CHELTENHAM COLLEGE CHELTENHAM PREP SCHOOL

Child Protection and Safeguarding Policy and Procedures

Reviewer: Michelle Lucas-Halliwell/Noll Jenkins
Approver: Dan Cupit
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'Cheltenham College' refers to Cheltenham College Senior School *and* Cheltenham College Preparatory School (including Cheltenham College Pre-Prep and Nursery School)
'College' refers to Cheltenham College Senior School
'Cheltenham Prep' refers to Cheltenham College Preparatory School
'Nursery and Pre-Prep' refers to Cheltenham College Nursery School and Pre-Prep

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1.1 Cheltenham College Contacts

Designated Safeguarding Leads	
College –Michelle Lucas-Halliwell	Email: m.lucas-halliwell@cheltenhamcollege.org Tel: 07786 683158
Prep – Mr Noll Jenkins	Email: n.jenkins@cheltenhamcollege.org Tel: 07766 726801
EYFS - Mrs Rebecca Hughes-Noon	Email: r.hughes-noon@cheltenhamcollege.org Tel: 07540 620500
Deputy Designated Safeguarding Leads **College**	
Mr James Hayden	Email: j.hayden@cheltenhamcollege.org Tel: 07917 930969
Mr Paul Hayes	Email: p.hayes@cheltenhamcollege.org Tel: 07747 741409
Mrs Ester Leach	Email: e.leach@cheltenhamcollege.org Tel: 07823 335136
Mr Andrew Hailes	Email: a.hailes@cheltenhamcollege.org Tel: 07769 675356
Prep Dr Kit Perona-Wright	Email: k.perona-wright@cheltenhamcollege.org Tel: 07740 477114
Ms Catherine Solomon	Email: c.solomon@cheltenhamcollege.org Tel: 07747 483597
Mrs Claire Baker	Email: c.baker@cheltenhamcollege.org Tel: 07872 997263
Heads **College** Mr Chris Townsend	Email: Head@cheltenhamcollege.org Tel: 01242 265628
Prep Mr Tom O'Sullivan	Email: prep.head@cheltenhamcollege.org Tel: 01242 706814

President of Cheltenham College Council William Straker-Nesbit	Email: President@cheltenhamcollege.org Tel: 01242 265686 and ask to speak to President of Council
Nominated Safeguarding Council Member Katy Dallimore	Email: CPCouncil@cheltenhamcollege.org Tel: 01242 265686 and ask to speak to Child Protection and Safeguarding Council Member
Cheltenham Early Help Team	Email: cheltenhamearlyhelp@gloucestershire.gov.uk **Tel: 01452 328160**

1.2 Important External Contacts

The details of the designated officer as follows:

Nigel Hatten (Local Authority Designated Officer)

Address: Shire Hall, Westgate Street, Gloucester, GL1 2TG.

Telephone: 01452 426994

Email: nigel.hatten@gloucestershire.gov.uk

The telephone numbers of the Gloucestershire children's social care department are as follows:

Professional Advice Line: For advice regarding Early Help, Family Help, thresholds, referrals and support for children and families.	01452 427070
Out of Hours (Emergency Duty Team)	01452 614194

If there are concerns that a child may be at risk of FGM, but there is no immediate/imminent risk, staff should contact the Gloucestershire Children and Families Front Door on 01452 426565.

If the concern is immediate or the child is in immediate danger, staff should call 999 and then contact the safeguarding team.

NSPCC Whistleblowing Advice Line

Staff may wish to contact the NSPCC Whistleblowing Advice Line if they are concerned that a child protection concern is not being dealt with properly, may be being covered up, has not been acted upon, or they are worried about being treated unfairly for raising a concern.

Telephone: 0800 028 0285
Email: help@nspcc.org.uk
Website: NSPCC Whistleblowing Advice Line

The contact details for Prevent partners.

Police (non-emergency): 101

Department for Education – Prevent/Counter-Extremism Helpline: 020 7340 7264

Email: counter.extremism@education.gov.uk

1.3 Contacts for pupils:

Safeguarding Children in Gloucestershire – Children's Helpdesk	01452 426565
NSPCC (Whistleblowing helpline)	0800 028 0285
Childline	0800 1111
Children's Commissioner	0800 528 0731
Independent Listeners Patrick Wheaton (Prep) Fiona Womersley (College)	 Mobile: 07557 105634 Email: patrick@stlukescheltenham.org.uk Mobile: 07785 994373 Email: fwomersley@aol.com
Student Support Services	SSS@cheltenhamcollege.org

1.4 Related policies

The following policies and procedures are also relevant to Cheltenham College's safeguarding practices:

(a) Anti-bullying Policy (P) & (C)

(b) Attendance and registration policy (P) & (C)

(c) Behaviour Policy (P) & (C)

(d) Child on Child Abuse Policy (C)

(e) Early Help Policy (C)

(f) Emotional Health and Well Being Policy (CC)

(g) Online Safety Policy (C)

(h) Guardianship Policy (C)

(i) Medications Policy (C)

(j) Missing Pupil Policy (P) & (C)

(k) Pupil ICT Acceptable Use Policy (P), Pupil ICT Acceptable Use Policy (C)

(l) Pupil Whistleblowing Policy (CC)

(m) Recruitment Policy (CC)

(n) Relationship and Sex Education Policy (CC)

(o) Staff Code of Conduct Policy (CC)

(p) Staff ICT Acceptable Use Policy (CC)

(q) Supervision of Pupils (P)

(r) Risk Assessment Policy for Pupil Welfare Needs (CC)

(s) Visitor policy and guidance (CC)

(t) Whistleblowing Policy (CC)

(u) Adults Living in Boarding Houses and College accommodation Policy (CC)

(v) Low Level Concerns Policy (CC)

These policies are available to staff on Cheltenham College's Policy Portal and hard copies are available on request.

2. Policy Statement

2.1 Cheltenham College's Child Protection and Safeguarding Policy and Procedures has regard to statutory guidance including Keeping Children Safe in Education (2026), Equality Act (2010), Working Together to Safeguard Children (2026), Prevent Duty Guidance (2023), and other relevant legislation. It:

2.1.1 has been authorised by the President and Council of College;

2.1.2 is published on the Cheltenham College website and available in hard copy on request;

2.1.3 can be made available in large print or other accessible format if required;

2.1.4 its procedures apply wherever staff, Council or volunteers are working with pupils even where this is away from Cheltenham College, for example an educational visit; and

2.1.5 also applies to the Early Years Foundation Stage (EYFS) Department.

Every pupil should feel safe and protected from any form of abuse. Cheltenham College is committed to safeguarding and promoting the welfare of children and young people, particularly those who are in need or at risk. This includes providing help and support to meet the needs of children as soon as problems emerge and protecting them from maltreatment both inside and outside the home, including online. All staff and volunteers are expected to share this commitment and play an active role in

identifying concerns early, responding appropriately, and maintaining a safe and supportive environment.

Cheltenham College is committed to actively challenging racism, discrimination and bias within all safeguarding processes. All staff must consider how experiences of racism or discrimination may shape a child's lived experience, influence their engagement with professionals, increase vulnerability to harm, or affect their willingness to disclose concerns. Practitioners must be alert to disproportionalities in behaviour, attendance, referrals, sanctions or exclusion data and ensure these are explored and addressed within safeguarding assessments.

Cheltenham College recognises that Prevent is an integral part of safeguarding. Staff must understand that concerns may relate not only to violent extremism but also to non-violent extremist ideology, including online content that promotes hatred, misogyny, racism, antisemitism, Islamophobia or other forms of intolerance. Staff must be alert to extremist narratives circulating on social media, gaming platforms, livestreaming sites and encrypted messaging apps, including content that targets young people through humour, memes, influencers or algorithmic recommendation systems. Cheltenham College will ensure pupils have safe opportunities to discuss sensitive topics, including extremism, and will teach critical thinking skills to help pupils challenge extremist narratives. The DSL will maintain oversight of Prevent concerns, ensuring timely consultation with Gloucestershire Prevent partners and the Channel Panel where appropriate.

The DSL will ensure that monitoring systems identify patterns of disproportionality and report trends to the Senior Leadership Team and Council as part of normal safeguarding oversight. Cheltenham College identifies a named Online Safety Lead responsible for filtering and monitoring systems, and a Council member with strategic oversight. Filtering and monitoring provision is reviewed regularly for effectiveness, proportionality, and impact on teaching and learning. All alerts are RAG rated and actions recorded.

2.2 Cheltenham College will take all reasonable measures to:

2.2.1 ensure that we practise safer recruitment in checking the suitability of staff, Council and volunteers (including staff employed by another organisation) to work with children and young people in accordance with:

- Disqualification under the Childcare Act 2006 (updated in August 2018);
- the Education (Independent School Standards) Regulations 2014 (as amended);
- the National Minimum Standards for Boarding Schools 2026;
- the Statutory Framework for the Early Years Foundation Stage (updated 2026)

See also Cheltenham College's Recruitment Policy

2.2.2 ensure that where staff from another organisation are working with our pupils on another site, we require written confirmation that appropriate safer recruitment checks and procedures have been completed on those staff. As made clear in our Visitor Guidance policy, external speakers are subject to vetting before any event takes place in the school;

2.2.3 follow the local inter-agency procedures of the Gloucestershire Safeguarding Children Partnership;

2.2.4 be proactive in attempting to identify pupils who may be at risk;

2.2.5 be alert to signs of abuse both in Cheltenham College and from outside and to protect each pupil from any form of abuse or harm, whether from an adult or another pupil;

2.2.6 deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with his / her agreed child protection plan;

2.2.7 design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;

2.2.8 be alert to the needs of children with physical and mental health conditions;

2.2.9 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

2.2.10 assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

2.2.11 identify children who may be vulnerable to radicalisation, and know what to do when they are identified;

2.2.12 teach pupils about safeguarding, for example through use of online resources, through the curriculum and Floreat and Thrive!, together with guidance on adjusting behaviour to reduce risks including the safe use of electronic devices and the internet, building resilience to protect themselves and their peers, and information about who they should turn to for help (see also Cheltenham College's Acceptable Use and Anti-bullying policies).

2.2.13 take all practicable steps to ensure that College premises are as secure as circumstances permit;

2.2.14 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in Cheltenham College or in the local area; and

2.2.15 Have regard to the statutory Prevent duty and relevant regulations, statutory guidance and standards issued by the Secretary of State for Education, including the requirements arising under the Counter-Terrorism and Security Act 2015 and associated guidance and regulations.

2.2.16 is committed to ensuring that pupils' access to the internet and other forms of ICT is subject to a robust filtering system, Smoothwall. Every day on rotation a member of the DSL Team checks any alerts that come through Smoothwall. Any concerning searches are followed up with the pupil's Hsm or resident tutor, either immediately or the next day, depending on the urgency of the search. In the Prep, searches are sent to the Deputy Head (Pastoral).

2.2.17 is committed to keeping children safe online through:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems
- Reviewing filtering and monitoring provision at least annually
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning

2.2.18 ensure that pupils understand the need to comply with any necessary infection control measures put in place to protect themselves and others.

2.3 Keeping Children Safe in Education (2026) defines safeguarding and promoting the welfare of children 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 the impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

2.5 The Prevent Duty Guidance for England and Wales (2023) emphasises that the duty to have due regard to the need to prevent people from being drawn into terrorism forms part of education settings' wider safeguarding and welfare responsibilities. Being drawn into terrorism includes not only violent extremism but also non-violent extremism, including certain divisive or intolerant narratives that can reasonably be linked to terrorism. Education settings should be safe spaces in which children and young people can understand and discuss sensitive topics, including, where appropriate, terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

2.6 Keeping Children Safe in Education (2026) provides that the inspection of independent schools will ensure that the Independent School Standards which concerns the welfare, health and safety of children are met.

2.7 If any pupil at Cheltenham College is identified as a Looked After Child (LAC) or a Previously Looked After Child (PLAC), the DSL will work closely with the relevant Children's Services team to ensure the pupil's welfare is safeguarded and promoted. Where parents retain parental responsibility, we will continue to keep them informed and involved, while also ensuring that the College has full information regarding the child's care status and arrangements, including foster placements or residential care settings. The DSL will maintain direct contact with the child's allocated social worker and will ensure the child is included on the Welfare Management Team list of vulnerable pupils, with regular discussion at DSL safeguarding meetings. The DSL will also liaise with the Virtual School Head (VSH) for the relevant local authority. The VSH has responsibility for promoting the educational outcomes of all children in care and supporting previously looked after children. The DSL will ensure that the Personal Education Plan (PEP) is in place and up to date, and that any additional support recommended by the VSH is actioned appropriately.

2.8 At Cheltenham College, staff are expected to be proactive in identifying pupils who may benefit from early help. This means providing support as soon as a concern arises, whether in the Early Years Foundation Stage or through to Upper College. Staff should raise concerns with the Designated Safeguarding Lead (DSL), who will coordinate appropriate support and liaise with external agencies where necessary. Staff may be involved in early help assessments, including identifying emerging issues, sharing relevant information, and in some cases, acting as the lead professional.

Cheltenham College staff should be particularly alert to pupils who are frequently missing from education, have experienced multiple suspensions, are at risk of permanent exclusion, or are affected by parental imprisonment or offending. Other indicators may include involvement in anti-social or criminal behaviour, risk of exploitation or radicalisation, low attendance, or early signs of abuse or neglect. Early identification and intervention are central to the College's

safeguarding approach and commitment to pupil wellbeing. Our Early help procedures are outlined in our Early Help Policy.

2.9 Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Staff must:

- Be wary of making assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Be aware that children with SEN and disabilities can be disproportionally impacted by things like bullying - without outwardly showing any signs; and
- Be aware of communication barriers and difficulties in overcoming these barriers
- Consider that some children are more prone to peer group isolation than other children

2.10 Staff should be sensitive to the needs of pupils who are questioning their gender and recognise that they may be particularly vulnerable to safeguarding risks, including:

- bullying,
- abuse,
- discrimination,
- social isolation,
- mental health concerns

Staff should be sensitive to the needs of pupils who are questioning their gender and recognise that they may be particularly vulnerable to safeguarding risks. The College will respond in a child-centred manner, having regard to *Keeping Children Safe in Education 2026* and other relevant statutory guidance, taking account of the individual circumstances, safeguarding needs, wishes and best interests of the child.

Parents and carers should ordinarily be involved in decisions relating to a pupil questioning their gender or social transition unless doing so may place the child at risk of significant harm. The DSL should be consulted where there are safeguarding concerns or uncertainty about parental involvement.

In considering single-sex facilities, changing rooms, toilets, boarding and overnight accommodation, PE and sport, the College will have regard to relevant legal and statutory requirements and the safeguarding, privacy, dignity and safety of all pupils affected.

2.11 Staff should also be aware that international children can be additionally vulnerable and therefore face safeguarding challenges.

2.12 Staff must recognise misogyny, sexist harassment and harmful gendered attitudes, including online misogynistic content as safeguarding risks under KCSIE 2026.

2.13 Staff must identify early signs of mental health concerns, including suicidal ideation, self-harm, emotional dysregulation, and deterioration linked to online harms or exploitation.

2.14 Cumulative harm, assessments must consider the cumulative impact of adverse events, abuse, neglect and exploitation, and the interaction between different risks and vulnerabilities. Concerns should not be considered in isolation. Staff must remain alert to hidden and non-visible harm, harm occurring online, and the ways in which discrimination and other factors may compound risk.

3. The Designated Safeguarding Lead

3.1 Cheltenham College's Council has appointed a member of staff with the necessary status and authority (Designated Safeguarding Lead) to be responsible for matters relating to child protection and welfare.

3.2 The Designated Safeguarding Lead shall be given the time, funding, training, resources and support to enable him/her to support other staff on safeguarding matters, to contribute to strategy discussions and/or inter-agency meetings and to contribute to the assessment of children.

3.3 Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in Cheltenham College. If preferred, parents may discuss concerns in private with the child's form teacher or their Hsm who will notify the Designated Safeguarding Lead in accordance with these procedures.

3.4 The name and contact details of the Designated Safeguarding Lead team are set out in Cheltenham College Contact list at the front of this policy. They, together with the main responsibilities of the Designated Safeguarding Lead, are also set out in Appendix 1.

3.5 The DSL has strategic oversight of filtering and monitoring systems, contextual safeguarding mapping, disproportionality data, and Family Help coordination. The DSL must understand emerging online harms including AI-generated abuse, synthetic imagery, algorithmic grooming and digital coercive control.

3.6 If the Designated Safeguarding Lead is unavailable, his/her duties will be carried out by a Deputy Designated Safeguarding Lead. Deputy Designated Safeguarding Lead's details are also set out in Cheltenham College Contact list and in Appendix 1. During school holidays there is a DSL duty rota with information on who to contact should it be necessary. In this policy, reference to the Designated Safeguarding Lead includes Deputy Designated Safeguarding Leads where the Designated Safeguarding Lead is unavailable. All members of the DSL teams have their mobile numbers published and can be contacted at any point, even if it is outside working hours.

4. Duty of staff, Council, contractors and volunteers

4.1 All staff, Council, contractors and volunteers of Cheltenham College are under a general legal duty:

4.1.1 to protect children from abuse;

4.1.2 to be aware of the terms and procedures in this Policy and to follow them;

4.1.3 to know how to access and implement the procedures in this Policy, independently if necessary;

4.1.4 to keep a sufficient record of any significant complaint, conversation or event in accordance with this Policy; and

4.1.5 to report any matters of concern to the Designated Safeguarding Lead immediately.

4.1.6 Support staff in liaising with other agencies for early help.

4.2 Staff connected to Cheltenham College's Early Years and Later Years provisions are under an ongoing duty to inform Cheltenham College if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer

to Cheltenham College's Recruitment Policy for further information about this duty and to their contract of employment in respect of their ongoing duty to update Cheltenham College.

4.3 College Council ensures that Cheltenham College's safeguarding arrangements consider the procedures and practice of the Gloucestershire Safeguarding Children Partnership. College Council has nominated one of its members to take leadership of Cheltenham College's safeguarding arrangements on behalf of the Council and to liaise with external agencies where this is required, including in the event of allegations of abuse made against the Head or a member of Council. The Nominated Safeguarding Council member is Katy Dallimore. See the role and duties of the Nominated Safeguarding Council Member and President of College Council set out in Appendix 5.

4.4 In addition to existing duties, all staff must uphold the College's commitment to anti-discriminatory and anti-racist safeguarding practice and ensure concerns are assessed through an inclusive, child centred lens.

4.5 All concerns, discussions and decisions made and reasons for those decisions should be recorded in writing. If in doubt staff should discuss issues with the DSL or the Deputy DSLs.

4.6 **Training**

4.6.1 Induction

(a) All staff, including temporary staff and volunteers, will be provided with induction training that includes:

(i) this Policy; including details of Children Missing in Education details.

(ii) the Child-on-Child Abuse Policy

(iii) the Staff Code of Conduct including the whistleblowing procedure.

(iv) online safety, including an understanding of the applicable roles and responsibilities in relation to filtering and monitoring the role of the Designated Safeguarding Lead and his / her identity and contact details together with that of and his / her Deputy

(v) child protection training in accordance with Gloucestershire Safeguarding Children Partnership procedures

(vi) KCSIE 2026

(vii) The Pupil Behaviour Policy

(viii) Cheltenham College's Whistleblowing policy

(ix) Prevent

(b) A schedule has been drawn up identifying appropriate training needs for some groups of staff and operatives who are not directly in pupil-facing roles, such as the domestic housekeeping and approved operatives. Their training may also be delivered in a different format, such as by a line manager using DSL approved training resources.

(c) Annual safeguarding training will include Prevent, misogyny and harmful gendered behaviour, mental health identification, contextual safeguarding, and emerging online harms including AI-generated abuse.

4.6.2 **Child protection training**

(a) All staff including the Head will receive a copy of this policy through the policy portal. Staff will be required to confirm they have read part 1 in full.

(b) On an annual basis all staff will receive training based on Gloucestershire Safeguarding Children's Partnership (GSCP) training. For most staff this will involve an online training module produced by the DSLs to test their knowledge and understanding of contextualised safeguarding and their knowledge and understanding of the Child Protection and Safeguarding policy. For some staff it will be more appropriate to do this training in small groups.

(c) Staff training will also include training in online safety and Prevent.

(d) The Nominated Safeguarding Council Member and the President of Council will receive appropriate training to enable them to fulfil their safeguarding role and duties, as set out in Appendix 5. All members of Council receive annual child protection and safeguarding training from the DSLs at The Prep and College.

(e) Staff will receive regular training and updates on safeguarding in a variety of formats, which will include regular staff briefings, INSET each term, the regular staff Bulletin and the College safeguarding newsletter.

4.6.3 **Designated Safeguarding Lead**

(a) The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals. For further details about the training of the Designated Safeguarding Lead, see Appendix 1.

(b) All training will be carried out in accordance with Gloucestershire Safeguarding Children Partnership (GSCP) procedures. Prevent training will be consistent with current Home Office Prevent duty training and any relevant Gloucestershire Prevent training requirements.

5. Procedures

Cheltenham College works within Gloucestershire's Family Help approach, which forms part of the Families First Partnership Programme. Family Help brings together multi-agency support for children and families, with the aim of providing timely, coordinated and proportionate help according to need. The approach promotes:

- a coordinated Family Help plan;
- consistent, relationship-based support for children and families;
- timely and proportionate information sharing; and
- a joined-up response where children and families experience multiple or overlapping needs and risks.

Where concerns emerge, the DSL will contact the Professional's helpline or the Multi-Agency Safeguarding Hub (MASH) as appropriate.

The DSL will use the GSCP escalation procedure where safeguarding responses are inadequate or concerns are not progressing appropriately.

5.1 **Safeguarding concern**

5.1.1 Every safeguarding concern raised from within or outside Cheltenham College will be taken seriously and action taken in accordance with this policy.

5.1.2 The child protection training provided to staff considers the types and signs of abuse staff should be aware of as well as contextual safeguarding concerns. Further details are set out in Appendix 2.

5.1.3 In accordance with Working Together to Safeguard Children (2026), concerns relating to Child Sexual Abuse (CSA) will be managed in accordance with the College's safeguarding and child protection procedures. Staff must recognise that CSA can take different forms, including contact and non-contact abuse, child sexual exploitation, sextortion, coercive or controlling behaviour, group-based exploitation and abuse facilitated through digital platforms. In responding to concerns, the College will:

- undertake prompt and robust multi-agency safeguarding activity to identify immediate protective actions, assess risk and clarify agency responsibilities;
- ensure that the child is directly engaged in the safeguarding process, with their voice, wishes, feelings and lived experience informing assessment and planning wherever appropriate; and
- remain alert to both visible and non-visible indicators of CSA, including withdrawal, fear, secrecy, changes in behaviour and unexplained or concerning online activity.

5.1.4 undertake prompt and robust multi-agency safeguarding activity to identify immediate protective actions, assess risk and clarify agency responsibilities;

5.1.5 ensure that the child is directly engaged in the safeguarding process, with their voice, wishes, feelings and lived experience informing assessment and planning wherever appropriate; and

5.1.6 remain alert to both visible and non-visible indicators of CSA, including withdrawal, fear, secrecy, changes in behaviour and unexplained or concerning online activity.

5.1.7 Cheltenham College recognises that children may experience multiple, overlapping harms simultaneously, including domestic abuse, exploitation, online harms, mental health concerns, coercive control, and child sexual abuse. Assessments and planning must address cumulative harm and interlocking risk factors rather than treating issues in isolation.

5.1.8 Online harms and digital safeguarding - The College recognises that online harms can intersect with risks and vulnerabilities experienced by children both within and outside the home. Staff must therefore consider the potential for digital technology and online platforms to facilitate or intensify safeguarding risks, including:

- AI-generated abuse and synthetic or manipulated imagery;
- online grooming and exploitation, including through group-based activity and private messaging;
- digital coercive or controlling behaviour;
- online sexual exploitation and sextortion;
- exposure to harmful or extremist content, including misogynistic and other harmful online communities; and
- grooming or exploitation that takes place across multiple platforms or services.

The College's monitoring and filtering systems may identify concerning patterns of online activity. Where such concerns arise, they must be considered as part of the College's safeguarding response and reported to the Designated Safeguarding Lead (DSL) and/or Online Safety Lead in accordance with the College's safeguarding procedures.

Staff must remain alert to the ways in which algorithms, recommender systems, influencers and online communities may expose children to harmful content or facilitate grooming, exploitation, radicalisation or other safeguarding risks. Online concerns should not be considered in isolation from other indicators of vulnerability or harm.

5.1.9 **Contextual Safeguarding and extra-familial harm** – The College recognises that children may experience harm in contexts outside the family home, including through peer groups, community and public spaces, transport routes, boarding environments, online spaces, sports clubs and other social settings. Staff must consider the wider context in which a child lives, studies and socialises when identifying and assessing safeguarding concerns.

The Designated Safeguarding Lead (DSL) will maintain an overview of relevant contextual safeguarding concerns and emerging patterns of risk. Where appropriate, the College will share relevant information with staff and multi-agency safeguarding partners to support a coordinated response to risks affecting individual children, groups of children or particular contexts.

5.1.10 If a member of staff is concerned that a pupil may be at risk of suffering serious or significant harm, the matter should be referred to the Designated Safeguarding Lead as soon as possible. If a member of staff suspects or hears a complaint of abuse, the procedures set out in Appendix 3 must be followed. See Appendix 4 for the procedures for dealing with allegations against staff, contractors and volunteers.

5.1.11 The College recognises that effective safeguarding requires a culture of constructive professional challenge. Staff and leaders will be expected to question, escalate and challenge decisions where there are concerns about the adequacy of safeguarding responses, and to do so in a timely and respectful manner in order to promote the best interests of the child.

5.1.12 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration through the GSCP escalation policy.

5.2 **Action by the Designated Safeguarding Lead**

5.2.1 On being notified of a complaint or suspicion of abuse, the action to be taken by the Designated Safeguarding Lead will take into account:

(a) the local inter-agency procedures of the Gloucestershire Safeguarding Children Partnership;

(b) Where relevant, comply with local information-sharing arrangements and protocols relating to Prevent referrals and the Channel process;

(c) the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence, including the identification of someone who may already be engaged in illegal terrorist-related activity, will always be referred to children's social care and, if appropriate, the police;

(d) the child's wishes or feelings; and

(e) duties of confidentiality, so far as applicable.

5.2.2 The DSL will use Gloucestershire's Graduated Pathway of Early Help and Support and Levels of action to assess and respond to concerns about a child's needs, safety and wellbeing, ensuring that support is proportionate to the level of need and risk. Where there are concerns that a child may be at risk of significant harm, the DSL will follow the Gloucestershire safeguarding referral procedures.

(a) Early Help will be contacted when emerging concerns about a child or family are identified that do not meet the threshold for immediate statutory intervention but indicate that additional support is needed to improve outcomes. This may include concerns around emotional wellbeing, behaviour, attendance, parenting capacity, or the impact of parental issues such as mental health, substance misuse, or domestic abuse. Early help coordinators can be contacted for advice without the need to share personal data.

The Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) will contact Gloucestershire's Professional Advice Line where there are emerging concerns about a child's welfare that require professional advice but do not yet meet the threshold for a referral to Children's Social Care. This includes situations where the DSL/DDSL is unsure about the level of need or risk and requires advice about the appropriate next steps, or requires guidance on identifying suitable support for a child or family. Relevant information will be shared where necessary and proportionate to enable informed advice and decision-making in the best interests of the child.

(b) The DSL will make a timely referral to Gloucestershire Children's Services where there are concerns that a child may be in need of statutory support or may be suffering, or likely to suffer, significant harm. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the DSL will make a referral in accordance with Gloucestershire's safeguarding procedures so that Children's Services can determine whether a Section 47 enquiry is required. Where a child is assessed as being in need of services under Section 17 of the Children Act 1989, the DSL will work with Children's Services and other relevant agencies to support an appropriate assessment and plan.

(c) The DSL is responsible for ensuring that referrals are made promptly and that sufficient, relevant information is provided to enable effective multi-agency assessment and decision-making. Where appropriate, the DSL will seek the consent of parents or carers before sharing information or making a referral. Consent will not be sought where doing so would place the child at increased risk of harm, prejudice the prevention or detection of a crime, or otherwise be inappropriate in accordance with safeguarding and information-sharing guidance.

5.2.3 Referrals to the Multi-Agency Safeguarding Hub (MASH) should be made by the DSL/DDSL using the Multi-Agency Referral Form (MARF) via the current Gloucestershire County Council online referral portal. The MARF should be completed fully and include relevant information about the child, the concerns identified, and any actions already taken. Where a safeguarding concern requires an urgent response, the DSL (or DDSL) should contact the Children and Families Front Door Service on 01452 426565 (Option 3) to discuss the concern and ensure an appropriate response. Where a child is at immediate risk of harm, the DSL (or DDSL) should contact the police on 999 without

delay and take any necessary steps to protect the child. For concerns that cannot safely wait until the next working day, outside normal office hours, professionals should contact the **Children and Families Services Emergency Duty Team on 01452 614194**.

5.2.4 The DSL will respond to concerns that a child or young person may be vulnerable to radicalisation in accordance with the Prevent Duty and current Gloucestershire Safeguarding Children Partnership (GSCP) procedures. The DSL will seek advice and follow the current Gloucestershire Prevent referral process where appropriate.

5.3 **Dealing with allegations against staff (including the DSL), Council, volunteers and contractors**

5.3.1 Cheltenham College has procedures for dealing with allegations against staff, Council, volunteers and contractors who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff, contractors and volunteers from false or unfounded allegations. These procedures are set out in Appendix 4.

5.3.2 The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (Designated Officer(s)). The designated officer(s) will be informed immediately and in any event within one working day of all allegations against staff, Council, volunteers and contractors that come to Cheltenham College's attention and appear to meet the criteria set out in paragraph A of Appendix 4.

5.3.3 Early Years Foundation Stage (EYFS)

(a) Cheltenham College will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS Department (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.

(b) These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.

5.3.4 Detailed guidance is given to staff, and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Code of Conduct, which is available on request, and includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils. Contractors are provided with clear guidance in a separate document.

5.3.5 Staff and volunteers should also feel able to follow Cheltenham College's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at Cheltenham College, potential failures by Cheltenham College or its staff to properly safeguard the welfare of pupils or other wrongdoing in the workplace that does not involve the safeguarding and welfare of children.

5.4 **Allegations against pupils**

5.4.1 All staff must be aware that abuse is abuse and it should never be tolerated or passed off as 'banter' or part of the growing up process. Allegations against pupils that may meet Level 3 or 4 on the Levels of Intervention Windscreen should be reported in accordance with the procedures set out in this Policy. A pupil against whom an

allegation of abuse has been made may be suspended from Cheltenham College during the investigation and Cheltenham College's policy on behaviour, discipline and sanctions will apply.

5.4.2 Cheltenham College will take advice from children's social care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

5.4.3 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, Cheltenham College will ensure that, subject to the advice of children's social care, the pupil's parents are informed as soon as possible and that an appropriate adult supports the pupil during the interview. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him / her if it is necessary to suspend him / her during the investigation.

5.4.4 Where an allegation is made against a pupil, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed and risk assessments will be put in place for both where appropriate

5.5 **Organisations or individuals using school premises.**

All staff should be aware that Cheltenham College may receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children e.g. sports clubs, community groups, services providers that run extra-curricular activities, international language schools etc. As with any safeguarding allegation, the procedures in Appendix 4 of this policy should be followed, which will include the LADO being informed.

5.6 **Missing child and children missing from education procedures**

Missing and absent Children

Cheltenham College recognises the importance of excellent attendance in school to facilitate the best educational outcomes for every pupil as set out in Working Together to Improve Attendance (2026). To quote from the Attendance and Registration Policy of both College and Prep, "We aim for an environment that enables and encourages all members of the community to reach out for excellence. To do this, it is essential that every child attends Prep / College every day and on time."

KCSIE (2026) states that children who are 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. All staff should therefore be very vigilant in terms of monitoring and reporting any concerns around pupil absence to the DSL team. Please see Cheltenham College's separate policy on attendance and registration.

5.6.1 All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any pupil missing from Cheltenham College. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.

5.6.2 Please see Cheltenham College's separate Missing Pupil Policies for further details.

Children Missing from Education

In accordance with the *School Attendance (Pupil Registration) (England) Regulations 2024*, Cheltenham College recognises its legal duty to inform the local authority of new pupils added to the admissions register at non-standard transition points. This is to help the local authority in identifying and safeguarding children who may be at risk of becoming missing from education.

The College will notify the local authority **within five school days** when a pupil is added to the admissions register outside of the school's standard points of entry.

Children Missing Education (CME) are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school

5.6.3 Cheltenham College will notify Gloucestershire County Council (or the pupil's home local authority) **within five school days** of removing a pupil from the admissions register where the removal meets any of the circumstances set out in **Regulation 9**, including:

(i) The pupil is being **electively home educated**

(ii) The pupil has **moved to another school**

(iii) The pupil is no longer living within a **reasonable distance** of the school

(iv) The pupil has been **certified medically unfit** and is not expected to return

(v) The pupil is in **custody for more than four months** and not expected to return

(vi) The pupil has been **permanently excluded**

(vii) The pupil has **died**, or

(viii) The pupil has **not returned from an extended absence**, and reasonable enquiries have failed to establish their whereabouts.

5.6.4 The local authority will also be notified of any student joining at a non-standard transition point. This will be done within **Five days** of the student joining in order to:

(a) fulfil its duty to identify children of compulsory school age who are missing education; and

(b) 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.

5.6.5 Where a pupil is absent from school without the school's permission for a continuous period of **10 school days or more**, has not taken up an allocated school place as expected, or has left the school suddenly and their destination is unknown, the school will follow the appropriate **Children Missing Education (CME)** procedures and notify the relevant local authority where required. Any safeguarding concerns will be acted upon without delay.

5.7 **Informing parents**

5.7.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Head, the designated officer, children's social care and/or the police before discussing details with parents.

5.7.2 In relation to Prevent referrals, the Designated Safeguarding Lead will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

5.7.3 See also section 4 of Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Head of Cheltenham College.

6. Secure College premises

6.1 Cheltenham College will take all practicable steps to ensure that College premises are as secure as circumstances permit.

6.2 Cheltenham College keeps a visitors' record at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on College premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge which must be clearly displayed and worn at all times whilst on Cheltenham College premises.

6.3 All visitors to the boarding houses must report to a member of staff immediately on arrival and must observe the necessity to be kept under sufficient staff supervision during their visit.

6.4 Cheltenham College's policy on the use of mobile phones and cameras in Cheltenham College, including the EYFS setting, is set out in the Staff ICT Acceptable Usage Policy. This policy applies to all staff in College, Prep and Pre-Prep. In the EYFS setting, neither staff nor children are permitted to bring mobile phones or any electronic device with imaging and sharing capabilities into the area.

Pupils at College must not have access to mobile phones during the school day. Boarders have limited access to mobile phones during designated periods in the evening and must hand in their phones overnight.

Pupils at Cheltenham Prep must not have access to mobile phones during the school day. Boarders may access their phones only at designated times and must follow the school's arrangements for overnight storage.

6.5 Parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publications of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

6.6 Premises safeguarding is annually with Council oversight, including digital premises (online environments) and filtering/monitoring systems.

7. Confidentiality and information sharing

7.1 Information sharing must be timely, relevant, proportionate and necessary to safeguard and promote the welfare of children. Staff must share information appropriately where this is required to identify, assess and respond to safeguarding concerns, including contextual and extra-familial risks. Information sharing should support effective multi-agency working and, where appropriate, inform and contribute to Family Help Plans and other safeguarding or child protection plans.

7.2 Cheltenham College will keep child protection records confidential and will only share information with those who have a legitimate need to know for the purposes of safeguarding

and promoting the welfare of children. The College will cooperate with the police, Children's Social Care and other safeguarding partners and will share relevant information promptly and appropriately where this is necessary to safeguard a child, including in relation to child protection enquiries under section 47 of the Children Act 1989. Information sharing will be undertaken in accordance with Working Together to Safeguard Children (2026) and applicable data protection legislation and guidance. The College will also comply with the Prevent Duty Guidance: England and Wales (2023) and the Channel duty guidance: protecting people susceptible to radicalisation (2025)

7.2 Cheltenham College will cooperate with Gloucestershire's multi-agency safeguarding arrangements and will contribute to safeguarding partnership activity where required. This includes:

- sharing relevant information promptly and appropriately with safeguarding partners and other agencies where this is necessary to safeguard children;
- cooperating with safeguarding reviews, audits, inspections and independent scrutiny where requested;
- contributing to multi-agency learning, quality assurance and improvement activity; and using relevant College safeguarding data and learning to identify patterns, recurring themes, disproportionality and areas for improvement in safeguarding practice.

7.3 Where allegations have been made against staff, Cheltenham College will consult with the LADO and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

8. Monitoring and review

8.1 Review and monitoring

The Designated Safeguarding Lead (DSL) will ensure that the procedures set out in this Policy, and the implementation and effectiveness of those procedures, are regularly monitored, reviewed and updated. The DSL will work with the Council and relevant Senior Leadership Teams as necessary to ensure that safeguarding arrangements remain effective, responsive and compliant with current statutory guidance and local safeguarding arrangements.

The College will undertake the following regular safeguarding assurance and review activity:

- **Filtering and monitoring reviews:** the College will regularly review the effectiveness of its filtering and monitoring systems, including the identification and response to safeguarding concerns arising from online activity. Any identified weaknesses or required improvements will be addressed promptly.

- **Termly welfare and safeguarding reporting:** the DSL will provide a report to the Council on welfare and safeguarding matters at least once each term, including relevant safeguarding activity, emerging themes, significant concerns, incidents, actions and areas for improvement.

- **Annual Safeguarding Compliance Review:** the DSL will undertake an annual review of the College's safeguarding arrangements and compliance with relevant statutory guidance, legislation and local safeguarding procedures. This will include consideration of the effectiveness of safeguarding procedures, training, record keeping, information sharing, safer recruitment, online safety and inter-agency working. The outcome will be reported to the Council.

- **Contextual Safeguarding Mapping Review:** the DSL will regularly review contextual and extra-familial safeguarding risks affecting children and young people within and around the College community. Emerging patterns, locations, peer-group risks, online risks and other relevant contextual factors will inform safeguarding planning and, where appropriate, multi-agency working.

8.2 Any significant child protection incident, safeguarding incident or near miss may result in a review of the relevant procedures and practice. Such a review may be initiated by a member of the DSL team, the Head or the Council Nominated Member. Where appropriate, the review will be undertaken with the Council Nominated Member and reported to the Council Welfare and Safeguarding Committee.

8.3 Where an incident involves a member of staff, the Local Authority Designated Officer (LADO) will be consulted and involved in accordance with local procedures, where appropriate, to determine whether any improvements to the College's safeguarding arrangements are required.

8.4 The DSL team will review safeguarding cases and emerging themes at least termly, identifying learning, patterns and required improvements and ensuring that lessons from individual cases are acted upon promptly.

8.5 Any deficiencies or weaknesses identified through monitoring, audits, reviews, incidents, near misses or external scrutiny will be addressed without delay. Where improvements are identified, the College will monitor their implementation and effectiveness.

8.6 The College will undertake a Safeguarding Compliance Review at the start of each academic year. The Review will assess the effectiveness and compliance of key safeguarding policies, procedures and practice, including their alignment with the latest *Keeping Children Safe in Education* (KCSIE) and other relevant statutory guidance, legislation and local safeguarding arrangements. The Safeguarding Compliance Review will identify any changes required to ensure that the College's safeguarding arrangements remain effective, compliant and fit for purpose. Any necessary actions or amendments will be identified at the outset of the academic year and monitored through to completion. The findings and recommendations arising from the Safeguarding Compliance Review will be presented to the first Welfare and Safeguarding Committee meeting in October, providing early oversight and direction. Following consideration and scrutiny by the Committee, the Review and any proposed amendments to this Policy will be reported to the full Council later in the term for consideration and approval. Detailed minutes of the Committee's and Council's consideration and decisions will be retained.

Appendix 1: The role of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)

At Cheltenham College, the Designated Safeguarding Lead (DSL) is a senior member of the College leadership team who is appointed to lead on safeguarding and child protection. The DSL has the appropriate status, skills, training, knowledge and experience to carry out the role effectively. The DSL has lead responsibility for safeguarding and child protection, including online safety and understanding the College's filtering and monitoring systems and processes.

Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to Gloucestershire Children's Services as required and support staff who make referrals to local authority children's social care
- to the Prevent programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or leaves employment due to risk of harm to a child, identify whether the circumstances may meet the criteria for a referral to the Disclosure and Barring Service (DBS), advise the Headteacher and HR accordingly, and coordinate and support the provision of relevant safeguarding information for any referral as required.
- where a crime may have been committed to the Police as required.

Working with others

The Designated Safeguarding Lead is expected to:

- chair weekly meetings of the DSL team and review safeguarding and child protection concerns recorded on CPOMS, ensuring appropriate actions and follow-up are identified and monitored;
- lead the preparation of the Annual Review of Safeguarding with the Nominated Safeguarding Council Member, for consideration by the full governing body;
- act as a source of support, advice and expertise for all staff on child welfare, safeguarding and child protection matters;
- act as a point of contact with the safeguarding partners and contribute to effective multi-agency working;
- liaise with the Head to keep them informed of significant safeguarding matters, particularly ongoing enquiries under section 47 of the Children Act 1989 and police investigations, including awareness of the requirement for children to have an Appropriate Adult where applicable;
- where concerns relate to a member of staff, liaise as required with the appropriate case manager and Local Authority Designated Officer (LADO), in accordance with Part Four of KCSIE;
- liaise with staff, including teachers, pastoral staff, school nurses, IT staff, the senior mental health lead and SENCOs, on matters relating to children's safety, safeguarding and welfare, including online and digital safety, and support a holistic assessment of children's needs and appropriate referrals to relevant agencies;
- oversee and coordinate the response to notifications received through Operation Encompass, in accordance with the College's safeguarding procedures;
- liaise with the Welfare Management Team where safeguarding concerns are linked to a child's mental health or wellbeing;

- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be experiencing challenging circumstances;
- work with the Head and relevant strategic leads to promote educational outcomes for children with welfare, safeguarding and child protection needs, including understanding how these issues may affect attendance, engagement, progress and achievement;
- work with relevant colleagues to identify the cohort of children who have or have had a social worker, understand their educational progress and attainment, and promote a culture of high aspirations for these children;
- support teaching and pastoral staff to identify and provide appropriate additional academic support, reasonable adjustments and other measures to help children who have or have had a social worker reach their potential, recognising that the impact of social care involvement may continue after statutory intervention has ended.

Information sharing and managing the child protection file

The DSL will have oversight of the management of child protection files, ensuring that records are accurate, up to date, securely stored and managed in accordance with statutory requirements, *Keeping Children Safe in Education (KCSIE) 2026* and the College's information governance procedures.

Child protection records should be clear, comprehensive and, where relevant, include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a record of actions taken, decisions reached and outcomes; and
- relevant information shared with, or received from, other agencies and safeguarding partners.
-

The DSL will oversee access to child protection information so that it is appropriately restricted to those who need to see it, and will support the appropriate, secure and lawful sharing of information in accordance with relevant information-sharing guidance, data protection legislation and *KCSIE 2026*.

The DSL will support timely, lawful, relevant and proportionate information sharing where this is necessary to safeguard and promote the welfare of a child. This includes:

- understanding and applying the appropriate lawful basis for sharing information;
- sharing relevant information with children's social care, the police and other safeguarding partners where appropriate;
- supporting the prompt sharing of information where this is necessary to identify, assess or respond to safeguarding concerns; and
- overseeing the secure transfer of relevant safeguarding and child protection information when a child moves to another school or college.

When a child leaves the College, the DSL will coordinate the secure transfer of the child protection file to the new school or college as soon as possible and in accordance with statutory requirements. Where appropriate, relevant information will also be shared with the local authority and other safeguarding partners. The College will retain an appropriate record of the transfer.

Raising Awareness

The Designated Safeguarding Lead will:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff

- ensure the school's or college's 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 school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

The Designated Safeguarding Lead (and any deputies) will undertake training that provides them with the knowledge and skills required to carry out their role effectively. Formal safeguarding and child protection training will be updated at least every two years, with knowledge and skills updated at least annually to reflect emerging safeguarding issues, changes in legislation, statutory guidance, local safeguarding arrangements and relevant developments.

The Designated Safeguarding Lead (and any deputies) will undertake appropriate Prevent training and maintain the knowledge and skills necessary to understand and respond to the risk of radicalisation and extremism, including the responsibilities of the College and relevant agencies.

The DSL and any deputies should:

- understand local arrangements for early help and Family Help, including referral pathways, thresholds for support and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct child protection conferences and review conferences and be able to attend and contribute effectively when required;
- understand the DSL's role in providing information and support to children's social care and other safeguarding partners to safeguard and promote the welfare of children;
- understand the impact that adversity and trauma can have on children, including their behaviour, mental health, wellbeing, attendance and educational outcomes, and understand appropriate responses;
- be alert to the additional safeguarding needs of children in need, children with SEND, children with relevant health conditions and young carers;
- understand the importance of effective information sharing within the College and with safeguarding partners, other agencies, organisations and practitioners, including the principles of lawful, relevant, proportionate and timely information sharing;
- understand the requirements of the Prevent duty and be able to provide advice and support to staff in relation to protecting children from the risk of radicalisation;
- understand the specific safeguarding risks associated with children being online and maintain up-to-date knowledge of online safety, including the College's filtering and monitoring systems, processes and arrangements across College networks and devices;
- recognise the additional online risks faced by children with SEND, including bullying, grooming and radicalisation, and have the knowledge and skills to support children with SEND to stay safe online;

- access relevant safeguarding resources, guidance and refresher training to maintain and develop their knowledge and skills; and
- promote a culture in which children are listened to, their wishes and feelings are taken seriously, and staff understand the importance of taking these into account when responding to safeguarding concerns and developing safeguarding arrangements.

Providing support to staff

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will develop and maintain the knowledge and expertise required to provide advice, guidance and support to staff on welfare, safeguarding and child protection matters, helping staff to respond confidently and appropriately to safeguarding concerns.

This includes:

- providing advice and support to staff throughout the referral process, including where concerns are referred to children's social care, the police or other relevant agencies; and
- supporting staff to understand the links between safeguarding, welfare and educational outcomes, including the impact of safeguarding concerns on attendance, engagement, progress and achievement, and to inform appropriate academic and pastoral support.

Understanding the views of children

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will promote a culture in which children are listened to, their wishes and feelings are taken seriously, and they feel able to raise concerns and seek support.

This includes:

- promoting, among all staff, a culture of listening to children and taking account of their wishes and feelings when responding to safeguarding concerns and in developing and implementing measures to protect them; and
- understanding the barriers that may prevent children from approaching staff about their circumstances and supporting the development of trusted relationships and appropriate communication pathways that enable children to share concerns and seek help.

Holding and sharing information

The Designated Safeguarding Lead will maintain the knowledge and skills required to manage and share safeguarding and child protection information effectively, in accordance with *Keeping Children Safe in Education (KCSIE) 2026*, relevant information-sharing guidance and data protection legislation.

This includes:

- understanding the importance of appropriate information sharing within the College and with other schools and colleges when children transfer, including in-year transfers and transitions between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners;
- understanding the requirements of the Data Protection Act 2018 and UK GDPR as they apply to safeguarding and information sharing, including the importance of identifying an appropriate lawful basis for sharing information;

- maintaining accurate, detailed and secure records of safeguarding concerns, referrals, actions and outcomes, and understanding the importance of effective record keeping in supporting the safeguarding and welfare of children; and
- supporting the appropriate, secure and timely transfer of safeguarding and child protection information when a child moves to another school or college.

The College will maintain robust arrangements for safeguarding and child protection responsibilities to be carried out when the DSL is unavailable. Deputy Designated Safeguarding Leads will provide appropriate cover, with clear arrangements for seeking advice and escalating concerns where necessary.

Appendix 2: Types and signs of abuse

Staff should be aware that abuse, neglect and exploitation are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. It is important that all staff are clear that abuse can take place wholly online or technology may be used to facilitate offline abuse. Children may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Safeguarding concerns should be considered in context and may arise from children's family, peer, school, boarding, community and online environments. Children may experience multiple and overlapping forms of harm, and staff should remain alert to cumulative harm and changing patterns of risk.

Staff can use this Government advice on 'What to do if you are worried a child is being abused'.

Types of abuse, neglect and exploitation.

Abuse, neglect and exploitation is 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 may also be the target of exploitation.

Part One of KCSIE 2026 sets out the forms of abuse, neglect and exploitation that staff should understand. Staff should read Part One in full and should not rely solely on this appendix when identifying or responding to safeguarding concerns.

Child-on-child abuse (including harassment and violence)

KCSIE 2026 makes clear that child-on-child abuse, including sexual violence and sexual harassment, must never be tolerated or passed off as "banter", "just having a laugh", "part of growing up" or an inevitable part of childhood. Staff should recognise that child-on-child abuse can take place in person or online and may involve sexual violence, sexual harassment, bullying, prejudice-based abuse, coercive or controlling behaviour, initiation/hazing, sharing of self-generated intimate images, sextortion and other forms of harmful sexual behaviour.

Staff should remain alert to the possibility that a child who perpetrates abuse may also be experiencing abuse or exploitation themselves. All concerns must be reported in accordance with the College's safeguarding procedures.

Cheltenham College has its own standalone Child on Child Abuse policy, and the guidance therein must be followed.

The purpose of the guidance contained within the policy is to recognise the many forms of child-on-child abuse and to include a planned and supportive response to issues that might arise in accordance with KCSIE 2026 and Working Together to Safeguarding Children 2026. All such abuse is unacceptable and will be taken seriously. Cheltenham College will also be mindful of the Statutory Guidance on Controlling or Coercive Behaviour to identify and evidence any potential offences.

Cheltenham College is clear that abuse is abuse. Abuse should never be tolerated or passed off as 'banter' or 'just having a laugh' or 'part of the growing up process'.

Examples of child-on-child abuse:

There are many types of abuse and the list is not exhaustive.

- Physical abuse
- Sexually harmful behaviour/including sexual assault
- Bullying (including cyber-bullying and prejudiced behaviour)
- Teenage relationship abuse (coercion, controlling behaviour, sexual harassment, threats insults and/or acts of physical or sexual abuse)
- Initiation / hazing rituals
- Emotional abuse (deliberate taunting or exclusion)
- Sharing of self-generated intimate images and/or videos, including images or videos generated or manipulated using AI, and sexual extortion (including financially motivated sexual extortion).

Staff should never view, copy, save, forward or otherwise distribute an image or video unless specifically directed to do so as part of an appropriate safeguarding or law-enforcement process. Concerns should be reported immediately to the DSL team in accordance with the College's safeguarding procedures.

Other forms of abuse may include coercive or controlling behaviour, abuse within children's intimate personal relationships, digitally facilitated abuse, online misogyny, sharing or threatening to share intimate images, financially motivated sexual extortion, AI-generated or digitally manipulated sexual imagery, and abuse facilitated through private messaging, encrypted or other digital platforms.

Cheltenham College must strive to adopt a zero-tolerance culture towards abusive behaviour.

As well as participating in annual whole staff training, staff should:

- Model (model good behaviours of courtesy and respect)
- Challenge (challenge behaviours that fall short)
- Correct (Make it clear why that behaviour is wrong)
- Protect (ensure that the child or young person subjected to the abuse is safe/alright – don't just assume.)
- Report (Using CPOMs).

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve

seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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 up skirting*, involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Part 5 of KCSIE 2026 contains statutory guidance on responding to allegations of child sexual abuse, including allegations involving staff and other adults. Staff must report concerns immediately in accordance with the College's safeguarding procedures.

Sexual abuse may also be facilitated through technology, including grooming, coercion, manipulation, the creation or distribution of self-generated intimate images or videos, sextortion, and AI-generated or digitally manipulated sexual imagery, including deepfakes.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific safeguarding issues

KCSIE identifies a range of safeguarding issues that can place children at risk of harm. The following list is not exhaustive. Staff must remain alert to emerging risks and to the possibility that different forms of harm may overlap or occur concurrently, including online and outside the home.

- Children missing from education
- Unexplained and/or persistent absence from education
- Children missing from home or care
- Child-on-child abuse
- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Sexual violence and sexual harassment between children
- Child sexual abuse (CSA), including child sexual exploitation (CSE)
- Child criminal exploitation (CCE), including County Lines
- Serious violence, gangs and youth violence

- Domestic abuse, including children experiencing or witnessing its effects
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gender-based violence and violence against women and girls
- Mental health and safeguarding
- Private fostering
- Radicalisation and the Prevent duty
- Sharing of nudes and semi-nudes, including consensual and non-consensual sharing
- Teenage relationship abuse and abuse in intimate personal relationships between children
- Modern slavery and trafficking
- Online safety and online harms
- Children with a social worker or who are otherwise in need of additional safeguarding support
- Children with family members in prison
- Contextual and extra-familial harm, including risks arising from peer groups, community settings, transport routes, boarding environments and online spaces
- Initiation and hazing rituals
- Sextortion and online sexual extortion
- AI-generated or digitally manipulated sexual images, including synthetic imagery and deepfakes
- Digital coercive or controlling behaviour
- Online grooming and exploitation, including group-based and cross-platform exploitation
- Online misogyny and exposure to harmful or extremist online communities
- Algorithmically promoted harmful content and online radicalisation
- Cumulative harm and multiple or overlapping forms of abuse or exploitation
- Hidden or non-visible indicators of abuse, including child sexual abuse

- Discrimination and prejudice where these contribute to or compound safeguarding risk

- Abuse or exploitation facilitated through private messaging, encrypted or other digital platforms.

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

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 noted exploitation as well as being physical can be facilitated and/or take place online

CSE can involve exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Children may experience both CSE and CCE and may move between different forms of exploitation. Exploitation may be perpetrated by individuals or groups and may occur through online or offline relationships, including group-based exploitation. Staff should consider the wider context of the child's relationships, peer groups, community and online environment when assessing risk.

The apparent consent of a child does not mean that exploitation is not taking place. Children may not recognise themselves as victims of exploitation and may actively resist attempts to protect them.

Female Genital Mutilation (FGM)

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. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the

Multi-Agency Practice Guidelines on Female Genital Mutilation. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

There is a statutory mandatory reporting duty in relation to FGM. The duty applies to regulated professionals, including teachers, where they discover in the course of their professional work that FGM appears to have been carried out on a girl under 18. Staff must also follow the College's wider safeguarding procedures where a child is identified as being at risk of FGM.

FGM is illegal under the FGM Act 2003 and comprises of all procedures involving partial or total removal of the external female genitalia for non-medical reasons. College follows the FGM Guidance for Schools (June 2019)

- If a girl informs a member of staff that an act of FGM (however described) has been carried out on her, or where the member of staff observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation, then the police should be informed as soon as possible, at least by the end of the next working day.
- Gloucestershire Police should be informed by calling 101.
- If there is a risk to life or serious immediate harm, staff should report the case immediately to police, including dialling 999 if appropriate.
- Please ensure you are given a reference number for the case, and this is recorded.

As with all Child Protection issues no leading questions should be asked, and a record of the conversation should be made as soon as possible.

Where a teacher, in the course of their professional work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher has a statutory duty to report the case to the police. This is a personal duty and should not be transferred to the DSL or another person. The teacher should make the report as soon as possible and, in any event, within one working day of the discovery.

The teacher should also inform the DSL as soon as possible so that the College can coordinate the wider safeguarding response.

If a girl informs a member of staff that an act of FGM has been committed to them they must not perform any examination to ascertain the validity of this statement. Any checks must be done by medical professionals.

The duty to report a disclosure to the police is a personal duty and cannot be transferred, unless you know that Cheltenham College has already made report about the same instance.

If the girl is 18 or over at the time of the disclosure staff do not need to disclose to the police but it should be reported to the DSL.

The duty applies to cases directly disclosed by the victim; if a parent, guardian, sibling or other individual discloses that a girl under 18 has had FGM, the duty does not apply and a report to the police is not mandatory. Any such disclosure should be reported to the DSL.

The DSL should inform the girl's parents / guardian that the disclosure has been made and that a report will be/has gone to the police. However, if the DSL and the member of staff whom the disclosure was made to believe that telling the child or parents or guardian about the report may result in a risk of serious harm to the child or anyone else, or of the family

fleeing the country, it should not be discussed with the family. The protection of the child must be paramount at all times.

Staff should continue have regard to their wider safeguarding responsibilities once the report has been made.

Failure to comply with this duty to report FGM will be dealt with in line with the staff disciplinary procedures and for teachers this may mean referral to the TRA (Teaching Regulation Agency).

It is important to note that if a member of staff has suspicions that FGM has been carried out, or that a girl may be at risk of FGM this should be reported to the DSL immediately who will contact the GSCP.

'*Up skirting'

The Voyeurism (Offences) Act 2019 criminalises 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. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

If a member of staff becomes aware of any incident of this nature taking place by or to a College pupil they should contact the DSL or DSL team as soon as possible.

Relationship and Sex Education (RSE)

The RSE curriculum follows the DfE's Relationship and Sex Education Guidance for schools. Curriculum content supports safeguarding by helping pupils to develop an understanding of how to live safe and healthy lives, respecting themselves and others and recognising healthy and unhealthy relationships. Staff should be aware of any potential issues which may come out of such lessons, and should report any concerns to the DSL team through CPOMS as soon as possible.

Mental Health Issues

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, by speaking to the designated safeguarding lead or a deputy. If in any doubt staff in College should speak to the Assistant Head (Safeguarding &

Pupil Welfare) about any pupil mental health concerns they have and these should be recorded on CPOMS.

Online Safety: The Four Cs and Emerging Risks

Cheltenham College recognises the breadth and complexity of safeguarding risks that children and young people may face online. These risks are categorised under the **"Four Cs"**:

1. **Content** – being exposed to harmful or inappropriate material (e.g. pornography, self-harm material, hate speech, misinformation and disinformation)
2. **Contact** – being subjected to harmful interaction with others online (e.g. grooming, online bullying or exploitation)
3. **Conduct** – engaging in risky or harmful online behaviour themselves (e.g. sexting, oversharing, or radicalisation)
4. **Commerce** – being exposed to harmful commercial practices (e.g. gambling, scams, and financial exploitation)

The school recognises the evolving nature of online risks and is committed to safeguarding pupils from digital harms in all forms. This includes risks associated with generative artificial intelligence (AI), misinformation, disinformation, and conspiracy theories.

Generative Artificial Intelligence (AI)

Generative AI technologies (such as chatbots, text generators, and image creation tools) will only be used in an age-appropriate, supervised context to support learning objectives. All use must comply with the school's Acceptable Use Policy and data protection requirements. Staff and pupils must not enter personal, sensitive, or identifying information into AI tools. Risks, including exposure to harmful or biased content, misinformation, and discriminatory material, are actively managed. The school's internet filtering and monitoring systems, restrict access to unsafe AI platforms and flag concerning activity. Staff receive regular training on the safe and ethical use of AI, and pupils are taught skills to critically evaluate AI-generated content.

Misinformation, Disinformation, and Conspiracy Theories

The school recognises that misinformation (inaccurate or misleading information shared without intent to deceive), disinformation (false or manipulated content shared with deliberate intent to deceive, such as "fake news"), and conspiracy theories can present significant safeguarding risks. Such harms can undermine trust in adults, schools, and safeguarding systems; radicalise or socially isolate pupils; contribute to poor mental health and anxiety; and negatively affect behaviour, critical thinking, and academic engagement. Through our online safety curriculum and pastoral care systems, we provide pupils with strategies to recognise and challenge harmful narratives, access safe and reliable information sources, and develop resilience to online manipulation. Filtering and monitoring tools are configured to detect and address related risks, and staff are trained to identify early warning signs and respond appropriately.

Teaching Online Safety

Cheltenham College recognises the critical importance of equipping pupils with the knowledge, skills, and resilience to navigate the digital world safely and responsibly. To this end, the College ensures that key components of online safety are thoroughly embedded across the curriculum, beginning in the early years and continuing throughout a pupil's time at the school.

At Cheltenham Prep, online safety education is delivered through a cross-curricular approach, with specific content integrated into the Thrive program and Computing curriculum. These lessons are age-appropriate and regularly reviewed to reflect emerging risks and technologies, such as social media platforms, gaming, data privacy, and online scams.

At College focused online safety content is delivered through the FLOREAT program. Lessons explore issues such as digital footprint, cyberbullying, sextortion, online grooming, misinformation/disinformation, and the risks associated with AI-driven manipulation.

The development and delivery of these materials are informed by the Department for Education's "Teaching Online Safety in Schools" guidance, which outlines what children should know to stay safe and behave appropriately online. Staff use this document to ensure content is not only relevant and evidence-based but also tailored to pupils' developmental stages and digital habits.

In addition, online safety is reinforced through:

- Assemblies and special focus days such as Safer Internet Day
- Regular communication with parents and guardians to support safe use of technology at home
- INSET and CPD for staff to ensure awareness of the latest digital safeguarding risks

This multi-layered approach helps pupils develop critical thinking, digital awareness, and the confidence to speak up if something online makes them feel uncomfortable or unsafe.

Signs of abuse

Possible signs of abuse include, but are not limited to:

- the pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference

- There is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries

- the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour

- the pupil asks to drop subjects or an activity with a particular member of staff and seems reluctant to discuss the reasons

- the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing

- the pupil appears neglected, e.g. dirty, hungry, inadequately clothed

- the pupil is reluctant to go home, or has been openly rejected by his / her parents or carers and

- inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

- Gloucestershire Safeguarding Children Partnership can provide advice on the signs of abuse and the DfE advice What to do if you're worried a child is being abused (2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice on what to do if you're worried that a child is being abused, including a list of signs of abuse:

https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/

Radicalisation and the Prevent duty

Cheltenham College has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

Cheltenham College aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Cheltenham College is committed to providing a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

Cheltenham College has adopted the Government's definitions for the purposes of compliance with the Prevent duty,
https://www.educateagainsthate.com/resources/prevent-duty-guidance-update-september-2023-a-briefing-note-for-schools-and-early-years-providers/

Extremism: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"
Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism"
Terrorism: "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."

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. Cheltenham College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

The latest Channel Duty Guidance notes the following:

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists;

- changing their style of dress or personal appearance to accord with the group;
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
- attempts to recruit others to the group/cause/ideology; or
- communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others.

Protecting children from the risk of radicalisation is part of Cheltenham College's wider safeguarding duties and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

Staff should be aware of the particular demands of life in a boarding school, particularly abuse by peers, the dangers of alcohol abuse and drug abuse and pupil relationships. All staff in boarding houses are reminded to be vigilant to ensure pupils wellbeing is safeguarded in respect of these potential dangers.

Boarding staff should try to make themselves aware of pupils who are in a relationship. Cheltenham College Relationship policy is clear that relationships where there is a significant age difference would be deemed as inappropriate, and Hsms would normally speak to parents about such an issue.

Sexual relationships between pupils should be reported to the Assistant Head (Pastoral) and will be dealt with in accordance with the Behaviour policy. Illegal sexual relationships would be referred to the relevant authorities, such as GSCP or the Police.

Staff should be aware of the risk of peer abuse particularly in relation to bullying issues, gender-based violence and sexting and deal with bullying in accordance with the anti-

bullying policy. If there is a risk of significant harm to any pupil then that should be considered a safeguarding matter and reported to the DSL.

Staff should report any concerns they have over child-on-child sexual violence or harassment to the DSL team.

Any suspicions should be put on CPOMS so that the DSL team have an overview of all the small pieces of evidence that show a clearer picture of the overall situation in any house or area of school.

Appendix 3: Guidance for staff and volunteers on suspecting or hearing a complaint of abuse or another safeguarding concern.

Action staff must take

1. A member of staff or volunteer suspecting or hearing a complaint of abuse:

    i. must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;

    ii. must not ask leading questions, i.e. a question which suggests its own answer;

    iii. must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass on the information in accordance with this Policy so that the correct action can be taken; and

    iv. must keep a sufficient written record of the conversation. The record should include:

        a) the date and time;

        b) the place of the conversation; and

        c) the essence of what was said and done by whom and in whose presence;

        and must be signed by the person making it, using names and not initials.

2. The written record and all other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely and passed on when reporting the matter in accordance with paragraph 3 below.

3. All suspicions or complaints of abuse must be reported to the Designated Safeguarding Lead as soon as possible, unless it is an allegation against a member of staff in which case the procedures set out in Appendix 4 should be followed.

4. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to the Multi-Agency Safeguarding Hub or to the Police immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should escalate their concerns for re-consideration.

5. Staff should be mindful of abuse from one pupil or more against another pupil, or child on child abuse. Reference should be made to Cheltenham College Anti-bullying policies. A bullying incident should be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

6. If a pupil reports sexual abuse, it is essential that any victim is reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. As with any allegation of abuse staff should not promise confidentiality, should listen carefully to the victim and not ask leading questions. It will be important to ensure the victim knows that the information will be passed on to professionals who know how to deal with such cases. As always, fill in an Incident on CPOMS as soon as possible, and refer to a DSL.

7. If a member of staff is concerned about a pupil always try to speak to that pupils' Head of Section or Housemaster / Housemistress (Hsm). They may ask you to speak to a DSL or to fill in an incident on CPOMS.

8. CPOMS (Child Protection Online Management System) provides a means for Heads of Section, Hsms and DSL teams to keep an eye on all issues pertaining to particular pupil.

9. Responding to digital disclosures

Where a child discloses a safeguarding concern through email, messaging, social media, online platforms or other digital means, staff must respond in the same way as they would to an in-person disclosure. Staff should:

- respond calmly and avoid judgement or criticism;
- avoid asking leading or investigative questions and seek only sufficient information to establish the immediate safeguarding concern;
- reassure the child that they have done the right thing in reporting the concern, without promising confidentiality;
- preserve relevant digital information and avoid deleting, altering, forwarding or otherwise interfering with potential evidence; and
- report the concern to the DSL as soon as possible and record the disclosure on CPOMS in accordance with College procedures.

10. Handling online and digital evidence

Where safeguarding concerns involve digital communications, images, videos, social media, messaging applications or other online material, staff should not investigate the matter themselves or attempt to obtain further evidence unless directed to do so by the DSL or an appropriate professional agency. Relevant evidence should be preserved securely and reported to the DSL. Staff should not forward, copy, download or circulate sexual images of children or other potentially illegal material. Where appropriate, the DSL will seek advice from the Police, Children's Services or other relevant safeguarding partners regarding the preservation and handling of digital evidence.

11. Mental health and safeguarding concerns

Staff must recognise that changes in a child's mental health, behaviour or emotional wellbeing may indicate an underlying safeguarding concern, including abuse, neglect, exploitation, bullying, child-on-child abuse, online harm or other forms of adversity. Where a member of staff has concerns about a child's mental health, they should follow the College's mental health and safeguarding procedures and report any safeguarding concerns to the DSL. Where there is an immediate concern that a child is at risk of serious harm, staff must follow the College's emergency safeguarding procedures without delay.

12. Immediate risk and escalation

Where a child is at immediate risk of serious harm, staff must take immediate action to secure the child's safety and contact the appropriate emergency service or Children's Services without delay. Staff should inform the DSL as soon as possible. If a concern has been reported but the staff member remains concerned that insufficient action has been taken or that the child's situation is not improving, they must escalate the concern to the DSL, Head

or another appropriate senior safeguarding lead. Staff should not assume that someone else has acted simply because a concern has already been reported.

Appendix 4: Dealing with allegations against members of staff, the Head, Council Member, Contractors or Volunteers

1. Cheltenham College's procedures

a. Cheltenham College's procedures for dealing with allegations made against staff will be used where the member of staff, the Head, Council, Contractors or volunteer has:

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

2. These concerns may arise from conduct inside or outside the College and may include, but are not limited to:

- online behaviour that raises safeguarding or suitability concerns;
- inappropriate digital communication or digital boundary violations, including inappropriate contact with pupils through social media, messaging applications or other online platforms;
- sexualised, discriminatory, misogynistic or otherwise harmful behaviour towards children or colleagues where this raises concerns about suitability to work with children;
- sharing, creating, accessing or promoting extremist or terrorist content where this raises concerns about safeguarding, radicalisation or suitability to work with children; and
- other conduct, including online conduct, that may indicate a risk of harm to children or call into question an individual's suitability to work with children

a. Any allegations meeting this criteria will be dealt with in accordance with the Gloucestershire Safeguarding Children Partnership procedures. Advice from the designated officer will be sought in borderline cases.

b. All such allegations must be dealt with as a priority without delay and should be reported within one working day.

c. If a crime may have been committed, the matter will be reported to the police.

d. Allegations against a teacher who is no longer teaching, and historical allegations will be referred to the LADO, and the police as directed by the LADO.

e. It is very rare for Cheltenham College to engage supply staff, but if the school did and any safeguarding concerns were raised, we would investigate thie matter in the same way we would for any member of staff.

f. If an allegation is received relating to an incident that happened when an individual or organisation was using the school premises, the appropriate action will be taken in accordance with this policy and will include informing the LADO.

3. Reporting an allegation against a member of staff (including the DSL), the Head, Council Member, contractor or volunteer, an authorised individual or someone from an organisation using the school premises.

a. Where an allegation or complaint is made against any member of staff, the Designated Safeguarding Lead or a volunteer, the matter should be reported immediately to the Head, or in his /her absence to the Nominated Safeguarding Council Member. The allegation will be discussed immediately with the designated officer before further action is taken. Where an allegation or complaint is made against the Head, the matter should be reported immediately to the President of Council or the Nominated Safeguarding Council Member, without first notifying the Head. The allegation will be discussed immediately with the designated officer before further action is taken. The President of Council will consult the Nominated Safeguarding Council Member, and vice versa.

b. Where an allegation is made against any Council Member, the matter should be reported immediately to the President of Council or the Nominated Safeguarding Council Member. The allegation will be discussed immediately with the designated officer before further action is taken. Where appropriate, the President of Council will consult the Nominated Safeguarding Council Member, and vice versa.

c. Where an allegation is made against an individual using the school premises, the matter should be reported immediately to the Head, or in their absence, to the Nominated Safeguarding Council Member. The allegation will be discussed immediately with the designated officer before any further action is taken.

d. For any allegation that is made outside of term-time, follow the guidance later in this section.

e. If it is not possible to report to the Head or President of Council or Nominated Safeguarding Council Member in the circumstances set out above, a report should be made immediately to the Senior Deputy Head (in the Senior School) and the DSL is the Prep School and if he/she is unavailable, one of the Deputy Designated Safeguarding Leads. Action will be taken in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the President of Council and the Nominated Safeguarding Council Member.

f. The person taking action in accordance with the procedures in this Appendix is known as the "Case Manager".

4. Disclosure of information

a. The case manager will inform the accused person of the allegation as soon as possible after the designated officer has been consulted.

b. The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

c. Where the Designated Officer advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

d. The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

5. Further action to be taken by Cheltenham College

a. A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Cheltenham College will take action in accordance with *KCSIE*, and Cheltenham College's employment procedures.

b. Alternative accommodation arrangements would be made for any member of boarding staff who may be suspended pending an investigation of a child protection nature

6. Ceasing to use staff

a. If Cheltenham College ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within Cheltenham College, with a report being presented to the Council without delay.

b. If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by Cheltenham College in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.

c. Where a teacher has been dismissed or would have been dismissed had they not resigned, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made. If there was Professional misconduct a referral to TRA will be made.

d. Early Years Foundation Stage (EYFS)

i. Cheltenham College will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS Department (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.

ii. These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.

7. Unfounded, false or malicious allegations

a. Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with Cheltenham College's behaviour and discipline policy. In College, arrangements for pupils raising serious concerns are set out in the Pupil Whistleblowing policy.

b. Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from Cheltenham College on the basis that they have treated Cheltenham College or a member of staff unreasonably.

c. Whether or not the person making the allegation is a pupil or a parent (or other member of the public), Cheltenham College reserves the right to contact the police to determine whether any action might be appropriate.

8. Record keeping

a. Details of allegations found to be unfounded will be removed from personnel records.

b. For all other allegations, full details will be recorded on the confidential personnel file of the person accused.

c. An allegation proven to be false, unfounded or malicious will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

9. Reporting Allegations outside of term-time

a. Any allegation, concern, or complaint that is made outside of term-time, whether it concerns a College member of staff, pupil, or an individual, child using College facilities, it is vital that the Head is contacted immediately or in their absence the Nominated Safeguarding Council Member. If this is not possible, a report should be made immediately to the SDH or the Duty DSL. The person you report the incident to will act in accordance with the Cheltenham College procedures and ensure that the appropriate senior staff are informed as soon as possible.

b. Details of the allegation, concern or complaint must only be shared with the senior member of staff who has been contacted. Once informed this individual, will be known as the 'Case Manager' and they will be responsible for liaising with the appropriate authorities, including the LADO. The Case Manager will take advice regarding allegations involving third parties and to whom, when, how, and by whom information is shared/disclosed.

c. **Under no circumstances must staff investigate, try to establish facts or disclose that an allegation has been made to anyone apart from the Case Manager who will take the appropriate action**

Appendix 5: Role and Duties of the Nominated Safeguarding Council Member and the President of Council

Overview

The Council of Cheltenham College acknowledge and understand that they have collective duties and responsibilities to safeguard and promote the welfare of children and to ensure that Cheltenham College's safeguarding policies, procedures and training are effective and comply with the law at all times.

The Council is determined to promote the well-being of children within Cheltenham College's care and recognises that well-being extends beyond the protection from harm and neglect into areas such as promoting:

- Physical and mental health and emotional wellbeing.
- Social and economic wellbeing.
- Opportunities for education, training and recreation.
- Opportunities for contributing to society.

The Council has nominated one of its members to champion best safeguarding practice in Cheltenham College, supporting the Council not just to discharge its duties under legislation and guidance but to move beyond regulatory compliance. The Nominated Safeguarding Council Member will:

- Support the Council in its commitment to promote the well-being of children within Cheltenham College's care.
- Take leadership of Cheltenham College's safeguarding arrangements, liaising with external agencies where this is required.

The appointment of the Nominated Safeguarding Council Member on the terms set out below forms part of the Council's acceptance of and response to its duties, not a delegation or abrogation of them.

Statutory Guidance

Statutory guidance 'Keeping Children Safe in Education (2026) defines safeguarding and promoting the welfare of children 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 the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Statutory guidance, 'Working Together to Safeguard Children 2026' requires a wide range of institutions, including independent schools, to have arrangements in place that reflect the importance of safeguarding and promoting the welfare of children, including:

- A clear line of accountability for the provision of services, designed to safeguard and promote the welfare of children.

- A senior board level lead to take leadership responsibility for Cheltenham College's safeguarding arrangements.
- A culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services.
- Clear whistleblowing procedures, suitable referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed.
- Arrangements, which set out clearly the processes for sharing information with other professionals and with the Local Safeguarding Children Partnership.
- A designated professional lead for safeguarding.
- Appropriate supervision and support for staff, including undertaking safeguarding training.
- Clear policies in line with those from the Local Safeguarding Children Partnership for dealing with allegations against people who work with children.

The 'Prevent Duty Guidance for England and Wales (2023) emphasises that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

Role and Duties of Council:

In accordance with KCSIE 2026 and applicable governance requirements, Council retains strategic oversight and accountability for the effectiveness of the College's safeguarding arrangements. While specific safeguarding functions may be delegated to committees, individual Council members or College leaders, Council must maintain appropriate oversight and assurance that safeguarding arrangements are effective.
Council will therefore:

- approve and ensure the annual review of the College's safeguarding and child protection policy and arrangements;
- ensure that safeguarding is appropriately identified, assessed and monitored as a strategic risk within the College's risk management framework;
- ensure that appropriate leadership, staffing, expertise, training and resources are available to discharge the College's safeguarding responsibilities effectively;
- maintain strategic oversight through the Welfare & Safeguarding Sub-Committee and the Nominated Safeguarding Council Member;
- receive and scrutinise regular reports from the Designated Safeguarding Lead and seek appropriate assurance regarding the effectiveness of safeguarding arrangements; and
- ensure that all Council members receive appropriate safeguarding and child protection training on induction and appropriate ongoing updates/training thereafter

Role and Duties of the Nominated Safeguarding Council Member:

The main role and duties of the Nominated Safeguarding Council Member on behalf of the Council (which retains overall responsibility) are to:

- Champion the promotion of well-being, safeguarding and child protection issues at the highest level within Cheltenham College.

- Encourage other members of Council to develop their understanding of the Council's responsibilities with regard to well-being, safeguarding and child protection and support them in the performance of these duties.

- Ensure that the Council puts in place a suitable child protection and safeguarding policy (CPS Policy) and associated procedures, which have proper regard to prevailing regulations, guidance, standards and advice.

- Be familiar with the Local Safeguarding Children Partnership guidance and procedures relating to safeguarding and child protection and associated issues, contributing to inter-agency working.

- Contribute to ensuring any deficiencies in Cheltenham College's safeguarding practices brought to Council's attention from any source are investigated and addressed.

- Meet regularly with Cheltenham College's Designated Safeguarding Lead in order to monitor the effectiveness of Cheltenham College's CPS Policy and procedures and the implementation of these across the school. It is recommended that this is at least a termly meeting.

- Ensure that the Council receives a report on the implementation of Cheltenham College's CPS Policy and procedures to support the full Council's review of the safeguarding at the school at least annually (or earlier if needed in response to changes to the law, policy or statutory guidance or as appropriate in response to specific incidents) in accordance with all statutory guidance and guidelines adopted by the Council.

- Alert the Council to any incident, which the Nominated Safeguarding Council member regards as a substantiated safeguarding incident.

- Ensure that the Designated Safeguarding Lead is part of Cheltenham College's Senior Leadership Teams and has sufficient time and resources at his/her disposal to carry out his/her duties effectively.

- Ensure that a Deputy Designated Safeguarding Lead is identified.

- Ensure that the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead receive appropriate training at least every two years.

- Ensure that arrangements are in place for the inclusion of child protection training on Cheltenham College's procedures in an induction programme for all people working in Cheltenham College, no matter for how long, nor the status of that individual.

- Ensure safer recruitment procedures are in place and implemented with appropriate checks undertaken on all new staff and volunteers.

- Review Cheltenham College's Single Central Register on at least a termly basis, after undertaking sufficient training to be able to interrogate the register and identify potential deficiencies. It is recommended that at least one review per year is on an unannounced basis.

- Be aware of how safeguarding and child protection issues, including guidance on adjusting behaviours to reduce risks, the safer use of electronic devices, social media

and the internet and advice on who to turn to for help, are properly addressed through the curriculum and schemes of work.

- Ensure that the Council carries out regular risk assessment of factors particular to Cheltenham College which have a bearing on the profile of particular well-being and safeguarding issues, such as (without limitation) historical concerns, looked after children, mental health, body image, self-harm, children missing education, radicalisation, pupils performing a caring role at home, children with special needs or learning difficulties, those for whom English is an additional language, child sexual exploitation, female genital mutilation and cyber-bullying.

- Both provide to and seek from the local authority and other relevant agencies information about how the Council's duties in respect of safeguarding and child protection have been discharged where appropriate or requested.

The identity of and contact details for the Nominated Safeguarding Council Member, together with an outline of his/her duties will be widely publicised within Cheltenham College community to ensure that pupils, parents, staff and Council members understand the purpose and importance of the role.

To the extent that the role and duties of the Nominated Safeguarding Council Member conflict with those assumed by others within Cheltenham College, including the President of Council, the Council will take all necessary action to resolve those conflicts so as to achieve clarity about respective roles and duties. This may include amendments to the CPS Policy, Cheltenham College's constitutional documents and/or other governance arrangements applicable to Cheltenham College.

Each of the Nominated Safeguarding Council Member and the President of Council will undertake appropriate training in accordance with the Local Safeguarding Children Partnership's recommendations to fulfil the respective role and duties.

Allegations against staff

Cheltenham College's CPS Policy sets out the detail of who is responsible for liaising with the local authority designated officer(s) in the event of allegations of abuse made against the Head, proprietor, member of Council or member of staff of Cheltenham College.

Where the Nominated Safeguarding Council Member is responsible for taking the lead in liaising with the local authority and/or other partner agencies, he/she will:

- Notify the designated officer of the local authority immediately before any action is taken.
- Ensure, with local authority support, that appropriate action is taken in accordance with agreed Local Safeguarding Children Partnership's procedures
- Attend initial and subsequent strategy meetings as required if other agencies are involved.
- Oversee an investigation under Cheltenham College's internal employment procedures when the other agencies' involvement is at an end or as soon as it is confirmed that this may take place.
- With the Designated Safeguarding Lead, review Cheltenham College's CPS Policy and procedures, taking advice from the designated officer of the local authority and making the necessary changes.

At the conclusion of a case in which an allegation is substantiated, the Nominated Safeguarding Council Member will conduct a review of the circumstances of the case seeking appropriate input from within and outside Cheltenham College to determine whether there are any improvements to be made to Cheltenham College's procedures or practice to help prevent similar events in the future. The Nominated Safeguarding Council Member will ensure that a full report is available for Council.

Appointment of the Nominated Safeguarding Council Member

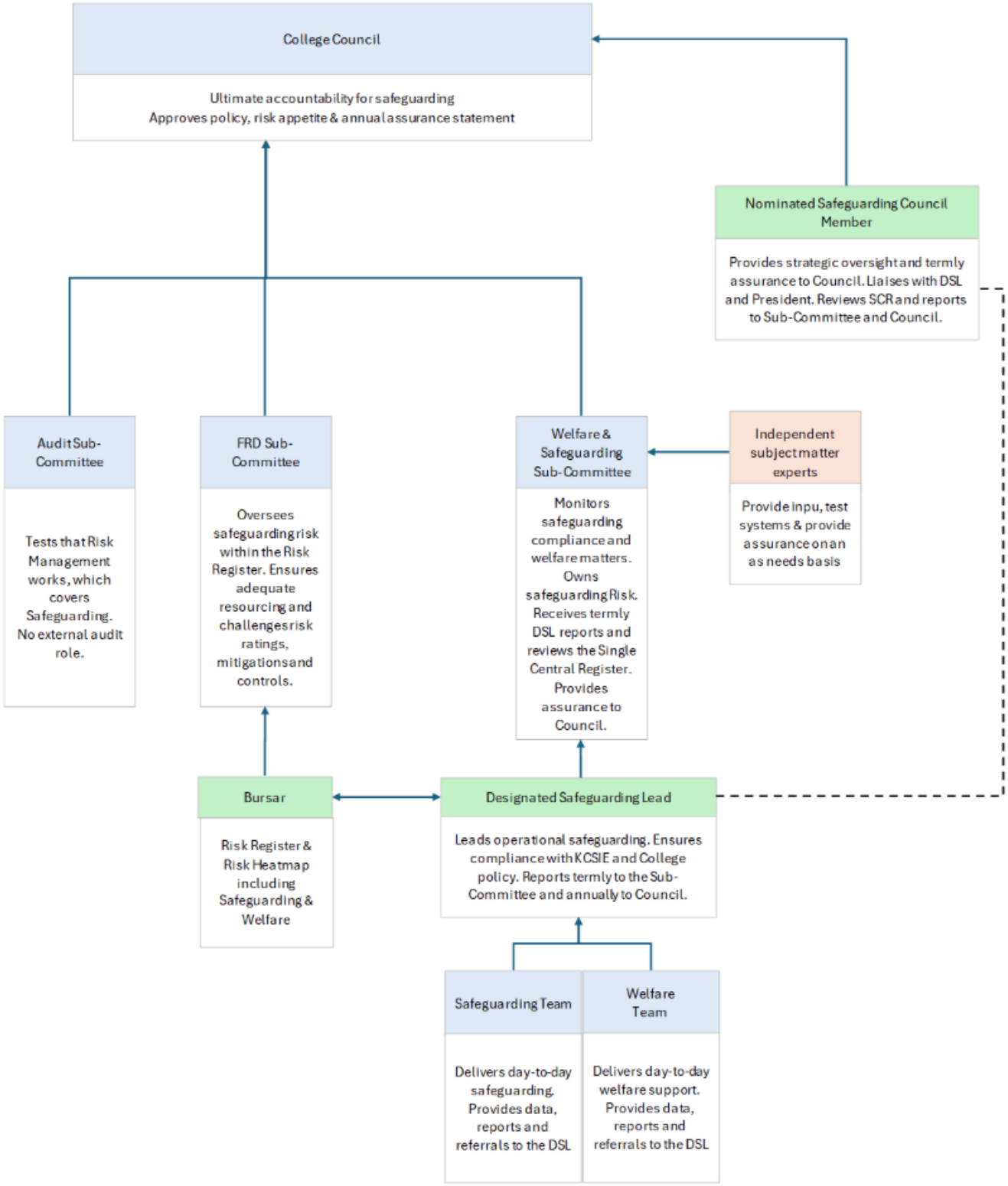
The Nominated Safeguarding Council Member is Katy Dallimore and she can be contacted in the following ways:

- By email: CPCouncil@cheltenhamcollege.org
- By telephone via the Secretary to Council: 01242 265686

If the Nominated Safeguarding Council Member is unavailable, his/her duties will be carried out by the President of Council.

The appointment of the Nominated Safeguarding Council Member has been made by Council after full consideration of the roles and responsibilities and the qualities required by potential candidates to discharge them effectively.

Welfare & Safeguarding Governance



Appendix 6: Information sharing and Confidentiality Guidance

Information sharing

Concerns about pupils should never be discussed inside or outside of College, unless in confidential meetings or in a space that guarantees confidentiality. As such information should never be discussed in a public forum. If there is an emergency and there is a need to have a conversation in order to safeguard the health and welfare of a pupil, it is still important to consider whether the surroundings offer a degree of confidentiality and to seek a more appropriate environment in order to deal with that issue.

There will be times when members of staff are expected to liaise and share information with external agencies such as LADO or Children's Services such as Early Help or with the MASH. Confidentiality and GDPR should never be a barrier to information sharing; indeed, Information sharing is essential for effective safeguarding and promoting the welfare of children and young people and it is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.

In order to safeguard pupils effectively while respecting confidentiality and data protection obligations, Cheltenham College ensures that the Designated Safeguarding Lead (DSL), or a member of the safeguarding team, shares information appropriately and securely. In most cases, the DSL will be the person responsible for making decisions about information sharing. They should be open and honest with the pupil and, where appropriate, their family about why, what, how, and with whom information will or may be shared, and seek agreement unless doing so would be unsafe or inappropriate.

If there is any uncertainty about whether information should be shared, the DSL should seek advice from the Data Protection Manager. Under the UK GDPR and the Data Protection Act 2018, information may be shared without consent if there is a lawful basis to do so, such as when a pupil's safety may be at risk. To support this judgement, the DSL should complete a Signs of Safety Assessment, available in the DSL folder on Teams, and base decisions on the facts of the case.

When sharing or requesting personal information, the DSL must be clear about the legal basis for doing so, ensure that the information is necessary for the intended purpose, and share it only with individuals who need to know. All shared information must be accurate, up to date, and transmitted securely using systems such as Egress or encrypted email. A record of decisions to share or not share information must be logged on CPOMS. Where information is shared with external agencies, a record should be kept detailing what was shared, with whom, and the purpose of the disclosure.

Sharing information with Local Authority Safeguarding Services

At Cheltenham College, the DSL is responsible for ensuring that any concerns about a pupil's welfare are appropriately shared with external agencies, including the local authority's Children's Social Care services, in line with statutory duties.

Under Section 17 of the Children Act 1989, the DSL may share relevant information to support the local authority's duty to assess and provide services to children in need. This includes contributing to early help assessments and ensuring that appropriate support is in place at the right time. Where there are more serious concerns, under Section 47 of the

Children Act 1989, the DSL will share information to support child protection enquiries when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Wherever possible, consent will be sought from parents or carers prior to sharing information. However, if there is concern that seeking consent may place the child at increased risk of harm, information may be shared without consent, provided it is necessary and proportionate to protect the child. The DSL will maintain a clear and detailed record of the rationale for any decisions made regarding information sharing. All decisions and actions will be recorded on CPOMs.

Sharing information with the police

The Designated Safeguarding Lead (DSL) may share information with the police where it is necessary for the prevention, detection, prosecution of crime, or where a pupil is at risk of significant harm. Under the UK GDPR and the Data Protection Act 2018, Cheltenham College may lawfully disclose personal data to the police for law enforcement purposes, provided there is a clear legal basis for doing so. Where the request involves special category data the DSL must ensure that the appropriate conditions under Articles 9 and 10 of the UK GDPR and Schedule 1 of the Data Protection Act 2018 are met. In most cases, this will be under Schedule 1, Paragraph 10, which permits disclosure for the prevention or detection of unlawful acts where seeking consent would prejudice those purposes. Requests from the police should be made in writing and clearly state the necessity of the request. Where possible, the police should complete an Interim Third-Party Material Request Form.

All disclosures must be recorded on CPOMS, including the rationale for sharing, the information shared, the recipient and the method of transmission. Information must be shared securely using encrypted/password protected email or approved platforms such as Egress. In emergency situations, the DSL may share information without delay if it is necessary, proportionate and should document the action taken as soon as possible afterwards. The DSL should also confirm with the police whether the individual concerned can be informed of the disclosure, particularly in relation to subject access requests.

Medical Confidentiality

In a school setting, medical confidentiality means respecting a pupil's right to privacy whilst balancing this against the risks of their individual case within the boarding school setting and telling those who need to know in order to keep that person safe. Passing on medical information to other people is usually done with the permission of the pupil. The decision to breach confidentiality against a pupil's wishes is one that is taken extremely seriously and is only done when there is felt to be a significant risk of harm to the pupil if the information is not shared.

Respecting patient confidentiality is an essential part of good care; this applies when the patient is a child or young person as well as when the patient is an adult. Without the trust that confidentiality brings, children and young people might not seek medical care and advice, or they might not tell us all the facts needed to provide good care.

Telling parents /guardians

Each pupil has a right to confidentiality, but the school should encourage the pupil to allow their parents to be contacted unless communicating with parents could pose a safeguarding

risk to that young person. In this case, the DSL must be consulted. If the child is a day pupil or a day boarder this need becomes ever more pressing, and there may be situations where the child's welfare away from school means parents must be contacted.

The right to confidentiality becomes more absolute as the pupil ages and matures. The school medical team uses the principles of Gillick Competency to make decisions about this. There is no set of defined questions to assess Gillick competency. Professionals need to consider several things when assessing a child's capacity to consent, including:

- the child's age, maturity and mental capacity
- their understanding of the issue and what it involves - including advantages, disadvantages and potential long-term impact
- their understanding of the risks, implications and consequences that may arise from their decision
- how well they understand any advice or information they have been given
- their understanding of any alternative options, if available
- their ability to explain a rationale around their reasoning and decision making.

The Fraser guidelines may also apply within College in pupils who are under 16 year. They apply specifically to advice and treatment about contraception and sexual health.

If the child is under 13 the parents must be informed and consent to the treatment plan. If the young person is over 13 and not registered with the College medical team then their parents may have to be informed if the school has concerns as they are the only ones who can ensure that the young person sees their own GP. Only their own GP can refer them to appropriate external services.

At 16 it is legally presumed young people have the capacity to make decisions about their own care. People with capacity are allowed to make decisions that we do not agree with, but some situations are not compatible with continuing to remain in the boarding environment. If a pupil is in that position then they will be assessed according to our Mental Health Assessment Policy and discussed within the Welfare Management Team to determine if they are fit to board. It is vital that pupils are supported to understand the complexity of their own situation, and to make decisions that recognise this.

In some situations where there is deemed to be a serious safeguarding concern regarding a pupil's health, or that of another, the DSL team will be informed and parents subsequently notified. The level of risk would need to be carefully assessed. Our Health Centre team, including our psychotherapists, will always try to gain a pupil's permission to involve parents, although that may not always be possible.

If the decision is taken to start medication that has a wider significance e.g. antidepressants in a pupil who is boarding, then the school doctors will routinely discuss sharing this information with the Hsm and their parents. In the vast majority of cases pupils are willing for this information to be shared. If the pupil is adamant that they are not willing to share the information then the school doctors will only agree to prescribe after a thorough risk assessment, and with appropriate safeguards in place e.g. weekly prescriptions, regular doctor or nurse reviews. Careful thought will be given to the holiday periods and ensuring that pupils are not given large quantities of medication to take home if parents are unaware of the prescription. In addition, where possible support will be offered via Teams over the holiday. If a pupil does not give consent to school or parental involvement at the initial consultation this should not be the end of the conversation, and it should be discussed regularly to ensure that the situation has not changed with regard to their level of risk. At all times the pupil's welfare will be used as the focus for our decision making.

Moving Practitioners

Students over the age of 16 have the right to move their health practitioner without their parents' consent. For boarding pupils, it is generally a condition of them being at College that they are registered under our practice. Students can choose to see a different doctor in our practice if they so wish. For day and day boarding pupils registered with another practice, College would not be involved in any decision to move practitioner unless it had been advised that for exceptional reasons they register at our practice.

Referral Protocols for Nurses

The Health Centre provides a safe environment where our school nurses can have private consultations with Pupils and staff. Consultations with the school nurses are treated as confidential unless there is a concern for the safety of that pupil or for others within College. If the nurse feels that a pupil has raised an issue where they would benefit from support from their teachers or parents, they will strongly encourage them to give consent for the nurse to discuss it and for the pupils themselves to be open with their parents or Hsm with support if necessary.

There will be times when the nurse feels it is in the child's best interest to breach their confidentiality. This will be in cases where there is concern for the pupil's safety, for example, in the case of self-harm and/or suicidal ideation. In some cases, the concern may be low level and can therefore be referred to the Assistant Head (Safeguarding & Pupil Welfare) for information only. The purpose of this, is because the Assistant Head (Safeguarding & Pupil Welfare) holds information from a variety of different sources and as DSL will also hold confidential safeguarding information. The Assistant Head (Safeguarding & Pupil Welfare) can therefore escalate the concern if there is a need. In other cases, if the concern is more serious and involves any form of abuse, then this matter must be raised as a safeguarding concern through CPOMs.

There will be other times when the pupil has been sent to the Health Centre by the Hsm as part of our self-harm policy or due to other concerns they may have, for example around eating or low mood. In these cases, unless there is good reason not to, then it is important that an update is provided via CPOMs at the earliest opportunity.

The following flow diagram should be used as guidance as to when and how to refer.

Low risk (Early help)

- One off incident which caused minimal injury and is without expression of further intent.

As per the self-harm policy, if the pupil is under 13, this needs to be recorded on CPOMs.

If the pupils is over 13 and is Fraser competent then this can be managed within the HC. The DPW needs to be informed either via phone or through email. All emails needs to recorded as confidential.

At this stage pupils should be signposted to appropriate in house support such as Student Support Services and/or the College Doctor.

Medium Risk (Pupil with complex needs)

- One off incident which caused serious harm and/or repeated expressions of intent for further harm.
- Intervention and support work is failing to reduce the risk of self harm and/or suicidal ideation.
- Disclosure of abuse (including child on child) or any concerns related to online grooming

If the pupil is not at immediate risk of harm, then concerns should be recorded on CPOMs under the right category – this needs to be recorded on the day.

You may want to follow this up with a phone call to the DSL/AH (S&PW)/Hsm

High Risk (pupil in acute need)

- Significant harm, for example, for example, the pupil's actions could result in their death or serious injury requiring hospital admission.
- Disclosure of abuse which could result in significant and/or immediate harm.

Immediate phone call to the AH (S&PW)/College Doctor/Hsm depending on the nature of the concern.

Please make sure all your notes are then recorded on to CPOMs as soon as you can after you have spoken to the appropriate person.

Appendix 7: Safeguarding Records Transfer Protocol

Cheltenham College is committed to ensuring that safeguarding records are transferred securely, promptly, and in line with statutory guidance and best practice. This appendix outlines the College's procedures for reviewing, redacting, and transferring safeguarding records when a pupil moves to another educational setting. These procedures comply with:

- **Keeping Children Safe in Education (KCSIE) 2026**, which mandates the timely and secure transfer of child protection files to a pupil's new school or college,

- **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, which require that personal data be processed lawfully, fairly, and transparently, with appropriate safeguards for the rights and freedoms of individuals,

Key Principles

- Safeguarding records are transferred to ensure continuity of care and protection.
- Only information that is relevant, proportionate, and necessary for safeguarding is shared.
- Transfers are carried out securely, with oversight from the Designated Safeguarding Lead and the Data Protection Manager.

Cheltenham College Procedure

Review and Redaction: the DSL will review the safeguarding file prior to transfer. Any excessive, irrelevant, or outdated information will be redacted. This includes the names or identifying details of other pupils, which must be removed unless they are essential to the safeguarding context. If there is any uncertainty about inclusion, the Data Protection Manager will be consulted to support appropriate decision-making.

Content to Include:

- Chronologies of concern
- Records of disclosures, referrals, and DSL decisions
- Multi-agency plans (e.g. Child Protection, Child in Need)
- Relevant agency/family correspondence
- Risk assessments and contextual safeguarding notes
- Behaviour or attendance records only if directly linked to safeguarding

Transfer Method and Timescale: Safeguarding files will be transferred **within five school days** of the pupil starting at the new setting. Transfer of safeguarding records will be carried out via one of the following secure methods: hand delivery, tracked postal service, encrypted digital transfer or direct transfer between CPOMS systems, where the receiving setting uses compatible safeguarding software.

Record of Transfer: A log will be maintained including:

- Pupil name and destination school
- Date and method of transfer
- Name of receiving DSL
- Confirmation of receipt

No Known Destination: If a pupil is removed from roll and no new setting is identified, the DSL will notify the relevant safeguarding partners in line with GSCP CME protocols.

The following table serves as a decision-making tool to determine which information should be shared and which should be withheld.

✅ Safeguarding Relevance Review Table

Type of Information	Safeguarding-Related	Include in Transfer?	Notes
Disclosure of abuse or neglect	✅ Yes	✅ Yes	Include records detailing disclosures, actions, and outcomes
DSL notes and decisions	✅ Yes	✅ Yes	Track DSL actions, rationale, and decision-making
Child Protection / CiN / My Plan / My Plan+	✅ Yes	✅ Yes	Where linked to safeguarding concerns
Chronologies of concern	✅ Yes	✅ Yes	Ensure clarity and completeness
External agency correspondence	✅ Yes	✅ Yes	Social care, police, health – if safeguarding-relevant
Behaviour logs (linked to risk)	⚠️ Maybe	🔍 DSL to review	Include if relevant (e.g. bullying, sexualised behaviour)
Attendance concerns indicating neglect	⚠️ Maybe	🔍 DSL to review	Patterns or summaries that inform safeguarding context
Academic reports	❌ No	❌ No	Exclude unless referenced in safeguarding concerns
Routine medical notes	❌ No	❌ No	Exclude unless linked to risk (e.g. unexplained injuries)
Parental complaints (not safeguarding-related)	❌ No	❌ No	Include only if central to a safeguarding case

All information shared as part of a safeguarding record transfer must adhere to the **'need to know'** principle. Only details that are necessary, proportionate, and directly relevant to protecting the pupil's safety and wellbeing should be included. This may include medical or mental health information, such as concerns around self-harm or eating disorders, but only where these present a safeguarding risk or are essential to ensure appropriate ongoing support.

Appendix 8: Safeguarding Children on Child Student Visas

Purpose and Context

This appendix outlines Cheltenham College's safeguarding responsibilities in relation to pupils who are sponsored under the Child Student Visa route. Considering increasing concerns from the UK Visas and Immigration (UKVI) department regarding the abuse of sponsorship routes by international criminal networks, the College recognises the vital importance of additional safeguarding and compliance measures. Criminal exploitation of children under the Child Student Visa route may include trafficking, working illegally, identity fraud, and coercive control. As a licensed sponsor, the College is committed to protecting international pupils and preventing misuse of the visa system.

UKVI has highlighted a range of safeguarding risks related to the abuse of the Child Student Visa route by criminal networks, fraudulent agents, and individuals seeking to exploit the vulnerability of children and young people entering the UK as students. These risks include:

Human Trafficking and Exploitation

- Organised criminal groups may use student visa sponsorship as a legal cover to traffic children into the UK, where they may be forced into exploitative labour, domestic servitude, or criminal activity.
- Pupils may be coerced into county lines drug operations, forced begging, or theft, particularly during periods when they are unsupervised or during school holidays.
- Exploited children may be made to abscond from school, change guardianship arrangements unofficially, or disappear after entry into the UK.

Digital Scams and Online Grooming

- Pupils and their families may fall victim to phishing scams, with fraudulent emails purporting to be from:
    - UK Border Force
    - Police or immigration authorities
    - Government departments
    - Banks or embassy officials
- These scams often demand payment of fake fines or visa fees, using threats of deportation or imprisonment.
- Pupils may also be targeted by online predators, particularly if they are socially isolated or experiencing difficulties settling into boarding life.
- Sextortion threats may include shame-based coercion, particularly targeting cultural values around honour, privacy, and reputation.

Isolation, Silence and Fear of Authority

- Cultural and language barriers can discourage pupils from disclosing problems, especially if they fear shame, failure, or loss of face.
- Some international pupils experience:
    - Loneliness or homesickness
    - Pressure to succeed and make their families proud
    - Fear of bringing shame to their family by reporting abuse or fraud

- This creates a barrier to help-seeking, particularly if pupils do not understand UK safeguarding processes or feel uncertain about their rights.

Inadequate Guardianship or Supervision

- Unregulated, informal, or inappropriate guardian arrangements may leave pupils unprotected during Exeats or holidays.
- Pupils may be left in the care of unsuitable adults, without proper DBS checks or safeguarding vetting, and be vulnerable to:
    - Emotional neglect
    - Poor supervision
    - Exposure to unsafe environments
    - Physical or sexual abuse
- Guardians may also delegate care to others without notifying the school, creating further safeguarding gaps.

Exploitation by Family Members or Acquaintances

- In rare cases, family-arranged guardianship may mask exploitative or abusive relationships.
- Pupils may be expected to:
    - Work informally in homes or businesses
    - Share cramped living conditions
    - Act as carers or translators for adults
- Their visa status may be used as leverage to control or silence them.

Responding to Safeguarding Concerns About International Pupils

Cheltenham College is committed to taking swift, proportionate, and child-centred action whenever there is a safeguarding concern involving an international pupil sponsored under the Child Student Visa route. Concerns may be raised internally by staff or students, externally by guardians or agencies, or through patterns of behaviour observed over time. All concerns, no matter how minor they may seem, are taken seriously.

Immediate Actions:

If a member of staff becomes aware of any concern about an international pupil, they must:

- Record the concern immediately and accurately on CPOMS
- Inform the Designated Safeguarding Lead (DSL) or Deputy DSL if there are immediate concerns.
- Ensure the pupil is safe, supported, and listened to in a sensitive and non-judgmental way

If there is a risk of immediate harm, the DSL or their deputy will:

- Take urgent protective action (e.g. remove the pupil from a harmful environment)
- Make a safeguarding referral or if there are immediate concerns, contact the police.
- Notify UKVI if the safeguarding concern affects the visa sponsorship or compliance obligations

Appendix 9- Safeguarding Pupils in Alternative Provision (AP) and Remote Learning

1. Legal and Statutory Framework

This appendix aligns with the following key legislation and statutory guidance:

- **Education Act 1996, Section 19**: Local authorities must arrange suitable, full-time education for children of compulsory school age who cannot attend school due to exclusion, illness, or other reasons

- **Keeping Children Safe in Education (2026)**: Schools remain responsible for safeguarding pupils placed in AP, including those learning remotely

- **Providing Remote Education Guidance (DfE, 2024)**: Remote education should be a last resort and must be high-quality, safe, and inclusive

- **Working Together to Safeguard Children (2026)**: Emphasises multi-agency collaboration and early intervention.

- **Working Together to improve School Attendance (2026):** Schools must safeguard pupils accessing remote education while still on roll, ensuring regular contact and support.

Cheltenham College recognises that in certain circumstances, pupils may be unable to attend school in person due to medical, emotional, or behavioral needs. In such cases, alternative provision may include placement in hospital schools, engagement with home tuition services, or access to remote learning platforms. The College remains responsible for safeguarding pupils in these settings, ensuring that all arrangements meet statutory requirements and reflect the principles outlined in its safeguarding framework.

Where pupils are receiving remote education due to attendance issues, such as illness, anxiety, or other barriers to physical attendance, Cheltenham College follows the Department for Education's guidance on providing remote education. This applies specifically to situations where the pupil undertakes remote learning for a period of time while still on roll at Cheltenham College. Safeguarding arrangements include maintaining regular contact, monitoring engagement, and ensuring pupils have access to safe and effective learning environments. The DSL will oversee all safeguarding measures, including risk assessments, online safety protocols, and welfare checks and will specifically:

- Obtain written confirmation of safer recruitment checks for AP staff.
- Know the exact location of students during school hours.
- Review AP placements half-termly to ensure safety and suitability.

In all cases, the College aims to support reintegration into full-time education and uphold its commitment to pupil wellbeing and safeguarding, where the pupil remains on roll.