BRADFIELD COLLEGE

Safeguarding and Child Protection Policy
2025/26

Key Contact Numbers (Section 2 provides full details)

DSL Number:	**07353 892 179**
DSL Team Email:	childprotection@bradfieldcollege.org.uk
Designated Safeguarding Lead (DSL):	Sarah Davies
Deputy DSLs (DDSLs)	Richard Penny
	Jeremy Preston
Headmaster	Jeremy Quartermain (07345 470790)
Berkshire West Local Safeguarding Partnership	01635 519 982

Most recent review	**August 2025**
Date of next review	**August 2026**

Contents

1. Aims, Principles, and Definitions

Bradfield places safeguarding at the top of its list of priorities and understands the need for a whole-school child-centred approach to safeguarding: all systems, processes and policies are designed and operate with the best interests, welfare, and wellbeing of our pupils at their heart.

We embrace the ethos of **Keeping Children Safe in Education (KCSIE)** being wholeheartedly committed to:

'Providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment, including online; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.' (KCSIE, paragraph 3)

To this end, we vigorously promote an environment in which our pupils feel they can speak out about their concerns knowing that we shall listen to them and take action on their behalf.

The law regards any person under 18 as a child and therefore subject to the legal requirements of child protection. However, 18 is not a magic age after which abuse in all its forms does not happen.

We do not underestimate the importance of working closely with parents and those in parental roles in order to strengthen our approaches to safeguarding and to wellbeing.

We promote a clear awareness that no community is immune from the potential for abuse and that we must therefore be alert to the fact that **abuse may happen here** and that our pupils may be subject to abuse both within and beyond the College.

Statutory and Non-statutory Guidance

We note the report of the **Independent Inquiry into Child Sex Abuse (IICSA)** which states: that abuse can and does happen in all types of schools and to all ages of children; and that we must be alert to the possibility that it probably is happening in some form or other here. See **Section 16 Boarding** for further details.

We implement the statutory guidance provided in **Relationships Education, Relationships and Sex Education** (RSE) and Health Education (RSHE) through an extensive educational programme.

We ensure that the College implements as effectively as possible the statutory and other guidance provided in KCSIE and in other key documents; see the section: **'Statutory and other key guidance'** below. In this policy links to the relevant parts of that policy are provided, thereby avoiding making this policy difficult to navigate and therefore allowing readers to pinpoint important material quickly and effectively.

We follow the guidance provided by the most recent edition of **Working Together**, including that successful outcomes for children depend on strong multi-agency partnership working across the whole system of help, support and protection including effective work from all agencies with parents, carers, and families.

The protocols, procedures, and practice set down in this policy and KCSIE, the **National Minimum Standards for Boarding (NMS)** and other statutory guidance are not options: they **must** be followed.

To these ends the College has set out a Code of Conduct for staff; a summary of some of key parts of this is provided below in the section **Summary Guidance: Code of Conduct**.

The College promotes the requirements of the **Equality Act 2010** and the 2025 judgment of the Supreme Court relating to this act, particularly regarding the protected characteristics of religion, race, sex, sexual orientation, and gender reassignment.

Governance and Leadership

The **Council of Governors** is ultimately responsible for safeguarding in the College and nominates a designated safeguarding governor (DSG) to liaise with key staff on safeguarding matters.

The designated safeguarding team provides regular summary reports on safeguarding to the senior leadership and to governors, including the identification of any emerging patterns and trends, any lessons which may be learned from specific incidents; and the actions to be taken to promote the wellbeing of pupils.

The College also carries out a series of inter-related audits presented at least annually to the senior leadership and to the governors: behaviour, bullying, and harassment; wellbeing, safeguarding; and boarding.

The College provides a wide range of polices associated directly or indirectly with safeguarding providing greater details in key areas. Links to these may be found in the section following: **Key College Policies related to Safeguarding.**

Local Guidance

The College works with and pays particular attention to the guidance provided by the **Berkshire West Safeguarding Children Partnership**, which is out local partnership (LSCP).

Mental Health Support

Schools have an important role to play in supporting the mental health and wellbeing of their pupils. 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.

Safeguarding includes preventing impairment of children's mental as well as physical health development. If staff have a mental health concern about a child, they will follow school procedures for reporting it to the pastoral team.

At this School we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and a clear referral system.

Definitions

Range of Policy:

This policy applies to all parts of the College including all boarding houses and to any trips visits, or other excursions arranged by the College.

Designated Safeguarding Team (DST):

The Designated Safeguarding Lead (DSL) and deputy DSLs supported by the Designated Safeguarding Governor (DSG).

Child:

Includes everyone under the age of 18 noting that special protection provisions also apply by law to any vulnerable adult aged 18 and over and that it may be a criminal offence for anyone in a position of trust in a school to engage inappropriately with any student in that school aged 18 or over.

Child Protection:

Refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering, significant harm.

Staff:

Refers to all those adults working for or on behalf of the College, full time, part time and/or self-employed, temporary or permanent including supply staff, in either a paid or voluntary capacity includinggovernors and contractors.

Parent:

Refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers, guardians and adoptive parents.

Safeguarding:

Promoting the welfare of children refers to the process of protecting children from maltreatment, abuse including child-on-child abuse, sexual violence and sexual harassment, preventing the impairment of health or development.

Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, promoting mental and physical health and development, and taking action to enable all children to have the best outcomes.

Attendance

Ensuring that any pupil whose attendance fails or may fail to reach 90% is monitored and supported in accordance with the statutory requirements of **Working Together to Improve Attendance**.

Working Together to Safeguard Children:

The statutory guidance which we follow states specifically that:

- Child protection is an 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.

- Effective safeguarding means practitioners should understand and be sensitive to contextual factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

- Providing help and support to meet the needs of children as soon as problems emerge, i.e. avoid prevarication and procrastination; delay for whatever reason may be catastrophic for a child at risk of suffering, significant harm.

2. Contacts

DSL Team (DST)

DSL Number: **07353 892 179**

DSL Team Email: childprotection@bradfieldcollege.org.uk

Designated Safeguarding Lead (DSL):   Sarah Davies

Deputy DSLs (DDSLs)   Richard Penny

                                                 Jeremy Preston

Should illness, requirement to isolate, or any other issue affect the entire DSL team's ability to respond, then contact should be made with the local authority directly or with the most senior member of the senior leadership team available who will liaise with the local authority directly.

As a boarding school; the college will ensure that the DSL or DDSLs are available 24/7 during term time – contact details are provided to staff through the QR code. During holidays all pupil related issues go to the DSL.

Senior Leadership Links

Head to whom safeguarding allegations against members of staff, volunteers, and contractors should be referred head@bradfieldcollege.org.uk

Council of Governors Links

Nominated governor for child protection and safeguarding (DSG):

Catherine Hartz   cpgovernor@bradfieldcollege.org.uk

The Warden (to whom safeguarding allegations against the Headmaster must be referred without informing the Headmaster):

Tom Beardmore-Gray   warden@bradfieldcollege.co.uk

Local Authority Key Contacts

Berkshire West Local Safeguarding Partnership

Email: BWSCP@brighterfuturesforchildren.org

Website: https://www.berkshirewestsafeguardingchildrenpartnership.org.uk/scp

The procedures in this policy apply to all staff and governors and are consistent with locally agreed inter-agency procedures of Berkshire West Safeguarding Children Partnership.

Children's Social Services at West Berkshire Council:

West Street House, West Street, Newbury RG14 1BD:

Contact, Advice and Assessment Team (CAAS)

01635 503 090 or email: child@westberks.gov.uk

For immediate concerns about the child's safety the police will be contacted by the DSL (Emergency 999, or Non-Emergency 101). EDT contact details for out of hours children's services in West Berkshire are 01344 351 999 edt@bracknell.forest.gov.uk

cpadmin@westberks.gov.uk

West Berkshire Building Communities Together Team Acting Manager

Alex O'Connor **westberksbct@westberks.gov.uk**

Designated Officer for the LA (previously known as the LADO)

Fiona Goussard

LADO.LADO@westberks.gov.uk.

Police

Police (Immediate Risk including Prevent):   999

Police (Non-emergency including Prevent)   101

https://www.thamesvalley.police.uk/ro/report/ocr/af/how-to-report-a-crime/

Other Contacts

Children's Commissioner: England

Telephone 0800 528 0731

help.team@childrenscommissioner.gsi.gov.uk

Child and Adolescent Mental Health Service - CAMHS

Telephone 0300 365 1234

https://cypf.berkshirehealthcare.nhs.uk/our-services/children-and-adolescent-mental-health-services-camhs/

Prevent

DoE Preventing extremism in schools and children's services

Telephone 020 7340 7264

counter.extremism@education.gov.uk

NSPCC

Telephone 0808 800 5000

https://www.nspcc.org.uk

Child-on-child abuse helpline: 0800 136 663

help@nspcc.org.uk

NSPCC Whistleblowing Advice Line

Telephone 0800 028 0285

ChildLine

Telephone 0800 1111

CEOP (Child Exploitation and Online Protection)

Telephone 0370 496 7622 (available 24/7)

communication@nca.gov.uk

Kooth: Online Mental Wellbeing Community

www.kooth.com

Inspectorates

Anyone may contact Ofsted, the Department for Education (DfE), or the Independent Schools Inspectorate (ISI) directly should they believe the College is not acting suitably with regard to safeguarding:

Ofsted: 0300 123 4666 or email CIE@ofsted.gov.uk ;

ISI: 0207 600 0100 or email concerns@isi.net

DfE: helpline 0370 000 2288 or go to https://www.gov.uk/contact-dfe

3. Statutory and other key guidance

We embrace and are determined to implement as effectively as possible the protocols, procedures, and good practice required by the key documents below for schools.

For each key document website links are provided:

Keeping Children Safe in Education (KCSIE) (September 2025)

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

The Independent Inquiry into Child Sex Abuse (IICSA) (March 2022)

https://www.iicsa.org.uk/reports-recommendations/publications/inquiry/final-report.html

We ensure that we fulfil the requirements demanded for effective liaison with external agencies including local authorities and the police as set out in:

Working Together to Safeguard Children (WT) (December 2023 with update May 2025)

https://assets.publishing.service.gov.uk/media/65cb4349a7ded0000c79e4e1/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf and video update https://www.youtube.com/watch?v=G4ntSqMCSUI

We also are committed to following the guidance provided by:

The Prevent Duty: an introduction for those with safeguarding responsibilities (PD) (September 2023)

https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-england-and-wales-accessible

Multi-agency Statutory Guidance on female genital mutilation (SGFGM) (July 2020)

https://assets.publishing.service.gov.uk/media/613f26d5e90e07044435c949/6.7166_HO_FBIS_BN_O__Leaflet_A4_FINAL_080321_WEB.pdf

What to do if you're worried about a child is being abused: advice for practitioners (CAAP) (March 2015)

https://assets.publishing.service.gov.uk/media/5a80597640f0b62302692fa1/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Teachers' Standards (TS) (December 2021)

https://assets.publishing.service.gov.uk/media/61b73d6c8fa8f50384489c9a/Teachers__Standards_Dec_2021.pdf

Sharing Nudes and Semi-Nudes: advice for educational settings (UKCIS) (March 2024)

https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

noting that sharing such images is now ubiquitous amongst young people.

Pornography's influence (on young people): Children's Commissioner Report (May 2023)

https://www.childrenscommissioner.gov.uk/resource/pornography-and-harmful-sexual-behaviour/

Equality Act 2010: advice for schools (EAAS) (May 2014)

https://assets.publishing.service.gov.uk/media/5a7e3237ed915d74e33f0ac9/Equality_Act_Advice_Final.pdf

Improving school security and lockdowns (July 2024)

https://www.gov.uk/government/publications/school-and-college-security

Data protection toolkit (DPT) and Cyber-security Standards(CSS):

https://www.gov.uk/guidance/data-protection-in-schools and https://www.gov.uk/guidance/plan-technology-for-your-school

https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges

Teaching online safety in schools (TOS) (January 2023)

https://www.gov.uk/government/publications/teaching-online-safety-in-schools/teaching-online-safety-in-schools

Relationships Education, Relationships and Sex Education (RSE) and Health Education (RSHE)

https://assets.publishing.service.gov.uk/media/62cea352e90e071e789ea9bf/Relationships_Education_RSE_and_Health_Education.pdf

with additional guidance on age limits (under review) provided in: https://www.gov.uk/government/news/age-limits-introduced-to-protect-children-in-rshe

Draft guidance for implementation September 2026: https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education

Teaching about relationships, sex and health (2021)

https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health

Preventing and Tackling Bullying (July 2017)

https://assets.publishing.service.gov.uk/media/625ee64cd3bf7f6004339db8/Preventing_and_tackling_bullying_advice.pdf

noting that this guidance fails to recognise that bullying need not involve repetition, for example where an individual instance of abuse on social media takes place: the inspectorate (ISI) now ecognises that such individual instances of bullying may take place.

Advice on Cyber-bullying (2014)

https://assets.publishing.service.gov.uk/media/62611456e90e07168ad2b1ea/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf

Working Together to Improve School Attendance (August 2024)

https://www.gov.uk/government/publications/working-together-to-improve-school-attendance

Guidance on Social Media (current)

https://saferinternet.org.uk/guide-and-resource/social-media-guides

Harmful online challenges and online hoaxes. (February 2021)

https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes/harmful-online-challenges-and-online-hoaxes

Child sexual exploitation (February 2017)

https://assets.publishing.service.gov.uk/media/5a7f8e3640f0b62305b87dbc/CSE_Guidance_Core_Document_13.02.2017.pdf

Criminal exploitation of children (October 2023)

https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines

National Minimum Standards for Boarding Schools (September 2022)

https://assets.publishing.service.gov.uk/media/64787a31b32b9e000ca96010/National_Minimum_Standards_for_boarding_schools.pdf

Independent School Standards (April 2019)

https://assets.publishing.service.gov.uk/media/5cd3fc2fe5274a3fd6ee74b0/Independent_School_Standards-_Guidance_070519.pdf

4. Key College Policies related to Safeguarding

The College provides a range of policies linked directly or indirectly to safeguarding. The following are all found on the College website;

https://www.bradfieldcollege.org.uk/about/policies/

- **Anti-Bullying Policy**

- **Attendance Policy**

- **Behaviour Policy**

- **Data Protection Policy**

- **Disability and Reasonable Adjustment Policy**

- **Equality and Diversity Policy**

- **IT Acceptable Use Policy**

- **Online Safety Policy**

- **Relationships and Sex Education Policy**

- **Special Educational Needs Policy**

- **Staff (Safer) Recruitment Policy**

- **Whistleblowing Policy**

Remote Access

Protocols are ready to be enacted should there be a need for teaching to take place remotely e.g. because of a pandemic or other serious situation which prevents the normal operation of the College. For individual instances of remote contact with pupils, teachers and others are expected to follow the guidance given in:

- the Code of Conduct for staff which requires high levels of professional behaviour at all times when in contact with pupils

- a remote access risk assessment provided by the DSL or member of the senior leadership.

Managing allegations and low-level concerns

Protocols are in place setting out how the College will manage any safeguarding allegations and low-level concerns.

5. Summary Guidance: Code of Conduct

This section summarises several of the key safeguarding elements of the Staff Code of Conduct.

Duty of care:

- all staff and volunteers must take reasonable care of pupils under their supervision, protecting them from harm and seeking to promote and safeguard their welfare.

Professional Conduct:

- everyone should always consider whether their words and actions are warranted, proportionate, safe and applied equitably:
- favouritism of any kind is unacceptable

- be aware of pupils' emotional needs – personal comments, sarcasm, embarrassing or humiliating words are always unprofessional and may be considered as a form of abuse

- be aware that some pupils may find it hard to tell someone that they are being abused: they may not be ready to do so or they may not know how to do so

- avoid language that is sexual, sexist or racist in tone or talk that is discriminatory or intimidating in nature

- avoid inappropriate conversation, including innuendo, salacious gossip or swearing

- never behave in a way that demeans or undermines a pupil, his/her parents, carers, friends or relatives

- particular care should be taken by those teaching on a one-to-one basis, by boarding staff, by those involved in the personal care of children, and by those who may come into physical contact in the course of educational demonstrations with pupils;

- should the need for reasonable restraint arise, this should be reported immediately to the Headmaster.

Personal integrity:

- recall that employees and volunteers occupy a professional "position of trust" and so, by law, must not attempt to cultivate any sort of sexual relationship with a pupil

- avoid behaviour and conversation that might cause a reasonable adult to question your suitability to work with other people's children;

- avoid dressing in a way that might be construed as sexually provocative;

- never behave in a way that might be thought of as showing favouritism to individual children, for example giving birthday cards, treats or small gifts (except in circumstances covered by the College's policy on rewards – outlined in the Behaviour Policy);

- staff and volunteers should talk immediately to their line manager (or the Second Master) if they sense a possibility their demeanour, words or actions might have been misconstrued.

Social contact:

- never arrange to contact or meet pupils outside the school setting except for reasons associated with work at the College and agreed in advance by managers:

- at College or when on College business (e.g. trips and visits), never meet pupils one-to-one behind a closed door;

- never cover the glass panels in classroom doors, or close curtains or blinds when meeting pupils in College;

- be aware of pupils' personal space – physical contact is wholly inappropriate, except in very limited circumstances (when a necessary part of the employee's professional duties);

- never smoke or take drugs in the presence of pupils: only drink alcohol (always moderately) when pupils are present if the occasion is licensed by the Second Master;

- staff and volunteers should never take pupils on a journey in their car – except in circumstances covered by the College's policy on Educational Visits.

Treatment of pupils:

- always value and respect pupils as individuals, behaving towards them in a safe, fair, mature and considered manner;
- never seek personal friendship with pupils;
- build relationships with pupils that have a professional character – treat all pupils equally;
- never make unprofessional remarks about pupils' appearance and dress, or make comments touching on physique or body image;
- avoid trivialising the significance of smoking, alcohol and drug abuse;
- never make inappropriate attempts at humour touching on anxiety, depression, or self-harm;
- staff and volunteers should not discuss their intimate personal relationships in conversation with pupils.

Behaviour online:

1. never exchange personal contact details (address, e-mail, details, telephone number) with a pupil at the College:
2. never use social networking sites to have personal contact with pupils at the College;
3. never take photographs of a pupil without first seeking their permission, and importantly also that of the Housemaster or Housemistress to do so, using a school owned device to do so, and being explicit about the intended use of the photograph;
4. never store photographs of pupils on the memory of any personal device;
5. take special care when posting personal photographs on sites like Facebook – think of such sites as places where images are on public display;
6. be aware of the need to ensure that the College remains free from the dangers of online e-security threats and therefore should comply with the College's protocols relating to downloading files and following links provided when online including in emails and other communications.

Monitoring and filtering:

- be aware that students are at risk when online.
- hence be familiar with the College's approach to and policies regarding online safety including:
  - the need for the College to provide effective filtering and monitoring of the access to the Internet including for AI images and information;
  - the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- in particular they should be aware that the DSL has the lead responsibility for online safety
- understanding the risks associated with online safety in general and also Prevent, with those related to the latter being set out in the College's risk assessment for Prevent.

Confidentiality:

- no employee or volunteer should ever promise to keep confidential or secret something told them by a pupil.

6. Summary Guidance: Abuse and Allegations

Staff, volunteers, governors, others working on site, and visitors should not assume that someone else will deal with a safeguarding concern: it is the responsibility of all to act when encountering such a concern. Hereafter this summary guidance refers to all such people other than visitors (who will receive guidance as to whom they should refer any safeguarding concerns) as 'staff' for convenience.

See later sections on abuse and allegations for greater details, namely sections 10, 11, 12 and 13

Abuse: adult-on-child where the adult is not a member of staff (Section 10); or child-on-child (Section 11)

Any disclosure about such abuse whether from the child affected or someone else must be reported immediately to a member of the DSL team.

If the disclosure is directly from the child: stay calm, reassure them that they have done the right thing in telling a responsible adult, make sure they are safe, and tell them that you must inform the DSL team.

Whoever provides the disclosure: do not ask them leading questions; do not put words in their mouth; produce a written account of what is said; and give this to the DSL team.

Do not discuss the matter with others and follow the guidance of the DSL team who, if significant harm is possible, will consult the local authority and perhaps the police before proceeding.

It is not for a member of staff to decide what the level of harm might be: this is a matter for the DSL team and those external agencies consulted.

Allegations against and concerns relating to staff or visitors other than the Head (Section 12)

Any safeguarding allegation should be reported to the Head immediately without informing the member of staff.

It is not for a member of staff to decide what the level of concern might be: this will be decided by the Head in close consultation with others such as the DSL, and external agencies.

If the disclosure is directly from the child: stay calm, reassure them that they have done the right thing in telling a responsible adult, make sure they are safe, and tell them that you must inform the Head.

Whoever provides the disclosure: do not ask them leading questions; do not put words in their mouth; produce a written account of what is said; and give this to the Head.

Do not discuss the matter with others and follow the guidance of the Head who, if significant harm is possible, will consult the local authority designated officer before proceeding.

Safeguarding allegations against the Head (Section 12)

Such allegations should be reported to the Warden immediately without informing the Head.

If the disclosure is directly from the child: stay calm, reassure them that they have done the right thing in telling a responsible adult, make sure they are safe, and tell them that you must inform the Warden.

Whoever provides the disclosure: do not ask them leading questions; do not put words in their mouth; produce a written account of what is said; and give this to the Warden.

Do not discuss the matter with others and follow the guidance of the Warden who, if significant harm is possible, will consult the local authority designated officer before proceeding.

Low-level concerns (section 13)

- For low-level concerns relating to conduct which has not reached the harm threshold, contact should be made in the first instance with the DSL who may clarify whether or not the conduct has reached the harm threshold: see the section 13 on low-level concerns.

Anyone may refer a safeguarding concern about abuse to the local authority or police.

7. Summary Guidance: Types and Signs of Abuse

KCSIE provides substantial details of the signs and types of abuse and staff should be familiar with these.

During the last decade, the attention of schools has been drawn to a wide range of types of abuse and associated signs and it is important that staff should have a good general understanding of these so that children at risk may be identified, helped and protected.

The designated safeguarding team will have a more comprehensive and deeper understanding and should be consulted for guidance.

Abuse is a form of maltreatment of a child.

Somebody may **abuse, neglect, or exploit** 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. Children are at risk of abuse or exploitation in situations outside as well as within their families.

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Abuse can and does take place wholly online, or technology may be used to facilitate offline abuse.

They may be abused by an adult or adults or another child or children.

The main types of abuse:

- **Physical:** which may involve various form of physical assault.

- **Emotional:** which may involve various types of control or coercion.

- **Sexual:** which may involve non-consensual assaults or coerced consensual encounters.

- **Neglect:** which may be material demonstrated through a lack of suitable clothing or through irregular contact with parents or may arise from a serious lack of normal affection and love at home

- **Domestic abuse and violence:** which may arise through witnessing violence of abuse in the home.

- **Child-on-child:** which may be arise from bullying in person or online or from the various forms of harassment or violence.

- **Online:** which may arise from inappropriate online contacts involving coercive and other forms of abuse.

- **Grooming:** a variety of manoeuvres which may precede a specific form of abuse.

- **Abduction:** where a child is removed and placed in danger, in some cases by an adult who is known to or is a family member of the child

- **Exploitation:** where a child is exploited sexually or through involvement in criminal behaviours: see in particular CSE and CCE below.

- **Misinformation, disinformation, and conspiracy theories:** where a child is deliberately exposed to harmful and misleading information and ideas

- **Restricting school attendance:** where a child is prevented or encouraged to be absent without good reason

For further details of these see: https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

In addition there are a number of specific forms to which the attention of schools has been drawn:

Child sexual exploitation (CSE) for further details see:

https://assets.publishing.service.gov.uk/media/5a7f8e3640f0b62305b87dbc/CSE_Guidance_Core_Document_13.02.2017.pdf

- Honour-based abuse (HBA) involving violence, threats of violence, intimidation, coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may have been committed to protect or defend the honour of an individual, family and/or community for alleged or perceived breaches of the family and/or community's code of behaviour.

- Female genital mutilation (FGM) evidence or suspicion of which requires notification to the police and other ritual abuses of young women; for further details see:

https://assets.publishing.service.gov.uk/media/613f26d5e90e07044435c949/6.7166_HO_FBIS_BN_O__Leaflet_A4_FINAL_080321_WEB.pdf

- Forced and under-age marriage, noting that the legal age for marriage in the UK is 18

- Fabricated and induced illness

- County lines, gang exploitation, and child criminal exploitation (CCE) for further details see:

https://assets.publishing.service.gov.uk/media/5a7f8e3640f0b62305b87dbc/CSE_Guidance_Core_Document_13.02.2017.pdf

- Extremism and terrorism (Prevent) for further details see **Section 17** on Prevent later in this policy.

Typical signs of abuse depending upon the type of abuse but also noting that there may be causes other than abuse, may include:

- unexplained or unusual changes in behaviour or mood

- depression

- unexplained bruises, burns, and other injuries,

- disobedience, anti-social, attention-seeking or aimless behaviour

- misuse of alcohol or drugs

- changes in eating patterns

- severe sleep disturbance

- sudden drops in achievement and attainment

- truancy or repeated absences

- children missing from education (CME) including those who leave the roll of the College and who are not placed elsewhere

- self-harm

- suicidal thoughts

and also for CCE and/or CSE

- unexplained gifts, possessions, or money

- sexually transmitted diseases

- older boyfriends/girlfriends

It is important not to make assumptions or try to second-guess what may or may not be happening but simply to report your concerns **without delay** to the designated safeguarding team.

It is also important to note that **more vulnerable children are often targets of abusers**.

8. Responsibilities

Designated Safeguarding Team (see Contact details in Section 2 above)

The detailed duties and responsibilities for the Designated Safeguarding Team are set down in the job descriptions for the DSL and members of her team.

In summary, these include the needs to:

- maintain child protection records securely and effectively;

- provide and/or arrange safeguarding training for staff and governors including during induction;

- guide, advise, and support staff reporting disclosures;

- if and as directed by the Head: guide, advise, and support staff making allegations and/or reporting low-level concerns;

- liaise with HR staff to ensure that the single central register and staff files are maintained as required and all required pre-appointment checks are made;

- liaise with boarding staff to ensure that safeguarding for boarders is effective;

- liaise with nursing and wellbeing staff to promote the wellbeing of pupils.

- ensure that the College's online safety programme is delivered effectively;

- liaise with pastoral staff to ensure that the RSE programme is delivered effectively;

- liaise with the local safeguarding partnership and other agencies specifically but not only when dealing with cases of abuse including when considering the extent to parents should be involved;

- monitor and support College pupils who are looked after children or who receive early help and intervention;

- protect the interests of vulnerable children in the College;

- carry out safeguarding and related reviews and audits;

- liaise with the designated safeguarding governor to provide an annual safeguarding report for governors;

Staff:

Be aware of and follow the guidance provided for staff in this Safeguarding Policy and also:

- regarding the protocols and procedures for dealing with and reporting disclosures, allegations, and low-level concerns and especially the needs to report immediately, reassuring pupils that they will be taken seriously and keeping them safe, and to maintain confidentiality;

- note that: many children may feel for many reasons that they are not ready to speak out about being abused, exploited, or neglected; they may not recognise or understand their experiences as harmful; they may be embarrassed, humiliated, or threatened;

- hence it is important to have professional curiosity and raising even slight concerns about a pupil with a member of the designated safeguarding team;

- with regard to Part 1 (or Annex A for staff not in direct contact with pupils) of KCSIE with particular note taken of the signs and types of abuse and of the protocols for referrals of the local safeguarding partnership;

- in the Staff Code of Conduct including as summarised in this policy; and

- in associated policies as set out in the relevant section of this policy, including ensuring that any use of reasonable restraint should be reported immediately to the Head.

HR Staff

in addition to the above responsibilities for all staff:

- be familiar with the safer recruitment requirements as set down in KCSIE and how to interact with government services to make key checks;
- ensure that all appropriate pre-appointment checks for each type of appointment – including identity, enhanced DBS, barred list, and right to work – are carried out; and
- liaise with the Headmaster and DSL to ensure that reports to the DBS and to the Teaching Regulation Agency (TRA) are made as required.

Boarding Staff

In addition to the general responsibilities for all staff, those with boarding duties should:

- recognise the responsibilities which arise from around the clock care; and
- ensure that they do not put themselves or pupils at risk by deviating from the guidance provided in the code of conduct on staff-pupil relationships.

Governors

In addition to recognising that the Council of Governors has ultimate responsibility for safeguarding in the College, the Council has duties to:

- nominate a designated safeguarding governor to liaise regularly with the designated safeguarding team and as required with HR staff carrying out pre-appointment checks;
- receive an annual safeguarding report as well as interim safeguarding reports;
- through the senior leadership ensure that the safeguarding team has sufficient time and resources to fulfil the demands made upon it; and through the senior leadership ensure that effective safeguarding training for staff is in place;
- receive regular audits on: safeguarding; behaviour, bullying, and harassment; and wellbeing; thereby enabling them to identify and act upon patterns and trends in each of these areas;
- ensure that effective systems are in place for filtering, monitoring and IT security including for AI images and information;
- ensure that effective programmes for online safety are in place; and
- ensure that effective programmes for wellbeing and relationship, sex and health education are in place;

Parents

Parents are expected to support the safeguarding work of the College:

- including with regard to keeping children safe online including when using smart and mobile technology and when remote learning is necessary; and
- they must understand that, whilst the College will endeavour to involve them in matters relating to their children, the College may not, without proper authority to do so, relate the details or even fact of a disclosure to them: this will be the case when to do so may undermine the safety or well-being of a child: guidance is always sought from local children's services and/or the police on such occasions.
- Parents must ensure their child attends regularly and punctually; notify the College of any absence before morning registration, providing the reason and any supporting evidence requested (e.g. medical); avoid term-time holidays without the College's prior written permission; and work with the College to address any barriers to attendance as part of early help.

Pupils

Pupils should work with the College to ensure that all may enjoy a safe and productive environment:

- they should have the confidence to report any concerns, about themselves or others, including those related to child-on-child abuse, to a member of staff who will in turn refer the report to the DSL or a member of her team.
- they should not put themselves at risk when online, using smart or mobile technology, in the public arena, following the guidance provided through the various elements of our programmes.

9. Training

During 2025/26, members of the College community will receive focused training to help them prepare for the changes to the statutory guidance on relationship and sex education, especially where these changes impact on safeguarding matters, including:

1. Raising awareness of the negative influence of harmful online movements (such as involuntary celibacy ideologies, or "Incel"), and ensuring that young males are supported with positive, respectful role models.

2. The impacts upon young people of the 2025 judgement of the Supreme Court that the Equality Act relates to men and women as defined by their sex at birth whilst noting that the provisions of the Gender Recognition Act of 2004 require that pupils should be taught to recognise that people with the protected characteristic of gender reassignment, as with the other protected characteristics, have protection from discrimination and should be treated with respect and dignity.

The following sets down the general approach to safeguarding training for members of the College Community.

A) **Designated Safeguarding Team**

Focused and the appropriate levels of training for those with designated safeguarding responsibilities as required by KCSIE, WT, and the local authority safeguarding partnership including with regard to:

- Developing with the assistance of both external and internal training a secure understanding of: this policy; part 1 of KCSIE; the staff code of conduct; the behaviour and anti-bullying policies; the whistleblowing policy (for general failings in safeguarding practice); the RSE policy; procedures for dealing with missing children; and the online safety policy.

- Specific training on mental and physical health and emotional wellbeing.

- The management of disclosures.

- Awareness of local authority reporting thresholds.

- The management of early help and interventions.

- Supporting the senior leadership as required on dealing with low-level safeguarding concerns and if necessary safeguarding allegations against staff.

- Supporting HR staff on safer recruitment.

- Understanding how to provide safer recruitment risk assessments.

B) **Designated Safeguarding Team: adjunct members**

Adjunct members of the safeguarding team and in particular the nursing staff and those in charge of boarding houses receive appropriate guidance on a range of problems related to safeguarding and wellbeing generally which they might encounter when dealing directly with pupils including:

- self-harm; suicidal thoughts; eating disorders; depression; high levels of anxiety; bullying and harassment; bereavement; family break-up; sexual violence and harassment.

C) **Safeguarding training for staff and others in regulated activity includes:**
- On induction to read and understand: this policy; part 1 (or where judged appropriate for staff who do not work directly with children Annex A of KCSIE); the staff code of conduct; behaviour and anti-bullying policies; whistleblowing policy; the RSHE policy; procedures for dealing with missing children; the online safety policy.

- The 'Blue Card" (accessed via the shared QR code) identifying the DSL and members of her team provided on induction.
- Specific directions to key parts of policies and guidance including: Prevent, FGM, youth produced sexual imagery; and any matters regarded as higher risk for College pupils.

- Specific training on mental and physical health and emotional wellbeing.

- Practical guidance relating to:
  - reporting disclosures, allegations, and low-level concerns;

- understanding the threshold for harm as determined by the local authority;
- ensuring confidentiality including not contacting parents without the express authority of the safeguarding team;
- dealing with bullying, sexual violence, and harassment of all kinds;
- supporting vulnerable pupils including those with SEND and LGBT+;
- the actions to be taken when pupils go missing;
- safeguarding pupils in boarding houses.

- Updates for all as required regarding any changes to policies and guidance.

- Occasionally, some pupils will work with other children in a voluntary capacity in offsite settings. The DSL will deliver appropriate training before they begin and a record of their attendance is kept. The same arrangement applies to the JCR.

D) Additional training for HR staff dealing with the SCR and staff files:

- Periodic external training is provided which includes regular reviews of the approach taken to safer recruitment and discussions relating to a wide range of HR problems.

E) Governors

They receive focused safeguarding training both on induction and regularly when in post including:

- On induction to read and understand: this policy; part 1 of KCSIE; the staff code of conduct; the behaviour and anti-bullying policies; the whistleblowing policy; the RSHE policy; and the online safety policy.

- During the annual update through the provision of specific details about safeguarding matters.

- The scrutiny of reports on safeguarding trends and patterns presented to meetings of the governors.

- Specific training for key governors on safer recruitment and how to scrutinise the single central register, staff files, and related risk assessments.

- Specific training on mental and physical health and emotional wellbeing.

F) Visitors and occasional contractors

They receive appropriate safeguarding documentary guidance on arrival.

10. Abuse: Adult-on-Child

This section deals the possible abuse of a pupil by an adult who is **not** a member of staff, volunteer, or governor or otherwise working in or for the College. For the approach to be taken for an adult who is so connected with the College see **Section 12 Allegations**.

All staff should have an awareness of safeguarding issues that can put children at risk of harm.

Behaviours linked to the likes of drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth-produced sexual imagery or YPSI) put children in danger.

Equally the experience of domestic abuse including coercive control may have serious and harmful effects on children even where they are not the direct subject of the abuse or control.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL and her team should be considering the context within which such incidents/behaviours occur.

This is known as **contextual safeguarding**, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Although many children are anxious to speak out about the abuse they are suffering, many children may feel for many reasons that they are not ready to speak out about being abused, exploited, or neglected.

They may not recognise or understand their experiences as harmful.

They may be embarrassed, humiliated, or threatened.

Hence it is important to have professional curiosity and raising even slight concerns about a pupil with a member of the designated safeguarding team (DST).

The approach to any disclosure should follow the following protocols:

- do not ask leading questions and do not put words into the mouth of the pupil disclosing

- do not promise confidentiality

- explain that the information must be passed to a member of the DST

- ensure that the pupil disclosing is safe: it is essential that they are not put at risk of harm

- report the disclosure immediately to a member of the DST

- consider taking them with you directly to a member of the DST or calling a member of the DST to assist

- complete a written report for the DST using as far as possible the words of the pupil disclosing

- do not discuss the disclosure with any other person

- do not attempt to investigate the disclosure

- do not inform the parents in any way about the disclosure: this is a matter for the DST in consultation with the local authority and/or police

The member of the DST receiving the disclosure will contact the children's services of the local authority and/or police to receive guidance about how the school should proceed and will follow that guidance.

If a crime may have been committed then the police must be informed.

The College in consultation with the local authority and/or police, taking due note the guidance provided by Working Together, will make a sensitive risk-assessed judgment about the practical management of the situation and how to provide the right support for the pupil concerned.

The College aims to be proactive by creating an environment in which pupils have confidence that if they speak out about any concern or anxiety, staff will listen to them sensitively, support them, and act appropriately on their behalf.

11. Abuse: Child-on-Child

Zero tolerance of all forms of bullying and harassment including sexual violence and harassment must be more than a statement of intent.

Even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

Particular attention is paid to those pupils regarded as more vulnerable.

Staff should report any suspected or actual child-on-child abuse immediately and within one day.

Child-on-child abuse can take many forms.

Child-on-child abuse includes, but may not be limited to:

- **bullying** (including cyber-bullying) noting that bullying with causes or threaten serious harm is potentially a child protection matter;

- **physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;

- **sexual violence and sexual harassment**;

- **sharing of nude or semi-nude images** through technology.

- **initiation/hazing type violence and rituals** which may include harassment, abuse or humiliation in both face to face and online; and

- the intimate and **often covert photographing or filming** of others without their consent including the criminal offence of "upskirting" (of pupils and/or staff)

The College takes all reasonable measures to minimise the risk of child-on-child abuse and takes particular note of the potential impact of child-on-child abuse on the mental health of pupils, including through the preventative education and other measures provided in our PSHE, Wellbeing, RSE, online safety, pupil behaviour and anti-bullying programmes.

Through these programmes, the College aims to ensure that pupils understand that the law protects them.

Particular attention is paid to protected characteristics under the Equality Act 2010, including: disability; gender reassignment; race; religion or belief; sex; and sexual orientation.

The College conducts a proactive risk assessment based on the principles of contextual safeguarding to determine the more likely risks to which its pupils are or may be exposed, assess and monitor those risks, and keep the assessment under annual review.

In its response to expressions of concerns or explicit allegations of child-on-child abuse, the College will always seek to act in a manner that is sensitive, proportionate and prompt. It is obviously helpful if the identity of the alleged abuser(s) is specified in any disclosure.

However, any pupil(s) disclosing abuse will never be pressed to reveal names during the initial disclosure (such details can be dealt with as the disclosure is followed up by the Children's Services, Police or College).

- **The approach to any disclosure should follow the following protocols:**

- stay calm and do not ask leading questions and do not put words into the mouth of the person disclosing

- do not promise confidentiality and explain that the information must be passed to a member of the designated safeguarding team (DST)

- ensure that the subject of the disclosure is safe

- report the disclosure immediately to a member of the DST

- complete a written report for the DST using as far as possible the words of the person disclosing

- do not discuss the disclosure with any other person: making contact with parents and others is a matter for the DSL and her team

- do not attempt to investigate the disclosure or speculate about any participants

The member of the DST receiving the disclosure will contact the children's services of the local authority to receive guidance about how the school should proceed and will follow that guidance. If a crime may have

been committed then the police should be informed.

The College will make a sensitive risk-assessed judgment about the practical management of the situation which may involve the separation of one or more pupil from others before, during, and after any investigatory process.

The investigation of any report of sexual violence or sexual harassment will follow the protocols set out in this policy above and elsewhere and take into account the additional guidance set out in Part 5 of KCSIE.

Appropriate support will be provided for all pupils involved, including those allegedly subject to the abuse and those said to be abusers.

Should a report be determined to be unsubstantiated, unfounded, or false, the DSL will consider whether or not the child or person making the allegation is in need of help or may have been abused by someone else; and a referral should be made to children's services. For reports that are deliberately invented or malicious, the College will decide whether disciplinary action is warranted.

The College will provide through the pastoral team appropriate support for both the victims (or survivors) and perpetrators of child-on-child abuse.

12. Allegations against Staff

Staff: refers to all those adults working for or on behalf of the College, full time, part time and/or self-employed, temporary or permanent including supply staff, in either a paid or voluntary capacity includinggovernors and contractors.

KCSIE Part 4, Section 1 (page 92 of KCSIE 2024 guidance) sets out the details of how the College should approach allegations.

Paragraph 362 of KCSIE sets out the behaviour likely to result in an allegation as follows:

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

An allegation may arise from a disclosure by the pupil directly involved, including a former pupil, from a member of the pupil's family, from a witness who is a pupil, member of staff or member of the public.

In all cases, except for an allegation against the Headmaster, the report of the allegation must be made immediately to the Headmaster or if unavailable to his designated deputy.

If the allegation is against the Headmaster, the report of the allegation must be made immediately to the Warden or if unavailable to the Warden's designated deputy.

If an allegation is disclosed to a member of staff, they must not ask leading questions or put words into the mouth of the person disclosing, they must not promise confidentiality, they should make a written record of the disclosure which will be passed to the Headmaster or Warden as appropriate.

The person about whom the allegation is made should not be informed. The allegation should not be discussed with others. No actions should be taken by the person making the report unless otherwise directed by the Headmaster or Warden (or designated deputy) as appropriate.

When an allegation of abuse is made against a member of staff, volunteer, governor, supply teacher, or other adult whilst on College property or on College business, the College will do its utmost to provide appropriate support for all involved to whom the College owes a duty of care.

The first action of the Headmaster or the Warden (or designated deputy) will be to consult without delay the designated officer of the local authority, sometimes known as the LADO and, should the LADO so advise, or if a crime has been committed, or if a child is at immediate risk of harm, the police.

Suspension from normal duties is not an automatic response. The approach of the College for its own personnel will be based on risk assessments agreed with the designated officer of the local authority. The College will liaise with those employed by other agencies or organisations and may appoint a case manager to deal directly with the matter and liaise with external agencies.

Paragraphs 367 and 368 of KCSIE set down the approach to be taken subject to the approval of the LADO and/or the police:

- Looking after the welfare of the child - the designated safeguarding lead (or a deputy) is responsible for ensuring that the child is not at risk.
- Investigating and supporting the person subject to the allegation – the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

The College will follow the protocols set down in the document: **Managing Allegations and Low-level Concerns**, taking due note the guidance provided by Working Together.

Any allegation relating to a **historical incident** should be made in writing to the Headmaster who will inform the LADO and Police in order to determine how the College should deal with the historical allegation.

Organisations that hire the Bradfield College premises in vacation periods are required to satisfy BCEL that they have appropriate safeguarding arrangements in place, in keeping with recent government guidance for out of school settings (After-school clubs, community activities and tuition: safeguarding guidance for providers - GOV.UK (www.gov.uk)). This does not mean that the College seeks to fully devolve its safeguarding responsibilities to an external agency.

13. Low-level Concerns

The College also provides general guidance in its Staff Code of Conduct.

What follows is a summary of what constitutes a low-level concern and how staff should act when regarding behaviour as a cause for concern.

KCSIE defines low-level concerns in terms of problematic behaviour with safeguarding implications on the part of a member of staff which does not appear to be serious enough to warrant an allegation of improper conduct. The behaviour may simply be thoughtless. However, it may be a prelude to abuse.

How the College acts when low-level concerns are reported will be in accordance with Part 4, Section 2 of:

https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf

The examples of low-level concerns given in Paragraph 433 of KCSIE are:

- Being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature.

- Having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.

- Taking photographs of children on their personal mobile phones or devices.

- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.

- Using inappropriate, sexualised, intimidating or offensive language.

This list is not intended to be inclusive of all possibilities.

The College encourages self-reporting when a member of staff believes they may have acted inappropriately. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Any member of staff who in good faith has cause for concern, however slight, should report their concern. Reporting a concern should not be seen as judgemental of a colleague but as a neutral action.

For the avoidance of doubt, any safeguarding **allegations** in every instance must be referred directly to the Headmaster. However, reports of any **low-level concerns** should be made in the first instance to the DSL (this includes information provided in the self-report button) who will routinely discuss this material with the Headmaster, who may in turn involve a member of the Safeguarding team (for example, the Second Master) to resolve the matter and if necessary, provide support for the member of staff concerned. Such reports or self-referrals will not normally be regarded as disciplinary matters. HR may also be consulted to advise on relevant support.

Although the DSL will make a record of the concern, if genuine, it is expected that the behaviour leading to the concern will not be repeated. Any repetition may lead to more serious and potentially disciplinary action.

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the Local Authority Designated Officer if required. A record of these reviews will be retained.

The College will deal with a malicious low-level concern as it does with any allegation made in bad faith. Equally, spreading rumours rather than reporting a concern may amount to unprofessional conduct. Even so, the motives for making a false report may be complex, and the person making the report may be in need of help themselves.

The College will follow the protocols set down in the document: **Managing Allegations and Low-level Concerns**, taking due note of the guidance provided by ***Working Together to safeguard Children***.

14. Early Help and Interventions

Effective early help relies upon local agencies working together to identify children and families who would benefit from early help, to undertake an assessment of the need for early help and to provide targeted early help services to improve the outcomes for the child and prevent needs escalating to a point where intervention from children's services would be needed.

Early help now strengthens the role of education and childcare settings in supporting children and keeping them safe: *Working Together to Safeguard Children* includes information on risk factors to be considered when identifying children and families who may benefit from early help.

College staff are made aware of the roles they might have with regard to early help.

Inter-agency assessments take place when a child and family would benefit from coordinated support from more than one agency (e.g. education, health, housing, police). The assessment should be undertaken by a lead professional who could be a teacher, family support worker, health visitor or GP and the decision about who should be the lead professional should be informed by the child and their family.

Examples of support services include family and parenting programmes, assistance with health issues and help for problems relating to drugs and alcohol.

For early help assessment to be effective: the assessment should be undertaken with the agreement of the child and their parents and should involve the child and the family as well as the professionals working with them; and professionals should be able to discuss concerns they may have about a child and family with a social worker in the local authority.

Staff should discuss emerging problems and early help requirements with the DST. If early help is appropriate, the DST will generally lead on liaising with other agencies and setting up an inter-agency assessment.

Staff should recognise that any child may benefit from early help and interventions, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;

- has special educational needs (whether or not they have a statutory education, health and care plan);

- 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 is frequently missing/goes missing from care or from home;

- is misusing drugs or alcohol themselves;

- Is at risk of modern slavery, trafficking, or exploitation;

- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems, or domestic abuse;

- has returned home to their family from care;

- is showing early signs of abuse and/or neglect;

- is persistently absent or at risk of persistent absence;

- is at risk of being radicalised or exploited;

- is a privately fostered child.

The School aims to ensure that children receive the right help, at the right time to address risk and prevent issues escalating.

Any such cases should be kept under constant review and consideration given to a referral to local authority's children's service for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Referrals to Children's Social Care/Services for statutory assessments are made under the Children Act 1989.

- A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or

development, or whose health and development is likely to be significantly or further impaired, without the provision of services.

- A child suffering or likely to suffer significant harm: local authorities, with the help of other organisations as appropriate, have a duty to make enquiries if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

There may be a need for children's social care and services and/or the police to provide immediate protection whilst an assessment or enquiries are carried out.

KCSIE states that any child may benefit from early help, but all College staff should be particularly alert to the potential need for early help for a child who for example:

- is disabled and has specific additional needs;

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);

- is vulnerable because of LGBTQ+ orientation or identity considerations;

- is a young carer;

- is showing signs of being drawn in to anti-social or criminal behaviour;

- 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 drugs or alcohol themselves.

- Has a parent or carer in prison

- Has a pattern of repeated absence from education

Further details are provided in:

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

and particularly in Chapter 3, Section 1 of:

https://assets.publishing.service.gov.uk/media/65cb4349a7ded0000c79e4e1/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf

15. Vulnerable Children

There are several categories of children who are regarded as being more vulnerable and therefore require particular attention when considering how best to safeguard them.

We recognise that pupils with special educational needs are statistically more vulnerable.

- Children with emotional and behavioural difficulties and disabilities may be especially vulnerable to abuse. College staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems aim to be sensitive to indicators of abuse.
- Children with special educational needs (SEND) or medical conditions may be disproportionately affected by bullying, including prejudice-based bullying, and may experience peer-group isolation. This vulnerability can exist even where outward signs are not apparent.

The College has pupils with emotional and behavioural difficulties and/or challenging behaviours.

The College will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self–esteem as part of an overall behaviour support plan agreed with parents/carers.

Pupils who board may also be regarded as vulnerable and therefore at a greater risk of harm and we endeavour to ensure they are safeguarded as effectively as possible: see **Section 16** Boarding.

As part of our pastoral programmes, staff will teach young people personal safety skills in an age-appropriate manner. Pupils will be taught about: how to keep themselves safe; how to deal with peer pressure; how to form appropriate relationships; and how to raise concerns.

Where necessary, the College will provide additional training to staff noting that there may be communication barriers and difficulties in managing or reporting these challenges. Supervision by senior managers will be vigilant to create a protective ethos around the pupil.

Other children at greater risk of harm include:

- those children who are Lesbian, Gay, Bi, or Trans (LGBTQ+) can be targeted by others. In some cases, a child who is perceived to be LGBTQ+ can be just as vulnerable as children who identify as LGBTQ+;
- those who need a social worker;
- those who have been subjected to toxic masculinity and Incel ideologies;
- those who have been subjected to sustained or harmful misinformation, disinformation, and conspiracy theories
- those requiring mental health support;
- looked after children;
- previously looked after children;
- children who are homeless even temporarily;
- children who are required to give evidence in court either for crimes committed against them or for crimes they have witnessed;
- children who are involved in family court proceedings relating to separation and other family matters;
- children with family members in prison: these children are at risk of poor outcomes including relative poverty, stigma, isolation and poor mental health.

The National Information Centre on Children of Offenders, NICCO provides information to support professionals working with offenders and their children, to help mitigate negative consequences.

- children with particular skill 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, a member of the designated safeguarding team should consider referring them to the **Cyber Choices** programme: this is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing and aiming to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

16. Boarding

The College has due regard to the safeguarding requirements of the revised National Minimum Standards for Boarding (**NMS**, September 2022) and to the recommendations of the Independent Inquiry in Child Sex Abuse (**IICSA**, March 2022).

IICSA noted that sexual abuse can and does occur in all types of schools and to all ages of children and consequently it recommended that schools must go beyond the acceptance that 'it could happen here' to the belief that 'it probably is happening here'.

The boarding environment is regarded by IICSA as a high risk for grooming and abuse by adults working at the school as well as providing opportunities for child-on-child sex abuse. Day pupils at boarding schools are also judged to be vulnerable to these risks.

Overseas boarders may be especially vulnerable not just at school but when staying with their educational guardians for whom there is no convincing system of checks.

The Inquiry also maintained that there is no simple general solution to the problem of child sexual abuse (CSA) in schools. Instead a series of incremental changes are proposed most of which require government action. However, several specific actions for individual schools are recommended, which the school fully embraces.

Accordingly we shall:

- **report any allegation** of child sexual abuse to the inspectorate as well as to the DBS and TRA;

- ensure that the Headmaster, DSL, and members of the DS team (and DSG) are **trained to the highest level**;

- ensure that **RSE for all pupils** including those with SEND is as effective as possible; and

- ensure that **pre-appointment checks and supervision of volunteers are as effective as possible**.

We support and embrace the key substantive changes made to the National Minimum Standards for boarding:

1. the focus upon good rather than suitable or adequate provision (e.g. accommodation, facilities, food) with our boarders helping us to determine the extent to which our provision is excellent;

2. the central importance of the welfare and wellbeing of boarders;

3. the need to ensure that our policies reflect the interests and needs of boarders;

4. the need to monitor any lodgings, host families and guardians that are appointed by the School rigorously and have appropriate steps in place to ensure the welfare of boarders for those with guardians appointed by parents/carers..

The College shall carry out an annual audit of boarding which shall be submitted to the Governors: boarding pupils will be invited to provide feedback to Governors on the experiences of boarding especially as it relates to their welfare and wellbeing.

Accordingly, the following guidelines amongst others will be followed:

- The **wellbeing of boarders** will be a primary concern.

- The risks associated with the **potential impact of sexual violence and sexual harassment** in the boarding environment will be considered

- Any incidents of sexual harassment or sexual violence within the boarding environment will be recorded as boarding incidents, and will also be formally logged as bullying or harassment incidents in line with College safeguarding procedures.

- Staff and boarders of all kinds and needs should know **what to do in an emergency including at night**.

- We shall ensure that there are **clear arrangements for arrival at and departure** from school.

- We shall ensure that **boarders know how to raise concerns** and staff must know how to respond when this happens.

- **Our personal conduct and bullying policies** reference behaviour and bullying in boarding accommodation.

- Any incidents of bullying or misconduct within the boarding environment are **recorded as boarding incidents**.

- In accordance with our **RSE policy** we promote good relationships amongst boarders.

- We take appropriate steps to ensure that **guardians are suitable and promote the welfare of boarders**.

- We do not appoint school staff as educational guardians for **boarders.**

- In the event that **lodgings and host families appointed or arranged by the school** become necessary there will be termly checks in place and DBS checks on all over 16s residing in such accommodation which will be good not merely suitable.

The school understands the importance of promoting positive relationships amongst all pupils including boarders. All pupils including boarders are aware that the school does not allow any sexual activity between pupils to take place on school site regardless of their age.

17. Prevent Duty

The College values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety, and community cohesion.

The College follows statutory guidance in its efforts to protect children and young people against the messages of violent extremism and all staff are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology taking note of the College's Prevent Risk Assessment: the College has due regard to *the need to prevent people from being drawn into terrorism* in line with the Counter-Terrorism and Security Act 2015 and Prevent Duty guidance. For specific details see:

https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-england-and-wales-accessible

Radicalisation is a process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. An act of terrorism typically endanger or cause serious risk or harm to others or to property or to electronic systems.

Members of staff complete an online general awareness training module on Prevent that includes information on when it is appropriate to make a referral to Channel.

Suitable IT filtering, screening, and monitoring is in place on the College's computer system; this will have wider advantages relating to any misuse of the College's systems.

Visiting speakers will be vetted so that the College can be satisfied that the information provided by speakers will be aligned to the ethos and values of the College and to British values.

Any concerns in relation to possible radicalisation are discussed with a pupil's parents unless there is a specific reason to believe that to do so would put the pupil at risk.

Staff will be made aware at safeguarding training of the guidance offered in the Revised Prevent Guidance for England and Wales (2015) and will be alerted to characteristics within children and families that may indicate radicalisation or warning indicators of those who may be vulnerable to radicalisation.

Staff will treat any radicalisation or extremism concerns in the same manner as safeguarding concerns and will follow the College's safeguarding and child protection procedures as outlined in the "Blue card" accessed via the QR code.

Indicators of radicalisation

- Identity crisis: distance from cultural or religious heritage and uncomfortable with their place in the society around them.

- Personal crisis: family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.

- Personal circumstances: migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

- Unmet aspirations: perceptions of injustice; feeling of failure; rejection of civic life.

- Criminality: experiences of imprisonment, probation, etc.; poor resettlement or reintegration, previous involvement with criminal groups.

Further guidance on possible indicators may be found at:

https://educateagainsthate.com/radicalisation

18. Safer Recruitment

The College has a safer recruitment policy available on the Website.

https://www.bradfieldcollege.org.uk/about/policies/

This policy sets out the protocols for checks which must be carried out prior to the appointment of:

- members of the teaching staff including peripatetic teachers of music
- sports coaches and others providing support for activities including CCF
- non-teaching and support staff
- security staff
- governors
- volunteers
- contractors
- visiting speakers
- others

As required by KCSIE, the following minimum checks will be carried out for any person in regulated activity i.e. with possible access to pupils:

- identity, usually passport and birth certificate
- enhanced DBS check which provides information about any police concerns or convictions
- children's barred list, which indicates whether or not an individual is barred from working in an environment where children are present

In addition, the following checks are carried out depending on the type of appointment and level of access to pupils:

- qualifications
- prohibition from teaching
- prohibition from management
- overseas checks: police and professional
- references: at least two including from the most recent employer
- medical declaration of mental and physical health
- right to work in the UK
- internet search, including interrogation of candidates' declared social media accounts

Additional requirements are in place for those over 16 years living in College accommodation who are not employees of the College.

During interviews, safer recruitment questions will aim to discern any problematic attitudes which might be harmful.

Safeguarding and GDPR

Safeguarding records are kept in compliance with GDPR requirements. Processing undertaken is to fulfil our legal responsibilities and discharge our legitimate pastoral interests. The rights of data subjects are respected.

19. Reviews and Updates

This policy will be reviewed annually by the DSL and scrutinised by the Pastoral Committee of Council. On their recommendation it is ratified by the full board. Amendments are made in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school. It incorporates key parts of the statutory guidance provided by Keeping Children Safe in Education (KCSIE).

The guidance in KCSIE sets out what schools and colleges in England must do to safeguard and promote the welfare of children and young people under the age of 18. These specific updates are incorporated in the policy as modified each year.

The DfE has announced that major changes may be made to KCSIE in 2026 and that a wide-ranging consultation will take place before the revised statutory guidance is published.

Updates for KCSIE 2025 include:

- amending the list of abuses to include exposure to misinformation disinformation, and conspiracy theories;

- specifying that the **Working Together to Improve Attendance** is statutory guidance;

- ensuring the filtering and monitoring includes the use of Artificial Intelligence (AI);

In addition, the DfE has released a draft of the revised statutory guidance for **Relationship and Sex Education** which will come into effect in September 2026.

Updates for KCSIE 2024 included:

- amending the definition of 'safeguarding and promoting the welfare of children' in line with Working Together to Safeguard Children 2023;

- additional information around when children may require early help, in accordance with the guidance in Working Together;

- a recommendation for school staff, governors and trustees to use the DfE Data Protection guidance for schools to understand data protection; and

- clarification that schools continue to be responsible for the safeguarding of pupils they place with an alternative provision provider.

Updates made to KCSIE 2023 included:

- clarification around the roles and responsibilities of education staff in relation to filtering and monitoring;

- clarification that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation;

- additional information on online pre-recruitment checks for shortlisted candidates; and

- information on responding to allegations related to organisations or individuals using school premises.

Revisions to the Bradfield College Safeguarding and Child Protection Policy

Any revised policy will be authorised by the Council of Governors and circulated to staff and volunteers and also made available on the College's website.

This version of the policy is a complete revision of previous versions, aiming to simplify and remove unnecessary repetitions as far as reasonable and promote easier navigation to key information.

Next Formal Review

The next scheduled review for this policy is July 2026, noting the likelihood of significant changes to KCSIE and other statutory guidance for September 2026.

SRD

September 2025