

RADLEY

Safeguarding

September 2026

Contents

Safeguarding Contact Details	4
Safeguarding and Child Protection	5
Introduction.....	5
Related Policies.....	6
Terminology.....	6
Aims.....	7
Safeguarding Procedures.....	9
What staff need to know	11
Confidentiality and Information Sharing.....	11
Safeguarding Training.....	12
Safer Recruitment.....	12
What staff should do if they have concerns about a child	13
Pastoral Care	14
Record keeping.....	15
What to do if you have concerns about another staff member	16
What to do if they have concerns about safeguarding practices within the college	16
Safeguarding Measures	18
Boarding, NMS compliance.....	20
Teaching Pupils how to keep safe.....	20
Child Protection Procedures	23
Reporting and referring concerns.....	23
Allegations against staff or volunteers.....	24
Whistleblowing.....	25
Allegations against Pupils (Child-on-Child)	26
Annex 1	28
Safeguarding Responsibilities.....	28
Role of Council	28
Role of the Warden.....	28
Role of the Designated Safeguarding Lead (DSL)	28
Role of the Deputy DSL(s)	30
Role of staff	30
Role of Parents	30
Role of Pupils	30

Annex 2	32
Dealing with disclosures	32
Ground rules	32
The seven R's.....	32
Annex 3	34
Abuse, Neglect and Exploitation.....	34
Physical abuse.....	34
Emotional abuse.....	35
Sexual abuse	37
Domestic abuse	38
Neglect.....	38
Mental Health	38
Serious Violence.....	39
Child-on-Child abuse (including harassment and violence).....	40
Harmful Sexual Behaviour (HSB)	41
Sexual Harassment.....	42
Sexual Violence	42
Self-generated intimate images including those generated using AI e.g. deepfakes and/or videos.....	43
Online Safety.....	44
Honour or Faith-Based Abuse (HBA) (including female genital mutilation and forced marriage).....	45
Child Sexual Exploitation (CSE)	46
Child Criminal Exploitation: County Lines.....	47
Modern Slavery.....	47
Prevent Duty.....	48
Gender Questioning Children.....	49
Other specific safeguarding issues.....	50
Appendix A.....	52
Allegation flowchart.....	52
Appendix B	53
Policy Updates.....	53

Safeguarding Contact Details

Designated Safeguarding Lead	Edward James, Deputy Head Pastoral	epj.james@radley.org.uk safeguarding@radley.org.uk	01235 543128
Deputy DSLs	Tom Ryder Art Dept.	trgr@radley.org.uk	01235 543039 07805 161435
	Suzie Naylor, Music Dept.	sln@radley.org.uk	01235 543144
Lead Nurse	Alex Gilley, Health Centre	amg.gilley@radley.org.uk	01235 543097
Warden	John Moule	warden@radley.org.uk	01235 543037
Chairman of Council	David Smellie	david.smellie@farrer.co.uk	
Council Safeguarding Lead	Carole Sweetnam	carole@sweetnams.co.uk	
LADO & ESAT Team (OSCP)			01865 810603
ESAT Emergency Duty team			0800 833 408
LADO Local Authority Designated Officer	Jo Lloyd	Jo.Lloyd@oxfordshire.gov.uk LADO.SafeguardingChildren@Oxfordshire.gov.uk	07584 581180 01865 810603
LADO team Education Safeguarding Advisors	Sandra Barratt	sandra.barratt@oxfordshire.gov.uk	01865 323457
	Amie Picher	amie.pilcher@oxfordshire.gov.uk	01865 815955
	Becky Langstone	becky.langstone@oxfordshire.gov.uk	01865 815957
Oxford MASH		mash-children@oxfordshire.gov.uk	0345 050 7666
Oxfordshire LCSS	Kirsty Middleton Hannah Alder Sophia Lazarou-West	Oxford South Office Senior Practitioner: Assistant Team Manager Link worker	0345 241 2608 07990368034 07990367819 07436 701271
Kingfisher Team		Child Sexual Exploitation	01865 335276
TVP Prevent Co-ordinator	Jo Physick	preventreferrals@thamesvalley.pnn.police.uk	01189 536349 ext. 751
Thames Valley Police			111

Other contacts

Non-emergency national police number	When should you call the police?	101
DfE dedicated contact for non-emergency advice for staff and governors	counter-extremism@education.gsi.gov.uk	020 7340 7264

Safeguarding and Child Protection

Introduction

This policy has been developed in accordance with the principles established by the Children Act 1989; and in line with the following guidance:

[Keeping children safe in education 2026](#) (KCSIE) September 2026

KCSIE incorporates the additional statutory guidance, [Disqualification under the Childcare Act 2006](#) (June 2016)

[“Working Together to Safeguard Children”](#) (March 2026)

[“What to do if you are worried a Child is being Abused” March 2015](#) ¹

[Oxfordshire Safeguarding Children Partnership Procedures Manual](#), December 2025

[Oxfordshire’s Threshold of Needs](#) guidance document, 2022

[Boarding Schools National Minimum Standards](#), May 2026

[Prevent Duty Guidance March 2024](#) *Prevent* is supplemented by non-statutory advice and a briefing note:

[Filtering and Monitoring Standards](#) (April 2026)

[Children Missing Education \(2025\)](#)

[Children Act 2004](#)

[Data Protection Act 2018](#)

[UK General Data Protection Regulation \(UK GDPR\)](#)

[Data \(Use and Access\) Act 2025](#)

The Council (School Governors) takes seriously its responsibility under section 11 of the Children Act 2004 and duties under “Working Together” to safeguard² and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements exist within the college to identify and support those children who are suffering harm or are likely to suffer harm. For the purposes of this policy children includes everyone under the age of 18.

We recognise that **all staff**³ and Council members have a full and active part to play in protecting our pupils from harm, and that promoting their welfare is our paramount concern.

¹ What To Do If You Are Worried A Child is being Abused
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

² Safeguarding (as defined in the Joint Inspector’s Safeguarding report is taken to mean “All agencies working with children, young people and their families take all reasonable measures to ensure that the risk of harm to children’s welfare are minimised” and “where there are concerns about children and young people’s welfare, all agencies take all appropriate actions to address those concerns, working to agree local policies and procedures in full partnership with other agencies”

³ “Staff” covers ALL adult staff on site, including temporary, supply and ancillary staff, trainee teachers, contractors and volunteers working with children

Radley recognises its duties to all children, and particularly those in need of support and those at risk of harm. Radley aims to provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of pupils free from discrimination or bullying where they can learn and develop happily.

This policy applies to all staff, Council members and volunteers working in our school. This policy has been written in line with the DfE statutory guidance **Keeping Children Safe in Education**.

Related Policies

This policy should be read in conjunction with the following College policies, all of which can be found on the College website.

- Code of Conduct
- Anti-Bullying Policy
- Behaviour Discipline and Rewards Policy
- Filtering and Monitoring Policy
- Curriculum, Teaching and Learning Policy
- Recruitment Procedures Policy
- Use of IT Policy
- Staff Code of Conduct, Complaints Policy
- Whistleblowing Policy
- Anti-Radicalisation Policy
- Missing Children Policy
- Access to College Premises Policy
- Education Guardianship Policy and Agreement
- Low Level Concerns Policy
- PSHE & RSE Policies

Terminology

Safeguarding and promoting the welfare of children is defined for this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Child protection is an aspect of safeguarding but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

The term **Staff** applies to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity. This also includes parents and governors.

Child refers to all young people who have not yet reached their 18th birthday. However, this policy applies to all pupils at the school and extends to visiting children and students from other establishments.

Parent refers to birth parents and other adults in a parenting role for example, adoptive parents, step parents, guardians and foster carers.

Abuse could mean exploitation, neglect, physical, emotional, or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care. Explanations of these are given within the procedure document.

DSL – refers to Designated Safeguarding Lead

DDSL – refers to Deputy Designated Safeguarding Lead

OSCP – refers to Oxfordshire Safeguarding Children Partnership

LADO – refers to Local Authority Designated Officer

MASH – refers to Multi Agency Safeguarding Hub

LCSS – refers to Locality and Community Support Services

Aims

- support the pupil's development in ways that will foster security, confidence and resilience
- provide an environment in which children and young people feel safe, secure, valued, respected and confident
- establish a clear understanding amongst all staff that our approach to safeguarding is one which recognises the real possibility that '**it could happen here**'. With this in mind, staff members will always act in the **best interests of the child**
- ensure pupils know how to approach adults if they are experiencing difficulties
- raise the awareness with all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse or cause for concern
- promote clear communication so that problems are identified, thereby enabling children to benefit from a **community-based early help** assessment. The pastoral support system within Socials provide pupils with a variety of people to whom they can turn in times of difficulty. In addition to boarding staff within the Social, pupils can contact the College Counsellor, the Chaplain or any member of staff with whom they feel comfortable
- provide a systematic means of monitoring children known or thought to be at risk of harm and contribute to assessments of need and support for those children where appropriate
- acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding children and young people
- develop a structured procedure within the school which will be followed by all members of the staff in cases of suspected abuse

- develop effective working relationships with all other agencies involved in safeguarding children
- ensure that all adults within the college who have direct or unsupervised access to children have been checked as to their suitability. This includes other community users of our facilities, following correct staff recruitment and selection procedures

Safeguarding Procedures

Procedures for safeguarding children will be in line with Oxfordshire Local Authority (the LA) and Oxfordshire Safeguarding Children Partnership's *Child Protection Procedures* and "Working Together to Safeguard Children".

We will ensure that:

- **All** staff and members of Council understand and fulfil their safeguarding responsibilities in providing a safe environment in which children can learn

All our staff should be prepared to identify children who may benefit from community-based early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years

- **Any** of our staff members who have a concern about a child's welfare will follow the Oxfordshire referral processes (detailed on page 14)
- The DSL and his deputy have undertaken appropriate training for the role, as recommended by the LA, within the past two years. Core safeguarding team members are:
 - Edward James, Deputy Head pastoral, **Designated Safeguarding Lead (DSL)**
 - Tom Ryder, **Deputy DSL**
 - Suzie Naylor, Head of PSHE, **Deputy DSL**
 - Alex Gilley, Lead Nurse, **Deputy DSL**

			
Mr Edward James	Mr Tom Ryder	Miss Suzie Naylor	Mrs Alex Gilley

- All members of staff are provided with training in Safeguarding at least every three years by OSCP approved trainers
- All members of staff are provided with termly updates on Safeguarding to keep up with any relevant safeguarding and child protection developments
- Prior to a pupil joining the college, a request is made to a pupil's previous school for any safeguarding records and information relating to the pupil. The information received is essential in providing proper understanding of the pupil's needs and will be shared to the Social Tutor. Schools are required to provide a nil return if such records do not exist
- Our lettings policy will seek to ensure the suitability of adults working with children on our site at any time and community users organising activities for children are aware of and understand the need for compliance with the school's child protection guidelines and procedures. The guidance on *Keeping children safe in out-of-school settings*⁴ details the

⁴ [Out-of-School settings: safeguarding guidance for providers](#) February 2026

safeguarding arrangements that the college expects these providers to have in place

- The name of any member of staff considered not suitable to work with children will be notified to the DBS (Disclosure and Barring Service) and TRA (Teaching Regulation Agency), with the advice and support of Human Resources and or Designated Officer (Local Authority Designated Officer⁵). The role of the Designated Officer is to provide advice and guidance to the school and to preside over the investigation of any allegation or suspicion of abuse directed against anyone working the school
- The appropriate pathways are taken in accordance with the Oxfordshire's Threshold of Need guidance:
 - A case of a child at risk of serious harm will be referred to the Oxfordshire Multi Agency Safeguarding Hub (MASH) Services immediately
 - A case of a child in need of support will be referred through LCSS and an (community-based) Early Help Assessment (EHA) may be appropriate
 - A case involving allegation of abuse by adults working in the school will be referred immediately to the Local Authority Designated Officer and, if criminal action is suspected, to the police
 - A case of suspected FGM will be reported to the police and, as appropriate, to Children's Services
 - A case of a child at risk of radicalisation will be referred to the Multi Agency Safeguarding Hub (MASH), if after consideration by the school, such a referral is appropriate
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children
- Whilst the school will work openly with parents as far as possible, it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believed to be in the child's best interests
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach

⁵ LADO, Oxfordshire Safeguarding Children Partnership, Safeguarding Team: 01865 810603. The DESIGNATED OFFICER is responsible for safeguarding in Oxfordshire schools and is our first port of call in seeking advice on safeguarding matters. The DESIGNATED OFFICER will advise on a 'no names' basis if asked to do so.

What staff need to know

As part of their induction, staff (including volunteers) new to the College will be made aware of:

- the Safeguarding Policy and the procedures for Child Protection
- the role and contact details of the designated lead and deputies
- the Staff Code of Conduct (with particular attention paid to on-line safety)
- [Keeping Children Safe in Education \(KCSIE\), Part 1 & Annex A](#) (staff working directly with children)
- Whistleblowing Policy
- What to do if they have a concern about a child
- Pupil Behaviour, Discipline and Rewards policy
- Anti Bullying Policy
- Pupils Access to Residential Accommodation Policy
- Missing Children Policy
- Appropriate Use of IT Policy – to include responsibility for filtering and monitoring

As part of their induction, staff who **will not be working directly** with children (including volunteers (Council)) will be made aware of:

- the Safeguarding Policy and the procedures for Child Protection
- the role and contact details of the Designated lead and deputies
- the Staff Code of Conduct (with particular attention paid to on-line safety)
- what to do if they have a concern about a child
- [Keeping Children Safe in Education, Part 1](#)
- Whistleblowing Policy
- Appropriate Use of IT Policy

Confidentiality and Information Sharing

We recognise that all matters relating to child protection are confidential. The Warden or DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children. Data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

All staff must be aware that they cannot promise a child they will keep secrets which might compromise the child's safety or wellbeing.

There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

Where a pupil leaves the college, the DSL ensures their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place

for when the child arrives. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil. This is outlined in more detail in the Attendance Policy.

Members of Council will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. DfE Guidance on [Information Sharing](#) (May 2024) provides further detail. OSCP provides advice on the [Seven Golden Rules](#) of Information Sharing.

Safeguarding Training

In addition to the safeguarding training (including online safety) provided as part of the induction process, staff undertake the required level of training for their role in line with Oxfordshire Safeguarding Children Partnership standards every 3 years for Generalist, and Advanced Safeguarding and every 2 years for Designated Leads. The DSL and deputies have additional training in inter-agency working and Prevent.

The DSL will provide termly updates for staff and members of Council, drawing attention to recent changes in government guidance and any concerning trends that may have appeared in recent months. Topical updates might include issues such as Affluent Neglect, Prevent duty, Online Safety, Filtering and monitoring on college devices and networks.

Safer Recruitment

We are committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.

The Council and College Management Team are responsible for ensuring that the college follows safe recruitment processes outlined within guidance and our Recruitment Policy, which can be found on the college SharePoint site or copies are available from the HR department.

A Single Central Record (SCR) is maintained in line with statutory guidance.

Council will ensure that at least one of the people who conducts a recruitment interview has completed safer recruitment training.

We are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.

We advise all staff to disclose any reason that may affect their suitability to work with children that could be a transferable risk to their role.

What staff should do if they have concerns about a child

If a staff member has **any concerns** about a child's welfare, they should act on them immediately and speak to the pupil's Social Tutor and the DSL (or deputy). Options will then include:

- managing any support for the child internally via usual Social based **pastoral care** support processes
- consultation with Locality and Community Support Services (LCSS) to discuss a referral for statutory services or if the child might be in need of universal services and community based early help which could include the targeted early help level of Family Help.
- referral to the Oxfordshire Multi Agency Safeguarding Hub (**MASH**) if the child is at risk of or has suffered significant harm

The protocol for reporting a concern is as follows:

A low-level concern about a child's wellbeing

- The concern is entered as an **Indicator** in Wellbeing Manager in ISAMS and a conversation is had with the pupil's Form Master and Tutor

A concern about a child's welfare

- The concern is entered as a **Pastoral Concern** in Wellbeing Manager in ISAMS and a conversation is had with the pupil's Form Master and Tutor. The ISAMS entry should be followed up with a conversation with the pupil's Tutor

A safeguarding concern about a pupil

- The concern is reported to the **DSL** or the DDSL if the DSL is not present. The report should be followed up with an email to Safeguarding@radley.org.uk, outlining details of the concern and, the person to whom the concern has been reported
- A child protection issue must be reported to the **DSL immediately** and followed up with an email to safeguarding@radley.org.uk
- The safeguarding@radley.org.uk inbox can be accessed by the DSL and DDSLs at all times

The DSL or a deputy will always be available to discuss safeguarding concerns. If in exceptional circumstances the DSL (or deputy) is not available this should not delay appropriate action being taken.

Staff should take personal responsibility for sharing information, being mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

Pastoral Care

It would be our hope that all concerns can be identified at an early stage and appropriate action and support can be provided within the college. Radley prides itself on the highest standards of pastoral care, delivered by a dedicated and caring staff. Our safeguarding provision is rooted in strong relationships between pupils and staff, fostered in the classroom, on the games field, and in the Socials. All members of staff who work closely with pupils are expected to be alert to those changes in behaviour which might suggest that the young person is in need to assistance. Pupils may not be ready to come forward talk about their difficulties and staff need to be professionally alert to signs of distress.

Our ability to provide high quality pastoral care is assisted by close communication with parents who believe in working together with the college to enable their sons to achieve the best outcomes.

<https://www.oscb.org.uk/practitioners-volunteers/locality-and-community-support-service-early-help/>**Community-Based Early Help**

Although they may not require the support of statutory children's services, at times Radley pupils and their families may need a bit of extra support. Community based early help brings together all the relevant services in Oxfordshire so they are working in a co-ordinated way to support families.

If early help is assessed as appropriate, the Designated Safeguarding Lead (or deputy) will generally lead on liaising with LCSS in setting up an inter-agency assessment as appropriate.

This may include Family Help. Family Help means providing support as soon as a problem emerges at any point in a child's life. Further guidance on which can be found here in Working Together to Safeguard Children.

Social Tutors may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Community based Early Help will work best when placed alongside strong school or college policies, preventative education and engagement with parents and carers.

Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. All school and college staff should be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need

- is a young carer (recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing)
- is pregnant and or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation • is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

A child is in danger or at risk of harm

If, a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Contact should be made through the Multi-Agency Safeguarding Hub (MASH). Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed, as soon as possible, that a referral has been made.

Record keeping

All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL (or deputy).

Low level pupil concerns are recorded in iSAMS as 'Pastoral Concerns'. Any concern that may have safeguarding implications (bullying, disordered eating, mental health, unexplained absence might be examples) should be emailed to Tutor or DSL, who will record in CPOMS (*Pupilsafe*).

For concerns relating to staff, records are kept confidential (only the DSL receives Low Level Concern entries), held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

What to do if you have concerns about another staff member

If a member of staff has concerns about a colleague (including supply staff, trainee teachers, volunteers or contractors) having acted in a way that has caused harm, or possesses a risk of causing harm, to a child or children, they should;

- refer the matter to the Warden (who will consider whether an onward referral to the LADO is required)
- where there are concerns about the Warden, this should be referred to the Chairman of Council

Concerns will be managed as directed in Part Four of KCSIE

It is important that **low-level concerns** are also reported, and staff should be aware of the policy. The term 'low-level' concern does not mean that it is unimportant or insignificant, it means that the behaviour towards a child does not meet the harm threshold for action as detailed above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the college may have acted in a way that:

is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over familiar with pupils
- having favourites
- taking photographs of pupils on their mobile phone for personal use
- Meeting with a pupil on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language

It is crucial that any such concerns are shared with the DSL, who will keep the Warden informed of patterns and any specific concerns. Low level concerns will be recorded and reviewed on a regular basis to identify any concerning patterns of behaviour. Low-level concerns are shared in line with a culture of openness, trust and transparency in which the college's values and expected behaviour are enacted, monitored and reinforced by all staff. Low-level concerns about agency staff should be shared with the agency in a similar way. Further guidance on low-level concerns can be found [here](#).

What to do if they have concerns about safeguarding practices within the college

- All our staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding regime and that such concerns will be taken seriously by the College Management Team
- Whistleblowing procedures should be followed

- If a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:
 - General guidance can be found at – <https://www.gov.uk/whistleblowing>
 - The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

All staff must recognise that the privileged environment offered by Radley is not, in itself, protection against abuse or neglect. Staff are advised to maintain an attitude of **“it could happen here”** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the **best interests of the child**. If a member of staff is unsure about the significance of their concern, they should speak to the DSL or send an email using the safeguarding@radley.org.uk email address.

Safeguarding Measures

1. Induction of new staff includes information on the college's Safeguarding team, Safeguarding Policy, Staff Code of Conduct, and Whistleblowing Policy and Appropriate Use of IT Policy. All staff are issued with Part 1 of KCSIE. They are required to confirm that they have read and understood the content of these sections.
2. Training in Safeguarding and Child Protection for staff and senior boys is part of the school's policy - the Child Protection training schedule for designated staff is every two years. All staff receive refresher training approximately every three years. Senior pupils have training at the end of the Fifth form as part of their preparation the additional responsibility that comes in the Sixth form. New members of staff receive training as part of the induction process. All other staff receive training through HR every three years and are made aware of these arrangements through department heads on induction. All staff are required to read Part 1 of the statutory guidance "Keeping Children Safe in Education" and measures are put in place to ensure that the content of Part 1 has been understood. Staff training will include reference to the risk of radicalisation and how to identify those at risk and the DSL will offer advice and support to others. Safer recruitment training is undertaken by members of the College Management Team and the HR department. Training focuses on the collective responsibility shared by all staff in the college to safeguard children. All staff are aware of their responsibility for identifying and reporting concerns relating to our safeguarding systems or the potential harmful behaviour of any member of the community be they staff, volunteers or pupils. Reporting concerns, no matter how small, may provide the vital pieces of information that enable the safeguarding team to safeguard pupils effectively. Members of Council are also provided with appropriate training in safeguarding as part of their induction. Council also receives a termly update from the DSL, drawing attention to any significant changes in legislation and guidance.
3. The proper supervision of boarding is key to safeguarding pupils at Radley. Supervision is organised by the Social Tutor, following guidelines set out by the Sub-Warden. All boarding houses (Socials) have a responsible adult in close proximity at all times. The resident boarding team includes the Tutor, a resident Sub-Tutor and the Pastoral House Mistress (PHM). Supervision in the Social is further enhanced through a duty rota of non-resident Sub-Tutors who assist in the evenings and at weekends. There will be at least two adults on duty in each Social from 7:00pm – 7:00am and at the weekend.
4. A roll call is taken to ensure that all pupils are present and to identify pupils who may have gone missing. The roll call, or 'Tick Off', is taken in the morning and in the evening as pupils are going to bed. There is an additional roll call in each Social on Sunday afternoon. A pupil missing from a lesson must be reported to the Tutor, unless his name appears on the 'Absences' list indicating that he has been given permission to be absent. If a pupil is found to be missing, either at roll call or from a lesson, the Missing Child Policy will be followed.
5. Senior pupils play an important role in safeguarding. Pupils in 6.1 are chosen and have training to take on the role of Peer Mentors. Pupils in 6.2 are chosen and have training to take on the role of College Prefects and Social Prefects. Training focuses on vigilance, empathy as well as what should be done in the event of a disclosure and how to report

such concerns.

6. All members of staff, volunteers and Council (governing body) members are subject to a DBS check. All adults resident in accommodation attached to a social are subject to a DBS check at an enhanced level. The school will check that anyone employed as a teacher is not subject to a prohibition order issued by the Secretary of State. This check is completed by using the free Employer Online Service.
7. Pupils that are identified as being 'at risk' might include: those who self-harm, those suffering from depression, pupils experiencing bullying and those coping with chronic medical conditions. In such cases a Pupil Risk Assessment would be formulated through discussion within the pastoral team. Input will be sought, where appropriate, from Parents, Tutor, College Counsellor / Independent Listener and Medical Officer. Advice may be requested from the Locality and Community Support Service (LCSS)⁶. A risk assessment will include a care plan. Risk assessments and care plans will be reviewed by the team on a termly basis.
8. A pupil who was identified as being 'in need' or 'at risk' outside of term time would be referred to the local authority children's social care according to their home address. Assessment of a pupil's needs is arrived at with reference to the Oxfordshire Multi-Agency Threshold of Needs Matrix.
9. The college will take steps to ascertain the whereabouts of any pupil withdrawn from the college, or removed from the Admissions register prior to their expected start date, communicating with the parents, prep school and local education authority as is necessary to confirm attendance at an alternative school. The local education authority will be informed where a pupil has been removed from the admission register.
10. Any adult visitor to a Social must be accompanied by a member of staff, if he/she enters the boarding side of the Social. Visitors to the College must report to the Bursary and sign in to receive a visitor's badge. This badge is returned after the visit and the visitor signs out. The only exceptions to this are relatives and guardians of pupils, or prospective parents who are asked to report to the Bursary on arrival and carry a visitor's badge.
11. **Visiting Speakers** As part of our PREVENT duties we are obliged to assess the suitability of visiting speakers (anyone giving talks to pupils in lessons, APT, societies, etc) and to keep a log. In all cases the following details will be provided to the Deputy Head (Academic) at least two weeks before the date of the proposed talk: Name; Topic, Date, Venue. Unless the speaker has a DBS check for Radley then they must be accompanied by a member of staff at all times.
12. Where other organisations have staff working at the College, enquiries are made that appropriate checks have been carried out by that organisation. Likewise, assurance should be gained that staff of another organisation have been checked for suitability if they supervise the school's pupils on a site other than at the school.
13. An annual Welfare Report (which includes the annual Welfare questionnaire) is provided for Council and includes any Child Protection issues. It is discussed as a separate agenda

⁶ Locality and Community Support Service (LCSS), has been set up to manage Early Help interventions where a concern about a child is not an immediate or significant safeguarding concern.

with CMT present. Any identified deficiencies will be remedied without delay. Termly Safeguarding Updates will be an agenda item at the termly GPC meeting.

14. The Safeguarding Policy is reviewed regularly and at least once a year, with any identified deficiencies remedied without delay.
15. The HR Department operates a Safer Recruitment Policy in line with the current DfE guidance. Copies are available on request from HR.
16. An aide-memoire re Child Protection procedures is placed at the back of calendars, posted in Socials and academic Departments.
17. All staff should be aware of risk situations for themselves. Inappropriate physical contact should be avoided, however it is not illegal to touch a pupil and there are occasions when physical contact, other than reasonable force, with a pupil is proper and necessary. Examples of where touching a pupil might be proper or necessary:
 - when comforting a distressed pupil
 - when a pupil is being congratulated or praised
 - to demonstrate how to use a musical instrument
 - to demonstrate exercises or techniques during sports coaching;
 - to give first aid

All staff should be aware of the policy on Use of Force to Restrain / Control Pupils and Physical Contact with Pupils

18. All staff should be aware of the policy on pupil access to staff accommodation and the need to log any such access via the online form, which can be found on the Staff Hub.
19. All staff are issued with the Code of Conduct Policy.

Boarding, NMS compliance

The arrangements for boarding take full account of the National Minimum Standards (NMS) for boarding.

Teaching Pupils how to keep safe

As part of their induction, pupils new to the College will be made aware of:

- who the Safeguarding team are and how to ask for help
- the Pupil Code of Conduct
- how to contact the college counsellor
- how to raise a concern or make a complaint

In addition, all pupils receive an annual safeguarding update and training from the DSL in the Michaelmas Term.

The school takes seriously its obligations to teach pupils how to keep safe, particularly when online:

- Online safety is taught within the PSHE programme, as well as through specific talks and guidance being given on arrival at the College and through IT lessons in the Shell curriculum. Reference is made to [Department for Education \(DfE\) \(2023\) *Teaching online safety in school*](#)
- Tutors and Form Masters will monitor usage of IT as far as is possible and flag up concerns with parents and with school management if there are concerns about a pupil's excessive or inappropriate use
- The IT Department will monitor IT usage, to include trends and patterns of use across the school
- The Use of IT Policy and School Rules provide a framework of acceptable usage designed to educate pupils in safe use of the internet and social media
- Online safety is protected by an effective filtering system and by access to the college internet network being restricted at night. However, the College recognises the challenges resulting from 4G and 5G internet access and restricts pupils' access to mobile devices at night. Care is taken not to over-filter as this might further encourage pupils to access the internet through 4G and 5G rather than working on the College network
- The school policies on preventing radicalisation and promoting British Values are designed to make pupils aware of the risks and to build resilience to them through the PSHE programme and the day-to-day life of the College
- PSHE education incorporates the [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education July 2025](#).
- The school places great importance on providing opportunities for its pupils to speak to adults or mentors/prefects that are trained in safeguarding. It is vital to listen and we seek to promote a culture – through Cocoa, Form Mastering, Tutoring and through the College Chaplain and Counselling service as well as through the day-to-day life of a boarding school – that encourages the pupils to feel comfortable and confident in expressing concerns

Pupils with additional needs

Pupils with additional needs might include those with Special Educational Needs (SEN), Looked-after Children (LAC) and those with disabilities. Children with additional needs can provide additional safeguarding challenges (online and offline). Additional barriers can exist when recognising abuse and neglect in this group of pupils which might include:

- assumptions being made about indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration
- pupils with SEN and disabilities can be disproportionally impacted by things like bullying - without outwardly showing any signs
- looked after children may have previous experiences of violence, abuse or neglect. They may display behavioural problems and attachment difficulties (problems forming secure relationships) which are associated with their negative life experiences. This means that some find it hard to develop positive peer relationships

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

The daughter of a member of teaching staff, joining the college as a day pupil In the Sixth form, might be seen as a pupil with additional needs in the context of a boys' school. Staff involved in the pastoral care of a girl, will consider the additional safeguarding challenges that may arise from the significant gender imbalance. (NMS 8.4)

Pupils who identify as LGBTQ+ may have additional needs in terms of a supportive forum in which they can talk, and they feel safe discussing gender, Identity, and sexuality. While the PSHE curriculum gives all students the opportunity to explore these important topics, the LGBTQ+ Society provides students with a safe space to explore these themes in more depth and with more personalised support.

Safeguarding children with medical conditions

Although serious incidents of harm and even child deaths have occurred in school and college settings, a child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk.

In the event of a clinical incident taking place in a school or college, the responsible healthcare professional, in conjunction with the DSL should consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident.

Child Protection Procedures

Reporting and referring concerns

KCSIE states: "No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with the child has a role to play in identifying concerns, sharing information and taking prompt action. Our procedures follow those of the OSCP found [here](#).

We recognise the importance of sharing information and reporting concerns to help ensure children are protected.

The following procedures apply to **all staff** working in the school and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or is at risk of harm.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

If a member of staff suspects abuse, spots signs or indicators of abuse, mental health concerns or they have a disclosure of abuse made to them they must:

1. Make an initial record of the information on the same day in an email sent to safeguarding@radley.org.uk
2. Speak to the DSL/DDSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate factual record as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
 - Dates and times of their observations
 - Dates and times of any discussions in which they were involved
 - Any injuries
 - Explanations given by the child / adult
 - What action was taken
 - Any actual words or phrases used by the child
 - Any questions the staff member asked (remembering not to ask any leading questions). **The records must be signed and dated by the author** (or equivalent on electronic based records).
5. In the absence of the DSL or their Deputy, be prepared to refer directly to the Multi Agency Safeguarding Hub (**MASH** contact: 0345 050 7666), if there is the potential for immediate significant harm.

Following a report of concerns, the DSL will:

1. Decide whether there are sufficient grounds for suspecting significant harm, in which case a referral must be made to Children's Social Care and the police if it is appropriate. The rationale for this decision should be recorded by the DSL.
2. Where appropriate, discuss concerns about a child's welfare with the family and where possible, seek their agreement before making a referral to Children's Social Care. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be taken into account.
3. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm the DSL (or Deputy) must contact Children's Social Care via MASH, sharing:
 - a. the known facts
 - b. any suspicions or allegations
 - c. whether or not there has been any contact with the child's family.

The MASH can be contacted by phone on 0345 050 7666.

4. If a child is in immediate danger and urgent protective action is required, the police must be called. The DSL/DDSL must then notify Children's Social Care of the occurrence and what action has been taken.
5. When a pupil needs urgent medical attention and there is suspicion of parental abuse causing the medical need, the DSL or their Deputy should seek immediate advice from the MASH about informing the parents, remembering that parents should normally be informed if a child requires urgent hospital attention. However, as in all cases, if it is felt this could put the child more at risk then all action should be taken in the best interests of the child.
6. If there is not considered to be a risk of significant harm, the DSL/DDSL will either actively monitor the situation, consider the community based early help process or contact the LCSS for advice.

All contact details can be found at the front of this policy.

Allegations against staff or volunteers

This procedure should be used in all cases in which it is alleged a member of staff or volunteer in a school, or another adult who works with children 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; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff or volunteer to the Warden immediately
- If an allegation is made against the Warden, the concerns need to be raised with the Chairman of Council as soon as possible. If the Chairman of Council is not available, then the Local Authority Designated Officer (LADO) team for Oxfordshire should be contacted directly
- Whilst schools and colleges are not the employer of supply staff, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply staff due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer team (LADO) to determine a suitable outcome. Further information can be found in KCSIE
- There may be situations when the Warden or Chairman of Council will want to involve the police immediately, for example, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence
- Once an allegation has been received by the Warden or Chairman of Council, they will contact the LADO team on 01865 810603 or lado.safeguardingchildren@oxfordshire.gov.uk as soon as possible **and before** carrying out any investigation into the allegation other than preliminary enquiries
- where there is a conflict of interest in reporting the matter to a head, a report can be made to the LADO direct
- If the allegation relates to a member of supply staff or contractor, the agency should be made aware of the allegation and be fully involved in any investigation

In consultation with the LADO team, the school will determine how to proceed and if necessary, a referral will be made to the MASH and/or the police.

The LADO team will assess the information provided and advise on next steps, in line with KCSIE part 4, and Oxfordshire County Council's Designated Officers' local procedures.

Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be familiar with the college's Whistleblowing Policy and be aware of their duty to raise concerns about the attitude or actions of colleagues and appropriate advice will be sought from the Designated Officer or Safeguarding Team where necessary.

While we have a separate Whistleblowing Policy, this is a summary that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly. This does not replace the Whistleblowing Policy and should be read in conjunction with the school policy.

Whistleblowing is a term that is used when staff want to report a concern within their

organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems.

There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns.

At Radley, the Warden is the senior manager and responsible for all staff. If you are concerned that any member of staff within the college is not following safeguarding processes or behaving in a way that is placing children at risk, you should, in the first place, make the headteacher aware.

If your concern is about the Warden, you should raise this with the Chairman of Council using the email contact on page 4.

If you would prefer to raise your concerns outside of the college, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email help@nspcc.org.uk for national organisations, or contact Oxfordshire County Council.

If you believe that a member of the staff is harming a child (an allegation) and this has been reported to the Warden and no / insufficient action has been taken, or the member of staff you have concerns about is the Warden, then you are able to contact the LADO team on 01865 810603 or email lado.safeguardingchildren@oxfordshire.gov.uk

If you believe that a child is being abused by individuals outside the college, you can make a referral to Children's Social Care by calling the MASH on: 0345 050 7666 (office hours) or 0800 833 408 (outside of office hours).

Further guidance for staff can be accessed [here](#), and through the [NSPCC](#) website

Allegations against Pupils (Child-on-Child)

We recognise that students will sometimes negatively affect the learning and wellbeing of others. Poor behaviour will be dealt with under the school's Behaviour Policy. Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Child protection issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Any abusive behaviour must be challenged proportionately, but immediately. Staff should be mindful that some of the following may need consideration in an allegation of abuse between children:

- The allegation is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- The allegation is of a serious nature, possibly including a criminal offence

- The allegation raises risk factors for other pupils in the school
- The allegation indicates that other pupils may have been affected by this student
- The allegation indicates that young people outside the school may be affected by this student

When an allegation is made by one pupil against another, members of staff receiving the allegation should follow the procedure detailed in the previous section – *Reporting and Referring Concerns*. KCSIE (Part 5) sets out how we will manage reports of child-on-child sexual violence and sexual harassment. We also recognise that, even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

It may be appropriate to exclude the pupil(s) being complained about for a period of time according to the school's behaviour policy and procedures. Appropriate support (advocacy) should be put in place for victim(s), perpetrator(s) and any other children who may have been affected. Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures. In situations where the school considers a safeguarding risk is present, a risk assessment will be prepared.

Any malicious/unfounded/unsubstantiated allegations will not form part of any future reference. Any malicious allegations will not be kept as part of a personnel record.

Annex 1

Safeguarding Responsibilities

At Radley we recognise that safeguarding is everyone's responsibility. The safeguarding responsibility is shared through the following roles:

Role of Council

The Radley College Council undertakes the regular review of Safeguarding related policies and procedures that operate within the college. Members of Council are mindful of the Charity Commission's Safeguarding expectations, which can be found [here](#). Council has a crucial role in monitoring and challenging staff on the effectiveness of safeguarding arrangements, as well as promoting a fair, open and positive culture in which staff feel able to report concerns, confident that they will be heard and responded to. The General Purposes Committee (GPC) receives a termly Safeguarding Update. Agenda items for Council Meetings are as follows:

- Michaelmas term - OSCP Annual Safeguarding Audit.
- Lent term – Welfare Questionnaire and Report.
- Summer term – Policy Review and approval.

The Council member with oversight of Safeguarding procedures, sometimes referred to as the *Designated Safeguarding Governor* (DSG) is **Mrs Carole Sweetnam**. In the case of an allegation made against the Warden, the Chairman of Council will liaise with the Local Authority Designated Officer (LADO). The DSG has oversight through visits to the college, during which they will have an opportunity to view the central register (SCR), meet with the DSL to discuss current concerns and meet with Tutors to hear about issues within the boarding houses. The DSG oversees the work of the DSL in completing the local authority's annual safeguarding audit. Procedures for ensuring pupils' online safety, including appropriate filtering and monitoring, is also part of the Designated Safeguarding Governor's remit.

Role of the Warden

- Ensures that the safeguarding and child protection policy and procedures are implemented and followed by all staff
- Allocates sufficient time and resources to enable the DSL and deputies to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures
- Ensures that child's safety and welfare is addressed through the curriculum.

Role of the Designated Safeguarding Lead (DSL)

- Refer all cases of suspected abuse, within 24 hours or one working day, to the local authority children's social care and:
 - The Designated Officer for child protection concerns (all cases which concern a staff member)
 - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or

- Police (cases where a crime may have been committed). Clarification on when to call the police can be found [here](#)
- Liaise with the Warden to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- Act as a source of support, advice and expertise to staff on matters of safety (including on-line) and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- The DSL assumes the role of 'Head of Prevent' as part of his safeguarding duties and will be the lead person within the school in advising and guiding staff on the risks of radicalisation of pupils and how to identify those at risk
- The Designated Safeguarding Lead will undergo training to provide them with the knowledge and skills required to carry out the role. Their knowledge and skills should be updated via regular training, at appropriate intervals, as and when required, (but at least annually), to keep up with any developments relevant to their role
- The Designated Safeguarding Lead and his deputies receive appropriate training through OSCP carried out every two years and used appropriately
- Understand the assessment process for providing community-based early help and intervention, for example through locally agreed common and shared assessment processes such as Early Help Assessments
- Have a working knowledge of how the local authority conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands the college's child protection policy and procedures, especially new and part time staff
- Be alert to the specific needs of pupils with special educational needs and young carers
- Be able to keep detailed, accurate, secure written records
- Encourage a culture of listening to pupils and taking account of their wishes and feelings, among all staff
- The Designated Safeguarding Lead will ensure the college's policies are known and used appropriately.
- Ensure the college's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with Council regarding this
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of college in this
- Link with OSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave the college, ensure their child protection file transferred to the new school or college as soon as possible
- Ensure on-line safety is promoted amongst pupils and all staff
- Ensure appropriate filtering and monitoring systems in place, regularly review their effectiveness, and escalate concerns when identified

Role of the Deputy DSL(s)

In the absence of the DSL, the deputies will carry out those functions necessary to ensure the ongoing safety and protection of children in the college. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

Role of staff

All staff will follow the Oxfordshire Safeguarding Children Partnership Procedures/Local Authority guidance in all cases of abuse, or suspected abuse (these can be found at www.OSCP.org.uk).

It is our expectation that staff will:

- Implement and follow the Safeguarding Policy
- Understand that our responsibility to safeguard children requires that we all appropriately share any concerns that we may have about children
- Support the pupil's development in ways that will foster security, confidence and resilience
- Provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties
- Assist in the monitoring of pupils known or thought to be at risk of harm
- Always challenge unkind or abuse behaviour between pupils and report incidents to the DSL
- Ensure that detailed and accurate written records of concerns about a child are kept even if there is no need to make an immediate referral. See guidance on [record keeping](#)

Role of Parents

The effective contextual safeguarding of pupils requires a trusting relationship between the college and its parents. Parents are asked to make known any and all pertinent information that might impact upon our ability to effectively support the health and development of their sons. Parental support for safeguarding is particularly important in the following areas:

- Notification of changes to family circumstances
- Notification of ill health and bereavement within the family
- Compliance with college guidance, particularly with regard to:
 - Technology (mobile phone use)
 - Leave out of college (Privi weekends)
- Raising concerns in a timely manner, so problems can be addressed early before they develop.
- Notify the College Health Centre of pupils' medical diagnosis, medical prescriptions and/or changes in medical prescription
- Vigilance regarding online activity when pupils are at home, to include appropriate filtering on home wifi.

Role of Pupils

Pupils are expected to abide by the school rules and to follow the expectations set out in the Behaviour Policy. Pupils sign up to a Code of Conduct shortly after they arrive at the college. The code of conduct sets out the expectation that all pupils will:

- Stand for what is right at all times
- Treat all members of the community with kindness
- Value and celebrate variety and difference
- Take an active interest in the world around them
- Appreciate and embrace the opportunities they have
- Take responsibility for their own actions and performance
- Give of their best in all circumstances
- Always be determined to improve and willing to fail
- Show courtesy, respect and common sense in all that they do
- Develop and demonstrate a sense of duty and service to others

Pupils in the Lower Sixth support junior pupils through a Peer Mentoring system. Pupils in the Upper Sixth support junior pupils through the Prefecting system. (See separate policies)

Annex 2

Dealing with disclosures

Ground rules

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals, to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. Ultimately, all staff have the responsibility to make a referral to the police or social care directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the school premises at the time and have concerns about sending a child home.

The seven R's

Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

Reassure

- Reassure the pupil, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure e.g. you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible

- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff

Report

- Share concerns with the DSL as soon as possible
- If you are not able to contact your DSL or the Deputy, and the child is at risk of immediate harm, contact MASH or Police immediately

Record

- If possible, make some very brief notes at the time, and record them as soon as possible in an email to *safeguarding@radley.org.uk*
- Keep your original notes on file
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- Complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

Remember

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Try to get some support for yourself if you need it

Review processes (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

Annex 3

Abuse, Neglect and Exploitation

All college staff should be aware that abuse, exploitation, neglect, modern slavery and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

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

In the context of Radley College, although it is not limited to this, the most likely form of physical abuse is one boy hitting or kicking another boy. Bruises on the upper arm or shins are a possible indicator of abuse, though care should be taken before jumping to conclusions, as very similar injuries will arise through sport.

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries

- Recurrent injuries or burns
- Bald patches

In the social context of Radley, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- no explanation is forthcoming
- the Young person (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if the child or young person:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

In the context of Radley College, although it is not limited to this, the most likely form of emotional is bullying type behaviour from a boy, or group of boys, toward another boy. Indicators of bullying include: withdrawal, underachieving, moodiness on the part of the bullied; bossiness and a quickness to criticise on the part of the bully.

Indicators of emotional abuse

- Developmental issues
- Delays in physical, mental and emotional development

- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting, by day or night
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Most harm is produced in low warmth, high criticism homes, not from single incidents. Emotional abuse is difficult to define, identify/recognise and/or prove. Emotional abuse can be chronic and cumulative and has a long-term impact.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

OSCP guidance on emotional abuse can be found [here](#).

OSCP guidance on domestic abuse can be found [here](#).

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

In the context of Radley College, sexual abuse is relatively rare, any concerns relating to possible sexual abuse, no matter how slight, must be reported to the DSL immediately.

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

Indicators of sexual abuse

Behavioural observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity. Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares

- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed

OSCP guidance on child sexual exploitation can be found [here](#).

Domestic abuse: domestic violence and abuse is: any incident or pattern of incidents in which a child might **see, hear or experience** controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.

*Domestic abuse occurs across **all** sections of society and boarding can sometimes provide a safe haven for children who may have experienced domestic abuse. Staff should be vigilant for signs that a child is reluctant to return home. Any concerns relating to possible domestic abuse, no matter how slight, must be reported to the DSL immediately. The College is registered with Operation Encompass, the DSL is recognised as the Key Adult for any referrals and has completed the required training.*

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

In the context of Radley College, indicators might include: persistent failure of parents to communicate effectively with the school; ill-fitting or thread bare uniform; parental absence during holiday periods – inadequate supervision when at home; and theft.

Mental Health: All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide.

If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise. These could include:

- significant changes in behaviour
- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

It's important to note that not every child who exhibits these behaviours is suicidal or has a mental health concern.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy. If staff feel that a child is in immediate danger, they should call 999. The DfE have published advice and guidance on [Mental Health and Behaviour in Schools](#)

Referrals concerning children who have suffered or are likely to suffer significant harm should be reported to Children's Social Care immediately. Those who are in need of additional support from one or more agencies should lead to an inter-agency assessment using local processes, including use of the "Common Assessment Framework" and "Team around the Child" approaches.

It is important that staff recognise that safeguarding incidents and/or behaviours can be associated with factors outside of college and/or can occur between children outside of college. All staff should be considering the context within which such incidents and/or behaviours occur. This is known as **contextual safeguarding**, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Contextual safeguarding recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse.

Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to the DSL (or deputy).

Serious Violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy), who will assess the risk and take appropriate action. Where relevant this will include any action needed to de-escalate peer conflict.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence.

These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending.

Child-on-Child abuse (including harassment and violence)

Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, or coercive control, exercised between children and within children's relationships.

All staff should recognise that children are capable of abusing other children (including online)

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

As well as knowing how to respond to concerns (see Child Protection Procedures – page 24), all staff should know that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, staff should know that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

Child-on-child abuse can take various forms such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, including misogyny, sexual violence and sexual harassment.
- consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals.

All staff should be aware that the unique nature of boarding may mean that children could be at greater risk of child-on-child abuse incidents as they share overnight accommodation. As a boarding school we must be particularly alert to safeguarding pupils against the risk of inappropriate pupil relationships and the potential for child-on-child abuse outside the normal school day (children may be particularly vulnerable in residential settings).

A Contextual Safeguarding approach will be helpful in understanding and responding to children's experiences having suffered abuse within their peer group.

It is important that staff recognise the possibility of child-on-child abuse happening within the college, even if it isn't being reported: a lack of reporting doesn't mean it isn't happening.

Staff should be particularly vigilant for pupils who might struggle socially as a result of neurodiversity or gender identity making them more vulnerable to child-on-child abuse.

Staff who witness unkind or abusive behaviour between pupils **must** challenge the behaviour and report the incident to the DSL as outlined in Child Protection Procedures – page 24.

Bullying is a particularly harmful form of emotional abuse which can occur between peers. Staff should aim to identify and correct unkind behaviour before it develops into bullying behaviour. In correcting unkind behaviour, staff should give consideration to likelihood that the young person who is perpetrating the abuse may also be at risk of harm and in need of safeguarding. Our policy on the prevention and management of bullying is set out in a separate document, the [Anti-Bullying Policy](#), and recognises that bullying behaviour may need to be addressed through child protection procedures. Bullying incidents can harm witnesses not just victims and this must be taken into consideration in any investigation into bullying incidents.

Indicators that may point to a bullying problem are:

- Unexplainable injuries
- Homesickness
- Lost or damaged to clothing, books, electronics, or disruption of personal space in the boarding house
- Frequent headaches or stomach aches, feeling sick or faking illness
- Changes in eating habits, like suddenly skipping meals or binge eating. Pupils may appear hungry because they did not go to meals in Hall
- Difficulty sleeping
- Declining grades, loss of interest in schoolwork, or not wanting to go to lessons
- Sudden loss of friends or avoidance of social situations
- Feelings of helplessness or decreased self-esteem
- Self-destructive behaviours such as harming themselves, or talking about suicide

Harmful Sexual Behaviour (HSB)

HSB can occur between two or more children of any age and sex, Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years' difference or if one is pre-pubescent and the other is not. However, a younger child may also abuse an older child, especially if they hold power over them, e.g. due to a disability or physical size. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum (the Brook Traffic Light is a useful guide for staff and safeguarding team: [Brook Traffic Light Tool.pdf](#) and may escalate into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable.

Early intervention in inappropriate behaviour such as misogyny can help to prevent escalation to

more serious abuse such as sexual harassment and sexual violence. The Lucy Faithfull Foundation has developed a HSB toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

The above resources are signposted to students via PSHE and when circumstances require that pupils might need additional support.

Any report of HSB should be taken seriously and reported to the DSL immediately. The DSL will follow KCSIE guidance on responding to reports of HSB.

Sexual Harassment

Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school or college. It specifically relates to child-on-child sexual harassment. Such behaviour can:

- violate a child's dignity,
- make them feel intimidated, degraded or humiliated, and
- create a hostile, offensive or sexualised environment.

Examples can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names,
- physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes. Schools and colleges should assess when such behaviour crosses 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 offence¹⁴¹), and
- online sexual harassment, which may occur independently, or as a broader pattern of sexual harassment and/or sexual violence.

Any report of sexual harassment should be taken seriously and reported to the DSL immediately. The DSL will follow KCSIE guidance on responding to reports of sexual harassment.

Sexual Violence

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003¹⁴⁴ as listed below:

- Rape
- Assault by penetration
- Sexual assault
- Causing someone to engage in sexual activity without consent

Any report of sexual violence should be taken seriously and reported to the DSL immediately. The DSL will follow KCSIE guidance on responding to reports of sexual violence.

Self-generated intimate images including those generated using AI e.g. deepfakes and/or videos.⁷

Consensual and non-consensual sharing of self-generated intimate images is also referred to as 'youth produced sexual imagery' or 'sexting'. Taking and sharing nude photographs (including those generated using AI e.g. deepfakes) of those aged under 18 is a criminal offence. There is advice for education settings working with children and young people (*updated March 2024*) [Sharing nudes and semi-nudes](#):

What to do if an incident of 'sexting' comes to your attention:

- **Report** it to the Designated Safeguarding Lead (DSL) immediately
- **Never** view, download or share the imagery yourself, or ask the child to share or download – this is illegal
- If you have viewed the imagery (e.g. if a young person has shown you something before you could ask them not to), report this to the DSL
- **Do not** delete the imagery or ask the young person to delete it
- **Do not** attempt to investigate the matter – this is the responsibility of the DSL
- **Do not** share information about the incident with anyone other than the DSL

The DSL will hold an initial review meeting with appropriate school staff. The pupil(s) involved will be spoken to (if appropriate). Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, a referral could be made to Children's Social Care and/or the police (CEOP).

An initial review will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms. This

⁷ Sexting in schools and colleges: Responding to incidents and safeguarding young people.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB__1_.PDF

may be unknown

- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved - in most cases parents should be involved

An immediate referral to police and/or children's social care should be made if at this initial stage:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- You have reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If none of the above apply then a school may decide to respond to the incident without involving the police or children's social care (the school can choose to escalate the incident at any time if further information/concerns come to light). The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support.

For example, consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal – whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos.

Online Safety

It is recognised that the use of technology presents challenges and risks to children and adults both inside and outside of school. The DSL has overall responsibility for online safeguarding within the school and during remote learning provision.

We recognise that issues can be broadly categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories. The school's Use of AI Policy offers guidance on safe, ethical use of AI tools by pupils and staff.
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, sharing other explicit images and online bullying, and
- **commerce:** risks such as online gambling, phishing and financial scams. Concerns about staff and pupils at risk should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

The DSL and College Management Team have read Annex C regarding Online Safety within 'Keeping Children Safe in Education' 2025.

We recognise the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE have appropriate policies in place that are shared and understood by all members of the school community. Further information about specific approaches relating to this can be found in the schools Acceptable Use Policy and Image Use Policy which can be found on the staff intranet/website

As we increasingly work online, it is essential that pupils are safeguarded from potentially harmful and inappropriate online material. We will ensure that appropriate filtering and monitoring systems are in place when pupils and staff access the internet provision through the college network, and that these systems are regularly reviewed.

We acknowledge that while filtering and monitoring are essential components of our school's online safety strategy, they form only part of a broader, proactive approach and that there are particular dangers in a boarding context. Pupils and adults may access the internet through personal devices and mobile data networks, which bypass school filtering systems. In addition, devices brought into school may already contain preloaded harmful content. Where such concerns are identified, appropriate and proportionate action will be taken to safeguard pupils and uphold our duty of care.

The school recognises risks linked to AI, including rare reports of systems giving harmful advice (e.g. encouraging self-harm or suicide). We mitigate these risks through digital-literacy teaching, staff training, and appropriate supervision / controls on pupils' use of AI. Staff will remain alert to distress or undue influence from AI / online content and will follow safeguarding procedures in line with Keeping Children Safe in Education (KCSIE).

There is a structured approach to enable all pupils to learn about and manage online risks effectively and will support parents and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online.

The College' mobile phone policy aligns with KCSIE and all other relevant guidance and can be found in the Handbook for Socials, Dons' Handbook and School Rules

Honour or Faith-Based Abuse (HBA) (including female genital mutilation and forced marriage)

Staff need to recognise the possibility that a pupil may disclose information relating to a sibling or close friend who has suffered abuse in the form of so called 'honour based' abuse. Staff should refer to KCSIE, ANNEX A for further information about the indicators that a girl may be at risk of,

or have suffered, honour-based abuse or forced marriage. Contact details for reporting cases should be made through the Oxfordshire MASH.

Female Genital Mutilation mandatory reporting duty for teachers

In an all-boys boarding environment, teaching staff still need to be mindful of their statutory duty to report suspected cases of female genital mutilation (FGM). Staff should speak to the DSL (or deputy) with regard to any concerns about FGM, but there is a specific **legal** duty on **teachers**. If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

Child Sexual Exploitation (CSE)

The definition of child sexual exploitation is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

The sexual exploitation of children **affects boys and young men**, as well as girls and young women. It can have a serious long-term impact on every aspect of their lives, health and education and it damages the lives of their families and carers. What marks out exploitation is an imbalance of power within the relationship and how the perpetrators use that power to groom and then abuse their victims and then prevent them from disclosing the abuse and from being helped to extract themselves from the abuse. Child sexual exploitation typically starts around the age of 10 -12 years although it has been recorded with children as young as 8 years of age.

This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain (Sexting). For further information, see Government

guidance.⁸ Any child can be targeted but Looked after Children, Children Leaving Care and Children with Disabilities are particularly vulnerable.

Child Criminal Exploitation: County Lines

Child Criminal Exploitation is an increasingly common form of abuse.

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. (Home Office, September 2018)

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are extended or regular periods of absence, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with **serious violent crime**. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance. 11

Modern Slavery

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information and guidance can be found here: [Modern slavery training: resource page - GOV.UK](#)

All staff who are concerned that a pupil is being exploited (or at risk of being exploited) should contact the DSL.

⁸https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

Prevent Duty

The Prevent duty is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. The Prevent duty Department of Education advice for schools and childcare providers, June 2015, states that, 'School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

The college's Prevent Risk Assessment is based on the Department for Education template and is reviewed annually in line with KCSIE or following a serious incident.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection.

Staff are aware through safeguarding of the threats, risks and vulnerabilities that are linked to radicalisation and the process of how this might be identified early on.

The school rules and curriculum promote respect, tolerance and diversity. Our PSHE provision, embedded across the curriculum, is reinforced in school meetings and underpins the ethos of the school. Pupils are regularly taught about how to stay safe when using the internet and encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see on the internet. IT filtering systems are in place to keep pupils safe when accessing the internet.

Staff who have concerns about a pupil will make these concerns known to the DSL at the earliest opportunity. The DSL, will then make a judgement as to whether or not it is appropriate to make a referral, to the Multi Agency Safeguarding Hub (MASH) to the **Channel programme**.⁹ Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism and provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

Signs of vulnerability

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are number of signs that together increase the risk. Signs of vulnerability include:

- underachievement
- being in possession of extremist literature
- poverty
- social exclusion
- traumatic events
- global or national events

⁹ Guidance issued under section 36(7) and section 38(6) of the CTSA 2015 in respect of Channel is available at: <https://www.gov.uk/government/publications/channel-guidance>

- religious conversion
- change in behaviour
- extremist influences
- conflict with family over lifestyle
- confused identity
- victim or witness to race or hate crimes
- rejection by peers, family, social groups or faith

A child being absent from school with increasing regularity, or a child going missing from education for an extended period is a potential indicator of abuse or neglect. All schools must inform their local authority of any pupil who is going to be deleted from the admission register under the circumstances listed in KCSIE p17.

Recognising Extremism

Early indicators of radicalisation or extremism may include

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school;
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Non-emergency advice for staff and Council members is available from DfE dedicated telephone helpline and mailbox for: 020 7340 7264 and counter-extremism@education.gsi.gov.uk Advice concerning a possible Channel Referral is available via email from the police: preventreferrals@thamesvalley.pnn.police.uk

Gender Questioning Children

In line with Keeping Children Safe In Education 2026 and the Equality Act 2010 pupils who are questioning their gender are supported by the College through our Safeguarding policy and in conjunction with our Equality, Diversity and Inclusion Policy.

The college does not initiate social transition. Our approach where a child or parent raises a request is as follows:

- **Best interests as the starting point:** When considering a request, we first determine what is in the best interests of the child and other children. The outcome may not align with the child's wishes.
- **Parental involvement as the default:** Parents should be involved as a matter of priority unless doing so would place the child at risk of harm. In such cases, the DSL must be involved before decisions are taken.
- **Structured and documented decision-making:** We adopt a clear and recorded decision-making process.
- **Accurate recording of biological sex:** We record a child's biological sex accurately wherever it is recorded, and relevant staff should be aware of biological sex to fulfil safeguarding duties.
- **Equality and human rights compliance:** Decisions must comply with safeguarding legislation and with obligations under the *Equality Act 2010* and *Human Rights Act 1998*, including undertaking a balanced consideration of the impact on all affected children.
- **Review and reconsideration obligations:** We will review decisions where circumstances change and reconsider arrangements agreed prior to the guidance coming into force where appropriate.

Single-sex spaces

Toilets

- The College does not allow children to use toilets designated for the opposite biological sex.
- Where a child does not wish to use facilities designated for their biological sex, the College will reasonably consider alternative individual facilities.
- Alternative arrangements will not compromise the provision of single-sex facilities.

Changing rooms and showers

- Access to opposite-sex changing rooms is not be granted as part of social transition support.
- Alternative arrangements (for example, enclosed private facilities) should be considered.

Boarding and residential accommodation

- Children will not share overnight accommodation with a child of the opposite biological sex.

Sport

- Where safety concerns exist, sport must be provided in single-sex groups, with no exceptions.
- Where no safety concerns arise and a pupil requests to participate differently, the College considers the child's best interests, the impact on other pupils, and the objective of safe and fair participation.

Other specific safeguarding issues as listed in Annex A of KCSIE should be kept in mind when considering possible difficulties a pupil may be experiencing:

- Concern around abduction and community safety incidents

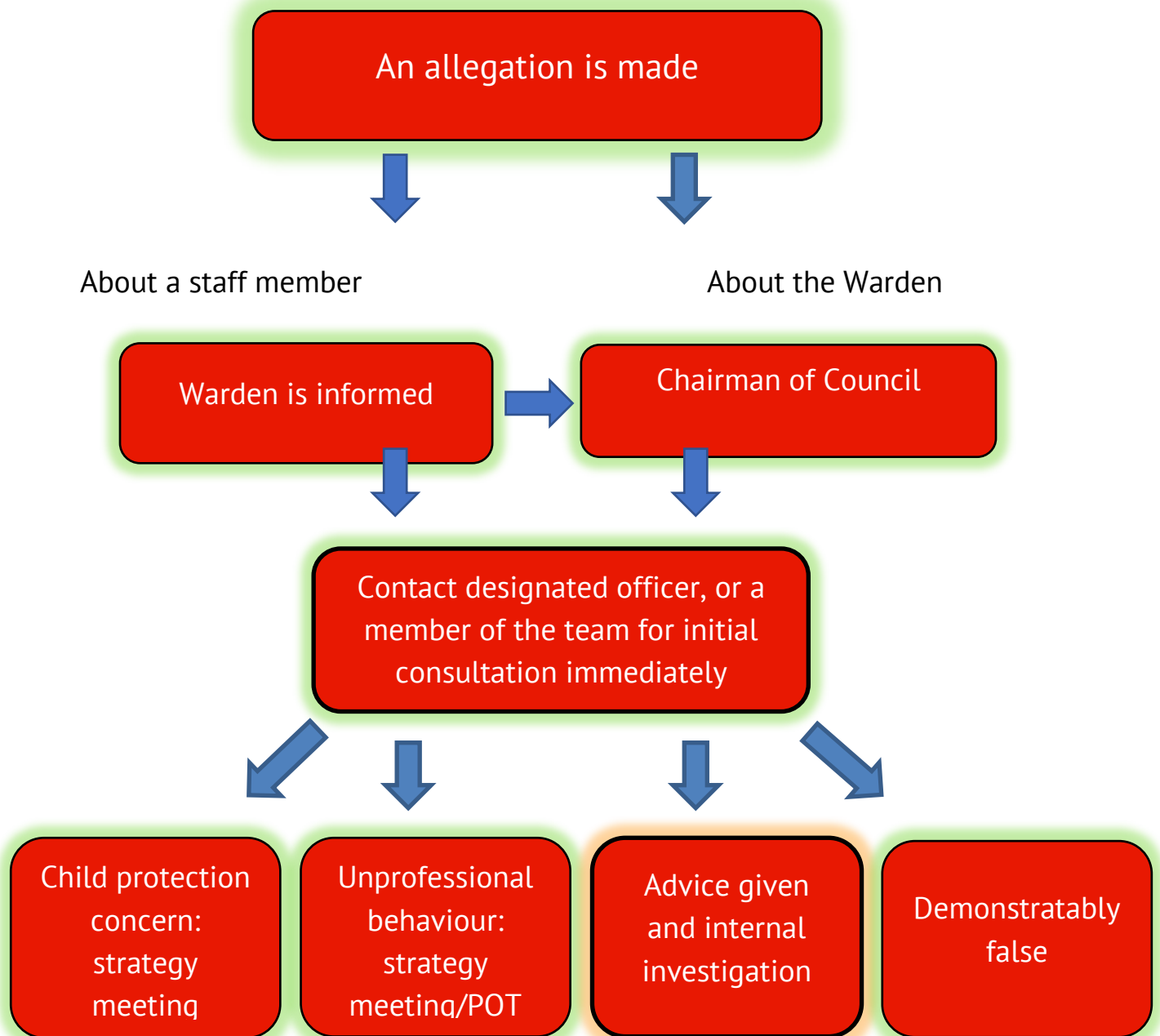
- Pupils who come under the supervision of the court system
- Pupils who may have family members in prison
- Implications of modern slavery
- Pupils who experience or become involved in cybercrime
- Children missing from education
- Pupils who experience homelessness

Staff should remain open minded to the possibility that, at some point, they may have to support a pupil who is experiencing unfamiliar challenges.

Appendix A

Allegation flowchart

If you have a concern that a person who works with children and young people may have behaved inappropriately or you have received information that may constitute an allegation you must:



Please note POT : Position of Trust Meeting

Appendix B

Policy Updates

Revision date	Page	Revision
26/5/2022	All	<i>Major revision with the aim of realigning with OSCP template policy and making content more accessible. Content has been reorganised and pages renumbered.</i>
	10	'Volunteers' - added (Council) to meet KCSIE Parra 81
	22	Bullet added to include online safety of pupils at home.
	31	vigilance for pupils who might struggle socially as a result of neurodiversity or gender identity
	18	Induction - pupils new to the College will be made aware of: • Safeguarding team • Code of Conduct • college counsellor • How to raise a concern of make a complaint
	11	Notes added on confidentiality.
05/07/2022	7	Link to update Oxfordshire Safeguarding Children Partnership Procedures Manual
	20	Text added regarding Council training requirement at induction.
12/10/2022	41	Bullet points added for possible indicators of bullying problems
	13 & 21	Reference linking to Pupil Access to Staff Accommodation Policy
	23	Text added to explain support offered by LGBTQ+ Society in providing a safe space for pupils to discuss issues relating to gender, sexuality and identity.
29/5/2023	4	Contact details for Safeguarding Governor amended.
	6	• Reference to KCSIE updated to 2023. • Link to Filtering and Monitoring Standards added to guidance documents.
	12	Reference added to clarify expectation that groups using college facilities outside of term time will comply with expectations set out in <i>Keeping children safe during community activities</i> . Link added in footnote.
	30	Role of the DSL now includes oversight of filtering and monitoring systems

	46-47	Wording changed to encourage early intervention on pupil absence, lowering the threshold from that of <i>a pupil missing form education</i> .
22/11/2023	31	DSG - additional responsibility added: <i>Procedures for ensuring pupils' online safety, including appropriate filtering and monitoring, is also part of the Designated Safeguarding Governor's remit.</i>
8/1/2024	5	Donna Crozier contact details removed, as she is no longer with ESAT.
	7	Working Together to safeguard Children 2023, reference updates.
18/04/2024	4	Contact details for Edward James, DSL (Designate)
	11	Ed James added to DSL team.
26/5/2024	2	Contact detail for DSL (Ed James) updated.
	5	Updated reference and link for Prevent Duty guidance (March 2024)
	12	Update reference for DfE Guidance on Information Sharing (May 2024)
	15	CPOMS StaffSafe added. <i>StaffSafe</i> will be used for managing records of safeguarding concerns relating to adults working in the college.
	38	Domestic abuse clarified with addition of: incidents in which a child might <i>see, hear or experience</i>
26/8/25	5	KCSIE 2025 link updated (and any further references to KCSIE 2024 updated to 2025)
	38	Information from KCSIE on Lucy Faithfull Foundation resources added
	42	Under "Online Safety", the definition of "content" has been updated. This now specifically includes that "misinformation, disinformation (including fake news) and conspiracy theories" should be viewed as safeguarding harms. Previously, only "fake news" was included as a standalone item. These additions widen the potential harms schools should be alert to.
13/11/25	4	LADO team Education Safeguarding Advisors. Replaced Lorna Berry with Amie Picher following ESAT review.
	15	CPOMS <i>StaffSafe</i> removed. It is no longer used for managing records of safeguarding concerns relating to adults working in the college
14/11/25	43	Added information on the safe use of AI.
18/11/25	38	Wording added that the College is registered with Operation Encompass, the DSL is recognised as the Key Adult for any referrals and has completed the required training.
	45	Added information on the college's Prevent Risk Assessment

03/09/2026	5	Updated version of Keeping Children Safe in Education to September 2026 Updated version of Working Together to Safeguard Children to March 2026 Updated version of Oxfordshire Safeguarding Children Partnership Procedures Manual to December 2025 Updated version of Oxfordshire's Threshold of Needs guidance document to 2022 Updated Boarding Schools National Minimum Standards to May 2026 Updated Filtering and Monitoring Standards to April 2026 Added link to Data Protection Act 2018 Added link to UK General Data Protection Regulation (UK GDPR) Added link to Data (Use and Access) Act 2025
	5 &17	Updated the definition of staff to include trainee teachers
	9	Removed footnote with definition of early help
	9	Replaced early help with community based-early help
	10	Replaced Keeping children safe during community activities, after school clubs and tuition: non statutory guidance for providers running out-of-school settings March 2022 with Out-of-School settings: safeguarding guidance for providers February 2026
	12	Replaced KCSIE Part 1 and Annex B with KCSIE Part 1 and Annex A Replaced KCSIE Annex A with Part 1
	12 &16	Wording added on data protection laws not preventing the sharing of information for the purposes of keeping children safe.
	12-13	Information added on transferring child protection files to a pupil's new school.
	14	Updated to refer to Family Help
	14	Added that the safeguarding inbox can be accessed by the DSL and DDSLs at all times
	15	Pastoral Care section updated to reflect the introduction of Family Help in KCSIE 2026 Updated list of potential indicators a child may benefit from early help
	17	Concerns about another member of staff: added the Warden will consider if a referral to the LADO is required
	19	All staff are issued with Part 1 of KCSIE
	21	Added that all staff should be aware of the policy on Use of Force to Restrain / Control Pupils and Physical Contact with Pupils Added all pupils receive an annual safeguarding update from the DSL
	22	Updated version of DFE Teaching online safety in schools to 2023 Updated version of Relationships Education, Relationships and Sex Education (RSE) and Health Education July 2025

	22	Additional wording to reflect updated SEND terminology and barriers to recognising abuse.
	23	New section regarding safeguarding children with medical conditions, particularly those with allergies
	28	Allegations against pupils (child on child) added paragraph on the importance of challenging inappropriate behaviours between children that are abusive in nature
	35	Reference to modern slavery added. Added that teenage relationship abuse includes physical, sexual, emotional abuse, and stalking, and that criminal exploitation includes financial exploitation,
	36	Updated definition of emotional abuse to include verbal abuse
	37	Updated definition of sexual abuse
	38 - 39	Updated the example of assault by penetration Additional wording on mental health problems can, in some cases develop into safeguarding concerns. Warning signs added. New section Serious Violence added
	40	Updated definition of child-on-child abuse
	41	Child-on-child abuse section renamed and updated to reflect KCSIE 2026
	42	New section Harmful Sexual Behaviour
	43	New section Sexual Harassment
	43	New section Sexual Violence
	44	Updates to Nude and Semi-Nude Image sharing including new heading, addition of consensual and non-consensual image sharing and generation using AI (deepfakes)
	45	Updates to the areas of risk
	46	Inclusion of mobile phone policy
	46	Updated title Honour or Faith-Based Abuse (HBA) (including female genital mutilation and forced marriage
	47	Expanded Child Sexual Exploitation content
	48	New section Modern Slavery added
	50	New section Gender Questioning Children added