



**OXFORD
International
College**

A NORD ANGLIA EDUCATION SCHOOL

SAFEGUARDING AND CHILD PROTECTION POLICY

POLICY INTENDED FOR:	Governors, Staff, Volunteers, Contractors or partner Agency Staff
CATEGORY:	Safeguarding
POLICY IMPLEMENTED BY:	Principal
REVIEWED BY:	OIC Safeguarding Governor
CONSULTATION WITH:	Designated Safeguarding Lead, OSCP
REVIEW DATE:	August 2025 Updated March 2026 (WTSC 2026)
FUTURE REVIEW:	August 2026

The Three Pillars

The three pillars of Oxford International College (OIC) are:

- Academic Excellence
- Personal Development
- Career and University Pathways

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KEY CONTACT DETAILS

Key Personnel	Name(s)	Contact details
Designated Safeguarding Lead (DSL)	Severine Collins	07900 091 649 Severine.collins@oxcoll.com
Deputy DSL(s)	Kieran Jones	07553 438 692 Kieran.jones@oxcoll.com
	Ben Holman	07379119 941 Ben.holman@oxcoll.com
	Meryl Suissa	07444 244 051 Meryl.suissa@oxcoll.com
	Jenny Bourlakis	07557358448 jenny@oxcoll.com
College's named 'Prevent' lead	Severine Collins	Severine.collins@oxcoll.com
Nominated Safeguarding Governor	Sue Hill	07464428455 Sue.hill@nordanglia.com
Chair of Governors	Richard Davies	Richard.davies@nordanglia.com
Education Safeguarding Advisory Team/ Local Authority Designated Officers (LADOs)	Jo Lloyd Sandra Barratt Becky Langstone Sophie Kendall	01865 810603 Lado.safeguardingchildren@oxfordshire.gov.uk ESAT.safeguardingchildren@oxfordshire.gov.uk
Locality Community Support Service (LCSS) worker	Kim Costar	07880 042 655 Kim.Costar@Oxfordshire.gov.uk
Multi agency Safeguarding Hub (MASH)		0345 050 7666
Out of hours Emergency Duty Team (EDT)		0800 833408
Police		101 or in emergencies 999

Date agreed and ratified by Governing Body: 10 October 2025

The policy must be reviewed and updated at least annually and/or following any updates to national and local guidance and procedures. The policy is consistent with Keeping Children Safe in Education 2025.

INTRODUCTION

The College recognises its responsibility not only to respond to safeguarding concerns but to identify and act upon emerging needs at the earliest possible stage. In line with national reforms, the College actively promotes early help and “family help” approaches to prevent escalation of risk. As Oxford International College (OIC) is a boarding College, the term “College” refers to academic as well as boarding communities within OIC. In addition, due to the age range of OIC students (14-19), our policy applies to all students at the college, including young people (as per the definition in Working Together 2026) who may be over 18 or turned 18.

Oxford International College’s unique education philosophy is underpinned by our belief and commitment that all our students will be supported to realise their full potential by learning and thriving in the safest possible environment. Our students are empowered to make decisions for themselves and are supported in this by learning through specific elements of the curriculum, aimed at enabling students to be able to keep themselves safe (e.g. through personal, social and health education and relationship and sex education (Life Skills), Wellbeing Wednesday programme, assemblies and Tutor sessions).

Oxford International College recognises that having appropriate safeguarding and child protection procedures does not mean that any risk to our students is eliminated. Rather, we expect all staff and volunteers in our College, and any contractors or partner agency staff used by our College, to recognise when a student may be at risk of, or is actually being harmed, and do all they can to reduce further risk of further harm.

We recognise that every member of staff plays a particularly important role in protecting our students and therefore it is essential that everybody working in the college understands the safeguarding responsibilities as we are both a place of education and home to students for a large part of each year. As such we are in the best position to identify concerns early and provide help for students or prevent concerns from escalating. Consequently, everyone who comes into contact with children and families has a role to play in ensuring children and young people are safe from abuse, neglect, exploitation, and harm. Our college is committed to safeguarding all students and aims to create a culture of vigilance. We expect that all staff will ensure that any decisions made are in the best interests of the child.

Oxford International College accepts and adheres to the following basic principles:

- A child’s welfare is paramount, and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender, or culture.
- All students need to be safe and feel safe in the College and in boarding.
- Every student is entitled to a rich and broad curriculum that equips them to keep themselves safe and we will provide a world-class, safe and happy environment to enable students to thrive and learn.
- Every adult in the College or boarding must have a demonstrable commitment to protecting the students with and for whom we work.
- We work in partnership with parents/carers and other external professionals to ensure the protection of students.

- Our guiding principle throughout is ‘the best interests of the students’.
- All students have the same equal rights to protection, but we recognise that we need to do more for some students because of their special educational needs (including language needs), disability, gender, religion, or sexual orientation.

1. AIMS AND OBJECTIVES

1.1 The governing body ensures that our College safeguards and promotes the welfare of students and work together with agencies to ensure that our College has adequate arrangements to identify, assess and support those children who are suffering or where significant harm is suggested.

[What to do if you think a child is at risk of abuse or neglect - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](https://www.oscb.org.uk). The DSL reports directly to the Governing body through reports, Termly meeting or directly with the Safeguarding Governor where required.

1.2 This policy provides the basis for good practice within the College for our Safeguarding work. It should be read in conjunction with the Oxfordshire Safeguarding Children’s Board Safeguarding Policies and Procedures, plus the safeguarding appendix document. These are in keeping with relevant national procedures and reflect what the partnership considers to be safe and professional practice in this context.

1.3 This policy applies to all members of staff in our College, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers.

2. THE LEGAL FRAMEWORK

2.1 This policy and the accompanying procedure have been developed in accordance with the following statutory guidance and local safeguarding procedures:

- *Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, March 2026:*
https://assets.publishing.service.gov.uk/media/69bb9be99c6ac6540dfd61f1/Working_together_to_safeguard_children_2026.pdf
- *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2025*
www.gov.uk/government/publications/keeping-children-safe-in-education--2

Safeguarding is defined in Working Together 2026 as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children’s mental and physical health or development 246 Children Act 1989 Section 105 170
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children’s Social Care National Framework.

3. ROLES AND RESPONSIBILITIES

3.1 The College's Designated Safeguarding Lead (DSL) has overall designated responsibility for safeguarding and ensures there is always appropriate cover for this role. The responsibilities of all Designated Safeguarding Leads are described in detail in Appendix A.

The Designated Safeguarding Lead (DSL) will take a proactive role in coordinating early help and multi-agency support, ensuring that the College remains actively involved in safeguarding processes following referral.

3.2 The governing body and proprietors are collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the College's day-to-day practice.

3.3 All staff members, governors, volunteers and external providers know how to recognise signs and symptoms of abuse, how to respond to students who disclose abuse and what to do if they are concerned about a child.

All staff are expected to exercise professional curiosity and judgement, particularly in situations where risk is unclear, emerging, or does not meet statutory thresholds.

3.4 Our College acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and students are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents.

3.5 The College and governing body takes all reasonable action to limit children's exposure to the risks from the College's IT system and ensures the College has appropriate filters and monitoring systems in place and regularly review their effectiveness.

The Designated Safeguarding Lead is **Severine Collins**
email: severine.collins@oxcoll.com
phone number: M +44 (0) 7900 091649

4 SUPPORTING CHILDREN

The College will actively identify students who may benefit from early help and initiate appropriate interventions in collaboration with external agencies. Strong emphasis is placed on contextual safeguarding, recognising risks beyond the home including exploitation, child-on-child abuse, and online harm.

4.1 Our College supports all students by:

- Ensuring the content of the curriculum includes social and emotional aspects of learning through PSHE, RSE and other curriculum contexts and ensuring that students are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it'.
- Ensuring a comprehensive curriculum response to online safety, enabling students and parents to learn about the risks of new technologies and social media and to use these responsibly.
- Encouraging students to talk about feelings and to feel that they are listened to, providing students with a range of appropriate adults to approach as needed.
- Supporting students to feel safe, develop confidence and independence and increase the development of self-esteem and self-assertiveness while not condoning aggression or bullying.
- Liaising and working together with other support services and those agencies involved in safeguarding students, including domestic abuse, Early Help and preventative services as required in Working Together to Safeguarding Children 2026.
<https://www.gov.uk/government/consultations/domestic-abuse-act-statutory-guidance>
- Considering intra familial harms and any necessary support for siblings (including following a report of sexual violence and/or harassment).

- Having a positive behaviour policy that is aimed at supporting vulnerable students in the College. The behaviour policy outlines measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.
- Having clear procedures in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence, and sexual harassment (which could take place on or off-line).
- Acknowledging the importance of 'contextual safeguarding', which considers wider environmental factors in a student's life that may be a threat to their safety and/or welfare. For OIC, due the students age-range and having over 30 nationalities in our community, this particularly includes (but is not limited to) Compulsory School Age Children (CSAs), students living outside of boarding, Racial incidents and Honour Based Abuse.
<https://contextualsafeguarding.org.uk/>
- Alerting the authority if it is aware of any child being looked after under a Private Fostering arrangement. On admission to College, and at other times, the College will be vigilant in identifying any private fostering arrangement, following the latest UKVI regulations on permitted living arrangements for sponsored students.
- Acknowledging that a child that is looked after (CWCF) or has been previously looked after by the Local Authority potentially remains vulnerable and all staff have the skills, knowledge and understanding to support these students.
- Taking positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting students with certain protected characteristics in order to meet their specific need. For example, taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. This includes making reasonable adjustments for disabled students and young people and those identified as having special educational needs.
- acknowledging that a child or young person being lesbian, gay or bisexual can sometimes be targeted by other students.
- offering support to students that are gender questioning with consideration to their individual needs, in partnership with their parents and any clinical advice
- Being aware that where a school places a student with an alternative provision provider, it continues to be responsible for the safeguarding of that student and should be satisfied that the placement meets the student's needs. The College will follow DfE guidance on Alternative Educational Provision: <https://www.gov.uk/government/publications/alternative-provision>

5 DEALING WITH A CONCERN AND RECORD KEEPING

Staff must record all concerns, including low-level or emerging concerns, as patterns over time may indicate safeguarding risk.

5.1 Our College uses CPOMs to share and store information about students where we have safeguarding or welfare concerns. If a member of staff has a concern about a student or if a student tells them they are being abused, exploited or neglected, staff will respond appropriately in the first instance by listening and offering reassurance.

5.2 Staff **must** also make an entry on CPOMs outlining the following factual record:

- Dates and times of their observations
- Dates and times of any discussions in which they were involved
- Any injuries
- Explanations given by the child / adult
- Any initial action taken
- Any actual words or phrases used by the child
- Any questions the staff member asked (remembering not to ask any leading questions)

The entry on CPOMs generates an alert which will go directly to the DSL and Deputy DSLs. If there is an immediate concern, staff should also ring the DSL on duty as per the rota (link available in the bulletin).

The DSL team meets weekly in a meeting called NEST. Incidents are discussed and records clearly records the rationale for decisions made, particularly where thresholds for referral are not met.

These records must dated by when the incident occurred. Staff must also ensure that:

- They listen to the wishes and feelings of the child, but not promise confidence.
- They report it to the DSL

The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL or DDSL is not immediately available.

In the absence of the DSL or DDSL, staff must refer directly to MASH and the police (if appropriate) if there is a significant concern.

5.3 The DSL will ensure any decisions and reasons for those decisions will be recorded in writing in CPOMS with clear outcomes documented following any action taken.

5.4 Our College will discuss any concerns we have with the child's parents. There may be occasions when this is not appropriate and College staff would consult with other agencies prior to involving parents. We will record any decision not to discuss with parents and why in CPOMS.

5.5 Safeguarding records are kept for individual students in CPOMS and are maintained separately from all other records relating to the child in the College. Safeguarding records are kept in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

5.6 All safeguarding records will be transferred in accordance with GDPR/KCSiE to the child's receiving College/setting within 5 College days.

5.7 The Principal will be kept informed of any significant concerns by the DSL. Other staff are informed on a need-to-know basis.

6 CONCERNS AND ALLEGATIONS ABOUT STAFF – For further details please refer to Appendix D

6.1 All staff must read the Low Level Concerns and whistleblowing policies and must understand the processes and procedures to manage any safeguarding concern or allegation (no matter how small) about staff members (including supply staff, volunteers and contractors).

6.2 If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to students is made about another member of staff (including supply staff, volunteers and contractors), then this should be referred to the Principal.

6.3 If the concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should also be shared with the Principal in accordance with the Low-Level Concerns policy.

7 INFORMATION SHARING

Safeguarding considerations take precedence over data protection concerns where there is a risk of harm to a child. Information must be shared proactively and without delay where necessary to safeguard a child.

- 7.1 We recognise that all matters relating to safeguarding are confidential.
- 7.2 All staff members have a professional responsibility to share information with other agencies to safeguard students. They must take responsibility for sharing information in order to keep students safe from harm, they must not assume someone else will pass on information.
- 7.3 All staff members who come into contact with students will be given appropriate training to understand the purpose of information sharing to safeguard and promote children's welfare.
- 7.4 We will ensure that staff members are confident about what they can and should do according to the law, including how to obtain consent to share information and when information can be shared without consent.
- 7.5 Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping students safe.

8 MULTI AGENCY WORKING

The College will actively contribute to multi-agency planning and intervention, including early help and family help processes. The College will appropriately challenge partner agencies where necessary to ensure children receive timely and effective support.

- 8.1 We actively develop and promote effective working relationships with other agencies, including agencies providing early help services to students, the police and Children's Social Care.
- 8.2 We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual students.
- 8.3 We will participate in Child Safeguarding Practice Reviews (CSPR's), other reviews and file audits as and when required to do so by the Oxfordshire Safeguarding Children's Board. We will ensure that we have a clear process for gathering the evidence required for reviews and audits and embed recommendations into practice and complete required actions within agreed timescales.

9 SAFER RECRUITMENT – Please read in conjunction with the Safer recruitment policy

The College has a separate safer Recruitment policy which is reviewed at least annually to reflect Government legislation and local authority policies.

- 9.1 Our College is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.
- 9.2 The Governing Body and Leadership Team are responsible for ensuring that the College follows safer recruitment processes outlined within guidance.
- 9.3 The College maintains an accurate up to date Single Central Record (SCR) in line with statutory guidance. This is monitored and reviewed to ensure compliance by the Governing Body and the College's Leadership Team.
- 9.4 The Governing Body ensures that at least one of the people who conducts a recruitment interview has completed safer recruitment training.
- 9.5 The College ensures that contractors and providers are aware of the College's safeguarding policy and procedures and that this will be referred to and followed if an allegation is made regarding a member of their agency. The College requires that employees and volunteers provided by these organisations use the College's procedures to report concerns.

9.6 We seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, 2025*.

Note: Where written assurances are not provided, access to our students or premises will be refused.

9.7 When commissioning services from other organisations, we ensure that compliance with our policy and procedures is a contractual requirement.

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

10 TRAINING

10.1 All staff in our College are expected to be aware of the signs and symptoms of Abuse and must be able to respond appropriately. All staff are required to read Part 1 of KCSIE on a yearly basis.

10.2 To ensure that all our staff can respond appropriately, every adult who is allowed access to students at OIC must undertake the basic safeguarding training course provided through the local safeguarding partnership as a minimum. This training is repeated at least every 3 years. In addition, all staff receive at least an annual update from the College's designated safeguarding lead.

10.3 Our DSL undergoes training to provide them with the knowledge and skills required to carry out their role. Our DSL and any members of our DSL team refresh their DSL training every 2 years.

10.4 Separate safeguarding training is provided to all new staff on appointment as part of their induction process including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This information will be regularly updated.

10.5 The Governing Body ensures that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training aims to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the College are effective and support the delivery of a robust whole college approach to safeguarding. Their training is regularly updated at Board meetings.

10.6 We ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-College training if it takes place during their period of work for the College.

10.7 The Designated Safeguarding Lead updates all staff and volunteers on any changes to safeguarding legislation and procedures and relevant learning from Child Safeguarding Practice Reviews (CSPRs) in line with Working Together 2026. These updates occur annually or more frequently when necessary and include safeguarding and child protection updates such as online safety (for example, via emails, weekly e-bulletins and weekly staff meetings), to provide them with the skills and knowledge to continue to safeguard children and young people effectively.

10.8 Reviews (CSPR's) in line with Working Together 2026. These will occur annually or more frequently when necessary and will include safeguarding and child protection updates such as online safety (for example, via emails, e-bulletins and staff meetings), to provide them with the skills and knowledge to safeguard children and young people effectively.

10.9 The College maintains accurate and up to date records of staff induction and training.

11 WHISTLEBLOWING IN A SAFEGUARDING CONTEXT

Whistleblowing is a term that is used where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed. All staff and volunteers must feel able to raise concerns and know they will be taken seriously by the Senior Leadership Team.

- 11.1 While our parent organisation Nord Anglia Education has a separate whistleblowing policy, this is a summary that outlines the process when there is poor or unsafe practice and potential failures in the College's safeguarding provision. This does not replace the whistleblowing policy and should be read in conjunction with the NAE policy.
- 11.2 The policy protects staff from being punished for raising concerns.
- 11.3 The Principal is responsible for all staff. If you are concerned that any member of staff within the College is not following safeguarding processes or is behaving in a way that is placing students at risk you should, in the first place, make the Principal aware.
- 11.4 If your concern is about the Principal, you should raise this with our Chair of Governors and/or the global head of safeguarding. These colleagues will always consult with the LADO.
- 11.5 If you would prefer to raise your concerns outside of the College, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email help@nspcc.org.uk for national organisations or make contact with Oxfordshire County Council.
- 11.6 If you believe that a member of the College staff is harming a child (an allegation) and this has been reported to the Principal and no / insufficient action has been taken, or the member of staff you have concerns about is the Principal, then you are able to contact the Designated Officers team (LADO) on 01865 810603 or email lado.safeguardingchildren@oxfordshire.gov.uk
- 11.7 If you believe that a child is being abused by individuals outside the College, you can make a referral to Children's Social Care by calling the MASH on **0345 050 7666** or **0800 833 408** (outside of office hours).

Further guidance for staff can be accessed through: [Child abuse concerns: guide for practitioners - GOV.UK \(www.gov.uk\)](#) and through the NSPCC website [What is Child Abuse & How to Keep Your Child Protected | NSPCC](#)

12 SITE SECURITY

- 12.1 All staff members have a responsibility to ensure our buildings and grounds are safe, this includes ensuring the safety of any visitors to the College.
- 12.2 The College will not accept the behaviour of any individual, parent or anyone else, that threatens College security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the College site.
- 12.3 No unauthorised adult is permitted access to any Building used by OIC and or/our students. All visitors will be asked sign into any building and where necessary will be escorted around the premises.

13 QUALITY ASSURANCE

- 13.1 We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. To do this the governing body will take an overview of compliance and we will work with external partners, such as colleagues from Oxfordshire ESAT team to provide an extra level of objective oversight.

13.2 The College's senior management and the governing body will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

14 POLICY REVIEW

14.1 This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle.

14.2 The Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures.

14.3 Additional updates to the safeguarding policy and appendix will take place when needed.

15 GOVERNING BODY APPROVAL

Safeguarding Governor:

Signed:



Name: Sue Hill

Date: 10 October 2025
(updates approved: 30 March 2026)

Chair of Governors:

Signed:



Name: Richard Davies

Date: 10 October 2025
(updates approved: 31 March 2026)

APPENDIX A: THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD

Managing referrals:

The DSL will consider early help and family help pathways alongside statutory referrals and ensure timely escalation where risk increases.

- Refer cases to MASH and the police, where appropriate, in a timely manner avoiding any delay that could place the child at increased risk.
- Identify any safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- Refer to the Oxfordshire Threshold of needs to assist with decision making - [Oxfordshire- Threshold-of-Needs-2021.pdf \(oscb.org.uk\)](#).
- Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding, including contextual safeguarding.
- Have responsibility to ensure there is at least one key adult for 'Operation Encompass'* and a point of contact for Child Exploitation. *Guiding principles of the scheme are here <https://www.operationencompass.org/College-participation> . An annual information letter must be sent to parents.
- To ensure that the Local Authority is notified if children are persistently absent or missing from education.

Record keeping:

Records include analysis and professional judgement, not solely descriptive accounts.

- Keep written (or online), detailed, accurate and secure records of safeguarding and welfare concerns and ensure and decisions made, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as children's social care or the Prevent program etc.
- Maintain a chronology of significant incidents for each child with safeguarding concerns, including a record of decisions made and the reasons for those decisions.
- Ensure such records are kept confidentially and securely and separate from the child's educational record.
- The College holds at least two emergency contact numbers for every student.
- When a student leaves our College the Designated Safeguarding Lead will contact the Designated Safeguarding Lead at the new College and will ensure that the safeguarding file is forwarded to the receiving College within 5 College days. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving College and/or evidence of recorded delivery.

Multi-agency working and information sharing:

The DSL will maintain active involvement in cases following referral and will not withdraw from safeguarding processes once external agencies are involved.

- The DSL recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance.
- Our College is not an investigating body when there are child protection concerns. We will, however, contribute to the investigation and assessment processes as required. We recognise the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

Training:

The designated safeguarding lead (and any deputies) undergoes training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The

designated safeguarding lead (and any deputies) also undertakes Prevent awareness training.

Raising awareness:

The designated safeguarding lead will:

- Ensure each member of staff has access to, and understands, the college's child protection policy and procedures, and that training is regularly updated and at least annually.
- Ensure the College's safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- Ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the College in this.
- Link with the safeguarding partnership arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that children and young people who have or have had a social worker are experiencing with teachers and leadership staff.
- Encourage a culture of listening to children and young people and taking account of their wishes and feelings in any action the College takes to protect them.

Quality assurance:

- Monitor the implementation of and compliance with policy and procedures, including periodic audits of Safeguarding files (at a minimum once a year).
- Complete the 175/157 annual safeguarding report and submit to the Local Authority
- Provide regular reports to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.

Support for staff:

- The College has a framework for providing an opportunity for staff who are working directly with vulnerable young people to have regular access to appropriate supervision with the Head Counsellor to talk through and reflect on their involvement with the student's case.

APPENDIX B: SAFEGUARDING TERMINOLOGY AND DEFINITIONS

Terminology:

This section clarifies how terms such as 'victim' and 'alleged perpetrator/perpetrator' are used within this policy, reflecting the terminology found in Keeping Children Safe in Education (KCSIE) 2025. These terms are necessary for accuracy in safeguarding procedures, but staff must adopt trauma-informed practice in all direct work with children.

Use of 'Victim' and 'Alleged Perpetrator/Perpetrator'

- KCSIE 2025 uses the terms 'victim' and 'alleged perpetrator(s)/perpetrator(s)' for clarity in statutory guidance.
- These terms are used within this policy to ensure consistency with national guidance.

Trauma-Informed and Child-Centred Language in Practice

- Staff must avoid imposing labels that a child may find distressing or inaccurate.
- Children may not identify with the term 'victim' and their preference should be respected.
- Alternatives such as 'child who has been harmed' or 'child who has caused harm' may be used where appropriate.
- Children displaying harmful behaviours may themselves be vulnerable.

Why Terminology Matters

- These terms support procedural clarity, accurate recording, and effective multi-agency communication.

Definitions:

- **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 (e.g. via the internet). They may be abused by an adult or adults or another child or children.
- **Children** are any people who have not yet reached their 18th birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSIE applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021.
- **Child protection** is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
- **Early help** is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children rather than reacting later. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support.
- **Harm** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.
- **Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 47 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development; his health or development shall be compared with that which could reasonably be expected of a similar child.'

- **Safeguarding children** is the action we take to promote the welfare of children and protect them from harm. At College, we consider children as any student in the community.
- **Safeguarding and promoting the welfare of children** is defined as:
 - Providing help and support to meet the needs of children and young people as soon as problems emerge.
 - Protecting children from maltreatment, whether that is within or outside the home, including online.
 - Preventing impairment of children's mental and physical health or development.
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
 - Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the child.
 - Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

College and Boarding staff are particularly important, as they are in a position to identify concerns early, provide help for students, promote children's welfare and prevent concerns from escalating (KCSIE 2025).

- **Vulnerable children:** Any child may benefit from Early Help, but all staff should be particularly alert to the potential need for early help for a child who:
 - is disabled or has certain health conditions and has specific additional needs
 - has special educational needs (whether or not they have a statutory Education, Health and Care plan)
 - has a mental health need
 - is a young carer
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
 - is frequently absent from education, missing/goes missing from home, or care,
 - has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
 - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
 - is at risk of being radicalised or exploited
 - has a parent or carer in custody or is affected by parental offending
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - is misusing alcohol and other drugs themselves
 - is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
 - is a privately fostered child.

<https://www.oscp.org.uk/practitioners/locality-and-community-support-service-early-help/>

A bespoke helpline is available for children and young people who've experienced abuse at College, and for worried adults and professionals that need support and guidance. If you are concerned about something, you can contact the NSPCC helpline Report Abuse in Education on **0800 136 663** or email help@nspcc.org.uk.

Categories of abuse/neglect/and exploitation:

- **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development and conveying 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;
- including where students see, hear, or experience effects' of domestic violence.

It may feature:

- age or developmentally inappropriate expectations being imposed on children;
- interactions that are beyond a child's developmental capability;
- overprotection and limitation of exploration and learning;
- preventing the child from participating in normal social interaction;
- seeing or hearing the ill-treatment of another;
- 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.

- **Neglect** is the persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, it may involve a parent 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;
 - ensure access to appropriate medical care or treatment;
 - including where they see, hear, or experience effects of domestic violence.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/neglect/>.

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, 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.
- **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 issue in education (KCSIE 2025).

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.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, 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.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health,

behaviour and education.

- If staff have a mental health concern about a child that is also a safeguarding concern immediate action should be taken, following the OIC safeguarding policy and by speaking to the designated safeguarding lead or a deputy.

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

The department has published advice and guidance [Preventing bullying - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/preventing-bullying) and [Mental Health and Behaviour in Colleges](https://www.gov.uk/government/publications/mental-health-and-behaviour-in-colleges). In addition, Public Health England has produced a range of resources to support secondary College teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing). Its resources include social media, forming positive relationships, smoking and alcohol. See [Every Mind Matters](https://www.gov.uk/government/publications/every-mind-matters) for links to materials and lesson plans.

APPENDIX C: IMPORTANT ADDITIONAL INFORMATION

Appendix C contains important additional information about specific forms of abuse and safeguarding issues for our staff awareness and is in line with Keeping children Safe in Education.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers.

Child Sexual Exploitation & Child Criminal Exploitation

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be treated as exploitation. As well as being physical, it can be facilitated and/or take place online.

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). CCE indicators can also be indicators of CSE, as can children who have older boyfriends or girlfriends and children who suffer from sexually transmitted infections or become pregnant.

The department provide: [Child sexual exploitation: guide for practitioners](#)

A full list of indicators can be found here: [Child Sexual Exploitation - Oxfordshire Safeguarding Children Partnership](#)

County Lines

Is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines.' They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence and weapons, including knives, corrosives and firearms. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery and missing persons and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against

them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 - year olds](#).

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [Child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children Who Are Absent from Education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are absent for prolonged periods or missing from education in their area.

Children who have unexplainable and/or persistent absences from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Staff should follow the College's procedures for dealing with children who are persistently absent and children missing education to identify such abuse as early as possible and, in the case of absent students, this helps prevent the risk of them becoming a child absent from education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and have a social worker (such as a child who is a child in need, who has a child protection plan or is a child we care for), where being absent from education may increase known safeguarding risks within the family or in the community. See 'working together to improve school attendance' for further statutory guidance: [Working together to improve school attendance - GOV.UK](#)

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Online Safety, Remote Learning, Cybercrime and Filtering & Monitoring

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Our college approach to online safety empowers staff to protect and educate students and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm, for example: making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If you feel students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The College has an Online Safety policy, which covers the use of mobile phones, cameras and other digital

recording devices e.g. I-Pads. For online safety, within the policy there is support about children accessing the internet whilst they're at College using data on their phones. This considers that many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G networks. This access means some children, whilst at College, sexually harass, bully and control others via their mobile and smart technology, share indecent images consensually and non-consensually and view and share pornography and other harmful content. This has been carefully considered within our ICT Policy, including the management of devices, filtering and monitoring and access to smart technology. The policy also reinforces the importance of online safety, including making parents aware of what the College asks children to do online (e.g. sites they need to visit or who they'll be interacting with online).

The policy for remote learning demonstrates an understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely. Guidance to support schools and colleges understand how to help keep students, students and staff safe whilst learning remotely can be found at <https://www.gov.uk/guidance/safeguarding-and-remote-education> and <https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools>

Cybercrime

The College is aware that students with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme.

Additional advice can be found at: [Cyber Choices](#), [When to call the Police](#) and [National Cyber Security Centre - NCSC.GOV.UK](#)

Filtering and monitoring

The Governing Body is doing all that they reasonably can to limit children's exposure to the above risks from the College's IT system. As part of this process, they ensure that the College has appropriate filters and monitoring systems in place and that there is regular review of their effectiveness.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, they also consider the age range of our students, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

To meet this duty, as per the Department for Education's [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK](#), the College's IT team and the DSL:

- identify and assign roles and responsibilities to manage filtering and monitoring systems;
- review filtering and monitoring provision at least annually;
- block harmful and inappropriate content without unreasonably impacting teaching and learning;
- have effective monitoring strategies in place that meet their safeguarding needs.

The Governing Body reviews the standards and discusses with IT staff and service providers what more needs to be done in meeting this standard. Additional guidance on "appropriate" filtering and monitoring can be found at:

- UK Safer Internet Centre: <https://saferinternet.org.uk/guide-and-resource/teachers-and-school-staff/appropriate-filtering-and-monitoring>. The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be assessed at <https://saferinternet.org.uk/blog/filtering-and-monitoring-webinars-available>.
- Southwest Grid for Learning (<https://swgfl.org.uk/>) has created a [tool](#) to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).

- Support for schools when considering what to buy and how to buy it is available via the: [schools' buying strategy](#) with specific advice on procurement here: [buying for schools](#).
- The Department has published [Generative AI: product safety expectations](#) to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

Domestic abuse

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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. Experiencing domestic abuse can have a serious, long lasting, emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990

Modern slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. [Modern slavery: how to identify and support victims - GOV.UK](#)

Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our College’s safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes:

- risk assessment
- working in partnership
- staff training
- IT policies

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. The College has clear procedures in place for protecting children at risk of radicalisation. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty. The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements consider the policies and procedures of Local Safeguarding Children Board (LSCBs).

Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#).

The **Prevent** guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to students at the College of being drawn into terrorism. As a minimum, however, the College ensures that the designated safeguarding lead and the Prevent lead undertake Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. At the College, we ensure that suitable filtering is in place and we teach students about online safety. Further information and guidance are available on the OSCP website: [Radicalisation - Oxfordshire Safeguarding Children Partnership](#)

The Department for Education has also published advice for schools on the Prevent duty and is intended to complement the Prevent guidance and signposts other sources of advice and support.

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

Channel

The staff should understand when it is appropriate to make a referral to the Channel team. Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be susceptible to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages and an individual will be required to provide their consent before any support delivered through the programme is provided.

The designated safeguarding lead (or a deputy) considers if it would be appropriate to share any information with the new school or college in advance of a student leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#) and [Channel training from the Home Office](#)

Sexual Harassment, Violence, Harmful Sexual Behaviours

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence is rape, assault by penetration, sexual assault, causing someone to engage in sexual activity without consent (when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003).

Sexual Harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside College. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's or student's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Harmful Sexual Behaviours exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. The College is aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and
- sexual harassment, that it is never acceptable and it will not be tolerated. It
- should never be passed off as "banter", "just having a laugh", "a part of
- growing up" or "boys being boys". Failure to do so can lead to a culture of
- unacceptable behaviour, an unsafe environment and in worst case scenarios
- a culture that normalises abuse, leading to children accepting it as normal and
- not coming forward to report it
- recognising, acknowledging and understanding the scale of harassment and
- abuse and that even if there are no reports it does not mean it is not
- happening, it may be the case that it is just not being reported
- challenging physical behaviour (potentially criminal in nature) such as
- grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras
- and lifting skirts. Dismissing or tolerating such behaviours risks normalising
- them.

Our College follows Part 5 of Keeping Children Safe in Education 2025 when responding to all signs, reports and concerns of child-on-child sexual violence and sexual harassment. [Please read Appendix D for more information.](#)

So-called 'honour'– based abuse (including female genital mutilation and forced marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the 162 motivation) and should be handled and escalated as such. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. [Female genital mutilation: resource pack - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Mandatory Reporting Duty for teachers - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the College’s designated safeguarding lead and involve the Integrated Front Door as appropriate.

Forced Marriages

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. The College can play an important role in safeguarding children from forced marriage.

APPENDIX D: CHILD ON CHILD ABUSE

What is Child-on-child Abuse?

Child-on-child abuse is any form of physical, sexual, emotional or financial abuse, and coercive control, abusive behaviour in intimate relationships, CSA and teenage relationship abuse, any form of abusive behaviour exercised between children and within children's relationships (both intimate and non-intimate).

Child-on-child 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, and/or gender-based violence.

Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to Child-on-child abuse therefore needs to consider the range of possible types of Child-on-child abuse set out above and capture the full context of children's experiences. This can be done by adopting a Contextual Safeguarding approach and by ensuring that our response to incidents of child-on-child abuse takes into account any potential complexity.

We recognise that abusive behaviour can happen to students in schools and other settings, and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual, as well as what preventative strategies may be put in place to reduce further risk of harm.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Equally, abuse issues can sometimes be gender specific e.g., girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence (KCSIE 2025). Research suggests that child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different. Therefore, it is important to consider the forms abuse may take and the subsequent actions required.

Children with Special Educational Needs

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Being more prone to peer group isolation than other children.
- The potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, the college will consider extra pastoral support for children with SEND, particularly when investigating any form of Child-on-child abuse.

Language

The language used will refer to alleged victims and alleged perpetrators as research has shown that many children who present with harmful behaviour towards others, in the context of Child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers. (Farrer and Co. 2017). The language used to children and parents in the reporting of any incidents that may have occurred could impact on any future rehabilitation of children and young people following any investigations that may occur.

Types of abuse

There are many forms of abuse that may occur between students, and this list is not exhaustive.

Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another, and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault etc.)

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour, and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another, sexual assault, rape or abuse.

Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. In referencing sexual harassment, it is in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

All staff should be aware of the associated risks and understand the measures in place to manage these.

Bullying (inclusive of all types)

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

Bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

Low-level disruption and the use of offensive language can in itself have a significant impact on its target. If left unchallenged or dismissed as banter or horseplay it can also lead to reluctance to report other behaviour.

Online bullying

Online bullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook, Snap chat and Twitter to harass threaten or intimidate someone for the same reasons as stated above.

It is important to state that online bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour.

If the behaviour involves the use of taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support young people may require in these instances, the college will have no choice but to involve the police to investigate these situations.

Sexting (Youth Produced Imagery)

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can occur in any relationship, to anyone, whatever their age, gender or sexual preference.

However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a new school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

Up Skirting

The Voyeurism (Offences) Act 2019 which criminalise the act of 'up skirting'. The [Criminal Prosecution Service \(CPS\)](#) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. This 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; sexting (also known as youth produced sexual imagery).

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Teenage relationship abuse

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: <https://rapecrisis.org.uk/get-informed/about-sexual-violence/sexual-consent/>

Sexual consent

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16

Measuring the behaviour

Simon Hackett's continuum of behaviour (see at the end of this section) can be a useful guide to measure the behaviour that has occurred and consider the circumstances around the incident (s).

The continuum looks at whether it:

- is socially acceptable
- involves a single incident or has occurred over a period of time
- is socially acceptable within the peer group
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning
- involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power
- involves a misuse of power

Behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies.

Expected action taken from all staff

All staff should be alert to the well-being of children and young people and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

Staff will challenge inappropriate behaviours by:

- Making it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh' or 'boys being boys'

Staff will not dismissing inappropriate behaviour risks leading to:

- A culture of unacceptable behaviours
- An unsafe environment for children
- A culture that normalises abuse, leading to students accepting it as normal and not coming forward to report it

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get a true, accurate account of the facts around what has happened, so that nothing is forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example, do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled.

In all cases of child-on-child abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters. Staff should also be mindful of contextual safeguarding and that wider safeguarding concerns may influence the child's account of the event(s). Alongside this peer pressure and the impact of sharing information about the incident(s) may also influence a child's account.

Gather the Facts

In cases specifically relating to Sexual violence and sexual harassment, part 5 of Keeping Children Safe in Education, 2025 states that two members of staff (one being the Designated Safeguarding Lead) should be present to manage the report, *where possible*.

In all circumstances, staff need to speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?) A full and clear record of exactly what the young person has said in their own language should be made and stored on CPOMS.

Consider the intent (begin to Risk Assess)

Has this been a deliberate or contrived situation for a young person to be able to harm another?

Decide on your next course of action

If from the information that you gather you believe any young person to be at risk of significant harm, you must make a safeguarding referral to social care immediately (where a crime has been committed the police should be involved also). This action would, in most circumstances be undertaken by the Designated Safeguarding Lead but in the event of their absence the referral can be made by another member of staff. If this is the case, once social care has been contacted and made a decision on what will happen next then you will be informed on your next steps.

If social care and the police intend to pursue this further, they may ask to interview the young people in school or they may ask for parents to come to school to be spoken to also. It is important to be prepared for every situation and the potential time it may take.

It may also be that social care feel that it does not meet their criteria in which case you may challenge that decision, with that individual or their line manager. If on discussion however, you agree with the decision, you may then be left to inform parents.

Informing parents

If, once appropriate advice has been sought from police/social care you have agreement to inform parents or have been allocated that role from the other services involved then you need to inform the parents as soon as possible. If services are not going to be involved then equally, this information may need to be shared with parents. Parents would not be informed if by doing so the child was put at further risk of significant harm.

If a young person is deemed to be 'Gillick Competent' following the 'Fraser' guidelines and does not wish you to share the information with parents, then the college must consider this especially for example if the young person is pregnant and this is why they are being bullied (unless this has occurred through significant harm in which case a criminal/social care case is likely).

In all circumstances where the risk of harm to the child is evident then the school should encourage the young person to share the information with their parent or even with them (they may be scared to tell parents that they are being harmed in any way). Where school can evidence, they are acting in the best interests of the young person they would not be criticised, however this would be the case if they actively breached the rights and choices of the young person.

The best way to inform parents is face to face and should be done via a Teams meeting as the nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents whether their child is the child who was harmed or who harmed another.

Points to consider:

- What is the age of the children involved?
- How old are the young people involved in the incident and is there any age difference between those involved?
- Where did the incident or incidents take place?
- Was the incident in an open, visible place to others? If so, was it observed? If not, is more supervision required within this particular area?
- What was the explanation by all children involved of what occurred?
- Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?
- What is each of the children's own understanding of what occurred?
- Do the young people know/understand what they are doing? E.g., do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from Children's Services Social Care.

Repetition

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

Outcomes

The outcome of the investigation will follow our local threshold guidance. Whatever the outcome, the college has a duty of care to manage the education needs of both children/young people in which case a risk assessment plan will be drawn up.

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

For the young person who has been harmed

What support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people or some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of PHSE and SMSC that certain issues can be discussed and debated more frequently.

If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

For the young person who has displayed harmful behaviour

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary. Particular support from identified services may be necessary through an early help referral and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g., making amends with the young person they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour, it may be a requirement for the young person to engage in one-to-one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation, the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi- agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

The college may also choose a punishment as a consequence such as suspension or internal suspension a period of time to allow the young person to reflect on their behaviour.

After care

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g., self-harm). In which case, regular reviews with the young people following the incident(s) are imperative.

Disciplinary Action

Our college will need to consider whether disciplinary action may be appropriate for any child/children involved – any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour; (b) to demonstrate to the child/children and others that child-on-child abuse can never be tolerated; and (c) to ensure the safety and wellbeing of other children. However, these considerations must be balanced against the child's/children's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action our college will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

Our college will, where appropriate, consider the potential benefit, as well as challenge, of using exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the college.

Review of Circumstances

Following any incident of harm, it is necessary for our School to consider if anything could have been done differently. This demonstrates how proactive the school is in continually reviewing our policies and systems in effectively keeping children safe.

Preventative Strategies for Schools and Settings

For all schools and settings, it is important to develop appropriate strategies in order to prevent the issue of child-on-child abuse rather than manage the issues in a reactive way.

Firstly, and most importantly for schools and settings is recognition that child-on-child abuse can and will occur on any site even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting young people to talk about any issues and through sharing information with all staff.

This can be supported by ensuring that the college has an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This is strengthened through the Lifeskills curriculum that tackles such issues as prejudiced behaviour and gives students an open forum to talk things through rather than seek one on one opportunities to be harmful to one another.

At OIC, our Lifeskills (PSHE/RSHE) Curriculum incorporates:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem

- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape
- What constitutes sexual harassment and sexual violence, and why they're always unacceptable

To enable such an open and honest environment it is necessary to ensure the whole workforce and governing body feels confident and enabled to talk about issues and challenge perceptions of young people including use of inappropriate language and behaviour towards one another. In order to create such an environment, it is necessary for staff to talk to young people in a way that continues to create an open and honest environment without prejudice and not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. Staff must consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised, it may result in a young person seeking no further help or advice.

Signposting is available to young people in the event that they don't feel confident raising an issue to staff or peer. The college has a resource board with support services on a wide range of issues so young people can seek their own solutions should they wish to. Student also have access to 2 Independent Persons and an anonymous reporting app (whisper) as well as the Tellus email address.

The college also recognises Multi agency working as a powerful tool to consolidate in house procedures. By accessing advice, support and guidance, effective decisions can be made in collaboration to improve outcomes for children who may be at risk of harm. Seeking advice and guidance can act as a preventative measure so that the right course of action is taken at the earliest opportunity. The college will actively refer concerns/allegations of child-on-child abuse where necessary to social care and the police where appropriate. This is particularly important because child-on-child abuse can be a complex issue, and even more so where wider safeguarding concerns exist.

Simon Hackett's continuum of behaviour

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making 	<ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal 	<ul style="list-style-type: none"> • Problematic and concerning behaviours • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity 	<ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure victim compliance • Intrusive • Informed consent lacking, or not able to be freely given by victim • May include elements of expressive violence 	<ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is physiologically and/or sexually arousing to the perpetrator • Sadism

APPENDIX E: SAFEGUARDING OF BOARDERS

1. Additional Safeguarding Risk to boarders from adults

The unique nature of boarding may mean that a child or young person is at a greater risk of contact with an adult in a position of power, during and outside of the working day. In addition, three of OIC's residential sites are shared with other Colleges, and/or private residents such as University students. (For a full list of sites and age range, see section 8).

With this in mind, careful consideration has been given to:

- Age of students allocated to specific accommodation.
- Layout and access to OIC accommodation.
- Security and staffing levels.
- Student education and ongoing monitoring.
- Working and liaising with site managers to ensure suitable arrangements are in place.
- Training house staff to report concerns and react in a timely manner to safeguard OIC students.

A full Risk Assessment is in place to assess and mitigate risks associated with shared boarding accommodation where students from different colleges, including older university students, share entrances and communal areas. We also assess the risk associated with mixed age groups. Please see section 3 on Additional Safeguarding Risk to boarders from Mixed Aged groups and Gender.

Whilst careful attention is given to these risks, OIC also acknowledges the importance of 'Outduction' and uses these boarding house contexts to prepare our students for University and beyond. This is done through careful induction on: the context of living in Oxford as a City; personal safety; travelling in groups; specific risks such as bike theft and crossing roads and how to contact staff in an emergency. Ongoing education is also done through our Life Skills curriculum and whole school assemblies when required.

Additionally, the informal nature of adults working in a boarding house means that House Parents are at additional risk of placing themselves in a situation where the Staff Code of Conduct could be compromised.

All staff, including Boarding staff, know that if any such incident occurs, they must immediately self-disclose this to the Principal, as per our Low Level Concerns Policy. The Principal will discuss the incident with the Designated Safeguarding Lead, respond to the incident and log it on the Low-Level Concerns log to enable the College to identify any concerning patterns of behaviour.

Boarding also has additional policies and procedures in place around adults' access to boarding houses where all staff flat doors are clearly labelled and identified and there is a zero tolerance ruling on students accessing staff accommodation, ensuring appropriate boundaries are maintained.

Please read the following policies that deal with this:

- Adults staying in boarding houses
- Boarding House Risk Assessments – Found on Sphera.
- Visitors to Boarding Houses

See separate Contextual Risk Assessments on Shared Boarding Facilities held by the Director of Boarding.

2. Additional Safeguarding Risk of Child-on-Child Abuse

The unique nature of boarding may mean that children could be at greater risk of child-on-child abuse incidents as children share overnight accommodation.

To reduce the risk of child-on-child abuse within the Boarding Houses, students are reminded frequently about the importance of respecting each other's space. All students board in single room accommodation with an en-suite.

With this in mind, careful consideration has been given to:

- Age of students allocated to specific accommodation.
- Layout and access to OIC accommodation.
- Security and staffing levels.
- Student education and ongoing monitoring.

- Working with site managers and leasing to ensure suitable arrangements are in place.
- Training house staff to report concerns and react in a timely manner to safeguard OIC students.

Our houses have been carefully laid out by age groups and gender (See section 8 of this appendix).

All our boarding houses are staffed by a team of well-trained, professional and appropriate boarding staff. There are residential house parents, non-residential house parents as well as nighttime awake House Parents. This means there are always at least two responsible adult staff present in boarding at any given time, with at least one awake on duty and always two at peak times in houses that exceed 35 students.

These staff teams are supported by highly experienced and trained Boarding leadership structure. This consists of boarding managers, who in turn are supported by the Assistant Head of Boarding and Director of boarding. This means there is at least one member of boarding staff on duty and contactable at any given time in the event of an emergency or if support is required. This team also rotate around the houses to provide a physical presence.

Inappropriate sexual behaviour is covered in the college's Life Skills curriculum and is an example of a serious breach of discipline and behaviour which may lead to an exclusion from the college. Any report of sexual violence or sexual harassment is taken seriously; staff are however aware that it is more likely that girls will be the victims of Sexual Violence or Sexual Harassment and more likely it will be perpetrated by boys.

Please also read Appendix D on Child-on-Child Abuse.

3. Additional Risk of Sexual Relationships between Boarders

As boarders are in college for longer periods than day students, and as they have more contact with one another during the week, there is an additional risk of a sexual relationship developing between boarders.

Sex education includes the teaching about intimate and sexual relationships, including sexual health, healthy sexual relationships and mutual respect, personal privacy and gender stereotypes. It also includes what the law says about sex, relationships, consent and young people, as well as pornography, broader safeguarding issues and using technology.

The college's policy on sexual relationships between children, particularly boarders, clearly states as per the boarding house rules that there are to be no visitors to your room accommodation without permission. All visits to be in common areas unless pre-approved. Therefore, you cannot access another cluster of rooms unless authorised by staff. Students of the opposite sex are not permitted to visit the dorms.

4. Additional Safeguarding Risk from Mixed Aged groups and Gender.

Due to the nature of the boarding accommodation available to OIC, students live in mixed age and in mixed gender boarding houses. A full Risk Assessment is in place to assess and mitigate risks associated with shared boarding accommodation where students from different ages, which includes:

- Careful consideration is given for rooming allocation in terms of age groups so over 18s are separated from those under 18.
- Careful consideration is given to the layout of the room allocations within the buildings so that male and female students are separated and access is restricted.
- Careful consideration is given to staff supervision, including where house staff live, awake overnight house parents, CCTV and security monitoring.
- Staff are aware of the rules and, through our check in and room check procedures, monitor visitors between students and report any incidents immediately.
- Students are clearly inducted on the rules regarding visitors, including to their rooms and in communal areas. This includes students of the same age and gender as well as not, in order to encourage students to respect each other's privacy.
- Students are taught about respectful relationships, consent and appropriate peer relationships

via our Life Skills (PSHE and RSE) programme.

- Students are not allowed visitors to their personal room or their 'cluster's' communal area without permission from their house staff.

(For a full list of sites and age range, see section 8 of this appendix)

Other considerations relate to relationship power dynamics and consent where under and over 18 cohabit. The College recognizes that students who have moved through the College and then become “adults” can provide invaluable support and role modelling for younger students’ social, emotional and academic development. This can be from a perspective that staff would not necessarily have. However, the college also considers that students who are over 18 have greater legal freedoms than the general College population. This includes age of consent, ability to access 18+ films and media content, visiting 18+ venues and consuming alcohol. They could also have access to financial services and credit contracts. Older students could have different peer groups, motivations, and priorities, but may not have developed the attitude skills and knowledge relating to their rights and responsibilities. OIC acknowledges the unique challenge of 18+ students living in a boarding environment, particularly where under 18s are present and as such:

- Students are educated on healthy relationships, power dynamics and consent in Life Skills (PSHE and RSE) programme and are aware of who to report concerns to.
- Students over the age of 18 understand their responsibility of legally being an adult in the context of a boarding house.
- For the avoidance of doubt students are not permitted to visit other rooms or other communal areas without permission from house staff, in the interest of managing relationships.
- Students are inducted on rules regarding visitors to personal rooms and communal areas.
- For all students in a mixed-age boarding house, staff monitor relationships and interactions in the interest of ensuring that over-18 residents do not pose a risk to younger students. Staff supervision levels are suitable in number and training and understand the need to remain vigilant in relationships and interactions between all students. They enforce rules on visitors to personal rooms and communal areas and report any instances of breaches.
- Staff are trained to spot signs of inappropriate relationships and aware of need to report in line with safeguarding policy. They understand safeguarding practices and know how to report their concerns to mitigate escalation in any situations that are a cause for concern.
- Regardless of age, age-restricted items such as smoking materials, vapes and alcohol are not permitted in the boarding houses. Daily room checks monitor rooms for these items. Room searches will be conducted if students are suspected to have these items.
- Students will be sanctioned if these items are found in their room. Over 18 students purchasing these items for an under 18 year old for use in or outside the boarding house would represent a 'serious breach' and would be sanctioned in line with the behaviour policy. Staff are aware of these regulations and are aware of how to report concerns.
- Over-18 students are educated to maintain appropriate boundaries with younger residents to avoid accusations of inappropriate behavior.
- Staff and students understand the need to report safeguarding concerns to designated safeguarding lead.

See separate Risk Assessments on Mixed Age Groups and Gender and Over 18 students.

5. Additional risk of Online Harm to Boarders

All Boarding students at OIC, due to their age, are trusted to keep their electronic devices overnight. Whilst this is seen as essential for communication home, studying and connecting with the online world, OIC understands and acknowledges that this policy comes with a number of associated risks.

A full Risk Assessment has been carried out to ensure the use of electronic devices has been considered and that appropriate mitigating support, education and guidance is provided for our students in order to safeguard their wellbeing and welfare. This covers:

a. Access to inappropriate, unsuitable or illegal content:

- Content Filtering Software - all our boarding houses and college sites have filtering and monitoring systems. Whilst some students could use own Data, majority of our students do use Wifi.
 - Education – Through the Life Skills programme and Strategy Tutor time, students are educated about the risks of the online world and how to stay safe online. Students understand the risks of accessing unsuitable material and understand that this is being monitored. When key trends emerge, curriculum and topics discussed are adapted i.e. Scams.
 - Students must adhere to the ICT Acceptable Use Policy.
 - Supervised Use - when in front of them, boarding staff actively monitor internet access in communal areas and provide supervised study times when appropriate. Looking out for any unsuitable use.
- b. Online interactions - Cyberbullying, grooming or radicalisation.**
- Anti-Bullying Policy: OIC operates a zero-tolerance policy with regards to cyberbullying, any instances will and have been dealt with in line with the Promoting Positive behaviour policy.
 - Education on Online Risks: Parts of the Life Skills programme and Strategy Tutor session have been on recognizing grooming, radicalization, and cyberbullying, including steps for reporting concerns. This is planned to be an ongoing scheme throughout the year.
 - Filtering and monitoring systems are in place to detect harmful online behavior (Smoothwall).
 - Access to Support: Students have access to a safeguarding officer or counselor trained in online safety issues. We have independent listeners, Tell Us and Whisper for anonymous reporting.
- c. Addiction to electronic devices, online gaming or gambling.**
- Students are educated and encouraged to follow a healthy lifestyle.
 - House staff aware of risks and monitor for any students who are spending excessive time online.
 - Students are given the option of handing in devices overnight if they are struggling with self-discipline.
 - Strategy tutors spot for signs of tiredness in classroom and actively report concerns to house staff.
 - Filtering and monitoring monitors and restrict access to gambling websites and apps.
- d. Sharing images / Live Streaming - Sexting, nudes and semi-nudes.**
- Students are educated about the legalities, risks and consequences of sharing inappropriate images.
 - Students are also taught about digital footprint and understand the dangers of sharing personal data and images online.
 - Students know who they can report concerns to regarding this and are actively encouraged to do so.
- e. Scams, Phishing attempts, Hacking.**
- In the Life Skills programme, Strategy Tutor time and in boarding houses, students are informed about the risk of scams and how to avoid them.
 - Students know who to report to if they think they have been a victim of one. In these instances, relevant authorities are informed.
 - Staff are also made aware of the common scams that are out there as well as ongoing trends so they can support in spotting the signs.
- f. Overcharging and overuse of devices: Health and Safety issues.**
- Check ins and daily room checks are completed by house staff to monitor general health and safety.
 - All chargers are PAT tested annually.
 - Daily room checks report any concerns or issues with electrical items.

See separate college policy on Online Safety Policy and ICT Acceptable Use Policy (students).

6. Education of Boarders on Safeguarding

All boarders attend a Safeguarding presentation every year delivered by the Designated Safeguarding Lead. This enables them to recognise behaviours from both adults and other children that are not safe and to give them the confidence to report any concerns they may have.

7. Tell Us, Whisper and Independent Listeners

All boarders are aware of the various means available to them to report a concern, other than going to a member of staff of their choice. Posters about these additional means of communication are available in all boarding and college locations.

A Tell Us email address (tellus@oxcoll.com) enable students to report anything that concerns them, including complaints. These concerns go directly to the DSL and are dealt with swiftly. Whisper also gives students the opportunity to report concerns anonymously. The Director of Boarding and the DSL get notifications from Whisper.

All boarders also have access to two Independent who is available to speak to the students in person when in House and students can email or call them directly to arrange a meeting.

All boarders complete a regular surveys where a focus on safety in boarding is addressed. This is anonymous and enables us to identify any patterns or locations that may compromise the safeguarding of boarders. Any action in relation to this is recorded and updated on the contextual risk assessments to ensure that these additional risks are assessed, addressed and actions can be documented.

8. List of OIC Boarding Houses

- Alice House - Block B (entirely OIC) - Block A Private Resident - OIC students cannot access.
Student age range: 16-19 Year old Students - Mixed Gender. Genders separated by floors of boarding house. Corridors are restricted by Salto lock system.
- Wavy Gate - Block B (Entirely OIC) - Block A - Kings College - Shared entrance and communal areas in gated site.
Student age range: 16-18 Year old Students - Mixed Gender. Genders are houses in two separate 'blocks'. Access to blocks and corridors restricted by Salto lock system.
- Thames Street - Entirely OIC - No shared site risk.
Student age range: 15-17 Year olds - Mixed gender. Genders separated by floors of boarding house. Corridors are restricted by Salto lock system.
- St Clements - Entirely OIC - No shared site risk.
Student age range: 17 and 18 year old. Male House only.

APPENDIX F: ATTENDANCE AND STUDENTS MISSING FROM COLLEGE OR BOARDING

Students being absent from class or boarding, particularly repeatedly and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues, including neglect, child sexual and child criminal exploitation, mental health problems, risk of travelling to conflict zones, etc.

All staff must respond promptly to a student absence (as set out in our 'Attendance Policy') to ensure that the student is safe, that we know where they are and the reason for the absence.

Prolonged absences

The College will inform the local authority of any student who has been absent for a prolonged period (without the College's permission for a continuous period of 10 days or more) and/or on repeated occasions and work with the local authority children's services, in line with the "Working together to improve College attendance" guidance.

Failure to report children missing from education would constitute non-compliance with the duty to have regard to Keeping Children Safe in Education. Children who go missing from College or boarding with no explanation, or who fail to return after a planned absence, will be regarded in the first instance as an immediate safeguarding concern. Every effort will be made to locate the child, liaising with MASH, the police, embassies and border control as well as Local Authority officers as appropriate.

We will inform the local authority of any student who is going to be deleted from our College's Admissions Register where s/he:

- has been taken out of College by her/his parents and the College has received written notification from the parent that s/he is being educated outside the College system, e.g., home education *;
- has ceased to attend College and no longer lives within reasonable distance of Oxford;
- has been certified by a relevant medical practitioner as unlikely to be in a fit state of health to attend College before ceasing to be of compulsory College age, and neither the student nor his/her parent(s) has indicated the intention to continue to attend this College after ceasing to be of compulsory school age;
- is in custody for a period of more than four months due to a final court order and we as a College do not reasonably believe s/he will be returning to the College at the end of that period; or,
- has been permanently excluded.

* In accordance with the recommendation of KCSIE (September 2025), if a parent expresses their intention to remove their son/daughter from the College with a view to educating at home, we will work with the local authority and other key professionals to try to coordinate a meeting with parents to discuss this.

The notification will be made as soon as the grounds for deletion are met, but no later than deleting the student's name from the register.

Children Who Are Absent from Education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are absent for prolonged periods or missing from education in their area.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and criminal exploitation - particularly county lines. College staff should follow the College's procedures for dealing with children who are persistently absent and children missing education to identify such abuse as early as possible and, in the case of absent students, this helps prevent the risk of them becoming a child absent from education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and have a social worker (such as a child who is a child in need, who has a child protection plan or is a child we care for), where being absent from education may increase known safeguarding risks within the family or in the community. See 'working together to improve College attendance' for further guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1099677/Working_together_to_improve_College_attendance.pdf

At OIC, all students are registered in every class. The attendance officers have a responsibility to check that all registers are marked and recorded on ISAMS. For all students the register should be checked 10 minutes into the lesson beginning first period each teaching day. If a student is missing from the class, the Attendance Officer should locate the students and inform the relevant staff.

When students fail to be located or in cases when absence of a student from the College for a prolonged period, or an extremely anxious enquiry from a friend or relative may give rise to concerns about the student's safety, the Missing Students Policy must be activated. The policy describes three thresholds which allow for different procedures to be adopted in the case of missing students and students who are absent without leave. The three thresholds are under 16s, under 18s (including Over 18s living in the same boarding house) and over 18s living in the College 18+ accommodation or independently. In most cases staff will be dealing with students who are absent without proper authorisation.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns. For OIIC students, these may include, but are not limited to:

- Scamming: any student reporting strange calls or being anxious about calls or messages they have received could be potentially scammed, subject to identity theft or money extortion. They may be asked to go to certain places and miss school or boarding checks, or the college may receive an email or communication about the need for the student to go somewhere/return home. Any worries around scams must be reported to the DSL team and logged under "potential scams" on CPOMS.
- Travelling to conflict zones: due to the international nature of our students, they may come from a conflict zone, or know people from conflict areas and want to help. Understanding the background of our students is important for us to recognize signs of agitation or anxiety, and inform the local authority, the police and boarder control if we expect they have run back to their home country.
- Trafficking: Children trafficked into the country may be registered at a College for a term or longer, before being moved to another part of the UK or abroad. This pattern of registration and de-registration may be an indicator that a child has been trafficked. It has been identified as a particular concern in Colleges which are situated near ports of entry, but practitioners should be alert to this possibility in all Colleges.
- FGM: If you suspect that FGM is going to happen or has happened, it is your responsibility to call the police directly. Girls may become anxious about returning home, or in pain and unable to sit still or concentrate upon returning. For more information, please refer to Appendix D

- Forced marriage: A forced marriage is where one or both people do not or cannot consent to the marriage and pressure or abuse is used to force them into the marriage. It is also when anything is done to make someone marry before they turn 18, even if there is no pressure or abuse. Forced marriage is illegal in the UK. It is a form of domestic abuse and a serious abuse of human rights. The DSL must be informed immediately we think that this may be occurring or have occurred.

An appropriate response is needed when a child has poor attendance or is regularly missing education.

<https://www.gov.uk/government/publications/children-missing-education>

The College must inform the local authority of any student who is going to be deleted from the admission register where they:

- have been taken out of College by their parents and are being educated outside the College system e.g. home education, have ceased to attend College and no longer live within reasonable distance of the College at which they are registered.
- have been certified by an appropriate medical practitioner as unlikely to be in a fit state of health to attend College before ceasing to be of compulsory school age and neither he/she nor his/her parent has indicated the intention to continue to attend the College after ceasing to be of compulsory school age.
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the College at the end of the period.
- have been permanently excluded.

The local authority must be notified when a College is to delete a student from its register under the above circumstances. Colleges should contact the Admissions Team: Tel: 01865 815175. This should be done as soon as the grounds for deletion are met, but no later than deleting the student's name from the register. It is essential that Colleges comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All Colleges must inform the local authority of any student who fails to attend College regularly or has been absent without the College's permission for a continuous period of 10 College days or more, at such intervals as are agreed between the College and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

APPENDIX G: CONCERNS AND ALLEGATIONS ABOUT STAFF INCLUDING SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS

The Local Authority Designated Officer for Allegations (LADO) must be told of allegations against adults working with children and young people within one working day. This includes allegations relating to individuals or organisations using the college premises for the purpose of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, we follow our safeguarding policies and procedures, including informing the LADO.

This includes all cases that meet the harm threshold where a person is alleged to have:

- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offence against, or related to, a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This includes behaviour that may have happened outside of the College, that might make an individual unsuitable to work with children and is known as transferable risk.

There are two levels of allegation/concern:

- allegations that may meet the harms threshold (see definition above)
- allegation/concerns that do not meet the harm threshold – referred to as ‘low level concerns’

The Governing Body ensures the College has policies and processes to deal with concerns (including allegations) which do not meet the harm threshold. Concerns may arise in several ways and from a number of sources. For example: suspicion, complaint or disclosure made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks undertaken.

We have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

Low Level Concerns - Creating a culture in which all concerns about adults, including allegations that do not meet the harm threshold, are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the College may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating students

Such concerns are always be recorded and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Pre-Appointment Checks and Safer Recruitment

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

When appointing new staff, The College will:

- verify a candidate's identity. Identification checking guidelines can be found on the [GOV.UK](https://www.gov.uk) website
- obtain (via the applicant) an enhanced DBS certificate (including barred list information for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, follow advice on the [GOV.UK](https://www.gov.uk) website
- if the person has lived or worked outside the UK, make any further checks we consider appropriate and verify professional qualifications, as appropriate
- verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.
- carry out an online search on shortlisted candidates to help identify any issues that are publicly available online. Shortlisted candidates will be informed before online searches are carried out. Ensure that evidence of these checks has been retained

In addition:

- we check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State
- we check that the Governing body is not subject to a section 128 direction made by the Secretary of the State
- we ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State for prohibition checks or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012

Single Central Record

The College keeps a single central record. The single central record must cover the following people:

- for schools, all staff, including teacher trainees on salaried routes, agency and third-party supply staff, even if they work for one day
- for colleges, details of staff, including agency and supply staff providing education to children under the age of 18, and
- for independent schools, all members of the proprietor body. In the case of academies and free schools, this means the members and trustees of the academy trust.

For agency and third-party supply staff, we include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff.

The single central record indicates whether the following checks have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained:

- an identity check, (identification checking guidelines can be found on the [GOV.UK](https://www.gov.uk) website)
- a standalone children's barred list check 90
- an enhanced DBS check (with children's barred list check) requested/certificate provided
- a prohibition from teaching check
- further checks on people who have lived or worked outside the UK
- a check of professional qualifications, where required,
- a check to establish the person's right to work in the United Kingdom.

In addition:

- The College records whether the person's position involves 'relevant activity', i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18.
- We record details of the section 128 checks undertaken for those in management positions.
- The details of an individual is removed from the single central record once they no longer work at the College or college.

Our College follows Part 3 of Keeping Children Safe in Education 2025 and this should be read on conjunction with the Safer Recruitment Policy, the Allegations against Staff policy, and the Low-Level Concerns Policy.

APPENDIX H: ADDITIONAL POLICIES

Acceptable Use IT Student Policy

Allegations against Staff and Volunteers Policy

Attendance Policy

Code of Conduct

Low Level Concerns Policy

Missing Students Policy

Online Safety Policy

Prevent Policy

Preventing Bullying Policy

Promoting Good Behaviour Policy

PSHE Policy

RSE Policy

Safer Recruitment and Selection Policy

Special Educational Needs and Disabilities Policy

Whistleblower Protection Policy