation and only after consultation with relevant OCL National Functions.

Support will be offered to both the person raising the concern and the member of staff involved, in line with OCL's duty of care obligations. Confidentiality will be maintained as far as possible throughout the process.

As an organisation, we are open to learning following incidents and would apply the same learning process outlined earlier in this policy.

## Section 8 - Responsibilities

### Role of the Designated Safeguarding Lead

The role of the DSL is outlined in KCSIE (2025), Annex C. In addition to statutory responsibilities, at OCL we also expect our DSLs to fulfil the following:

- In addition to statutory training, the DSL is expected to complete the OCL DSL Academy course on Leading Safeguarding.
- Maintain a list of those students deemed to be vulnerable.
- Ensure that families are fully aware of the academy's safeguarding policies and procedures and are kept informed and involved as appropriate.
- Liaise with the Senior Mental Health Lead, Oasis Mental Health Team, and local mental health services as appropriate to support student wellbeing.
- Undertake the OCL annual safeguarding audit in collaboration with the Principal and Deputy DSL.
- Track the progress, attainment, and aspirations of children known and previously known to social care, ensuring accurate vulnerability recording within Bromcom and CPOMS, and submit safeguarding data as required.

During term time and normal school hours, a DSL will always be available in our academies. For most of the time, this will mean 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 academies, access to a DSL will be through a phone call or Teams call.

### Role of the Principal

The principal is accountable for the effective safeguarding and protection of all children within the academy. This includes ensuring that safeguarding policies and procedures are fully embedded in practice and consistently followed by all staff. The principal will:

- Lead the development of a strong safeguarding culture across the academy and wider Hub operations.
- Ensure full implementation of this safeguarding policy and all related procedures, with robust systems in place to monitor their effectiveness.
- Complete the OCL Annual Safeguarding Audit and report findings, including action plans, to the Regional Director (RD).
- Ensure the Designated Safeguarding Lead (DSL) maintains lead responsibility for safeguarding and child protection, even where specific tasks are delegated to trained deputies.
- Hold weekly meetings with the DSL and engage regularly with the academy's safeguarding team.

Working in partnership with the DSL team, the principal will also ensure:

- All staff are trained to recognise signs of harm and abuse, are vigilant, and know how to respond appropriately, including making referrals to early help and statutory services.
- A strong culture of listening to children is promoted, ensuring that their views, wishes, and concerns are considered and acted upon.
- The academic progress and wellbeing of vulnerable pupils - particularly those with a social worker or those students previously known to children's services - are closely tracked and supported.
- A consistent, positive behaviour approach is implemented, aligned with the principles of the Oasis Way.
- Staff and volunteers receive appropriate safeguarding training and have the skills, knowledge, and understanding needed to protect children in all contexts, including off-site activities and alternative provision, in accordance with Keeping Children Safe in Out-Of-School Settings guidance.

In addition, the principal will:

- Appoint a designated teacher responsible for promoting the educational achievement of looked-after and previously looked-after children, and for supporting pupils with SEN and SEND, ensuring this person receives appropriate training.

- Ensure that safeguarding policies and procedures are clearly communicated to all staff, students, parents, and visitors.
- Appoint a deputy DSL to provide additional safeguarding capacity and ensure continuity of provision.
- Support the DSL by ensuring appropriate workload management, allowing time for urgent safeguarding responses, meetings, and case conferences.
- Ensure that the names and contact details of the DSL and deputy DSL are clearly displayed in staff areas, included in the staff handbook, and published on the academy website.
- Use the Critical Incident Reporting System to escalate serious safeguarding concerns to the RD and the National Safeguarding Team as appropriate.
- Ensure safer recruitment practices are followed and take immediate and appropriate action in response to any allegations made against staff.
- Oversee the implementation of the Oasis Health and Safety Policy to provide a safe and secure environment for all students and staff, fulfilling the academy's statutory responsibilities.

### Safeguarding Governance

The OCL **Board of Trustees** holds strategic leadership responsibility for safeguarding arrangements across all OCL academies. It ensures that safeguarding policies, procedures, training, and web filtering systems are always effective and fully compliant with current legislation.

To support this responsibility, the Board will:

- Appoint a named trustee with specific oversight of safeguarding and child protection, with clearly defined objectives and outcomes.
- Ensure this Board member participates in the National Safeguarding Steering Group and provides scrutiny of the organisational safeguarding risk register.
- Monitor that every staff member within OCL receives annual safeguarding training delivered via appropriate and accessible formats.
- Ensure that Board members and the Executive Team receive annual safeguarding training that enables them to strategically challenge and evaluate the effectiveness of safeguarding practices across the organisation.

The **Chief Executive Officer (CEO)**, as delegated by the Board of Trustees, is accountable for safeguarding across the Trust. This includes oversight through Oasis Professional Governance and the National Safeguarding Steering Group. The CEO reports to the Board on safeguarding matters, ensuring transparency and accountability at the highest level.

The **National Safeguarding Steering Group** plays a key role in upholding OCL's commitment to the safety and wellbeing of all children. Its purpose is to provide guidance and ensure the consistent implementation of best safeguarding practices across all Oasis academies and services.

This group includes:

- The Chief Education Officer
- The National Director of Safeguarding and Mental Health
- National Safeguarding and Mental Health Leads
- Leaders from OCL's People and Culture Directorate, the Property and Estates directorate, Oasis Community Partnerships, Oasis Restore, Oasis Housing, and the National Institute of Teaching (NIOT)
- Representative Principals and Designated Safeguarding Leads
- Representatives from relevant pan-Oasis strategy groups such as the Violence Reduction Strategy Group

Together, this group ensures that all academies adopt effective safeguarding policy and practice in line with OCL's vision: that every child has the right to protection from harm and to thrive in a safe and nurturing environment.

### National Function Support

The National Safeguarding & Mental Health Team is a national function that provides ongoing support to academies in the areas of child protection, safeguarding, and mental health. This includes ensuring policies align with legislation, offering expert guidance, supervising critical incidents, supporting audits and action plans, reviewing safeguarding practices, leading investigations into serious incidents, and keeping staff informed of current safeguarding developments.

## Training requirements

All staff receive an induction which includes safeguarding training, and this training is refreshed annually. All staff should also receive additional training or briefings throughout the academic year to further upskill them on safeguarding topics, particularly those prevalent within their setting.

Those with a designated safeguarding role, including the principal, within Oasis must complete the Designated Safeguarding Lead training course approved by Oasis Community Learning which meets the requirements set out in Keeping Children Safe

in Education. They are also expected to complete additional training provided by Oasis in response to latest guidance or best practice so that the quality of safeguarding within our academies remains high.

Academy safeguarding staff are also encouraged to participate in local arrangements such as training provided by their local safeguarding children partnership or DSL network groups.

## 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 2025, DfE.
- Working Together to Safeguard Children, December 2023, HM Government.
- Inspecting safeguarding in maintained schools and academies, October 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	Board	Leadership			Academy				National Team		Other National Functions		
		OCL CEO	OCL CeoO	Regional Director	Academy Principal	DSL	SMHL	All academy-based staff	Director Safeguarding & Mental Health	National Safeguarding & Mental Health Team	All Other National Functions	People and Community Directorate	Information Technology Directorate
Section 1 – At A Glance	I	I	I	C	A	R	I	I	I	I	I	I	I
Section 2 – Child Safeguarding Practice	I	I	I	I	A	R	I	I	C	C	I	I	I
Section 3 – Attendance & Children Missing from Education	I	I	I	I	A	R	I	I	C	C	I	I	I
Section 4 – Emotional Wellbeing & Mental Health	I	I	I	I	A	R	R	I	C	R	I	I	I
Section 5 – Opportunities to Teach Safeguarding	I	I	I	I	A	R	R	I	I	I	I	I	I
Section 6 – Leadership of Safeguarding	I	I	I	I	A	R	R	I	C	C	I	I	R
Section 7 – Maintaining a Safe Workforce	I	R	R	R	A R	R	R	R	R	R	R	A R	R
Section 8 - Responsibilities	A	R	R	I	R	R	I	I	R	R	I	I	I
Training Requirements	A	R	R	C	A	R	I	I	C	C	I	I	I

## APPENDIX 1 – 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.*

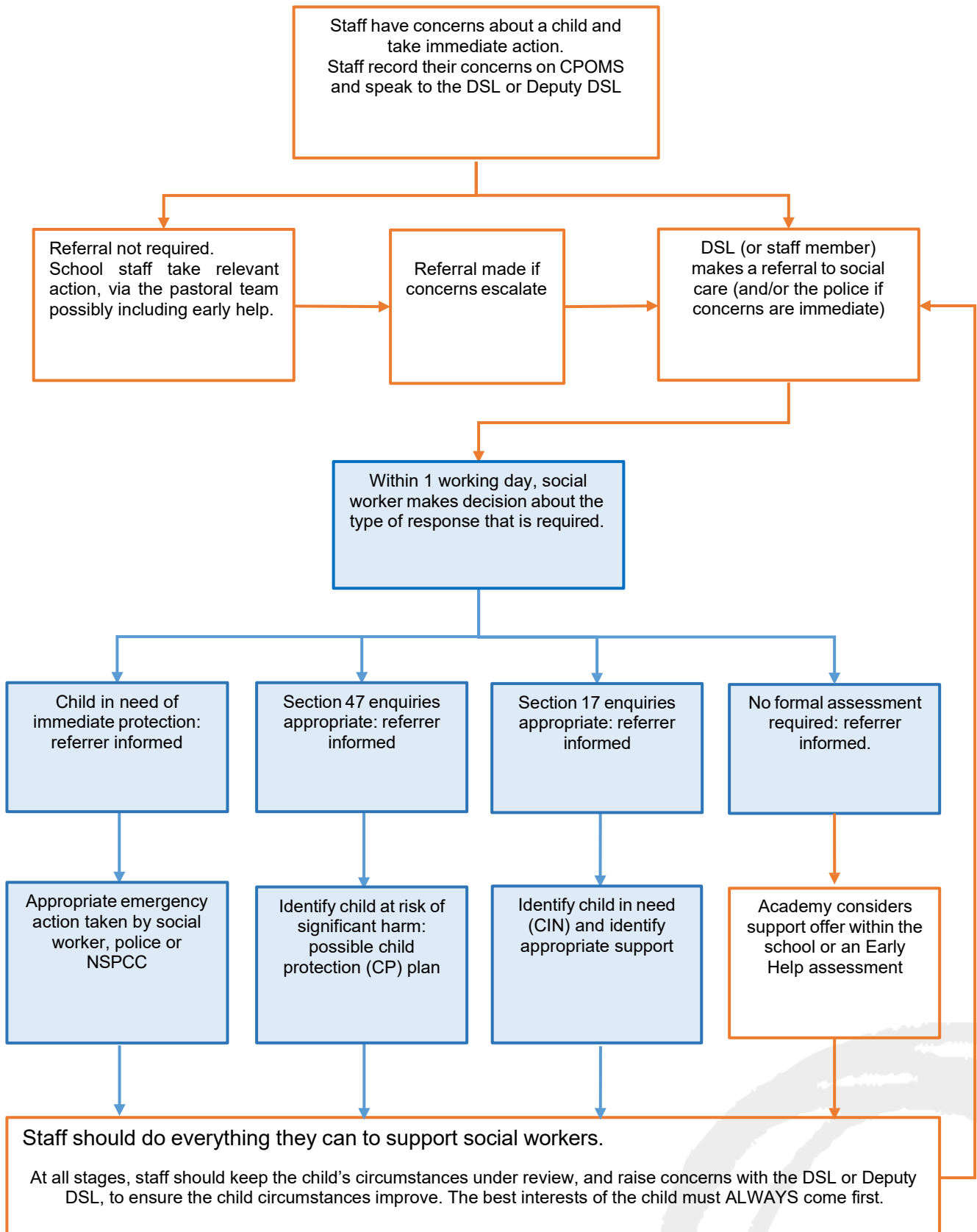
#### Dealing with disclosures of abuse:

- 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.

## APPENDIX 2 – Flow Chart for Reporting Concerns



# 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:

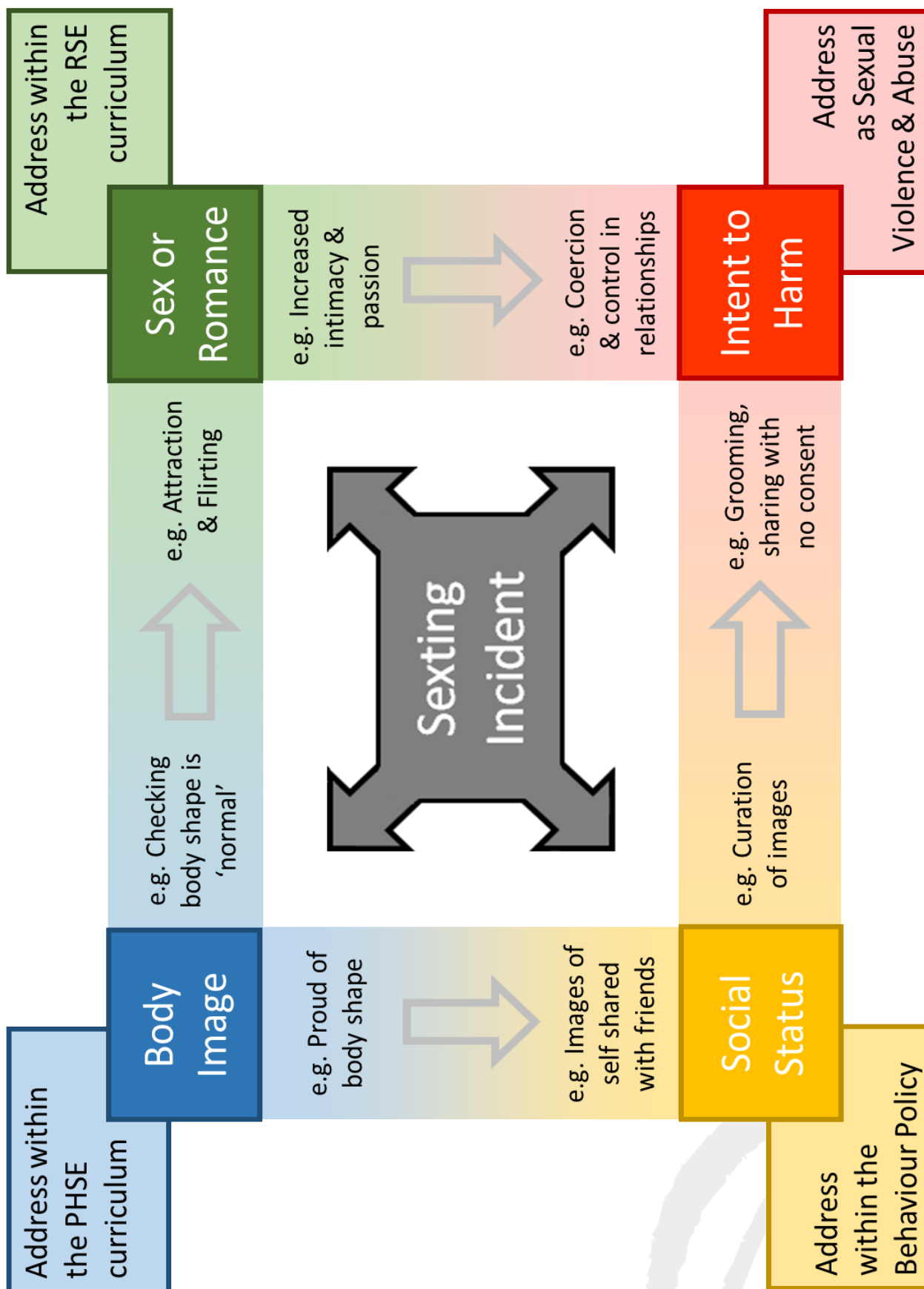
Recorded on CPOMS as a safeguarding incident, and on BROMCOM.

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
12.1	May 2025	J Needham M Cannon	N/A	Update to reflect 2025 KCSIE changes & shortened to be more user friendly. No substantive changes
12.2	July 2025	J Needham M Cannon	N/A	Minor amends to reference new guidance
12.2	July 2025	Jon Needham & Matthew Cannon	Compliance, Policy and Legal Directorate	For upload

### 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](mailto:Jon.needham@oasisuk.org)

### Approvals

This document requires the following approvals.

Name	Position	Date Approved	Version
Directors' group			

### 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

**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