Safeguarding Pupils Policy

November 2017
Introduction

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

- “Working Together to Safeguard Children 2015” (WT)
  - WT refers to the non-statutory advice: Information sharing (March 2015)
- “What to do if you are worried a Child is being Abused” March 2015
- “Keeping Children Safe in Education” (KCSIE) September 2016
  - KCSIE incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (June 2016)
  - KCSIE also refers to the non-statutory advice for practitioners: What to do if you’re worried a child is being abused (March 2015)
- Oxfordshire’s Threshold of Need guidance document, 2017
- Boarding Schools National Minimum Standards, April 2015
  - Prevent is supplemented by non-statutory advice and a briefing note:
    - The Prevent duty: Departmental advice for schools and childminders (June 2015)
    - The use of social media for online radicalisation (July 2015)
- Children Missing Education (2015)
- Children Act 2004

The Council takes seriously its responsibility under section 11 of the Children Act 2004 and duties under “Working Together” to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements exist within our setting to identify, and support those children who are suffering harm or are likely to suffer harm.

We recognise that all staff and Council members have a full and active part to play in protecting our pupils from harm, and that the welfare of children is our paramount concern. Radley recognises its duties to all children, and particularly those in need of support and those at risk of harm.

Radley aims 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.

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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, and volunteers working with children
The aims of this policy are to:

- 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 early help. 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.

The school follows specific procedures to protect children who are suffering harm or at risk of suffering harm as a result of physical, sexual and emotional abuse or neglect in accordance with Section 157 of the Education Act 2002. An important distinction is made here between children who may be at risk of harm (ie no actual evidence of harm having occurred but where there may be concerns) and children suffering harm (for which there is some evidence).

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4 ‘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. Early help can also prevent further problems arising. (Working Together, 2015)
Safeguarding Procedures

Procedures for safeguarding children will be in line with Oxfordshire Local Authority (the LA) and Oxfordshire Safeguarding Children Board, “Child Protection Procedures” and “Working Together to Safeguard Children 2015”.

We will ensure that:

- All staff and members of Council understand and fulfil their safeguarding responsibilities.
- Designated members of staff have undertaken appropriate training for the role, as recommended by the LA, within the past two years. Designated staff will update their training with LA approved training on a regular basis and at least annually. Our designated staff members are:
  - Mr B J Holden, Sub-Warden, Designated Safeguarding Lead (DSL)
  - Mrs L E Nott, Deputy DSL
  - Mr J R W Beasley, Head of Year 9
  - Miss S L Naylor
  - Mrs A M Gilley, Lead Nurse

In the absence of an appropriately trained member of staff, the Warden will assume this lead role.

- All adults (including volunteers) new to the College will be made aware of this policy and the procedures for child protection, the name and contact details of the Designated Person and have these explained, as part of their induction into the school.
- All members of staff are provided with opportunities at least every three years to receive training in order to develop their understanding of the signs and indicators of abuse, how to respond to a pupil who discloses abuse and the procedure to be followed in appropriately sharing a concern of possible abuse or a disclosure of abuse.
- All members of staff are provided with termly updates on Safeguarding to keep up with any relevant safeguarding and child protection developments.
- 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 schools child protection guidelines and procedures.
- The name of any member of staff considered not suitable to work with children will be notified to the
DBS (Disclosure and Barring Service), with the advice and support of Human Resources and or LADO (Local Area Designated Officer, Alison Beasley). The role of the LADO 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 OSCB Multi Agency Safeguarding Hub (MASH) Services immediately
  - A case of a child in need of support will be referred through LCSS and the Common Assessment Framework (CAF), triggering inter-agency assessment and support as appropriate
  - A case involving allegation of abuse by adults working in the school will be referred immediately to the LADO 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, through the OSCB Multi Agency Safeguarding Hub (MASH), to the Channel Programme, if after consideration by the school, such a referral is appropriate

Our safeguarding procedures follow those detailed in the Oxfordshire Safeguarding Children Board Procedures Manual and are reviewed and up-dated annually and a summary report of findings sent to Council and the local authority Safeguarding Children Board. Termly Safeguarding updates will be provided for the Council. An OSCB annual Safeguarding Audit is produced through collaboration between the Warden, the Designated Safeguarding Lead and the Member of Council with Safeguarding oversight.

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

6 Oxfordshire Safeguarding Children Board Procedures Manual is found at: http://oxfordshirescb.proceduresonline.com/
**Categories of Abuse**

The table below outlines the four main categories of abuse as defined by the Department of Education’s *Keeping Children Safe in Education*, September 2016. (Full definitions can be found in this document.) Staff should be aware that the possible indicators are not definitive and that some children may present these behaviours for reasons other than abuse.

<table>
<thead>
<tr>
<th>Type of Abuse</th>
<th>Possible Indicators</th>
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<tbody>
<tr>
<td><strong>Neglect</strong></td>
<td>Obvious signs of lack of care including:</td>
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<td>• Problems with personal hygiene</td>
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<td></td>
<td>• Constant hunger</td>
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<td>• Inadequate clothing</td>
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<td>• Emaciation</td>
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<td>• Lateness or non-attendance at school</td>
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<td>• Poor relationship with peers</td>
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<td>• Untreated medical problems</td>
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<td>• Compulsive stealing and scavenging</td>
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<td>• Rocking, hair twisting, thumb sucking</td>
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<td></td>
<td>• Running away</td>
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<td>• Low self-esteem</td>
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<td>The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</td>
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<td>• provide adequate food, clothing and shelter (including exclusion from home or abandonment)</td>
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<td>• protect a child from physical and emotional harm or danger</td>
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<td>• <strong>ensure adequate supervision</strong> (including the use of inadequate care givers)</td>
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<td>• ensure access to appropriate medical care or treatment</td>
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<td>It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.</td>
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<td><strong>Physical Abuse</strong></td>
<td>Physical signs that do not tally with the given account of occurrence</td>
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<td>• Conflicting or unrealistic explanations of cause</td>
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<td></td>
<td>• Repeated injuries</td>
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<td>• Delay in reporting or seeking medical advice.</td>
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<td></td>
<td>A form of abuse which may involve hitting, shaking, 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</td>
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<td><strong>Sexual Abuse</strong></td>
<td>Sudden changes in behaviour</td>
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<td>• Displays of affection which are sexual and age inappropriate</td>
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<td>• Tendency to cling or need constant reassurance</td>
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<td>• Tendency to cry easily</td>
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<td>• Regression to younger behaviour – eg</td>
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including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Asexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

<table>
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<tr>
<th>thumb sucking, acting like a baby</th>
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<tr>
<td>Unexplained gifts or money</td>
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<td>Depression and withdrawal</td>
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<td>Wetting/soiling day or night</td>
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<td>Fear of undressing for PE</td>
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<tr>
<th>Emotional Abuse</th>
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<td>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 not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including 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 child, although it may occur alone.</td>
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<tr>
<td>Rejection</td>
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<td>Isolation</td>
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<td>Child being blamed for actions of adults</td>
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<tr>
<td>Child being used as carer for younger siblings</td>
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<tr>
<td>Affection and basic emotional care giving/warmth, persistently absent or withheld.</td>
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</table>

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.

**Anti-Bullying**

Our policy on the prevention and management of bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

**Female Genital Mutilation (FGM)**

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures. FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Staff recognise the possibility that a pupil may disclose information relating to a sibling or close friend who has suffered abuse in the form of FGM. It is mandatory for staff to report to the police cases where they discover that an act of FGM appears to have been carried out. Staff should refer to KCSIE, page 15 for further information about the indicators that a girl may be at risk of FGM. Contact details for reporting cases of FGM should be made through the Oxfordshire MASH.

Since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach where FGM has taken place. Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.

**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.
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.7

Forced marriages (FM) and Honour Based Violence (HBV)

FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014. A FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor FM is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

FM is illegal in England and Wales and includes:
- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)

Honour based violence (HBV) is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. HBV might be committed against young person who:
- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

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.

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 be in need of help or protection.

Staff are aware through safeguarding training 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 PSHCE 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 concern 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, through the OSCB Multi Agency Safeguarding Hub (MASH) to the Channel programme. 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
- 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

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8 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
A child going missing from education 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 p13.

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, art work 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 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
Safeguarding Measures

1. Induction of new staff includes information on the college’s Safeguarding team, Safeguarding policy, Code of Conduct, and Whistleblowing policy. All staff are issued with Section 1 and Annex A of KCSIE 2016. They are required to confirm that they have read and understood the content of these sections.

2. Training in Child Protection for all Common Room 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 receive training when they are appointed as a Mentor or Prefect. 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 obliged 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 senior management team and the HR department.

3. 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.

4. Pupils that are identified as being ‘at risk’ might include: those who self-harming, 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) on a ‘No Names’ basis. A risk assessment will include a care plan. Risk assessments and care plans will be reviewed by the team on a termly basis.

5. 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.

6. 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.

7. Any adult visitor to a Social must be accompanied by a member of staff, if he/she enters the boarding

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9 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.
side of the Social. An adult is anyone who is 16 or over. 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.

8. **Visiting Speakers** As part of our PREVENT duties we are obliged to assess the suitability of visiting speakers (anyone giving talks to boys in lessons, APT, societies, etc) and to keep a log. In all cases the following details will be provided to the Academic Director 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.

9. 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.

10. An annual Welfare Report (which includes the annual Welfare questionnaire) is provided for the Council (governing body) and includes any Child Protection issues. It is discussed as a separate agenda with SMT present. Any identified deficiencies will be remedied without delay. Termly Safeguarding Updates will be an agenda item on at GPC meetings.

11. The Safeguarding Policy is reviewed regularly and at least once a year, with any identified deficiencies remedied without delay.

12. The HR department operates a safer recruitment policy and a staff code of conduct in line with the current DfE guidance. Copies are available on request from HR.

13. An aide-memoire re Child Protection procedures is placed at the back of calendars, posted in Socials and academic Departments.

14. 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.

15. 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 for boarding.
Teaching Pupils how to keep safe

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

- Online safety is taught within the PSHCE programme, as well as through specific talks and guidance being given on arrival at the College and through IT lessons in the Shell curriculum.
- 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 School’s Shell IT Policy, Use of IT Policy, Technology 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.
- 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 PSHCE programme and the day to life of the College.

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 Special Educational Needs (SEN) and disabilities

Pupils with Special Educational Needs (SEN) and disabilities can provide additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of pupils which might include:

- assumptions that 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;
- communication barriers and difficulties in overcoming these barriers.
Role of the Designated Safeguarding Lead (DSL)

- Refer all cases of suspected abuse to the local authority children’s social care and:
  - The LADO 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).
- 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 and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Be the lead 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 leads should 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 OSCB carried out every two years in order to:
  - Understand the assessment process for providing 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 to:
  - 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 the local LSCB 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.
Role of Council

The Radley College Council undertake the regular review of safeguarding related policies and procedures that operate in our school. The Council have a crucial role in monitoring and challenging staff on the effectiveness of safeguarding arrangements. The GPC receive a termly Safeguarding Update. Agenda items for Council Meetings are as follows:

- Michaelmas term - OSCB Annual Safeguarding Audit.
- Summer term – Policy Review and approval.

The Council member with oversight of Safeguarding procedures is Mrs E J Martineau. In the case of an allegation made against the Warden, the Chairman of Council will liaise with the LADO and DSL.
Child Protection Procedures

What to do if you have concerns about a child?

If staff members have any concerns about a child (as opposed to a child being in immediate danger) they should raise these with the Designated Safeguarding Lead. The DSL will help decide, with reference to Oxfordshire’s Threshold of Need, whether a referral to children’s social care, early help or other support is appropriate. If a referral to children’s social care is appropriate, in most instances the DSL will make the referral. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn’t been made they can and should consider making a referral themselves. If after a referral the child’s situation does not appear to be improving the DSL (or the person that made the referral) should press for reconsideration to ensure their concerns have been addressed, and most importantly the child’s situation improves. If early help is appropriate the DSL will support the member of staff in liaising with other agencies and setting up an inter-agency assessment as appropriate. If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children’s social care if the child’s situation doesn’t appear to be improving. It is important for children to receive the right help at the right time to address risks and prevent issues escalating.

If a child is in immediate danger, or is at risk of harm, a referral should be made to the Oxfordshire MASH immediately. Anybody can make a referral to the MASH. Immediate danger might be signalled by:

- Allegations/concerns that the child has been sexually/physically abused.
- Concerns that the child is suffering from severe neglect of other severe health risks.
- Concerns that the child is living in or will be returned to a situation that may place him/her at immediate risk
- The child is frightened to return home

Dealing with a Disclosure

If a member of staff receives information which raises concern that a child may have suffered abuse, it is vital and a legal requirement that it is dealt with as here described. Safeguarding incidents could happen anywhere and staff should be alert to the possibility of concerns being raised at any time.

If there is risk of immediate significant harm\(^\text{10}\) to a child, the matter should be communicated to the DSL and a referral will be made immediately. Anyone may raise concerns directly with the Multi Agency Safeguarding Hub (MASH), the process for which is described in the Oxfordshire Safeguarding Children

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\(^{10}\) The Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Physical Abuse, Sexual Abuse, Emotional Abuse and Neglect are all categories of Significant Harm. Where harm is defined as the ill treatment or impairment of health and development. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes a single violent episode may constitute significant harm but more often it is an accumulation of significant events, both acute and longstanding, which interrupt, damage or change the child’s development.
Board Procedures Manual\textsuperscript{11}. The Oxfordshire MASH can also be contacted via email mash-childrens@oxfordshire.gcsx.gov.uk

All schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school’s permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State)\textsuperscript{10}.

The Designated Safeguarding Lead (DSL) is appointed by the Warden. The current DSL is the Sub-Warden (Ben Holden). He has responsibility for child protection issues in the school. In his absence, any allegation will be referred to his named deputies (John Beasley, Lucy Nott, Suzie Naylor, Dan Pullen or Alex Gilley) or direct to the Warden. Contact details can be found at the end of this policy. A referral to children's social care can be made by anyone.

1. Any member of staff who is told of any incident or has strong suspicion of physical or sexual child abuse or of bullying occurring in the school, or to a pupil of the school at home or outside the school, must report the information immediately to the DSL. Staff should not attempt to differentiate between levels of risk or need. All concerns must be communicated to the DSL or, in his absence, his named deputies.

2. Child abuse to be reported includes abuse of a pupil by a staff member or other adult, abuse at home which a pupil reports to staff, abuse by a stranger outside school, and abuse of one pupil by another pupil. In the case of abuse by a pupil, or group of pupils, referral to external agencies on grounds of child protection will be made if the victim has been or is at risk of suffering serious harm.

Consideration will be given in such cases to:

\begin{itemize}
  \item[a.] the frequency, nature and severity of the incident(s);
  \item[b.] whether the victim was coerced by physical force, fear, or by a pupil or group of pupils significantly older than himself, or having power or authority over him;
  \item[c.] whether the incident involved a potentially criminal act;
  \item[d.] whether, if the same incident (or injury) had occurred to a member of staff or other adult, it would have been regarded as assault or otherwise actionable.
\end{itemize}

3. Local child protection procedures will be followed in cases of alleged child abuse. College staff (including the designated staff member and the Warden) should not undertake investigation into any type of abuse before the school has taken advice from the LADO or children’s social care. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by school staff beyond the point at which it is clear that there is an allegation of abuse. The interviewing of children and adults involved is now carried out by specially trained staff only, following procedures agreed between (amongst others) the local authority and police in line with government requirements. These are designed to avoid unnecessary or repeated interviewing and examinations.

\textsuperscript{11} \url{http://oxfordshirescb.proceduresonline.com/chapters/quick_guide.html}
4. When an investigation turns out to be a 'false alarm' and also when an investigation is substantiated, the Oxfordshire Safeguarding Children Board (OSCB) will work with the school to recover from the situation.

5. If a pupil is making allegations about abuse (either of himself or another) he must be made aware that, while the matter will be kept as private as possible, other people as well as the immediate confidant will become involved, but no confidentiality can be promised. It is important that pupils should know this in advance. Referral to external agencies will only be made if the victim has or is at risk of suffering serious harm. Non-statutory advice is available in the document - Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (March 2015)¹²

6. The following is the procedure that members of staff are required to follow when an allegation of abuse is made. (It is open to members of staff to suggest that pupils should make any allegations direct to the DSL or his deputies, though this may not always be appropriate.) Members of staff should:

   a. Limit any questioning to the minimum necessary to seek clarification only on whether abuse has occurred, avoid leading questions and do not promise confidentiality.
   b. Stop asking any more questions as soon as the pupil has disclosed that he believes that something abusive has happened to him, or to someone else.
   c. Tell the informing pupil that the DSL will now make sure that the appropriate people deal with the problem (these will include the LADO, the specialist social worker, and that it may need to involve the police).
   d. Ask the informing pupil or adult what steps they would like taken to protect them now that they have made a disclosure, and assure them that the school will try to follow their wishes.
   e. Refer the matter immediately, with all relevant details, to the DSL, as above.
   f. Make a written record of what has been disclosed, using the pupil’s own words, as soon as possible. Record the date, time, place and any noticeable nonverbal behaviour. Make a copy of the written record available to the DSL.

7. After the DSL has received an allegation of abuse, he will need to co-ordinate various courses of action. He will NOT investigate the matter further, but will refer it immediately (and within one working day at the latest) to the LADO (Local Authority Designated Officer), who may involve the Family Division of the police and the Team Manager (Children and Families) of the local social services office (an out of hours number is available). If the allegation suggests a criminal act may have taken place, the police will also need to be informed.

8. It may be necessary to allocate another staff member to stay with the pupil (preferably an adult of the pupil's own choice).

9. In certain circumstances the designated staff member (DSL) may need to be advise from the LADO/SSD Team Manager as to whether (a) parents should be told (this will normally be very early on,

¹² https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice
though there may be circumstances where this would be inappropriate) or (b) any medical treatment or examination is necessary. Further, advice will be taken as to whether the pupil should be isolated, or any other staff be informed.

10. In any subsequent interview of a pupil who has made allegations, the person he has initially approached or a staff member of his choice may be required to accompany him.

**Allegations against Staff**

Full account is taken of DfE’s (July, 2015) guidance ‘Keeping Children Safe in Education’- Part 4 and process as described in the Oxfordshire Safeguarding Children Board Procedures Manual, Section 1.11

**Key points:**

1. All staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children to be conducted in view of other adults.

2. We understand that a child or young person may make an allegation against a member of staff or volunteer working within the college. If such an allegation is made, the member of staff receiving the allegation will immediately inform DSL who will notify the Warden and LADO immediately and within one working day at the latest. The Warden, on all such occasions, will discuss the content of the allegation with the LADO (Local Authority Designated Officer) before taking any action.

3. If the allegation made concerns the Warden, the DSL will immediately inform the Chairman of Council who will consult with the LADO, without notifying the Warden first.

4. If the allegation concerns the DSL, the member of staff receiving the allegation will immediately inform the Warden who will then inform the Chairman of Council and the LADO, without notifying the DSL first.

5. In the case of an allegation of abuse which may have resulted in serious harm, the police will be informed immediately.

6. The school will follow the procedures for managing allegations against staff, a copy of which can be accessed through the OSCB website.

7. Where an allegation is made against a member of staff, the matter will be dealt with as a matter of priority and without any unnecessary delays.

8. Where advised, the member of staff may be suspended. If appropriate, alternative accommodation will be found during the period of investigation.

9. 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.

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10. Where any member of staff or volunteer is deemed unsuitable to work with children and leaves the College for this reason, the Disclosure and Barring Service (DBS) will be informed by the HR Manager as soon as possible and within 1 month. The school has a duty to consider making a referral to the National College for Teaching and Learning (“NCTL”) where a teacher has been dismissed (or would have been dismissed had s/he not resigned) and a prohibition order may be appropriate because of unacceptable professional conduct, conduct that brings the profession into disrepute or a conviction at any time for a relevant offence.

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 LADO or Safeguarding Team where necessary.

Allegations against Pupils (Peer-on-Peer)

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their 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. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:
- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil;
- is of a serious nature, possibly including a criminal offence;
- raises risk factors for other pupils in the school;
- indicates that other pupils may have been affected by this student;
- indicates that young people outside the school may be affected by this student.

Examples of safeguarding issues against a student could include:

Physical Abuse
- violence, particularly pre-planned
- forcing others to use drugs or alcohol

Emotional Abuse
- blackmail or extortion
- threats and intimidation

Sexual Abuse
- indecent exposure, indecent touching or serious sexual assaults
- forcing others to watch pornography or take part in sexting (see below)

Sexual Exploitation
- encouraging other children to attend inappropriate parties
- photographing or videoing other children performing indecent acts
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 - *Dealing with a Disclosure*.

It may be appropriate to exclude the pupil being complained about for a period of time according to the school’s behaviour policy and procedures. 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.

**Sexting**

When an incident involving a pupil having produced sexual imagery comes to the attention of a member of staff or parent:

- The incident should be referred to the DSL as soon as possible.
- 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 will be made to children’s social care and/or the police immediately.

An initial review meeting 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 may be unknown.

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• Whether immediate action should be taken to delete or remove images from devices or online services
• 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 (a 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.
### Safeguarding Contact Details

<table>
<thead>
<tr>
<th>Designated Safeguarding Lead</th>
<th>Mr B. J Holden, Sub-Warden</th>
<th><a href="mailto:bjh@radley.org.uk">bjh@radley.org.uk</a></th>
<th>01235 548515</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deputy to DSL</td>
<td>Mrs. L. E. Nott, Languages Dept.</td>
<td><a href="mailto:len@radley.org.uk">len@radley.org.uk</a></td>
<td>01235 543044</td>
</tr>
<tr>
<td>Child Protection Officers</td>
<td>Mr J. R. W. Beasley, History dept.</td>
<td><a href="mailto:jrwb@radley.org.uk">jrwb@radley.org.uk</a></td>
<td>01235 543047</td>
</tr>
<tr>
<td></td>
<td>Mrs S. I. Naylor, Music Dept.</td>
<td><a href="mailto:sln@radley.org.uk">sln@radley.org.uk</a></td>
<td>01235 543144</td>
</tr>
<tr>
<td>Warden</td>
<td>Mr John Moule</td>
<td><a href="mailto:warden@radley.org.uk">warden@radley.org.uk</a></td>
<td></td>
</tr>
<tr>
<td>Chairman of Council</td>
<td>Mr M E Hodgson</td>
<td><a href="mailto:mhodgson@dng.co.uk">mhodgson@dng.co.uk</a></td>
<td></td>
</tr>
<tr>
<td>Council Safeguarding Lead</td>
<td>Mrs E J Martineau</td>
<td><a href="mailto:Jane.Martineau@rooselaw.co.uk">Jane.Martineau@rooselaw.co.uk</a></td>
<td></td>
</tr>
<tr>
<td>OSCB Team</td>
<td></td>
<td></td>
<td>01865 810603</td>
</tr>
<tr>
<td>OSCB Emergency Duty team</td>
<td></td>
<td></td>
<td>0800 833 408</td>
</tr>
<tr>
<td>OSCB LADO</td>
<td>Mrs Alison Beasley</td>
<td><a href="mailto:alison.beasley@oxfordshire.gov.uk">alison.beasley@oxfordshire.gov.uk</a></td>
<td>01865 815956</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>07833 436649</td>
</tr>
<tr>
<td>SCB Assistant LADO</td>
<td>Mrs Donna Crozier</td>
<td><a href="mailto:donna.crozier@oxfordshire.gov.uk">donna.crozier@oxfordshire.gov.uk</a></td>
<td>01865 816382</td>
</tr>
<tr>
<td>Oxfordshire MASH</td>
<td></td>
<td><a href="mailto:mash-children@oxfordshire.gov.uk">mash-children@oxfordshire.gov.uk</a></td>
<td>0345 050 7666</td>
</tr>
<tr>
<td>Oxfordshire LCSS</td>
<td>Mr Dave Mepham</td>
<td><a href="mailto:LCSS.South@oxfordshire.gov.uk">LCSS.South@oxfordshire.gov.uk</a></td>
<td>07780 490791</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>03452412608</td>
</tr>
<tr>
<td>Kingfisher Team (CSE)</td>
<td></td>
<td></td>
<td>01865 335276</td>
</tr>
<tr>
<td>TVP Prevent Co-ordinator</td>
<td>Jo Physick</td>
<td><a href="mailto:preventreferrals@thamesvalley.pnn.police.uk">preventreferrals@thamesvalley.pnn.police.uk</a></td>
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</tr>
<tr>
<td>Thames Valley Police</td>
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**Other contacts**

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<thead>
<tr>
<th>Non-emergency national police number</th>
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<tr>
<td>DfE dedicated contact for non-emergency advice for staff and governors</td>
<td><a href="mailto:counter-extremism@education.gsi.gov.uk">counter-extremism@education.gsi.gov.uk</a></td>
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### Table of substantive changes.

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<td>Reference made to staff members acting in the best interests of the child.</td>
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<td>Page 14</td>
<td>Notes added to outline how pupils are taught about keeping themselves safe, particularly when online.</td>
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<td>Page 21</td>
<td>Further guidance added about management of Allegations against Pupils (peer-on-peer)</td>
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<td>Page 22</td>
<td>Guidance added on dealing with ‘Sexting’</td>
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<tr>
<td>18/11/2016</td>
<td>Page 9</td>
<td>Notes added to section on FGM to include Honour based Violence (HBV)</td>
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<td>3/5/2017</td>
<td>Page 8</td>
<td>Updated definition of CSE from DfE Guidance document Feb 2017</td>
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<td>26/5/2017</td>
<td>Page 24</td>
<td>Update phone number for Oxfordshire Mash (0345 050 7666)</td>
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<td>Additional contacts for Donna Crozier, the assistant LADO for Oxfordshire (01865 816382)</td>
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<td>Reference LCSS as a source of advice for lower level concerns and Early Help assistance</td>
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<td>LCSS contact details</td>
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<td>Reference and link added, Oxfordshire Threshold of Need 2017</td>
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