COTHILL
Family • Foundations • Future

RADLEY
SCHOOLS GROUP

COTHILL SAFEGUARDING POLICY

June 2026

(This policy applies to all boarding and day pupils)

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Key Contact Information

Radley Schools Group and School Contact Details

School Contacts	Name	Contact
Designated Safeguarding Lead (DSL)	Adam Pearson (Deputy Head Pastoral)	apearson@cothill.org.uk (01865 410867)
Deputy Designated Safeguarding Lead (DDSL)	Emi-Lou May (Head's Wife)	emay@cothill.org.uk (01865 390800)
Head of Boarding	Adam Pearson	apearson@cothill.org.uk
Matron (Boarding)	Sarah Wright	swright@cothill.org.uk
School Nurse & DDSL	April Bailey	abailey@cothill.org.uk
Teacher of ICT (Filtering and Monitoring)	Chris Page (L3 DSL trained)	cpage@cothill.org.uk
School Chair of Advisory Board	Peta Darnley	pdarnley@radleyschoolsgroup.org.uk
Group CEO (Prep schools)	Andrew Ashton	01865 966037
Chair of College Council	David Smellie	david.smellie@farrer.co.uk
Designated Safeguarding Trustee	Carole Sweetnam	carole@sweetnams.co.uk

Details of the Local Safeguarding Children Partnership:

The school is situated in the area of the Oxfordshire Local Safeguarding Children Partnership and operates their inter-agency procedures.

Role	Name	Contact
Local Authority Designated Officer (LADO)	Jo Lloyd	lado.safeguardingchildren@oxfordshire.gov.uk (01865 810603)
Children's social care	MASH	0345 050 7666/01865 519 800
Local Safeguarding Children Partnership (LSCP)	Oxfordshire Safeguarding Children Partnership (OSCP)	https://www.oscp.org.uk/ oscp@oxfordshire.gov.uk
Early Help Services	Locality Community Support Service (LCSS) Oxfordshire	Tel: 0345 2412705 https://myehmportal.oxfordshire.gov.uk/web/portal/pages/home

Our school takes pupils from outside our own area and where necessary we work with other local authorities. The equivalent contact details are usually available on the website of the local authority.

This policy is written to reflect both the whole-school approach to safeguarding children, child-on-child abuse (see below) and the local protocol for assessments.

National Contacts

Police

Emergency Tel: 999 Non-emergency Tel: 101

National Police Prevent Advice Line (to report terrorism/radicalisation/extremism)

Tel: 0800 011 3764

FGM Helpline

Tel: 0800 0283550

NSPCC

Weston House, 42 Curtain Road, London EC2A 3NH

Tel: 0808 800 5000 24h

Whistleblowing Helpline for staff

Tel: 0800 028 0285 Email: help@nspcc.org.uk

Website: A link for dedicated NSPCC helplines can be found here.

Childline

Tel: 0800 1111

Website: The link can be found here.

Kidscape Bullying Helpline

Tel: 020 7823 5430

Website: The link can be found here.

ISI (Independent Schools Inspectorate)

CAP House, 9-12 Long Lane, London EC1A 9HA

Tel: 020 7600 0100

Email: info@isi.net

Website: The link can be found here.

OFSTED (Office for Standards in Education)

Tel: 0300 123 4666

Children's Commissioner for England – Dame Rachel de Souza

Tel: 020 7783 8330 Tel: (for children living away from home – boarding) 08005280731

Email: info.request@childrenscommissioner.gov.uk

Web: contact information page here.

Crimestoppers

Tel: 0800 555 111

CEOP (Child Exploitation and Online Protection Command)

web: The link can be found here.

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

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

Oxfordshire Safeguarding Children Partnership Procedures Manual

The Radley Schools Group Council (Governors) takes seriously its responsibility under section 11 of the Children Act 2004 and duties under "Working Together" to safeguard[1] and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements exist within all of the schools within the group 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.

[1] 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"

The School promotes an inclusive and anti-discriminatory safeguarding culture in which racism, faith-based prejudice and other forms of discriminatory behaviour are recognised, challenged and addressed. The School recognises that such behaviour can have safeguarding implications, and safeguarding considerations will therefore be embedded across the School's behaviour, anti-bullying, pastoral and safeguarding arrangements. The best interests of the child will remain at the heart of the School's response.

We recognise that **all staff**[2] and LAG members have a full and active part to play in protecting our pupils from harm, and that promoting their welfare is our paramount concern. The school recognises its duties to all children, and particularly those in need of support and those at risk of harm. The school 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 school staff, members of the Group Head Office (RSG), Radley school employees, All members of the Local Advisory Group (LAG), 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 school policies, all of which can be found on the school 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 School Premises Policy
- Education Guardianship Policy and Agreement
- Low Level Concerns Policy
- PSHE & RSE Policies

[2] "Staff" covers ALL adult staff on site, including temporary, supply and ancillary staff, trainee teachers and contractors and volunteers working with children

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 concerns arise
- 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. Child protection is where there is a concern a child has suffered, or is likely to suffer, significant harm 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.

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, other children, 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
LADO – refers to Local Authority Designated Officer
MASH – refers to Multi Agency Safeguarding Hub
RSG – refers to Radley Schools Group
LCSS – refers to Locality and Community Support Services
OSCP – refers to Oxfordshire Safeguarding Children Partnership

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 and that pupils' views and wishes are listened to and taken seriously
- 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 concerns are identified, thereby enabling children to benefit from a **community based early help** assessment. The pastoral support system provides pupils with a variety of people to whom they can turn to in times of difficulty. In addition to pastoral staff pupils can contact 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 school 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 the Oxfordshire Safeguarding Children Partnership's Child Protection Procedures and "Working Together to Safeguard Children".

We will ensure that:

- All staff and members of Council and the LAG 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
- The DSL and DDSL(s) have undertaken appropriate training for the role, as recommended by the LA, within the past two years.
- All members of staff are provided with training in Safeguarding at least every three years by 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 school, a request is made to the feeder 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 as appropriate.
- 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 safeguarding guidelines and procedures. The guidance on keeping children safe in out-of-school settings details the safeguarding arrangements that the school 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 Officer). The role of the Designated Officer is to help with 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 Local Authority Threshold of Need guidance:
    - A case of a child at risk of serious harm will be referred to the Local Authority Safeguarding Hub (MASH) Services immediately
    - A case of a child in need of support will be referred through Local Authority Safeguarding Hub and a 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 and/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
- The school has an Independent Person who is able to see pupils and parents by appointment. Contact details are displayed throughout the school.

What staff need to know

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

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

Prejudice-based harm

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, sense of safety and willingness to seek help. Staff should remain alert to the signs and impact of prejudice-based harm and should consider and report such concerns through the School's safeguarding procedures where appropriate.

Confidentiality and Information Sharing

We recognise that all matters relating to child protection and safeguarding are confidential. The Head 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 school, the DSL ensures their child protection file is transferred to their new school 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 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.

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 local authority standards every 3 years for Generalist, and Advanced Safeguarding and every 2 years for DSL and DDSLs. The DSL and deputies have additional training in inter -agency working and Prevent .

The DSL will provide termly updates for staff and members of the LAG, 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 school 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 school Management Team are responsible for ensuring that the school follows safe recruitment processes outlined within guidance and our Recruitment Policy, which can be obtained from the RSG 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 Designated Safeguarding Lead (DSL) or a Deputy DSL (DDSL) as soon as possible and recorded in line with the school's safeguarding procedures. Action must not be delayed because a member of staff is unsure whether a concern meets a particular threshold.

Options will then include:

- managing any support for the child internally via the schools pastoral care support processes
- consultation with Council Safeguarding Team 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 Local Council Multi Agency Safeguarding Hub (MASH) if the child is at risk of or has suffered significant harm[3]

Racism, faith-targeted abuse and other discriminatory behaviour can have a significant impact on a child's welfare, wellbeing and sense of safety. Staff must therefore consider whether any such incident has safeguarding implications and, where appropriate, report it to the DSL or DDSL in accordance with the procedures above. An incident should not be treated solely as a behaviour or anti-bullying matter where there are safeguarding implications.

The protocol for reporting a concern is as follows:

A concern about a child 's wellbeing

- The concern is entered on CPOMS and a conversation is had with the child's Form Teacher or Houseparent

A concern about a child's welfare

- The concern is entered on CPOMS and a conversation is had with the DSL

[3] Any member of staff may make a safeguarding referral to Children's Social Care or the police if they believe a child is at risk of harm. Where a referral is made by someone other than the DSL, the DSL must be informed as soon as possible that the referral has been made

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 entry on CPOMS 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

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 and staff should gain advice from a member of the SLT.
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 school. The school 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 children and staff, fostered in the classroom, on the games field, and throughout the school. All members of staff who work closely with pupils are expected to be alert to those changes in behaviour which might suggest that the pupil is in need of assistance. Pupils may not be ready to come forward and 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 school to enable their children to achieve the best outcomes.

Community-Based Early Help

Although they may not require the support of statutory children's services, at times pupils and their families may need a bit of extra support. Community based early help brings together all the relevant services 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 the local authority 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. Teaching staff 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 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 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
- 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

Any concern that may have safeguarding implications, including bullying, racism, faith-targeted abuse, prejudice-based or other discriminatory incidents, disordered eating, mental health concerns or unexplained absence, should be reported to the DSL and recorded in accordance with the School's safeguarding recording procedures.

All pupil concerns are recorded on CPOMS, including any concern that may have safeguarding implications (bullying, disordered eating, mental health, unexplained absence might be examples).

For concerns relating to staff, records are kept confidential (only the Head and DSL receive 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 Head (who will consider whether an onward referral to the LADO is required)
- where there are concerns about the Head, 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 school 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 Head, or in their absence the DSL. 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 school'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 school

- All our staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or school's safeguarding regime and that such concerns will be taken seriously by the school 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 the school 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 a deputy DSL.

Safeguarding Measures

1. Induction of new staff includes information on the school'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 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. New members of staff receive training as part of the induction process. All other staff receive training through the DSLs 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 school Management Team and the HR department. Training focuses on the collective responsibility shared by all staff in the school 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 the LAG and Council are also provided with appropriate training in safeguarding as part of their induction. The LAG 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 Cothill. Supervision is organised by the Head of Boarding/Deputy Head, Pastoral following guidelines set out by the Head.

4. If a pupil is found to be missing, either at registration or from a lesson, the Missing Child Policy will be followed.
5. All members of staff, volunteers, LAG and Council (governing body) members are subject to a DBS check. All adults resident in accommodation attached to a boarding house 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.
6. 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. A risk assessment will include a care plan. Risk assessments and care plans will be reviewed by the team on a termly basis.
7. 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.
8. The school will take steps to ascertain the whereabouts of any pupil withdrawn from the school, or removed from the Admissions register prior to their expected start date, communicating with the parents, previous 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.
9. **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, assemblies, lectures, etc) and to keep a log. In all cases the following details will be provided to the Deputy Head Pastoral at least two weeks before the date of the proposed talk: Name; Topic, Date, Venue. Unless the speaker has a DBS check for The school then they must be accompanied by a member of staff at all times.
10. Where other organisations have staff working at the school, 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.
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 in line with the current DfE guidance. Copies are available on request from HR.
13. All staff should be aware of the policy on Restrictive Interventions, Use of Reasonable Force, and Physical Contact Policy
14. All staff should be aware of the policy on pupil access to staff accommodation.
15. All staff are issued with the Code of Conduct Policy.
16. 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

Boarding Safeguarding and National Minimum Standards Compliance

The school recognises that boarding presents additional safeguarding responsibilities and therefore ensures that safeguarding arrangements for boarders operate at all times, including evenings, nights, weekends and school holidays when pupils remain on site.

This policy applies fully to all boarders and boarding staff and is implemented in accordance with the Boarding Schools National Minimum Standards (NMS).

Safeguarding Arrangements for Boarders

The school ensures that:

- Boarding pupils are appropriately supervised at all times, with clear staffing rotas and handover arrangements
- Boarding staff are trained in safeguarding and child protection in line with their roles and responsibilities
- A Designated Safeguarding Lead (DSL) or Deputy DSL is available or on call at all times when boarders are present
- Clear escalation routes exist for safeguarding concerns arising outside the normal school day

Boarding Staff Responsibilities

All boarding staff:

- Understand that they have the same safeguarding responsibilities as teaching staff
- Are trained to identify signs of abuse, neglect, exploitation, peer-on-peer abuse and poor mental health
- Know how to record and report concerns promptly, including during night-time hours
- Are aware of and follow the school's Staff Code of Conduct and safeguarding procedures
- Ensure pupils have access to, and understand how to access, the schools Independent Person

Pupil Voice and Access to Support

Boarders are supported to raise concerns through:

- Boarding staff and houseparents
- The Designated Safeguarding Lead or Deputy DSL
- The school counsellor or medical staff
- The Independent Person, whose contact details are displayed clearly within boarding accommodation

Boarders are actively encouraged to speak up and are reassured that concerns will be taken seriously and acted upon.

Managing Risk in Boarding

The school recognises that certain safeguarding risks may be heightened in boarding contexts and takes steps to mitigate these, including:

- Monitoring and addressing inappropriate peer relationships and child-on-child abuse
- Managing risks associated with online activity, personal devices and social media use
- Considering the impact of gender imbalance, age differences and vulnerability within boarding houses

- Implementing individual risk assessments and care plans for boarders identified as being at risk, reviewed regularly by the pastoral and safeguarding teams

Missing Pupils

If a boarder is missing or unaccounted for:

- The school's Missing Child Policy is followed without delay
- Clear procedures are in place for escalation, record keeping and communication with parents and external agencies where required

Overnight and Out-of-Hours Safeguarding

The school ensures that:

- Where pupils are on site outside the normal school day, safeguarding arrangements operate at all times. Appropriate senior staff are available to provide safeguarding advice and take action when required.
- There are clear procedures for responding to safeguarding concerns during the night
- Boarding staff know how to contact senior staff, the DSL or emergency services when required
- Records of incidents or concerns arising overnight are shared promptly with the DSL and relevant staff

Oversight and Review

- Boarding safeguarding arrangements are monitored by the Head of Boarding, DSL and Council Safeguarding Lead via the Chair of LAG.
- Compliance with the National Minimum Standards is reviewed regularly
- Any safeguarding concerns or themes arising in boarding are reported to governance as part of routine safeguarding oversight

Teaching Pupils how to keep safe

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

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

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 throughout the year and through IT lessons. Reference is made to Department for Education (DfE) (2023) Teaching online safety in school
- The school 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 and monitoring system
- 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 School
- 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 that encourages the pupils to feel comfortable and confident in expressing concerns. All junior pupils and new starters are appointed a Senior Mentor who supports them throughout their first year at Cothill. All children are also given a 'Family Lead' who, alongside the Form Teacher and Houseparent (if boarding) has a key pastoral role in supporting the pupil.

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 may need additional safeguarding support 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 disproportionately 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.

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. The PSHE curriculum gives all pupils the opportunity to explore these important topics.

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. 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 welfare 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 and send to the DSL
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.[4]
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. Safeguarding referrals to statutory agencies do not require parental consent. While the school will work openly with parents wherever appropriate, concerns may be shared without parental knowledge where this is necessary to protect a child.
4. 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.
5. 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.
6. 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

[4] Safeguarding referrals to statutory agencies do not require parental consent. While the school will work openly with parents wherever appropriate, concerns may be shared without parental knowledge where this is necessary to protect a child.

then all action should be taken in the best interests of the child and anyone else who might be vulnerable.

7. 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 council's safeguarding team 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 Head immediately
- If an allegation is made against the Head, 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
- It is the school's responsibility to ensure allegations against any supply staff 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 Head 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 Head, they will contact the LADO team **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 the 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 their next steps, in line with KCSIE part 4, and the local authorities 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 schools 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 School 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.

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

If your concern is about the Head, you should raise this with the Chairman of Council using the email at the front of this document.

If you would prefer to raise your concerns outside of the school, 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 the local authority.

If you believe that a member of the staff is harming a child (an allegation) and this has been reported to the Head and no / insufficient action has been taken, or the member of staff you have concerns about is the Head, then you are able to contact the LADO team directly.

If you believe that a child is being abused by individuals outside the school, 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 pupils 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" or "girls can be mean to each other" 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, or any other power inbalances
- 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 for each pupil involved 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

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

Role of Radley Schools Group Council

The Radley College Council undertakes the regular review of Safeguarding related policies and procedures that operate within each of the schools. Members of Council are mindful of the Charity Commission's Safeguarding expectations. 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 Prep School Committee receives a termly Safeguarding Update.

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 any of the Heads, the Chairman of Council will liaise with the Local Authority Designated Officer (LADO).

The Chair of the LAG has responsibility for safeguarding in each of the schools and reports into the Council Prep School Committee. During the LAG visits to the school they have an opportunity to view the central register (SCR), meet with the DSL to discuss current concerns and meet with staff to hear about issues within the boarding houses. The Chair of the LAG 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 Head

- 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 the 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 Head to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 (child protection) 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/her 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/her deputies receive appropriate training every two years.
- 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 an initial child protection conference and review child protection conferences 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 school'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 and CWD
- 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 relevant school's policies are known and used appropriately.
- Ensure the school's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with LAG 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 school in this
- Link with council to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave the school, ensure their child protection file transferred to the new school or school 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 school. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

Role of Independent Person (Independent Listener)

In accordance with the Boarding Schools National Minimum Standards (NMS), the school ensures that all boarders have access to an Independent Person who provides an additional, independent avenue for pupils to raise concerns, seek advice, or discuss worries, including those relating to safeguarding, wellbeing, or boarding life.

The Independent Person works alongside but independently from the school's safeguarding and pastoral systems. Where safeguarding concerns arise, these are shared with the DSL in line with statutory guidance. The Independent Person does not replace internal reporting routes, the DSL, or external safeguarding agencies

Definition of Independence

The Independent Person:

- Is independent of the school's day-to-day management, disciplinary and safeguarding decision-making
- Is not employed in a teaching, boarding, or pastoral role within the school
- Is not a member of the Designated Safeguarding Lead (DSL) team
- Has no involvement in pupil discipline, sanctions, or boarding supervision
- Is appointed with oversight from the Council Safeguarding Lead

The Independent Person:

- Provides pupils with a listening, supportive, and non-judgemental service
- Is available to boarders and, where appropriate, parents, to discuss concerns about:

    - Personal wellbeing
    - Relationships
    - Boarding life
    - Safeguarding matters
    - Any issue pupils feel unable to raise within the school
- Does not investigate concerns or make disciplinary decisions
- Encourages pupils to access appropriate support and safeguarding processes where needed

The Independent Person operates within statutory safeguarding requirements and therefore:

- Cannot offer absolute confidentiality
- Will explain clearly to pupils that any concern indicating a risk of harm must be shared with the school's DSL or appropriate external agencies
- Will report safeguarding concerns promptly, following the school's safeguarding procedures
- May initially consult the DSL on a 'no names' basis, where appropriate, to seek advice on thresholds

Access for Boarders

- Boarders are informed about the Independent Person and how to contact them through:
    - Induction
    - Boarding handbooks
    - Notices within boarding accommodation
- Pupils may contact the Independent Person directly and without seeking permission
- Arrangements ensure that access is confidential, timely, and practical, including outside normal school hours where appropriate

Role of staff

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 school 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 children. 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 school's guidance, particularly with regard to:
    - Technology (mobile phone use)
- Raising concerns in a timely manner, so problems can be addressed early before they develop.
- Notify the schools 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.

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. Email these notes to the DSL
- 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 school 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.

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 context of our school, 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 school interactions. 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 our school, although it is not limited to this, the most likely form of emotional abuse is bullying type behaviour from another child, or group of children, toward another child. 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.

Sexual abuse involves forcing, causing or inciting a child to take part in sexual activities, whether or not violence is involved and whether or not the child understands what is happening. It may involve physical contact, including penetrative and non-penetrative acts. It may also involve non-contact activities, such as involving children in looking at or producing 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 as well as offline, and technology can be used to facilitate offline abuse. It may be perpetrated by adults or by other children. Children may be sexually abused within their family, within an institution or in a community setting, and are more likely to know the person abusing them than not. Sexual abuse by another child is a specific safeguarding issue in education.

Staff should understand the legal position on consent. A child under 13 can never provide valid consent to sexual activity. There are also specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

The School maintains an attitude of "it could happen here" in relation to sexual abuse. Any concern relating to possible sexual abuse, however slight, must be reported to the DSL or DDSL immediately and dealt with in accordance with the School's safeguarding procedures.

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 (although age/development must be taken into account here)
- 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

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.

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 our school, 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;*
- *theft.*

We are also conscious of the need to look our for affluent neglect.

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 school and/or can occur between children outside of school. 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 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:

- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents
- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- 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 school, 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.

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 the 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 are skipping meals
- 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 offence), 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 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.[5]

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 may be unknown

[5] 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

- 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 selfharming

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 School Leadership Team have read Annex C regarding Online Safety within 'Keeping Children Safe in Education' 2026.

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 school 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 operates a 'no personal mobile device' policy for pupils, with the exception of overseas pupils who require them for travelling. However, these devices are handed into the matron team and kept securely during school hours.

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.

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 themselves, 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 Council MASH.

Female Genital Mutilation mandatory reporting duty for teachers

All teaching staff 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[6]. 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.

Modern Slavery

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour.

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6 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

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.

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 school'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. 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 a 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

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:

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 School through our Safeguarding policy and in conjunction with our Equality, Diversity and Inclusion Policy.

The school 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 School 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 school 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 to 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 School 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

Most of the above are unlikely to affect the lives of pupils at our school, but 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

Policy Updates

Revision Date	Page	Revision
1st January 2026	All	Major revision with the aim of improving the flow of the safeguarding policy, as well as the signposting of information to make it an easier document for adults to work with and understand. A further improvement has been to ensure best practice is shared across all 8 schools in the Radley Schools Group.Content has been reorganised and pages renumbered.
May 2026		Update to reflect a revised Working together to safeguard children document (now dated 2026)
June 2026	All	Comprehensive annual review and update of the Radley Schools Group Safeguarding Policy to incorporate KCSIE 2026 and revised statutory guidance. Significant revisions include updated safeguarding terminology and procedures, Family Help, information sharing, SEND, online safety, boarding standards, medical conditions, child-on-child abuse, harmful sexual behaviour, serious violence, exploitation, modern slavery, AI-generated imagery (deepfakes), gender questioning children, and wider safeguarding responsibilities for staff and pupils. This Group policy was approved by the Council at its Summer Term 2026 meeting.
1st Sept 2026	All	Reviewed and added school specific information ahead of policy implementation for Autumn term 2026. (ASP - Cothill DSL)
Oct 2026	All	Update to reflect final KCSIE changes. (ASP - Cothill DSL. Updates shared by RSG)

Appendix B - Cothill Safeguarding Poster

COTHILL SAFEGUARDING

WE HOPE YOU FEEL HAPPY, HEALTHY & SAFE

ALL PUPILS AT COTHILL HOUSE ...

- HAVE THE RIGHT TO SPEAK FREELY AND VOICE THEIR VALUES AND BELIEFS.
- ARE ENCOURAGED TO RESPECT EACH OTHER'S VALUES AND SUPPORT EACH OTHER.
- HAVE THE RIGHT TO BE SUPPORTED IN ALL THEIR NEEDS.

WHO CAN HELP?

You can speak to **any** member of staff and ask for help.

If you would like to speak to someone off site, there are three useful phone numbers you can call. These numbers are also by the phones:

INDEPENDENT LISTENER
Alix Anson - 07557 051010

CHILDLINE
0800 1111

THE CHILDREN'S COMMISSIONER - HELP AT HAND
0800 528 0721

Important Contacts for Staff:
Local Authority Designated Officer (Jo Lloyd)
01865 810603
Multi-Agency Safeguarding Hub
0345 050 7666 / 0800 833 40

DESIGNATED SAFEGUARDING LEAD (DSL)

ADAM PEARSON

DEPUTY DESIGNATED SAFEGUARDING LEADS (DDSL)

EMI-LOU MAY

APRIL BAILEY