

**RADLEY**

# **Safeguarding**

**September 2020**

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## Safeguarding Contact Details

<b>Designated Safeguarding Lead</b>	<b>Ben Holden,</b> Sub-Warden	<a href="mailto:bjh@radley.org.uk">bjh@radley.org.uk</a>  <a href="mailto:safeguarding@radley.org.uk">safeguarding@radley.org.uk</a>	01235 548515, 07779 586673
<b>Deputy to DSL</b>	<b>Tom Ryder</b>	<a href="mailto:trqr@radley.org.uk">trqr@radley.org.uk</a>	01235 543039
	Art Dept. <b>Suzie Naylor,</b> Music Dept.	<a href="mailto:sln@radley.org.uk">sln@radley.org.uk</a>	07805 161435 01235 543144
Lead Nurse	Alex Gilley, Medical Centre	<a href="mailto:amg.gilley@radley.org.uk">amg.gilley@radley.org.uk</a>	01235 543097
Warden	John Moule	<a href="mailto:warden@radley.org.uk">warden@radley.org.uk</a>	01235 543037
Chairman of Council	David Smellie	<a href="mailto:david.smellie@farrer.co.uk">david.smellie@farrer.co.uk</a>	
Council Safeguarding Lead	Jane Martineau	<a href="mailto:jane.martineau@rooselaw.co.uk">jane.martineau@rooselaw.co.uk</a>	
<b>Education Safeguarding Advisory Team (OSCB)</b>			<b>01865 810603</b>
ESAT Emergency Duty team			0800 833 408
Local Authority Designated Officer ( <b>LADO</b> )	<b>Alison Beasley</b>	<a href="mailto:alison.beasley@oxfordshire.gov.uk">alison.beasley@oxfordshire.gov.uk</a>	01865 815956 07833 436649
Assistant Designated Officers	Donna Crozier	<a href="mailto:donna.crozier@oxfordshire.gov.uk">donna.crozier@oxfordshire.gov.uk</a>	01865 816382 07901 331799
	Hannah Holland	<a href="mailto:hannah.holland@oxfordshire.gov.uk">hannah.holland@oxfordshire.gov.uk</a>	01865 813032 07867 467822
Oxfordshire MASH		<a href="mailto:mash-children@oxfordshire.gov.uk">mash-children@oxfordshire.gov.uk</a>	0333 014 3325
Oxfordshire LCSS	Emma Walker	<a href="mailto:Emma.Walker@oxfordshre.gov.uk">Emma.Walker@oxfordshre.gov.uk</a>	0345 241 2608
	<b>Anitta Gillett</b>	<a href="mailto:Anita.Gillett@Oxfordshire.gov.uk">Anita.Gillett@Oxfordshire.gov.uk</a>	
Kingfisher Team (CSE)			01865 335276
TVP Prevent Co-ordinator	Jo Physick	<a href="mailto:preventreferrals@thamesvalley.pnn.police.uk">preventreferrals@thamesvalley.pnn.police.uk</a>	01189 536349 ext. 751
Thames Valley Police			111

### Other contacts

Non-emergency national police number	<a href="#">When should you call the police?</a>	101
DfE dedicated contact for non-emergency advice for staff and governors	<a href="mailto:counter-extremism@education.gsi.gov.uk">counter-extremism@education.gsi.gov.uk</a>	020 7340 7264

## Introduction

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

- [“Keeping Children Safe in Education”](#) (KCSIE) September 20120
  - KCSIE incorporates the additional statutory guidance, [Disqualification under the Childcare Act 2006](#) (June 2016)
  - KCSIE also refers to the non-statutory advice for practitioners: [What to do if you’re worried a child is being abused](#) (March 2015)
- [“Working Together to Safeguard Children” July 2018 \(WT\)](#)
  - WT refers to the non-statutory advice: [Information sharing](#) (July 2018)
- [“What to do if you are worried a Child is being Abused” March 2015](#)<sup>1</sup>
- [Oxfordshire Safeguarding Children Board Procedures Manual](#), June 2020
- [Oxfordshire’s Threshold of Need](#) guidance document, 2017
- Boarding Schools National Minimum Standards, April 2015
- [Prevent Duty Guidance \(2015\)](#)
  - Prevent is supplemented by non-statutory advice and a briefing note:
    - [The Prevent duty: Departmental advice for schools and childminders](#) (June 2015)
    - [The use of social media for on-line radicalisation](#) (July 2015)
- [Children Missing Education \(2016\)](#)
- [Children Act 2004](#)

The Council (School Governors) takes seriously its responsibility under section 11 of the Children Act 2004 and duties under “Working Together” to safeguard<sup>2</sup> and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements exist within our setting to identify and support those children who are suffering harm or are likely to suffer harm. For the purposes of this policy children includes everyone under the age of 18.

We recognise that **all staff**<sup>3</sup> and Council members have a full and active part to play in protecting our pupils from harm, and that the welfare of children is our paramount concern. Radley recognises its duties to all children, and particularly those in need of support and those at risk of harm. Radley aims to provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of pupils free from discrimination or bullying where they can learn and develop happily.

This policy applies to all staff, Council members and volunteers working in our school. This policy has been written in line with Keeping Children Safe in Education 2018.

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<sup>1</sup> What To Do If You Are Worried A Child is being Abused

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

<sup>2</sup> 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”

<sup>3</sup> “Staff” covers ALL adult staff on site, including temporary, supply and ancillary staff, and volunteers working with children

## Related Policies

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

- Anti-Bullying Policy,
- Behaviour Discipline and Rewards Policy,
- Curriculum, Teaching and Learning Policy,
- Recruitment Procedures Policy
- Use of IT Policy,
- Staff Code of Conduct, Complaints Policy,
- Whistleblowing Policy,
- Anti-Radicalisation Policy,
- Missing Children Policy,
- Access to College Premises Policy.

## Terminology

**Safeguarding and promoting the welfare of children** refers to the process of protecting children from abuse or neglect, preventing the impairment of their mental or physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective and nurturing care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

**Child Protection** refers to the processes undertaken to meet statutory obligations laid out in the [Children Act 1989](#) and associated guidance (see [Working Together to Safeguard Children, An Interagency Guide to Safeguard and Promote the Welfare of Children](#)) in respect of those children who have been identified as suffering, or being at risk of suffering harm.

**Staff** refers 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.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents

**DSL:** Designated Safeguarding Lead.

**OSCB** – Oxfordshire Safeguarding Children Board

**LCSS** – Locality and Community Support Services

## Aims:

- support the pupil's development in ways that will foster security, confidence and resilience;
- provide an environment in which children and young people feel safe, secure, valued, respected and confident;
- establish a clear understanding amongst all staff that our approach to safeguarding is one which recognises the real possibility that '**it could happen here**'. With this in mind, staff members will always act in the **best interests of the child**;
- ensure pupils know how to approach adults if they are experiencing difficulties;
- raise the awareness with all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse or cause for concern;
- promote clear communication so that problems are identified, thereby enabling children to benefit from **early help**<sup>4</sup>. The pastoral support system within Socials provide pupils with a variety of people to whom they can turn in times of difficulty. In addition to boarding staff within the Social, pupils can contact the College Counsellor, the Chaplain or any member of staff with whom they feel comfortable;
- provide a systematic means of monitoring children known or thought to be at risk of harm and contribute to assessments of need and support for those children where appropriate;
- acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding children and young people;
- develop a structured procedure within the school which will be followed by all members of the staff in cases of suspected abuse;
- develop effective working relationships with all other agencies involved in safeguarding children;
- ensure that all adults within the College who have direct or unsupervised access to children have been checked as to their suitability. This includes other community users of our facilities, following correct staff recruitment and selection procedures.

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<sup>4</sup> 'Early help' means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising, (Working Together, 2018)

## Safeguarding Procedures

Procedures for safeguarding children will be in line with Oxfordshire Local Authority (the LA) and Oxfordshire Safeguarding Children Board, “Child Protection Procedures” and “Working Together to Safeguard Children 2018”.

We will ensure that:

- **All** staff and members of Council understand and fulfil their safeguarding responsibilities in providing a safe environment in which children can learn.  
**All** our staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child’s life, from the foundation years through to the teenage years.
- **Any** of our staff members who have a concern about a child’s welfare will follow the Oxfordshire referral processes (detailed on page 6).
- The DSL and his deputy have undertaken appropriate training for the role, as recommended by the LA, within the past two years. Core safeguarding team members are:
  - Ben Holden, Sub-Warden, **Designated Safeguarding Lead (DSL)**
  - Tom Ryder, **Deputy DSL**
  - Suzie Naylor, Head of PSHE, **Child Protection Officer**
  - Alex Gilley, Lead Nurse, **Child Protection Officer**



- All members of staff are provided with training in Safeguarding at least every three years.
- All members of staff are provided with termly updates on Safeguarding to keep up with any relevant safeguarding and child protection developments.
- Prior to a pupil joining the college, a request is made to boy’s prep 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 will be shared to the Social Tutor. Prep 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 schools child protection guidelines and procedures.
- The name of any member of staff considered not suitable to work with children will be notified to the DBS (Disclosure and Barring Service), with the advice and support of

Human Resources and or Designated Officer (Local Authority Designated Officer, Alison Beasley<sup>5</sup>). The role of the Designated Officer is to provide advice and guidance to the school and to preside over the investigation of any allegation or suspicion of abuse directed against anyone working the school.

- The appropriate pathways are taken in accordance with the Oxfordshire's Threshold of Need guidance:
  - A case of a child at risk of serious harm will be referred to the Oxfordshire Multi Agency Safeguarding Hub (MASH) Services immediately
  - A case of a child in need of support will be referred through LCSS and an 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 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

Our safeguarding procedures follow those detailed in the Oxfordshire Safeguarding Children Board Procedures Manual<sup>6</sup> and are reviewed and up-dated annually and a summary report of findings sent to Council and the local authority Safeguarding Children Board. Termly Safeguarding updates will be provided for the Council. An OSCB annual Safeguarding Audit is produced through collaboration between the Warden, the Designated Safeguarding Lead and the Member of Council with Safeguarding oversight.

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

<sup>6</sup> Oxfordshire Safeguarding Children Board Procedures Manual is found at: <http://oxfordshirescb.proceduresonline.com/>

## What staff need to know

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

- the Safeguarding Policy and the procedures for Child Protection;
  - the Covid-19 Addendum to the policy
- the role and contact details of the Designated lead and deputies;
- the Staff Code of Conduct (with particular attention paid to on-line safety);
- [Keeping Children Safe in Education, Part 1](#) (all staff)
  - KCSIE Annex A, (Staff working directly with children)
- Whistleblowing policy
- What to do if they have a concern about a child
- Pupil Behaviour, Discipline and Rewards policy.
- Anti Bullying Policy
- Missing Children Policy

All staff are required to demonstrate that they have read and understood the contents of KCSIE Part 1. Members of staff with responsibilities in boarding should also be able to demonstrate an understanding of the guidance contained in Annex A.

## 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 boy's Social Tutor and the DSL (or deputy).

See page 34 for a flow chart setting out the process for our staff when they have concerns about a child. Options will then include:

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

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

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

### Pastoral Care

It would be our hope that all concerns can be identified at an early stage and appropriate action and support can be provided within the college. Radley prides itself on the highest standards of pastoral care, delivered by a dedicated and caring staff. Our safeguarding provision is rooted in strong relationships between boys and staff, fostered in the classroom, on the games field, and in the Socials. All members of staff who work closely with the boys are expected to be alert to those changes in behaviour which might suggest that the young person is in need to assistance.

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

### Early help

If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Social Tutors may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

**Any** child may benefit from early help, but college staff should be particularly alert to the potential need for early help for a child who:

- is a young carer;
- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is misusing drugs or alcohol themselves;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;

### **A child is in danger or at risk of harm**

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

### **Record keeping**

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

## What staff should do if they have concerns about another staff member

If our staff members have concerns about another staff member, including supply staff and volunteers, then;

- this must be referred to the Warden.
- Where there are concerns about the Warden this should be referred to the Chairman of Council.

Concerns will be managed as directed in Part Four of KCSIE.

## What staff should do if they have concerns about safeguarding practices within the college

- All our staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding regime and that such concerns will be taken seriously by the senior 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](mailto:help@nspcc.org.uk)

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

## Safeguarding Measures

1. Induction of new staff includes information on the college's Safeguarding team, Safeguarding policy, Code of Conduct, and Whistleblowing policy. All staff are issued with **Section 1** and **Annex A** of **KCSIE 2018**. They are required to confirm that they have read and understood the content of these sections.
2. Training in Safeguarding and Child Protection for all Common Room and senior boys is part of the school's policy - the Child Protection training schedule for designated staff is every two years. All staff receive refresher training approximately every three years. Senior pupils have training at the end of the Fifth form as part of their preparation the additional Responsibility that comes in the Sixth form. New members of staff receive training as part of the induction process. All other staff receive training through HR every three years and are made aware of these arrangements through department heads on induction. All staff are obliged to read Part 1 of the statutory guidance "Keeping Children Safe in Education" and measures are put in place to ensure that the content of Part 1 has been understood. Staff training will include reference to the risk of radicalisation and how to identify those at risk and the DSL will offer advice and support to others. Safer recruitment training is undertaken by members of the senior management team and the HR department. Training focuses on the collective responsibility shared by all staff in the college to safeguard children. All staff are aware of their responsibility for identifying and reporting concerns relating to our safeguarding systems or the potential harmful behaviour of any member of the community be they staff, volunteers or pupils. Reporting concerns, no matter how small, may provide the vital pieces of information that enable the safeguarding team to safeguard pupils effectively.
3. The proper supervision of boarding is key to safeguarding pupils at Radley. Supervision is organised by the Social Tutor, following guidelines set out by the Sub-Warden. All boarding houses (Socials) have a responsible adult in close proximity at all times. The resident boarding team includes the Tutor, a resident Sub-Tutor and the Pastoral House Mistress (PHM). Supervision in the Social is further enhanced through a duty rota of non-resident Sub-Tutors who assist in the evenings and at weekends. There will be at least two adults on duty in each Social from 7:00pm – 7:00am and at the weekend.
4. A roll call is taken to ensure that all pupils are present and to identify pupils who may have gone missing. The roll call, or 'Tick Off', is taken in the evening as pupils are going to bed. There is an additional roll call in each Social on Sunday afternoon. A pupil missing from a lesson must be reported to the Tutor, unless his name appears on the 'Absences' list indicating that he has been given permission to be absent. If a pupil is found to be missing, either at roll call or from a lesson, the Missing Child Policy will be followed.
5. Senior pupils play an important role in safeguarding. Boys in year 12 are chosen and have training to take on the role of Peer Mentors. Boys in year 13 are chosen and have training to take on the role of College Prefects and Social Prefects. Training focuses on vigilance, empathy as well as what should be done in the event of a disclosure and how to report such concerns.
6. All members of staff, volunteers and Council (governing body) members are subject to a DBS check. All adults resident in accommodation attached to a social are subject to a DBS check at an enhanced level. The school will check that anyone employed as a teacher is not subject to a prohibition order issued by the Secretary of State. This check

is completed by using the free Employer Online Service.

7. Pupils that are identified as being 'at risk' might include: those who self-harm, those suffering from depression, pupils experiencing bullying and those coping with chronic medical conditions. In such cases a Pupil Risk Assessment would be formulated through discussion within the pastoral team. Input will be sought, where appropriate, from Parents, Tutor, College Counsellor / Independent Listener and Medical Officer. Advice may be requested from the Locality and Community Support Service (LCSS)<sup>7</sup> on a 'No Names' basis. A risk assessment will include a care plan. Risk assessments and care plans will be reviewed by the team on a termly basis.
8. A pupil who was identified as being 'in need' or 'at risk' outside of term time would be referred to the local authority children's social care according to their home address. Assessment of a pupil's needs is arrived at with reference to the Oxfordshire Multi-Agency Threshold of Needs Matrix.
9. The college will take steps to ascertain the whereabouts of any pupil withdrawn from the college, or removed from the Admissions register prior to their expected start date, communicating with the parents, prep school and local education authority as is necessary to confirm attendance at an alternative school. The local education authority will be informed where a pupil has been removed from the admission register.
10. Any adult visitor to a Social must be accompanied by a member of staff, if he/she enters the boarding side of the Social. Visitors to the College must report to the Bursary and sign in to receive a visitor's badge. This badge is returned after the visit and the visitor signs out. The only exceptions to this are relatives and guardians of pupils, or prospective parents who are asked to report to the Bursary on arrival and carry a visitor's badge.
11. **Visiting Speakers** As part of our PREVENT duties we are obliged to assess the suitability of visiting speakers (anyone giving talks to boys in lessons, APT, societies, etc) and to keep a log. In all cases the following details will be provided to the Academic Director at least two weeks before the date of the proposed talk: Name; Topic, Date, Venue. Unless the speaker has a DBS check for Radley then they must be accompanied by a member of staff at all times.
12. Where other organisations have staff working at the College, enquiries are made that appropriate checks have been carried out by that organisation. Likewise, assurance should be gained that staff of another organisation have been checked for suitability if they supervise the school's pupils on a site other than at the school.
13. An annual Welfare Report (which includes the annual Welfare questionnaire) is provided for Council and includes any Child Protection issues. It is discussed as a separate agenda with SMT present. Any identified deficiencies will be remedied without delay. Termly Safeguarding Updates will be an agenda item at the termly GPC meeting.
14. The Safeguarding Policy is reviewed regularly and at least once a year, with any identified deficiencies remedied without delay.
15. The HR Department operates a Safer Recruitment Policy in line with the current DfE guidance. Copies are available on request from HR.
16. An aide-memoire re Child Protection procedures is placed at the back of calendars,

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<sup>7</sup> Locality and Community Support Service (LCSS), has been set up to manage Early Help interventions where a concern about a child is not an immediate or significant safeguarding concern.

posted in Socials and academic Departments.

17. All staff should be aware of risk situations for themselves. Inappropriate physical contact should be avoided, however it is not illegal to touch a pupil and there are occasions when physical contact, other than reasonable force, with a pupil is proper and necessary. Examples of where touching a pupil might be proper or necessary:
- when comforting a distressed pupil;
  - when a pupil is being congratulated or praised;
  - to demonstrate how to use a musical instrument;
  - to demonstrate exercises or techniques during sports coaching;
  - to give first aid.
18. All staff are issued with the Code of Conduct Policy.

### **Boarding, NMS compliance**

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

### **Teaching Pupils how to keep safe**

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

- Online safety is taught within the PSHE programme, as well as through specific talks and guidance being given on arrival at the College and through IT lessons in the Shell curriculum. Reference is made to [Department for Education \(DfE\) \(2019\) \*Teaching online safety in school\*](#)
- Tutors and Form Masters will monitor usage of IT as far as is possible and flag up concerns with parents and with school management if there are concerns about a pupil's excessive or inappropriate use.
- The IT Department will monitor IT usage, to include trends and patterns of use across the school.
- The *Use of IT Policy* and *School Rules* provide a framework of acceptable usage designed to educate pupils in safe use of the internet and social media.
- Online safety is protected by an effective filtering system and by access to the college internet network being restricted at night. However the College recognises the challenges resulting from 3G and 4G internet access and restricts boys' access to mobile devices at night. Care is taken not to over-filter as this might further encourage boys to access the internet through 3G and 4G rather than working on the College network.
- The school policies on preventing radicalisation and promoting British Values are designed to make pupils aware of the risks and to build resilience to them through the PSHE programme and the day to day life of the College.
- PSHE education will seek to incorporate the new [Relationships Education, Relationships and Sex Education and Health Education \(England\) Regulations 2019](#)

The school places great importance on providing opportunities for its pupils to speak to adults or mentors/prefects that are trained in safeguarding. It is vital to listen and we seek to promote a culture – through Cocoa, Form Mastering, Tutoring and through the College Chaplain and Counselling service as well as through the day to day life of a boarding school – that encourages the pupils to feel comfortable and confident in expressing concerns.

### **Pupils with additional needs.**

Pupils with additional needs might include those with Special Educational Needs (SEN), Looked-after Children (LAC) and those with disabilities. Children with additional needs can provide additional safeguarding challenges. 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 overcoming these barriers.

## Safeguarding Responsibilities

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

### Role of Council

The Radley College Council undertakes the regular review of Safeguarding related policies and procedures that operate within the college. Council has a crucial role in monitoring and challenging staff on the effectiveness of safeguarding arrangements. The General Purposes Committee (GPC) receives a termly Safeguarding Update. Agenda items for Council Meetings are as follows:

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

The Council member with oversight of Safeguarding procedures is **Mrs Jane Martineau**. In the case of an allegation made against the Warden, the Chairman of Council will liaise with the DESIGNATED OFFICER and DSL.

### Role of the Warden

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

### Role of the Designated Safeguarding Lead (DSL)

- Refer all cases of suspected abuse, within 24 hours or one working day, to the local authority children's social care and:
  - The DESIGNATED OFFICER for child protection concerns (all cases which concern a staff member);
  - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
  - Police (cases where a crime may have been committed). Clarification on when to call the police can be found [here](#).

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

## **Role of the Deputy DSL(s)**

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

## **Role of staff**

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

It is our expectation that staff will:

- Implement and follow the Safeguarding Policy.
- Understand that our responsibility to safeguard children requires that we all appropriately share any concerns that we may have about children.
- Support the pupil's development in ways that will foster security, confidence and resilience.
- Provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
- Assist in the monitoring of pupils known or thought to be at risk of harm.
- 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: [http://portal.oxfordshire.gov.uk/content/public/CYPF/schools/behaviour\\_attendance/safeguarding\\_child\\_protection/Keeping\\_Child\\_Protection\\_Records.doc](http://portal.oxfordshire.gov.uk/content/public/CYPF/schools/behaviour_attendance/safeguarding_child_protection/Keeping_Child_Protection_Records.doc)

## **Role of Parents**

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

- Notification of changes to family circumstances
- Notification of ill health and bereavement within the family
- Compliance with college guidance, particularly with regard to:
  - Technology (mobile phone use)
  - Leave out of college (Privi weekends)
- Raising concerns in a timely manner, so problems can be addressed early before they develop.

## **Role of Pupils**

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

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

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

# Child Protection Procedures

## What to do if you have concerns about a child?

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

If a **child is in immediate danger**, or is at risk of harm, a referral must be made to the Oxfordshire MASH immediately. Anybody can make a referral to the MASH, though this will normally be done by the DSL. (Referrals to statutory agencies may be made **without** parental consent.) Immediate danger might be signalled by:

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

## Dealing with a Disclosure

If a member of staff receives information which raises concern that a child may have suffered abuse, it is vital **and a legal requirement** that it is dealt with as here described. Safeguarding incidents could happen anywhere and staff should be alert to the possibility of concerns being raised at any time. All staff must be alert to the fact that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up";

If there is risk of **immediate significant harm**<sup>8</sup> to a child, the matter should be communicated to the DSL and a referral will be made immediately. Anyone may raise concerns directly with the Multi Agency Safeguarding Hub (MASH), the process for which is described in the

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<sup>8</sup> The Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children. [Physical Abuse](#), [Sexual Abuse](#), [Emotional Abuse](#) and [Neglect](#) are all categories of Significant Harm. Where harm is defined as the ill treatment or impairment of health and development. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes a single violent episode may constitute significant harm but more often it is an accumulation of significant events, both acute and longstanding, which interrupt, damage or change the child's development.

Oxfordshire Safeguarding Children Board Procedures Manual<sup>9</sup>. The Oxfordshire MASH can also be contacted via email [mash-childrens@oxfordshire.gcsx.gov.uk](mailto:mash-childrens@oxfordshire.gcsx.gov.uk)

Local child protection procedures will be followed in cases of alleged child abuse. College staff (including the DSL and the Warden) will not undertake an investigation before the school has taken advice from the DESIGNATED OFFICER or children's social care. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by school staff beyond the point at which it is clear that there is an allegation of abuse. The interviewing of children and adults involved is carried out by specially trained staff, following procedures agreed between (amongst others) the local authority and police in line with government requirements. These are designed to avoid unnecessary or repeated interviewing and examinations. It is the responsibility of the bodies involved to provide support to both victim and perpetrator.

If a pupil is making allegations about abuse (either of himself or another) he must be made aware that, while the matter will be kept as private as possible, other people as well as the immediate confidant will become involved, but **no confidentiality can be promised**. It is important that pupils should know this in advance. Referral to external agencies will only be made if the victim has or is at risk of suffering serious harm. Non-statutory advice is available in the document - [Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (July 2018)<sup>10</sup>

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

Members of staff should:

- Limit any questioning to the minimum necessary to seek clarification only on whether abuse has occurred. Avoid leading questions and do not promise confidentiality.
- Stop asking any more questions as soon as the pupil has disclosed that he believes that something abusive has happened to him, or to someone else.
- Reassure the pupil that the appropriate people deal with the problem (these may include the DESIGNATED OFFICER, a specialist social worker, and that it may need to involve the police).
- Ask the informing pupil or adult what steps they would like taken to protect them now that they have made a disclosure, and assure them that the school will try to follow their wishes.
- Refer the matter immediately, with all relevant details, to the DSL, as above.
- Make a written record of what has been disclosed, using the pupil's own words, as soon as possible. Record the date, time, place and any noticeable nonverbal behaviour. Make a copy of the written record available to the DSL.
- If a crime has been committed the DSL should be informed within 24 hours or one working day.

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<sup>9</sup> [http://oxfordshirescb.proceduresonline.com/chapters/quick\\_guide.html](http://oxfordshirescb.proceduresonline.com/chapters/quick_guide.html)

<sup>10</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

After the DSL has received an allegation of abuse, he will need to co-ordinate various courses of action. He will NOT investigate the matter further, but will refer it immediately (within one working day) to the DESIGNATED OFFICER, who may involve other agencies as appropriate. If the allegation suggests a criminal act may have taken place, the police will also need to be informed.

In certain circumstances the DSL may need to take advice from the DESIGNATED OFFICER/SSD Team Manager as to whether (a) parents should be told (this will normally be very early on, though there may be circumstances where this would be inappropriate) or (b) any medical treatment or examination is necessary. Further, advice will be taken as to whether the pupil should be isolated, or any other staff be informed.

### **Allegations against Staff**

Full account is taken of DfE's (September 2018) guidance 'Keeping Children Safe in Education'- Part 4 and process as described in the Oxfordshire Safeguarding Children Board Procedures Manual, Section 1.11<sup>11</sup>

#### **Key points:**

1. All staff should take care not to place themselves in a vulnerable position with a child, particularly when they are working on a one-to-one basis.
2. We understand that a child or young person may make an allegation against a member of staff or volunteer working within the college. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Warden who will notify the DESIGNATED OFFICER immediately and within one working day at the latest. The Warden, on all such occasions, will discuss the content of the allegation with the DESIGNATED OFFICER (Local Authority Designated Officer) before taking any action.
3. If the allegation made concerns the Warden, the member of staff receiving the allegation will inform the Chairman of Council who will consult with the DESIGNATED OFFICER, without notifying the Warden first.
4. In the case of an allegation of abuse which may have resulted in serious harm, the police will be informed immediately.
5. The school will follow the local authority procedures for managing allegations against staff, a copy of which can be accessed through the OSCB website.
6. Where an allegation is made against a member of staff, the matter will be dealt with as a priority and without any unnecessary delays.
7. Where advised, the member of staff may be suspended. If appropriate, alternative accommodation will be found during the period of investigation.
8. Any malicious/unfounded/unsubstantiated allegations will not form part of any future reference. Any malicious allegations will not be kept as part of a personnel record.

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<sup>11</sup> [http://oxfordshirescb.proceduresonline.com/chapters/p\\_allegs\\_workers.html](http://oxfordshirescb.proceduresonline.com/chapters/p_allegs_workers.html)

9. Where any member of staff or volunteer is deemed unsuitable to work with children and leaves the College for this reason, the Disclosure and Barring Service (DBS) will be informed by the Head of HR as soon as possible and within 1 month. The college has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult. The school also has a duty to consider making a referral to the <sup>12</sup>~~DBS~~ where a teacher has been dismissed (or would have been dismissed had s/he not resigned) and a prohibition order may be appropriate because of unacceptable professional conduct, conduct that brings the profession into disrepute or a conviction at any time for a relevant offence.

## Whistleblowing

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

## Allegations against Pupils (Peer-on-Peer)

We recognise that students will sometimes negatively affect the learning and wellbeing of others. Poor behaviour will be dealt with under the school's Behaviour Policy. Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Child protection issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Staff should be mindful that some of the following may need consideration in an allegation of abuse between peers:

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

When an allegation is made by one pupil against another, members of staff receiving the allegation should follow the procedure detailed in the previous section - **Dealing with a Disclosure**. When appropriate, staff should refer to Part 5 of KCSIE (2018) which provides summary guidance for managing a report of peer on peer sexual violence or sexual harassment. The full guidance, can be found ([here](#)).

It may be appropriate to exclude the pupil being complained about for a period of time according to the school's behaviour policy and procedures. Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures. In situations where the school considers a safeguarding risk is present, a risk assessment will be prepared.

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<sup>12</sup> The Teaching Regulation Agency (TRA) assumed the professional misconduct functions of the National College for Teaching and Leadership (NCTL) on 1 April 2018

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.

# Appendix A

## Indicators of abuse and neglect

All college staff should be aware that abuse, neglect and 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.

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

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

*In the context of Radley College, the most likely form of physical abuse is one boy hitting or kicking another boy. Bruises on the upper arm or shins are a possible indicator of abuse, though care should be taken before jumping to conclusions, as very similar injuries will arise through sport.*

**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 not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

*In the context of Radley College, the most likely form of emotional is bullying type behaviour from a boy, or group of boys, toward another boy. Indicators of bullying include: withdrawal, underachieving, moodiness on the part of the bullied; bossiness and a quickness to criticise on the part of the bully.*

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to

facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding (see peer on peer abuse) issue in education.

*In the context of Radley College, sexual abuse is relative rare. When a concern is identified, it would most likely stem from adolescent experimentation. Any concerns relating to possible sexual abuse, no matter how slight, must be reported to the DSL immediately.*

**Domestic abuse:** domestic violence and abuse is: any incident or pattern of incidents of 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 Radley College, indicators might include: persistent failure of parents to communicate effectively with the school; ill-fitting or thread bare uniform; parental absence during holiday periods – inadequate supervision when at home; and theft.*

**Mental Health:** All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. 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. The DfE have published advice and guidance on [Mental Health and Behaviour in Schools](#)

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

It is important that staff recognise that safeguarding incidents and/or behaviours can be associated with factors outside of college and/or can occur between children outside of

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

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

## Peer on Peer abuse

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, or coercive control, exercised between children and within children's relationships. Peer-on-peer abuse can take various forms, including: serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, sexual abuse, and/or gender based violence.

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

Bullying is a particularly harmful form of emotional abuse which can occur between peers. Staff should aim to identify and correct unkind behaviour before it develops into bullying behaviour. In correcting unkind behaviour, staff should give consideration to likelihood that the young person who is perpetrating the abuse may also be at risk of harm and in need of safeguarding. Our policy on the prevention and management of bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

Examples of peer on peer abuse could include:

- Emotional Abuse
  - bullying;
  - threats and intimidation.
- Physical Abuse
  - violence, particularly pre-planned;
  - initiation/hazing type violence and rituals;
- Sexual Abuse
  - indecent exposure, indecent touching or serious sexual assaults;
  - forcing others to watch pornography or take part in sexting (see below).
  - 'Upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Sexual Exploitation
  - encouraging other children to attend inappropriate parties;
  - photographing or videoing other children performing indecent acts.

## Sexting<sup>13</sup>

Sexting is defined as **the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18**. It includes nude and nearly nude and/or sexual acts. It is also referred to as 'youth produced sexual imagery'.

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.
- 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.

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<sup>13</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB__1_.PDF)

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

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

## Honour Based Abuse (HBA)

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

### Female Genital Mutilation mandatory reporting duty for teachers

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

## Child Sexual Exploitation (CSE)

The definition of child sexual exploitation is as follows:

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

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

around the age of 10 -12 years although it has been recorded with children as young as 8 years of age.

**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.<sup>14</sup> Any child can be targeted but Looked after Children, Children Leaving Care and Children with Disabilities are particularly vulnerable.

## Child Criminal Exploitation: County Lines

### Definition

*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 missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

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

### Prevent Duty

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

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

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

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<sup>14</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

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**.<sup>15</sup> Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism and provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

### **Signs of vulnerability**

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

- underachievement
- being in possession of extremist literature
- poverty
- social exclusion
- traumatic events
- global or national events
- religious conversion
- change in behaviour
- extremist influences
- conflict with family over lifestyle
- confused identify
- victim or witness to race or hate crimes
- rejection by peers, family, social groups or faith

A child going missing from education is a potential indicator of abuse or neglect. All schools must inform their local authority of any pupil who is going to be deleted from the admission register under the circumstances listed in KCSIE 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;

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<sup>15</sup> Guidance issued under section 36(7) and section 38(6) of the CTSA 2015 in respect of Channel is available at: <https://www.gov.uk/government/publications/channel-guidance>

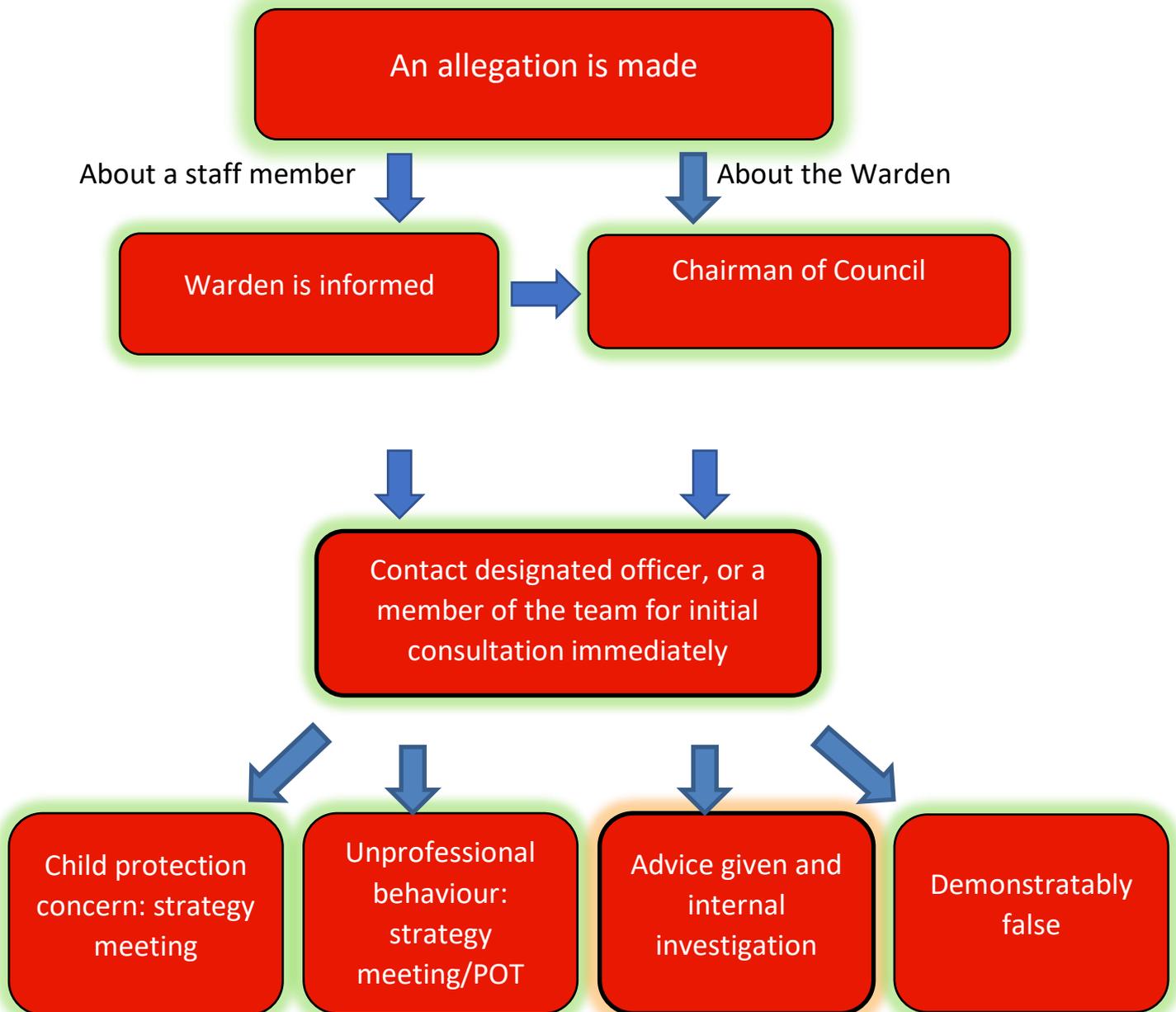
- advocating messages similar to illegal organisations or other extremist groups;
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.);
- secretive behaviour;
- online searches or sharing extremist messages or social profiles;
- intolerance of difference, including faith, culture, gender, race or sexuality;
- graffiti, art work or writing that displays extremist themes;
- attempts to impose extremist views or practices on others;0
- 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](mailto:counter-extremism@education.gsi.gov.uk) Advice concerning a possible Channel Referral is available via email from the police: [preventreferrals@thamesvalley.pnn.police.uk](mailto:preventreferrals@thamesvalley.pnn.police.uk)

## Appendix B

### Allegation flowchart

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



Please note POT : Position of Trust Meeting

Staff have concerns about a child or young person

referral not required, setting takes relevant action, possibly including early help and monitors in house

referral made in concerns escalate

DSL or (staff member) make referral to social care/police

Social care makes a decision on how to progress the referral and the type of response required

Child in need of immediate protection (referrer informed)

Section 47 enquiry (referrer informed)

Section 17 enquiry (referrer informed)

No further action required (referrer informed)

Appropriate emergency action taken by police or social care

Identify child at risk of significant harm, will proceed to initial child protection plan (ICPC)

Identify child in need, offer appropriate support to child and family

Setting consider early help assessment, working with other universal services (consider CAF)

At all stages, staff should keep the child's best interest at the forefront of any decisions. The child's circumstances should be kept under review, and re-referrals should be made where appropriate.

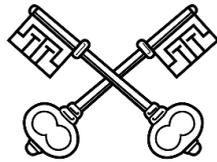
Please note the referrer should always receive feedback after a referral is made, or be involved in any ongoing meetings if the case progresses

## Appendix C

### Policy Updates

Revision date	Page	Revision
1/9/2018	All	Policy was fully revised in light of KCSIE 2018 and the revised Oxfordshire policy model.
23/11/2018	2	Section heading - Pupils with SEN and disabilities, changed to Children with additional needs.
	16	Children with additional needs – this section now includes reference to issues relating to Looked After Children.
29/11/2018	30	Section added to Appendix covering <i>Child Criminal Exploitation: County Lines</i>
29/11/2018	7	Bullet point added to Safeguarding Procedures detailing our request to prep schools for the sharing of any Safeguarding records relating to pupils joining the college.
4/2/19	17	DSL job description to include responsibility for on-line safety
	27	Appendix A Update to peer on peer abuse to include sexual abuse
	22	Support for both perpetrator and victim
	23	Reporting time for a crime
	21	Parental consent when referrals to statutory agencies are made
	16	Use of 3G and 4G
5/4/2019	27	Examples added to illustrate possible indicators of neglect in the context of Radley.
3/5/2019	3	Contact details changed to reflect changes in Pastoral team and Chairman of Council
	5	Abbreviations explanation added for OSCB and LCSS
	7	Changes made to Pastoral team – TRGR and KMWS added.
11/6/2019	3	References to OSCB in contact details have been replaced with Education Safeguarding Advisory Team.
	8	Reference to Common Assessment Framework (CAF) has been updated to Early Help Assessment (EHA)
	28	'Upskirting added as an example of sexual abuse.
	31	Definition of Child Criminal Exploitation added.
21/10/2019	15	Link added to DfE guidance on teaching online safety.
	16	Reference and link to DfE RSE regulations.
	24	Reference to 'college's legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult.
22/05/2020	3	Updated contact details to reflect team changes.
26/08/2020	5	Wording altered to clarify that safeguarding seeks to promote both physical and mental health.
	12	Text added to clarify that concerns about a staff member, also applies to supply staff and volunteers.
	28	Additional paragraph highlights mental health issues as a possible indicator of abuse.
	28	New paragraph drawing attention to domestic abuse.
	31	Wording changed from 'violence' to 'abuse' to recognise non-violent forms of abuse

	33	Additional paragraph drawing attention to <b>serious violence</b> as a product of Child Criminal Exploitation
16/10/2020	3 & 18	Link to NPCC advise on when to contact the police has been added.



**RADLEY**

**Safeguarding  
C-19 Addendum**

**April 2020**

### Safeguarding Contact Details

<b>Designated Safeguarding Lead</b>	<b>Ben Holden, Sub-Warden</b>	<b>bjh@radley.org.uk</b>	<b>01235 548515, 07779 586673</b>
<b>Deputy to DSL</b>	<b>Tom Ryder, Art Dept.</b>	<b>trgr@radley.org.uk</b>	<b>01235 543039, 01235 543039</b>
	Suzie Naylor, Music Dept.	sln@radley.org.uk	01235 543144
Lead Nurse	Alex Gilley, Medical Centre	amg.gilley@radley.org.uk	01235 543097
Warden	John Moule	warden@radley.org.uk	01235 543030
Chairman of Council	David Smellie	david.smellie@farrer.co.uk	
Council Safeguarding Lead	Jane Martineau	jane.martineau@rooselaw.co.uk	

# COVID-19 Arrangements for Safeguarding and Child Protection

**Policy owner: Radley College**

**Date: 3<sup>rd</sup> April 2020**

**Date shared with Council: 14<sup>th</sup> April 2020**

**Date shared with staff: 14<sup>th</sup> April 2020**

Adapted by Alison Beasley, Designated Officer and Manager of the Education Safeguarding Advisory Team

With thanks to Louis Donald, Trust Safeguarding Manager at the Stowe Valley Multi Academy Trust and Andrew Hall , <https://www.safeguardingschools.co.uk/andrew-hall>

This is also in line with DFE guidance <https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>

## 1. Context

On 19<sup>th</sup> March 2020, in light of growing concerns around the Coronavirus pandemic, parents were asked to collect their sons and term ended.

This addendum to the Radley Safeguarding Policy contains details of our individual safeguarding arrangements in the following areas:

## 2. Vulnerable children

Vulnerable children include those who have a social worker and those children and young people with education, health and care (EHC) plans.

Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services.

The Warden and Designated Safeguarding Lead (and deputies) know who our most vulnerable children are and we will continue to work with and support children's social workers to help protect those individuals.

We will ensure that all professionals involved with vulnerable pupils, (e.g. social workers, SEND case workers, LCSS, Early Help worker etc) are fully informed around the arrangements that we have put in place around safeguarding pupils who are known to be vulnerable.

Where parents are concerned about the risk of the child contracting COVID-19, the boy's Tutor and the Lead Nurse will be available to talk through these anxieties with the parent/carer following the advice set out by Public Health England.

## 3. Attendance monitoring

Staff will monitor the engagement of pupils and follow up on those who fail to attend lessons and activities as expected. There will be those who do not attend due to time zone difference. Pupils missing lessons will be recorded with an email to the Form Master, who will follow up with the boy at the end of the day where necessary. Form Masters will be responsible for drawing the Tutor's attention to a pattern of absence and recording this as a **General Concern** in the Daybook, with a notification going to the Tutor and DSL. The Tutor and DSL will consult on the most appropriate way of following up on the concern with the parents.

To support the above, we will, when communicating with parents/carers, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

In all circumstances where a vulnerable child does not attend consistently, we will notify their local Childrens' Services or social worker.

#### **4. Designated Safeguarding Lead** (*Contact details, page 1*)

A member of the DSL team will be available at all times and will be contactable via phone or online video – outside of normal working hours, the DSL's mobile number should be used. (07779 586673)

Where a trained DSL (or deputy) is not on site, in addition to the above, a designated member of staff will assume responsibility for co-ordinating safeguarding on site.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

#### **5. Reporting a concern**

Where staff have a concern about a pupil, they should continue to follow the process outlined in our Safeguarding Policy.

Staff should phone the Designated Safeguarding Lead, or one of his deputies or the Warden. This will ensure that the concern is received. A summary of the concern must be emailed to [safeguarding@radley.org.uk](mailto:safeguarding@radley.org.uk) as soon as is possible after speaking with the DSL.

**Staff are reminded of the need to report any concern immediately and without delay.**

Where staff are concerned about an adult working with children in the college, they should continue to follow our normal procedures and alert the Warden immediately. The Warden will follow normal allegation management procedures as detailed in Keeping Children Safe in Education and liaise with Oxfordshire's Local Authority Designated Officer; Alison Beasley, as details in our main policy. If there is a requirement to make a notification to the Warden whilst away from school, this should be done verbally and followed up with an email to the Warden.

Concerns around the Warden should be directed to the Chair of Governors:

**Mr David Smellie** (*contact details on page 1*)

## **6. Safeguarding Training and induction**

For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

All existing school staff have had safeguarding training and have read part 1 of Keeping Children Safe in Education (2020). The DSL will communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

If new staff are recruited, or new volunteers join, they will continue to be provided with a safeguarding induction.

If staff are used from another education or children's workforce setting within the college, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:-

1. the individual has been subject to an enhanced DBS and children's barred list check
2. there are no known concerns about the individual's suitability to work with children
3. there is no ongoing disciplinary investigation relating to that individual

Upon arrival, they will be given a copy of our Safeguarding Policy (which will be similar to their current setting if an Oxfordshire school), confirmation of local processes and confirmation of DSL arrangements.

## **7. Safer recruitment/volunteers and movement of staff**

It remains essential that people who are unsuitable are not allowed access to children. When recruiting new staff, we will continue to follow the relevant safer recruitment processes, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2020) (KCSIE).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

Should we find ourselves utilising volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 167 to 172 of KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

We will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at

paragraph 163 of KCSIE, in line with advice from the LADO where appropriate.

We will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral.

During the COVID-19 period all referrals should be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk)

Whilst acknowledging the challenge of the current National emergency, it is essential from a safeguarding perspective that we are aware, on any given day, which staff/volunteers will be active in delivering lessons and activities in the virtual school, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, we will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

## **8. Online safety in schools and colleges**

Radley will continue to provide a safe environment, including online. This includes the use of an online filtering system. Where students are using computers in school, appropriate supervision will be in place.

## **9. Children and online safety away from school and college**

It is important that all staff who interact with pupils, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate referrals should still be made to children's social care and, as required, the police.

We will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be neutral.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.

- Staff must only use platforms sanctioned by the college to communicate with pupils
- Staff should record, the length, time, date and attendance of any sessions held.

All staff will be reminded of the following policies:

- Staff code of conduct
- Use of IT policy

## **10. Supporting children not in school**

- Radley is committed to ensuring the safety and wellbeing of all pupils and young children within the college.
- Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in college, we will ensure that a robust communication plan is in place for that child or young person.
- The communication plans can include; remote contact, phone contact and email. Other individualised contact methods may be considered and recorded.
- College staff, the DSL and his deputies will work closely with pupils, parents and carers to maximise the effectiveness of any communication plan.
- This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.
- We will share safeguarding messages on our website and social media pages as appropriate.
- We recognise that boarding is a protective factor for some pupils, and the current circumstances, can affect the mental health of pupils and their parents/carers.
- Dons need to be aware of this in setting expectations of pupils' work when they are at home.
- We will ensure that, where we are caring for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them.

## **11. Supporting children in school**

Radley is committed to ensuring the safety and wellbeing of all its students.

We will continue to be a safe space for all children to attend and flourish should we be called upon to care for children during the current crisis. The Warden will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety.

We will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID-19.

We will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them.

## **12. Peer on Peer Abuse**

We recognise that during the closure a revised process may be required for managing any report of such abuse and supporting victims.

If we receive a report of peer on peer abuse, we will follow the principles as set out in part 5 of KCSIE and of those outlined within of the Child Protection Policy.

The school will listen and work with the young person, parents/carers and any multi-agency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded, and appropriate referrals made.

**All staff will be sent this additional policy to read and to will confirm, via email, that they have read and understood the content.**

# Appendix A

## Policy Updates

Substantive changes to the policy are listed below and indicated in the text with a vertical line in the left hand margin.

<b>Revision date</b>	<b>Page</b>	<b>Revision</b>
April 2020	All	Policy supplement (Covid-19 Addendum) to be read in conjunction with the college's Safeguarding policy.
May 2020	3	Updated contact details to reflect team changes.