We are an ambitious and inclusive Trust of schools strengthening communities through excellent education.

Ted Wragg TRUST

Child Protection and Safeguarding Policy

(KCSIE 2026 Update)

Responsibility for approval: Trustees
Date of approval: September 2026
Next review: July to September 2027

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** Out of hours contact details will be made available to staff and will be included in out of office replies on emails*

*** Any changes to key personnel/holiday/emergency contacts will be shared with the appropriate agencies and LA safeguarding boards/hubs*

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1.0 Safeguarding Statement

1.1 Exmouth Community College recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils and expects all staff, governors and volunteers to share this commitment. We recognise that all children, regardless of age, disability, Special Educational Needs (SEND), gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.

We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection and justice. We listen to our pupils and take seriously what they tell us, and our children are aware of the adults they can talk to if they have a concern. When there are concerns for a child's welfare, we may need to share information and work in partnership with other agencies. We will ensure concerns are discussed with parents/carers first, unless we have reason to believe that by doing so would be contrary to the child's welfare.

This Child Protection and Safeguarding policy underpins and guides our safeguarding procedures and protocols.

Child Protection and Safeguarding Policy Circulation

- This policy will be published on the Trust's and individual school's websites and included in the Trust's policy monitoring schedule.
- This policy will be circulated to every Member, Trustee/Director, Governor and Employee by sending an email to the link on the Trust's website.
- The Trustees and Trust Leader for Safeguarding & Attendance are responsible for overseeing, reviewing and organising the revision of this policy.

2.0 Terminology / Definitions

2.1 ***Staff*** refers to all adults working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

2.2 ***Child*** includes everyone under the age of 18 or 25 if a care leaver.

2.3 ***Parents*** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers, adoptive parents and local authority (LA) corporate parents.

2.4 ***Child Protection*** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

2.5 ***Safeguarding and promoting the welfare of children*** is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development.
- Ensuring 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.

2.6 ***Abuse*** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

2.7 ***Victim*** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

2.8 ***Alleged perpetrator(s)*** *and* ***perpetrators*** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

3.0 Safeguarding Legislation and Guidance

3.1 The following safeguarding legislation and guidance has been considered when drafting this policy:

- Education Act 2002 Section 175 (maintained schools only)
- Education Act 2002 Section 157 (Independent schools incl Academies and CTC's)
- The Education (Independent School Standards) (England) Regulations 2014
- The Safeguarding Vulnerable Groups Act 2006
- Teachers' Standards (Guidance for school leaders, school staff and governing bodies)
- Working Together to Safeguard Children
- Keeping Children Safe in Education
- Working together to improve school attendance 2026.pdf
- Statutory Guidance on the Prevent Duty
- Meeting Digital and Technology Standards in Schools Filtering and Monitoring Core Standards
- EYFS Statutory Framework
- Information Sharing 2024
- What to do if you're worried a child is being abused
- After school clubs' community activities and tuition safeguarding guidance for providers
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- The Public Sector Equality Duty (PSED)
- Use of reasonable force and other restrictive interventions guidance
- Data (Use and Access) Act 2025
- Crime and Policing Act 2026

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4.0. Equality Statement

4.1 Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse and violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5.0 Policy Principals, Aims and Values

5.1 The welfare of the child is paramount:

- All children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
- We recognise that all adults, including temporary staff, volunteers and governors, all have a duty to protect our pupils from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical, mental wellbeing and moral development of the individual child.
- Pupils and staff involved in child protection issues will receive appropriate support and supervision at the earliest opportunity.

5.2 This policy aims to:

- Raise the awareness of all staff of the need to safeguard children.
- Provide all staff with guidance on the procedures they should adopt if they suspect a child, may be experiencing, or be at risk of experiencing, harm. Including consideration to the use of appropriate early assessments, resources and agency support.
- Provide an environment in which children and young people feel safe, secure, valued and respected, and that they will be listened to should they make a disclosure.
- Raise awareness that abuse can be both familial and/or contextual; and abusers can be both adult/s to child/ren or child/ren to child/ren.
- Demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- Provide a systematic means of identifying and monitoring children known or thought to be at risk of harm.
- Emphasise the need for high levels of communication between staff and the designated safeguarding leads (DSL's) internally and with external agencies and partners, including our contribution to assessments, referrals and support plans.
- Develop and promote effective working relationships with other partnership agencies, particularly Children's Social Care, Police and Health in line with Working Together to Safeguard Children 26.
- Support the child's development in ways that will foster security, confidence and independence.
- Ensure that all staff working within our school who have unsupervised access to children have been checked as to their suitability, including pre-employment checks and online searches, verification of their identity, qualifications, and a Disclosure Barring Service (DBS) check (according to guidance)[1], and a single central record is maintained and subject to regular audit.
- Provide clarity and expectations on professional behaviours and code of conduct, including lone working requirements.

5.3 Supporting and Protecting Children:

- We recognise that a child who is abused or witness's abuse may feel helpless and humiliated and could experience barriers to making a disclosure. We understand that the behaviour of a child in these circumstances may range from that which is perceived to be normal, to that which is aggressive or withdrawn, as well as exhibiting signs of mental health problems. We understand the impact on a child's mental health, behaviour and education from familial and/or contextual abuse. Exmouth Community College may not only provide stability in the lives of children who have been abused or who are at risk of

[1] Guidance regarding DBS checks updated by the Protection of Freedoms Act 2012 and KCSiE 26

harm, but it plays a significant part in the prevention of harm to our children through the early identification of risk of harm.

5.4 Our school will support all children by:

- Encouraging and developing self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or any form of bullying (incl. cyber bullying),
- Promoting a caring, safe and positive environment within the school and providing children with good lines of communication with trusted adults, including the availability for different methods for reporting concerns by pupils to suit their needs and systematically gathering pupil voice to evaluate the impact of systems and processes.
- Responding sympathetically to any requests for time out to deal with distress and anxiety.
- Offering details of helplines, counselling or other avenues of external support.
- Liaising and working together with all other settings, support services and those agencies involved in the safeguarding of children in line with the Working Together to Safeguard Children 26 guidance.
- Notifying children's social care as soon as there is a significant concern.
- Ensuring appropriate information is shared confidentially and in a timely manner at key transition points in a child's journey to ensure continued support (incl. school medical records).
- Ensuring children are taught to understand, analyse and manage risk through our Personal, Social, Health and Economic (PSHE) Education and Relationship and Sex Education (RSE) and through all aspects of school life, including online safety.
- Accessing and utilising the necessary resources, guidance and toolkits to support the identification of children requiring mental health support, support services and assessments.
- Reassuring victims that they are being taken seriously and that they will be supported and kept safe.

5.5 The school community will protect children by:

- Working to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to.
- Ensuring all children know there are adults in the school whom they can approach if they are worried or in difficulty.
- Regular opportunities for consultation with children, parents and staff to hear and act on their voice.
- Including safeguarding in all aspects of the curriculum to equip children with the skills they need to stay safe from harm, identify risk and to know who they should turn to for help; in particular this will include positive relationships, mental health, anti-bullying, information about child on child abuse (sexual harassment, sexual violence, harmful sexual behaviour, serious violence, exploitation, consent), online-safety, road and water safety, pedestrian and cycle training;
- Provide focussed activities to prepare specific year groups for transition to new settings and/or key stages e.g. personal safety/independent travel/orientation and identification of key adults.
- Ensuring all staff, pupils and parents are aware of school guidance for their use of mobile technology and the safeguarding issues around the use of mobile technologies, including the safe use of social media, AI and online platforms and their associated risks.

6.0 Safe School, Safe Staff

6.1 All Staff will:

- Read and understand at least part 1 of Keeping Children Safe in Education KCSiE 2026 and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance.

- Identify concerns early, provide help for children, and prevent concerns from escalating.
- Provide a safe environment in which children can learn and thrive.
- Be made aware of the systems used which support safeguarding, and these will be explained to them as part of staff induction and on an annual basis. This will include:
    - the Child Protection and Safeguarding policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse)
    - the Behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
    - the Staff Code of Conduct should amongst other things, include how to report low-level concerns, allegations against staff and whistleblowing procedures
    - the Computer/Mobile Device Use and Online Policy, including use of AI guidance – Staff
    - the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods, as well as the child missing education procedure
    - the role of the Designated Safeguarding Lead (including the identity of the designated safeguarding lead and any deputies)
    - copies of the policies and procedures pertinent to their role in safeguarding the children in their care E.g. behaviour policy, SEND policy, Online safety policy.
    - receiving safeguarding awareness training annually
    - receiving regular safeguarding updates including online safety, serious violence, child on child abuse and emerging contextual safeguarding risks
    - being aware of their role in the school's filtering and monitoring system and receive regular updates on its effectiveness
    - being aware of their role in safeguarding, early help and implementing child protection support plans
    - the early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
    - the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
    - the process for community-based Family Help assessments
    - what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
    - safeguarding issues that often overlap and can put children at risk of harm, including:
        - Drug taking and/or alcohol misuse
        - Unexplainable and/or persistent absences from education
        - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
        - Consensual and non-consensual making or sharing of nudes or semi-nudes
    - new and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
    - the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
    - the fact that children can be at risk of harm inside and outside of their home, at school and online
    - the fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

6.2 **Governors will:**

- All governors will read Keeping Children Safe in Education (KCSIE) in its entirety.
- Ensure mechanisms are in place to assist staff to understand and discharge their roles and responsibilities as set out in Part one of KCSiE 26.
- Be aware of the key safeguarding personnel within the school and the schools safeguarding statement and ethos.
- Receive appropriate safeguarding awareness training as they join (at the point of induction) the governing board and at least annually thereafter.
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils.
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Ensuring that reviews are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
- Ensure appropriate safeguarding and associated policies are in place and implemented effectively, leading to a whole school effective safeguarding culture.

6.3 **School will:**

- Provide a coordinated offer of Family Help, (identifying children and families in need of support at the earliest opportunity), contribute to such arrangements, support interagency working and plans and maintain records on the agreed system (s), as applicable.
- Maintain and regularly review (at least half termly) the SCR to ensure the suitability of adults working with children on site E.g. Letters of assurance, DBS checks, S128 checks and safeguarding training.
- Provide community users with the school's Child Protection and Safeguarding policy and ensure they have read and adhere to the expectations as laid out in the policy and KCSiE 26.

6.4 **Parents will:**

- Have access to the Safeguarding statement, policy and other associated documents via the school website.
- Be made aware of school's responsibility to safeguard children.
- Have access to appropriate signposting for support for both their child and their family.

7.0 Roles and Responsibilities

7.1 Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

Our school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

We will follow the statutory guidance as set out in the latest KCSiE 26 Document (and associated documents and guidance), adhering to the roles, responsibilities and expectations identified for:

- Governing bodies, proprietors and management committees
- The Headteacher
- The DSL
- The DDSL
- Staff

7.2 **Governing bodies, proprietors and management committees:**

- Understand and fulfil their responsibilities, namely, to ensure that there is an effective Child Protection and Safeguarding policy, a Behaviour Policy, which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying), together with a Staff Behaviour policy (Code of Conduct) which should, amongst other things, include low-level concerns, allegations against staff and whistleblowing, plus acceptable use of technologies (including the use of mobile devices and AI), staff/pupil relationships and communications including the use of social media.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation.
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils.
- Ensure appropriate safeguarding arrangements are in place to respond to children who are absent from education, particularly on repeat occasions and/or for prolonged periods,
- Ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction and annually thereafter. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- Ensure their school or college has appropriate filtering and monitoring systems in place, which meet the latest guidance and review their effectiveness at least once each academic year. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Ensure the school has appropriate cyber security systems in place

7.3 **Their roles and responsibilities will include:**

- Child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with the statutory requirements, are reviewed annually and that the Child Protection and Safeguarding policy is publicly available on the school website or by other means.
- Ensuring that all staff, including temporary staff and volunteers are provided with the school's Child Protection and Safeguarding policy, staff Code of Conduct and the Computer/Mobile Device Use and Online Safety and AI guidance.
- Appoint a senior board level (or equivalent) lead [or, link governor] to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- In line with KCSIE 26 and the DfE Filtering and Monitoring Standards, the DSL and SLT will conduct annual risk assessments of filtering/monitoring systems and maintain oversight of these tools.

- Ensuring that all staff have read at least KCSiE 26 Part 1 and mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities, as set out in the guidance.
- Ensuring the school operates an effective safer recruitment procedure.
- Ensuring that the school has procedures for dealing with allegations of abuse against staff (including the Headteacher), supply staff, volunteers and against other children, and that a referral is made to the DBS if a person in regulated activity has been dismissed.
- Ensuring that a member of the school senior leadership team has been appointed as the DSL who will take a lead responsibility for safeguarding and child protection across the school
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). Appendix 3 of this policy covers this procedure
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Ensuring that the DSL and deputy(ies) undertake appropriate Level 3 training every two years.
- Ensuring all staff and volunteers undertake regular safeguarding training as appropriate; but at least annually.
- Ensuring at least one member of the governing body has completed safer recruitment training, to be refreshed at least every five years.
- Ensuring at least one member of the governing body has completed cyber security training (annually).
- Ensuring children are being taught about safeguarding (including online safety) as part of a broad and balanced curriculum, covering relevant issues to meet their needs including children who have recognised vulnerabilities. The content should recognise both national and local contexts and recognises the age and stage of children alongside any SEND needs.
- Having appropriate safeguarding responses in place for children who are absent from education.
- Having appropriate online filtering and monitoring systems in place that are reviewed at least annually for their effectiveness and adhere to the Department for Education filtering and monitoring standards.
- Ensuring enhanced DBS checks at the appropriate level are in place for all Governors.
- Ensuring any weaknesses in Child Protection are remedied immediately.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

7.4 **The Headteacher** is responsible for the implementation of this policy. They support the governing body, designated safeguarding lead (DSL), deputies, staff and volunteers to fulfil their roles and responsibilities as outlined below.

Roles and responsibilities will include:

- Ensuring the Child Protection and Safeguarding policy and procedures are effectively implemented and followed by all staff.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Regularly reviewing (at least half termly) the SCR to ensure the suitability of adults working with children on site E.g. Letters of assurance, DBS checks, S128 checks and safeguarding training.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Supporting and promoting a safeguarding culture and ethos in school, so that children's wishes and feelings are considered when determining what action to take and what services to provide.
- Ensuring appropriate online filtering and monitoring systems are in place that are reviewed annually for their effectiveness and adhere to the Department for Education filtering and monitoring standards.
- Ensuring the appropriate level of security protection procedures are in place in order to safeguard the school systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
- Carrying out an annual review of the school's approach to online safety, supported by an annual risk assessment that considers and reflects the risks the children face.
- Ensuring systems are in place for children to regularly express their views and give feedback and that children all have a trusted adult.
- Following the whistleblowing policy and procedures if an allegation is made against a member of staff, supply staff or volunteer, including liaising with the Local Authority Designated Officer (LADO) and referring anyone who has harmed or may pose a risk to a child to the Disclosure and Barring Service.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Maintaining a central low-level concern and LADO log which is reviewed regularly to detect any emerging patterns and provide training and support accordingly.
- Ensuring pupils are provided with opportunities throughout the curriculum to learn about safeguarding and managing risk within and beyond the home, including keeping themselves safe online.
- Ensuring the relevant staffing ratios are met, where applicable
- Where applicable:
    - Making sure each child in the Early Years Foundation Stage is assigned a key person
    - Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting.

7.5 **The Designated Safeguarding Lead (DSL):**

The DSL is a member of the senior leadership team. Our DSL is Alan Yendell. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Out of Hours – email alan.yendell@exmouthcollege.org or call the out of hours number - 07849 168007

When the DSL is absent, the Deputy DSL's, Neil Dyke, Jessica Hunter and Mareike Cockley – will act as cover.

If the DSL and Deputy DSL's are not available or absent, we have cover arrangements in place. This includes:

- Shared email inbox ECC Safeguarding - ECCSafeguarding@tedwraggtrust.co.uk
- Wider Safeguarding Team – Level 3 Trained, identified on Safeguarding Posters and have PINK lanyards

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), NRM, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school and will have time to review them annually for their effectiveness
- Make sure that staff have appropriate Prevent training and induction
- Act as a lead practitioner for the local authority

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

The full responsibilities of the DSL and Deputy DSL's are set out in their job description.

Roles and responsibilities will include:

- During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns.
- Managing and making referrals to Children's Social Care, Channel programme, NRM, the Police and other agencies as appropriate
- Creating positive working relationships with others – e.g. a point of contact with safeguarding partners and agencies, a source of support and advice for staff, to promote supportive engagement with parents and/or carers and the SLT/Governing body and Trustees
- Ensuring that the school staff know who the cohort of children who are / or have been known to a social worker are, understanding their personal development needs, academic progress and attainment, and maintaining a culture of high aspirations for this cohort
- Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker, reach their potential, recognising that even when statutory social care intervention has ended, this is still required
- Providing *at least* fortnightly case oversight and management for the Deputy DSL's, identifying emerging risk and preventing drift and delay
- Information sharing and managing the child protection files in line with the latest information sharing guidance
- Raising Safeguarding and Child Protection Awareness for all staff, pupils and parents
- Keeping up to date with the training, knowledge and skills required to carry out the role of DSL
- Providing support, advice and guidance to staff

- Holding and sharing information as appropriate
- Undertaking termly safeguarding supervision

See Appendix 22 for Principles and Standards for Safeguarding Supervision

7.6 **The Deputy Designated Safeguarding Lead/s (DDSL):**

- Is/ are trained to the same standard as the Designated Safeguarding Lead (DSL) and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL the deputy will assume all the functions above.
- Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL, this lead responsibility should not be delegated.

7.7 **Staff**

Roles and responsibilities will include:

- Maintaining an attitude of 'it could happen here' where safeguarding is concerned.
- Identifying concerns early, providing help for children, promoting children's welfare and preventing concerns from escalating.
- Providing a safe environment in which children can learn and thrive.
- Knowing what to do if a child tells them they are being abused, exploited, or neglected.
- Being able to reassure 'victims' that they are being taken seriously and that they will be supported and kept safe.
- Recognising the barriers for children when wanting to make a disclosure (verbal or non-verbal) and knowing what other methods are suitable.
- Identifying children who may benefit from early help, (providing support as soon as a problem emerges) and the part they play in these support plans.
- Raising any concerns for a child following the Trust and schools safeguarding policies and procedures.
- Being aware of local authority referral processes and supporting social workers and other agencies following any referral including the process for community-based Family Help assessments.
- Adhering to Teachers' Standards - that teachers (which includes Headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Being aware of systems within school which support safeguarding e.g. Safeguarding policy, Behaviour policy, code of conduct, SEND policy, Reasonable Force policy, Attendance policy and Children Missing from Education.

Undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring and cyber security). Recognising that children absent from education can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation and as such acting without delay if this occurs.

8.0 Confidentiality

- Our school recognises that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm the school must contribute to inter-agency working in line with Working Together to Safeguard Children and share information between professionals and agencies where there are concerns.

- All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children and that the Data Protection Act 2018[2] is not a barrier to sharing information where the failure to do so would place a child at risk of harm.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the Headteacher or DSLs will only disclose information about a child to other members of staff or wider agencies on a need-to-know basis.
- We will always undertake to share our intention to refer a child to the Local Authority Safeguarding Hub with their parents /carers, unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will contact the relevant Local Authority Safeguarding Hub consultation line.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK DPA 2018 that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Where a child leaves the school, the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving (See TWT safeguarding file transfer guidance).
- In line with KCSiE all children's safeguarding files will be kept confidential and stored securely. Records will be detailed and accurate and will cover all concerns, discussions and decisions made including the rationale for those decisions.

[2] The UK Data Protection Act 2018 (DPA 2018) is supplementary to the General Data Protection Regulation 2016 (the GDPR) and replaces DPA 1998.

9.0 Recognising and Responding to Safeguarding Concern

9.1 **Recognising:**

Any child, in any family, in any school, could become a victim of abuse. Staff should always maintain an attitude of "it could happen here". We also recognise that abuse, neglect and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

- Abuse and neglect are forms 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 the family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.
- Children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and making or sharing nudes and semi-nudes put children in danger and that safeguarding issues can manifest themselves via child-on-child abuse.

Further information about the four categories of abuse; physical, emotional, sexual and neglect, (familial and contextual) and indicators that a child may be being abused can be found in appendices 1 – 17 of this policy and in Keeping Children Safe in Education 26. There are also a number of specific safeguarding concerns that we recognise our pupils may experience below:

- Child missing or absent from education
- Child missing from home or care
- Child sexual exploitation (CSE), child criminal exploitation (CCE)
- Bullying including cyberbullying
- Domestic abuse
- Substance misuse
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence
- Violence against women and girls (VAWG)
- Mental health difficulties
- Private fostering
- Radicalisation
- Sharing or producing sexual imagery including nudes and semi-nudes
- Teenage relationship abuse
- Trafficking
- Child on child abuse
- Up skirting
- Serious violence
- Sexual harassment/sexual violence

- There will be occasions when staff may suspect that a pupil may be at risk but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, and they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed.
- We recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. However, they may also indicate a child is being abused or needs a safeguarding response.

- In these circumstances staff will try to give the child the opportunity to talk / express themselves. It is fine for staff to ask the pupil if they are okay or if they can help in any way.
- Further information on the different types of safeguarding concerns and schools' response can be found in the **Appendices Section** –

Appendix 1.	Categories of Abuse	Page 26
Appendix 2.	Anti-Bullying / Cyberbullying	Page 30
Appendix 3.	Racist Incidents	Page 30
Appendix 4.	Radicalisation and Extremism	Page 30
Appendix 5.	Domestic Abuse (including Operation Encompass)	Page 32
Appendix 6.	Exploitation (including CSE, CCE and County Lines)	Page 33
Appendix 7.	Female Genital Mutilation	Page 36
Appendix 8.	Forced Marriage	Page 38
Appendix 9.	Honour or faith-based Abuse	Page 38
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Appendix 11.	Mental Health	Page 39
Appendix 12.	Private Fostering Arrangements	Page 40
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Appendix 15.	Children Who Are Absent from Education	Page 41
Appendix 16.	Child on Child Abuse (incl Sexual Violence, Sexual Harassment and HSB)	Page 41
Appendix 17.	Serious Violence	Page 44
Appendix 18.	Online Safety	Page 45
Appendix 19.	AI and technology	Page 46
Appendix 20.	Sharing or producing sexual imagery including nudes and semi-nudes	Page 48
Appendix 21.	Arrangements for safeguarding children educated offsite, on trips and visits and for work experience and clubs run by external providers	Page 49
Appendix 22.	Principles and Standards for Supervision	Page 50
Appendix 21.	Additional resources	Page 52

9.2 **Responding:**

- Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL and put them in writing, see FLOW CHART A below. Records should include:
    - a clear and comprehensive factual summary of the concern.

- details of how the concern was followed up and resolved.
- a note of any action taken, decisions reached and the outcome.

- If the pupil does begin to reveal that they are being harmed, staff should follow the advice in FLOW CHART A and in the table below 'pupil making a disclosure'.
- All concerns however small must be recorded and shared with the DSL, as this information could provide the 'missing' piece of the bigger picture of the lived experience for the child.
- All staff should demonstrate 'professional curiosity' and speak to the DSL if you have concerns about a child.

FLOW CHART A

1. Offer reassurance, listen and take seriously what is being said. Never promise to keep secrets or be persuaded by the child, young person or their family not to take action.

2. Recognise that it is not your job to investigate, verify what is being said or examine the individual disclosing; this is the statutory responsibility of the child protection services and/or the Police. However, it is important to ascertain relevant and factual information in a timely and sensitive manner.

3. Explain the process to the individual; that you will need to pass this information on, to whom, and the reasons why and possible actions / outcomes.

4. Any concerns must be recorded, including the child's voice, body map (if necessary) and other relevant information in line with our schools recording procedure (TWT CPOMS Guidance). Concerns may also be shared with the DSL/DDSL verbally (especially if there is an urgency to the situation), these conversations will also be recorded in writing.

9.3 **If a pupil discloses to a member of staff**;

- We recognise that it takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, guilty or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.
- A child who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one and where possible, the child is not passed on to someone else to listen to their concerns for a second time.

9.4 **During their conversation with the pupil staff will:**

- Listen to what the child has to say and allow them to speak freely.
- Remain calm and not overact or act shocked or disgusted – the pupil may stop talking if they feel they are upsetting the listener.
- Reassure the child that it is not their fault and that they have done the right thing in telling someone.
- Not be afraid of silences – staff must remember how difficult it is for the pupil and allow them time to talk.
- Take what the child is disclosing seriously.

- Ask open questions and avoid asking leading questions.
- Avoid jumping to conclusions, speculation or make accusations.
- Avoid automatically offering any physical touch as comfort. It may be anything but comforting to a child who is being abused.
- Avoid admonishing the child for not disclosing sooner. Saying things such as 'I do wish you had told me about it when it started' may be the staff member's way of being supportive but may be interpreted by the child to mean they have done something wrong.
- Tell the child what will happen next, that they cannot keep secrets and that information will be shared (and with who and why) to ensure the right level of support is given.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.

9.5 **Notifying Parents**

- The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and normally the DSL/DDSL will contact the parent in the event of a concern, suspicion or disclosure of abuse of that the child has been harmed in some way.
- However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from the Local Authority Safeguarding Hub e.g. familial sexual abuse.
- Where there are concerns about forced marriage or honour-based abuse, parents should not be informed a referral is being made, as to do so may place the child at a significantly increased risk. In some circumstances it would be appropriate to contact the police.

9.6 **Making a referral**

- Concerns about a child or a disclosure should be immediately raised with the DSL who will help decide whether a referral to the Local Authority Safeguarding Hub or other support is appropriate in accordance with the latest local authority guidance.
- If the school are uncertain about whether a concern raised should be referred to the Local Authority Safeguarding Hub, a consultation will be sought with the Local Authority to seek further support and guidance.
- If a referral is not made, the decision not to make a referral and the subsequent action should be recorded.
- If a referral is needed, the DSL should make this rapidly and have the necessary systems in place to enable this to happen. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can, and should, consider making a referral themselves.
- The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.
- If after a referral the child's situation does not appear to be improving, the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves.
- If a child is in immediate danger or is at risk of harm, a referral should be made to the Local Authority Safeguarding Hub and/or the police immediately. **Anybody can make a referral.**
- Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

9.7 **Supporting our staff**

- We recognise that staff working in the school who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support such as safeguarding supervision as appropriate.

9.8 **Lone Working**:

- When undertaking home visits, it is best practice for there to be two members of staff who attend.
- Where there is an identified risk in visiting the home, a risk assessment should be completed in advance of the home visit taking place.
- Wherever possible, staff should ring ahead and inform the parent/carer of the intended visit, if this is appropriate.
- Staff should always notify an appropriate person in school of their intention to undertake a home visit.
- In the event where it is not possible for staff to be accompanied by a colleague on a home visit, emergency contact numbers should be exchanged, and an expected arrival and finish time should be shared with an appropriate member of staff at school.

10.0 Children who are particularly vulnerable

10.1 Exmouth Community College recognises that some children are more vulnerable to abuse, neglect and contextual safeguarding concerns and that additional barriers exist when recognising abuse for some children. We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

In some cases, possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

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

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care

- Is at risk of so-called 'honour or faith-based' abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

11.0 Pupils who are questioning their gender

11.1 We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail.

11.2 Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

11.3 The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

11.4 The school will ensure that the decision-making process is documented and records are kept.

12.0 Whistleblowing

12.1 At Exmouth Community College we recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

- All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to Deputy CEO, Tim Rutherford or the LADO in accordance with the Whistleblowing Policy.
- The Whistleblowing Advice Line | NSPCC is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – and the line is available from 08:00 to 20:00 Monday to Friday, and 09:00 to 18:00 at weekends. The email address is help@nspcc.org.uk
- Any allegations concerning the Headteacher should be made to Tim Rutherford Deputy CEO using the LLC /LADO reporting mechanism on the StaffHub.

13.0 Allegations against Staff

13.1 All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults. Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be

given at induction. Refer to the guidance for Safe Working Practice in the annual safeguarding training for all staff.

13.2 If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the Deputy CEO Tim Rutherford. Logging concerns using the LLC / LADO reporting link on the StaffHub will notify the correct person directly via email once the form is completed.

13.3 Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

Flow Chart B (below) outlines the process for raising concerns about staff.

FLOW CHART B

1. All employees and volunteers must record in writing and where possible using the LLC/ LADO reporting link, any concerns they have about the practice or behaviour of a member of staff and share it with the Headteacher (or equivalent senior member of staff if not in a school).

2. The Headteacher will make an assessment to determine if the matter is a 'low level concern' or an 'allegation' (this means that the concern may meet the harm threshold).

3. The Local Authority Designated Officer (LADO) will be contacted for all 'allegations' and the relevant guidance will be followed. If the Headteacher needs advice or guidance they should contact the LADO. If the allegation is against the Headteacher, the person receiving the allegation will contact the Deputy CEO, Tim Rutherford. This can be done using the LLC / LADO reporting link.

4. Where concerns are considered to be 'low level' by the Headteacher, they should be managed in-line with KCSiE 26 and the wider school policies and procedures. The Designated Safeguarding Lead may be involved in this process at the request of the Headteacher.

5. If the concern relates to the Headteacher, the person receiving the information will immediately inform the Deputy CEO, Tim Rutherford who will consult the LADO, without notifying the Headteacher first.

6. In the event of an allegation against the Headteacher, the decision to suspend will be made by the Trust Executive Team with advice from the LADO.

In line with KCSiE 26 part 4 guidelines:

13.4 Suspension of the member of staff, excluding the Headteacher, against whom an allegation has been made, needs careful consideration. Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step and the Headteacher will seek the advice of the LADO, the Deputy CEO or Executive Director of Education and a member of the HR team in making

this decision. Staff, parents, governors and trustees are reminded that publication of material that may lead to the identification of a staff member who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

- The Trust Leader for Safeguarding & Attendance will be advised of all allegations (that meet the harm threshold) relating to staff with the exception of Headteachers and Executive Team.

13.5 Supply Teacher, trainee teachers and all contracted staff

- In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business. Where this applies, schools and colleges share safeguarding responsibilities with the employment agency or business. Schools and colleges remain responsible for gathering the facts and managing the safeguarding process, while working closely with the employment agency or business, which will usually lead on any disciplinary action.

- Whilst schools and colleges are not the employer of supply teachers, they are still responsible for ensuring that allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

- Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or local authority children's social care. The school or college will usually take the lead on handling allegations to ensure that all appropriate action is taken.

- Where concerns or allegations relate to a trainee teacher placed within a school or college, the expectations of schools and colleges set out above also apply. In addition, teacher training providers are expected to follow the same procedures as set out for supply agencies.

13.6 Organisations or Individuals using school premises.

- Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their own safeguarding policies and procedures, including informing the LADO.
- When dealing with an allegation against a member of staff, leaders should refer to Part 4 of KCSiE 26 for additional guidance.

14.0 Physical Intervention and reasonable force

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events will always be recorded on CPOMS under the distinct category of reasonable force.

- Staff who are likely to need to use physical intervention will be appropriately trained.
- We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.
- We recognise that touch is sometimes appropriate in the context or working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.
- Physical intervention logs will be reviewed at least termly by Governors / Trustees in line with the latest guidance and Trust Policy.

15.0 Confidentiality, Sharing Information and GDPR

- All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence where there may be a legal case.
- Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.
- Staff should only discuss concerns with the DSL, Headteacher/principal or Trust Executive Team (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.
- However, following several cases where senior leaders in school had failed to act upon concerns raised by staff, Keeping Children Safe in Education (KCSiE 26) emphasises that any member of staff can contact children's social care if they are concerned about a child.
- Child protection information will be stored and handled in line with the Data Protection Act 2018 [3] and HM Government Information Sharing and Advice for practitioners providing safeguarding services to children, young people, parents and carers. School leaders will consider where appropriate information sharing prior to the child's formal transfer to their new setting, this could also include key staff from their new setting to be invited to meetings e.g. Child Protection, Core group or Team Around a Family (with consent of parents and professionals).
- At the point a child formally transfers to their new setting, their safeguarding file will be transferred securely in line with GDPR expectations as soon as possible but within 5 working days. School staff will follow the TWT safeguarding file sharing guidance.

Information sharing is guided by the following principles:

- Necessary and proportionate
- Relevant
- Adequate
- Accurate
- Timely
- Secure

Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Exmouth Community College will ensure that images of children used within publications, publicity and on the website have written parental consent prior to any images being taken and used. This consent will be obtained in line with school's annual data collection process.

16.0 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

[3] The UK Data Protection Act 2018 (DPA 2018) is supplementary to the General Data Protection Regulation 2016 (the GDPR) and replaces DPA 1998.

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for all pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Ensure all pupils have a trusted adult who they would feel confident to raise concerns with

- Students are taught to report and worries of concerns to members of staff that are part of the Safeguarding and Welfare Team – these are identified by wearing PINK lanyards.
- In addition, students are taught to report any worries or concerns to any member of staff within the school community who they feel safe and trust to do so.
- Students are taught how to report, why to report and who to report to through assemblies, headteacher broadcast, tutor lessons, PHSE lessons and discussions with students and parent/carers.

17.0 Policy Links

This policy also links to our policies and guidance on which can be found on our school website - https://www.exmouthcollege.org/page/?title=Key+Statutory+Information&pid=7

- Behaviour
- Staff Behaviour Policy / Code of Conduct
- Whistleblowing (including low level concern reporting)
- Anti-bullying
- Health & Safety
- Parental concerns
- Attendance
- Curriculum
- PSHE
- SEND
- Teaching and Learning
- Computer/Mobile Device Use and Online Policy
- Administration of medicines
- Drug Education
- Relationships and Sex Education
- Reasonable Force and Restrictive Interventions
- Online Safety
- IT Acceptable Use
- Risk Assessment
- Recruitment and Selection
- Child Sexual Exploitation
- Intimate Care
- Radicalisation and Extremism
- Data Protection/GDPR Guidance
- Use of AI Policy

Adoption of the Policy

This Policy has been adopted by the Trustees of the Ted Wragg Multi Academy Trust**.**

Appendices (1-23)

1. Categories of Abuse

Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

Signs of Abuse in Children:

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-needing behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression and/or anxiousness
- Age-inappropriate sexual behaviour
- Child Sexual Exploitation
- Criminality
- Substance abuse
- Mental health problems
- Poor attendance

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm.
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague).
- May require consultation with and / or referral to Children's Services.

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s.
  Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups).

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses.
- Have unrealistic expectations of the child.

- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment).
- Be absent or misusing substances.
- Persistently refuse to allow access on home visits.
- Be involved in domestic abuse.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury.
- Several different explanations provided for an injury.
- Unexplained delay in seeking treatment.
- The parents/carers are uninterested or undisturbed by an accident or injury.
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury).
- Family use of different doctors and A&E departments.
- Reluctance to give information or mention previous injuries.

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby.
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding.
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive).
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally.
- Variation in colour possibly indicating injuries caused at different times.
- The outline of an object used e.g. belt marks, handprints or a hairbrush.
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting.
- Bruising around the face.
- Grasp marks on small children.
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

Mongolian Blue Spot: Bruising in non-mobile children is rare and may indicate abuse or neglect. Birth marks, especially Mongolian Blue Spots, can mimic bruising.

Mongolian Blue Spot can be identified (see below), however if in any doubt as to the cause of the bruise refer to Southwest Child Protection Procedures (proceduresonline.com) local authority guidance and consultation.

- Areas of skin hyperpigmentation – flat, not raised, swollen or inflamed.
- Not painful to touch.
- Usually present at birth/ develop soon afterwards.
- Will not change in shape or colour within a few days.
- Normally uniform blue/ grey in colour across the mark.

- Common in African, Middle Eastern, Mediterranean and Asian children.
- While most occur at the lower back and buttocks, they can appear anywhere (e.g. back of shoulder or limb). Scalp/ face rarely affected.
- Can be single/ multiple, vary in size, but mostly few centimetres diameter.
- Gradually fade over many years.

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine).
- Linear burns from hot metal rods or electrical fire elements.
- Burns of uniform depth over a large area.
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks).
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.
- Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.
There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures.
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement.

There is an unexplained fracture in the first year of life.

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse.
The following may be indicators of emotional abuse:

- Developmental delay.
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment.
- Indiscriminate attachment or failure to attach.

- Aggressive behaviour towards others.
- Scapegoated within the family.
- Frozen watchfulness, particularly in pre-school children.
- Low self-esteem and lack of confidence.
- Withdrawn or seen as a "loner" – difficulty relating to others.

Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct.
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age.
- Continual and inappropriate or excessive masturbation.
- Self-harm (including eating disorder), self-mutilation and suicide attempts.
- Involvement in prostitution or indiscriminate choice of sexual partners.
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area.
- Blood on underclothes.
- Pregnancy in a younger girl where the identity of the father is not disclosed.

Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

The Centre of Expertise on Child Sexual Abuse now has an education specific landing page **www.csacentre.org.uk** with guides on safety planning, communicating with children, communicating with parents and a range of other resources for professionals.

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care.
- Failure of adult supervision to prevent risk of harm
- A child seen to be listless, apathetic and irresponsive with no apparent medical cause.
- Failure of child to grow within normal expected pattern, with accompanying weight loss.
- Child thrives away from home environment.
- Child frequently absent from school.
- Child left with adults who are intoxicated or violent.
- Child abandoned or left alone for excessive periods.

2. Anti-bullying/Cyberbullying

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, sexist, homophobic, transphobic and gender related bullying. We keep a record of known bullying incidents on CPOMS which is shared with and analysed by the governing body. All staff are aware that children with Special Educational Needs (SEND) and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will consider implementing child protection procedures.

The subject of bullying and the harm it can cause is addressed at regular intervals in the PHSE curriculum.

3. Racist Incidents

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents which is shared and analysed by the governing body.

4. Radicalisation and Extremism

The Prevent Duty for England and Wales (2023) under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy).

Our school is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism[4].

Our school seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

[4] https://www.gov.uk/government/publications/prevent-duty-guidance

Our staff receive training to help identify potential early signs of radicalisation and extremism. Indicators of susceptibility to radicalisation are in detailed below.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice on Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014)[5].

The school governors, the Headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and local community on an annual basis and put actions in place to reduce that risk. Risk assessments may include the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then the Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Indicators of Susceptibility to Radicalisation

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of susceptibility

Indicators of susceptibility include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

[5] Promoting fundamental British values as part of SMSC in school Guidance for Maintained Schools

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are susceptible to radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Prevent duty ensures schools and colleges have 'due regard' to the need to prevent people from being drawn into terrorism.

Channel is the voluntary, confidential support programme which focuses on providing support at an early stage to individuals that have been identified as being vulnerable to radicalisation. Prevent referrals may be passed to the multi-agency Channel panel to determine whether individuals require support.

Prevent duty guidance: England and Wales (2023) - GOV.UK (School specific para's 141-210)

Guidance on Channel can be accessed here: Channel and Prevent Multi-Agency Panel (PMAP) guidance - GOV.UK

Further information can be obtained from the Home Office website.

5. Domestic Abuse (Including Operation Encompass)

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

How does domestic abuse affect children?

- Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which

can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are at risk of significant harm.

What are the signs to look out for?

- Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

Operation Encompass

Operation Encompass helps police and schools work together to provide emotional and practical help for children.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time.

The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed).

This is the procedure set out in the statutory Operation Encompass guidance for Information sharing duty operation encompass

What should I do if I suspect a family is affected by domestic abuse?

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Sources of information and support can be found in the link below:

Contact: https://new.devon.gov.uk/dsva/

6. Exploitation including CCE, CSE and County Lines

Both CSE (child sexual exploitation) and CCE (Child Criminal Exploitation) 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. This power imbalance could be due to age, gender, sexual identity, cognitive ability, physical strength, status, and /or access to economic or other resources. The abuse could be linked to an exchange for something the victim perceives that they need or want and/or will be to the financial benefit or other advantage (such as increase status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and adults or children (who themselves may be experiencing exploitation). The abuse can be a one-off occurrence or a series of incidents

over time and range from opportunistic to complex organised abuse. It may 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 the activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. The experience of girls who are criminally exploited can be very different from boys, the indicators may not be the same and both boys and girls that are being criminally exploited may be at higher risk of sexual exploitation.

Any concerns that a child is being or is at risk of being sexually or criminally exploited should be passed without delay to the DSL. We are aware there is a clear link between regular school absence, CSE and CCE. Staff should consider a child to be at potential CSE/CCE risk in the case of regular school absence and make reasonable enquiries with the child and parents to assess this risk in all cases.

The DSL will use the appropriate Local Authority Assessment tool e.g. the Exploitation Toolkit, the Devon Children and Families Partnership Adolescent Safety Framework Safer Me Assessment[6] on all occasions when there is a concern that a child is being or is at risk of being sexually or criminally exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually or criminally exploited. These assessments will indicate to the DSL whether e.g. a Safer Me Early Help approach or referral to the Exploitation Hub/Local Authority Safeguarding Hub is required. If the DSL is in any doubt, they will contact the Local Authority Safeguarding Hub.

In all cases if the assessment identified any level of concern the DSL should contact their local MACE[7] (Missing and Child Exploitation) and email the completed (e.g. Safer Me) assessment along with a Safeguarding Hub enquiry form. If a child is in immediate danger the police should be called on 999.

Exmouth Community College is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. Consequently, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

Exmouth Community College includes the risks of sexual and criminal exploitation in the PHSE and RSE curriculum. Pupils will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE/CCE, including online, and knowing how and where to get help.

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual or criminal exploitation.

Signs include:

- Going missing from home or school.
- Regular school absence/truanting.
- Underage sexual activity.
- Inappropriate sexual or sexualised behaviour.
- Sexually risky behaviour, 'swapping' sex.
- Repeat sexually transmitted infections.
- In girls, repeat pregnancy, abortions, miscarriage.
- Receiving unexplained gifts or gifts from unknown sources.

[6] DCFP Adolescent Safety Framework info and Safer Me Assessment

Plymouth Adolescent Safety Framework).

[7] DCFP MACE guidance

- Having multiple mobile phones and worrying about losing contact via mobile.
- Online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs).
- Changes in the way they dress.
- Going to hotels or other unusual locations to meet friends.
- Seen at known places of concern.
- Moving around the country, appearing in new towns or cities, not knowing where they are.
- Getting in/out of different cars driven by unknown adults.
- Having older boyfriends or girlfriends.
- Contact with known perpetrators.
- Involved in abusive relationships, intimidated and fearful of certain people or situations.
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers.
- Associating with other young people involved in sexual exploitation.
- Recruiting other young people to exploitative situations.
- Truancy, exclusion, disengagement with school, opting out of education altogether.
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual).
- Mood swings, volatile behaviour, emotional distress.
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- Drug or alcohol misuse.
- Getting involved in crime.
- Police involvement, police records.
- Involved in gangs, gang fights, gang membership.
- Injuries from physical assault, physical restraint, sexual assault.

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

County lines is a term used to describe gangs and organised criminal networks involved in the exporting of illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of 'deal line.'

Exploitation is an integral part of the county lines offending model with children and vulnerable adults being exploited to move (and store) drugs and money. The same grooming models used to coerce, intimidate and abuse individuals for sexual and criminal exploitation are also used for grooming vulnerable individuals for county lines.

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16and 17-year-olds who can legally consent to have sex.

Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

For further information on signs of a child's involvement in sexual exploitation: Child sexual exploitation: guide for practitioners

For further information on County Lines: Criminal exploitation of children and vulnerable adults: county lines guidance

Modern slavery and the National Referral Mechanism (NRM)

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

7. Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

Keeping Children Safe in Education (KCSiE) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out below.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

What is FGM?

- It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.
- 4 types of procedure:
    - Type 1 Clitoridectomy – partial/total removal of clitoris
    - Type 2 Excision – partial/total removal of clitoris and labia minora
    - Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
    - Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

- FGM can be carried out due to the belief that:
    - FGM brings status/respect to the girl – social acceptance for marriage.
    - Preserves a girl's virginity.
    - Part of being a woman / rite of passage.
    - Upholds family honour.
    - Cleanses and purifies the girl.
    - Gives a sense of belonging to the community.
    - Fulfils a religious requirement.
    - Perpetuates a custom/tradition.
    - Helps girls be clean / hygienic.
    - Is cosmetically desirable.
    - Mistakenly believed to make childbirth easier.

Is FGM legal?

- FGM is internationally recognised as a violation of human rights of girls and women. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women.
- Exmouth Community College staff are trained to be aware of risk indicators of FGM identified in this section of the Appendix. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.
- Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.
- There are no circumstances in which any member of staff should examine a girl.

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony.
- Family taking a long trip abroad.
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan).
- Knowledge that the child's sibling has undergone FGM.
- Child talks about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities.
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs.
- Mentioning something somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinal tract infection.

- Disclosure.

The 'One Chance' rule

As with Forced Marriage (outlined below) there is the 'One Chance' rule. It is essential that settings /schools/colleges act **without delay** and make a referral to children's services.

8. Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

9. Honour or faith-based abuse

Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Honour or faith-based abuse might be committed against people who.

- Become involved with a boyfriend or girlfriend from a different culture or religion.
- Want to get out of an arranged marriage.
- Want to get out of a forced marriage.
- Wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy) without delay.

10. One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Exmouth Community College Staff recognise they may only have one chance to speak to a pupil who is a potential victim and have just one chance to save a life.

Exmouth Community College is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

11. Mental Health

Staff will 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. Whilst Exmouth Community College recognise that only appropriately trained professionals can diagnose mental health problems; staff are able to make day to day observations of children and identify such behaviour that may suggest they are experiencing a mental health problem or be at risk of developing one.

An understanding of how traumatic Adverse Childhood Experiences and experiences of abuse and neglect can impact on a child's mental health, behaviour and education through to adolescence and adulthood will be covered in safeguarding awareness training and updates. If staff have a concern about a child's mental health that is also a safeguarding concern, they will share this with the DSL or Deputy DSL without delay. Exmouth Community College will also refer to the mental health and behaviour in schools' guidance[8].

If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

When supporting children experiencing mental health difficulties school will explore resources such as:

- https://www.annafreud.org/ Anna Freud National Centre for Children and Families
- Papyrus | Young Suicide Prevention
- Storm Skills Training: Self-harm and suicide prevention training
- Promoting children and young people's mental health and wellbeing
- Rise Above: Resources for School from Public Health England #esafety
- Every Interaction Matters Webinar
- Wellbeing for Education Recovery
- Preventing and Tackling Bullying
- Promoting and supporting mental health and wellbeing in schools and colleges
- Summary of responsibilities where a mental health issue is affecting attendance

12. Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

[8] Mental health and behaviour in schools: guidance

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

recognise that most privately fostered children remain safe and well, but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this will the DSL and the DSL will notify the LA Safeguarding Hub of the circumstances.

13. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and their deputy/deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

14. Looked after children and previously looked after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant Virtual School Heads

We have appointed a designated teacher, Sarah Lasker (Assistant Headteacher), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with Virtual School Heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

15. Children Who Are Absent from Education

Attendance, absence and exclusions are closely monitored in line with the Working together to improve school attendance - GOV.UK guidance. The school will hold more than one emergency contact number (ideally 3) for pupils and students where reasonably possible.

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. All children with attendance below 50% will be monitored by the DSL.

The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority, particularly where children go missing or are absent from education on repeat occasions and/or are missing for periods during the school day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'[9].

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

16. Child on Child Abuse (including Sexual Violence, Sexual Harassment and HSB)

The DSL, Governing Body/Board and Headteacher will take due regard to Part 5**,** KCSiE 26.

In most instances, the conduct of pupils towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Exmouth Community College recognise that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'. Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI

[9] Children missing education statutory guidance for local authorities and schools

- Upskirting, which is a criminal offence, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- Serious youth violence[10] – any offence of most serious violence or weapon enabled crime, where the victim is aged 0-19' i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way but also includes assault with injury offences. All staff will receive training so that they are aware of indicators which may signal that children are at risk from or involved with serious violence and crime and may pose a risk to other children.

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

The term child-on-child abuse can refer to all these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with child-on-child abuse (i.e. girls being sexually touched/assaulted, or boys being subjected to initiation/hazing type violence).

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Exmouth Community College aims to reduce the likelihood of child-on-child abuse through:

- The established ethos of respect, friendship, courtesy and kindness.
- High expectations of behaviour.
- Clear consequences for unacceptable behaviour.
- Providing a developmentally appropriate PSHE and RSE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe.
- Systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed.
- Robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.

Research indicates that young people rarely disclose child-on-child abuse and that if they do, it is likely to be to their friends. Therefore, Exmouth Community College will also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

Any concerns, disclosures or allegations of child-on-child abuse in any form should be referred to the DSL using the school's child protection procedures as set out in this policy. Where a concern regarding child-on-child abuse has been disclosed to the DSL(s), advice and guidance will be sought from KCSiE 26 and the Local Authority Safeguarding Hub and where it is clear a crime has been committed, or there is a risk of crime being committed the Police will be contacted.

[10] Preventing youth violence and gang involvement

Working with external agencies, the school will respond to the unacceptable behaviour. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils, then safeguards will be put in place to promote the well-being of the pupils affected and both the victim and perpetrator will be provided with support. This will include a risk assessment / management plan which will be clearly communicated to parents / carers and the pupils which will be regularly reviewed.

Sexual Harassment, Sexual Violence and Harmful Sexual Behaviour

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

Staff will use recognised tools to support in their identification of risk from the behaviour such as Hackett, Brook or AIM. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity

Encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent. The Brook Traffic Light Tool, Hackett's Continuum or the AIM checklist can be used by staff to determine age-appropriate behaviour and to aid decision making on the potential risk and likely harm.

Inappropriate Sexual Behaviour

Can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies

Consent – agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience.
- Knowledge of society's standards for what is being proposed.
- Awareness of potential consequences and alternatives.
- Assumption that agreements or disagreements will be respected equally.
- Voluntary decision.
- Mental competence.

Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

The Lucy Faithfull Foundation has developed a HSB Toolkit, designed for parents, carers, family members and professionals, to help everyone play their part in keeping children safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed Shore space, an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

17. Serious Violence

Serious violence is a continuing and increasing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action

- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

18. Online Safety

Our pupils increasingly use electronic equipment daily to access the internet and share content and images via social media and gaming sites.

Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate and harmful material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

Exmouth Community College has an online safety policy which explains how we try to keep pupils safe in school and how we respond to online safety incidents. This contains information on the approach taken in filtering and monitoring pupils' online activity. (See flowchart below).

Exmouth Community College will also provide advice to parents when pupils are being asked to learn online at home and consider how best to safeguard both pupils and staff.

Pupils are taught about online safety and identifying and managing risk throughout the curriculum and all staff receive online safety training, including outlining their role in filtering and monitoring which is reviewed regularly and updated.

19. AI and technology

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

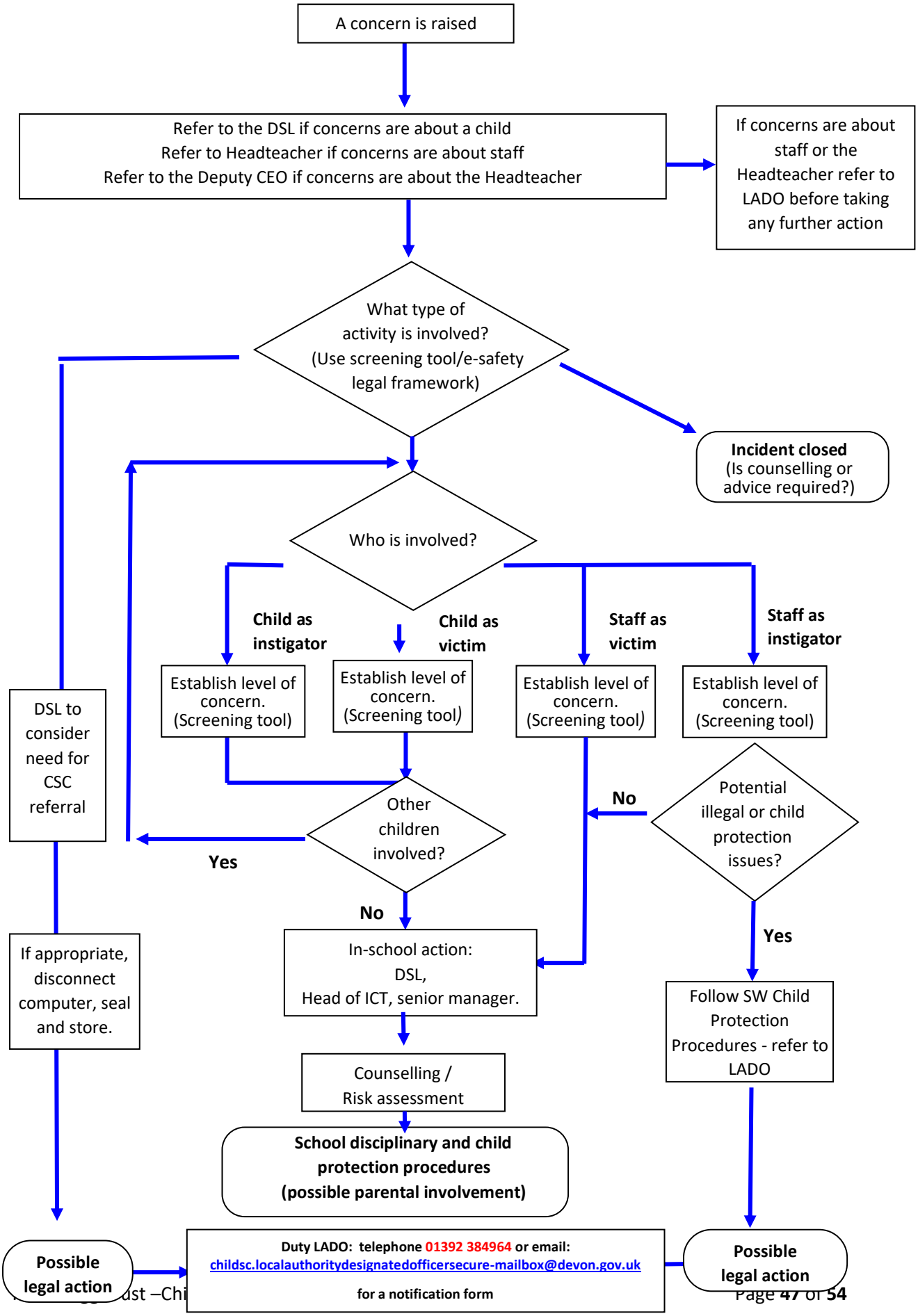
Exmouth Community College recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (for example, bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Exmouth Community College will ensure that AI and any associated technology use complies with existing safeguarding frameworks, including:

- Keeping Children Safe in Education (KCSIE 26) statutory guidance
- UK GDPR and Data Protection Act 2018
- Children's Online Privacy Protection and age-appropriate design codes
- TWT Use of AI Guidance

Ted Wragg TRUST

What to do if you have an online safety concern:



20. Sharing or producing sexual imagery including nudes and semi-nudes

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'[11], and 'Sharing nudes and semi-nudes: how to respond to an incident.'[12]

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving the sharing of nudes and semi-nudes, they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. **Staff should not view, copy or print the imagery.**

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the Local Authority Safeguarding Hub and/or the Police as appropriate.

Immediate referral at the initial review stage should be made to the Local Authority Safeguarding Hub/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Headteacher, to respond to the incident without escalation to the Local Authority Safeguarding Hub or the police. Such decisions will be recorded.

[11] Sexting in schools and colleges
[12] Sharing nudes and semi-nudes: how to respond to an incident (UCKIS)

In applying judgement, the DSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is more vulnerable than usual i.e. at risk.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated or if the image been more widely distributed.
- There other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances.
- The children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or the Local Authority Safeguarding Hub. Otherwise, the situation will be managed within the school.

The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedure.

21. Arrangements for safeguarding children educated offsite, on trips and visits and for work experience and clubs run by external providers

- Where staff employed by the school / Trust are not supervising children from their own setting they must still follow this policy.
- Where staff are supervising children from their own settings but at off- site locations, this policy and specified school and location specific local policies apply.
- Visitors working on school sites with children are expected to abide by this policy.
- Where locations for off- site activities/events have their own risk assessments for children and visitors, these should be adopted and adhered to.
- Where locations for off- site activities/events have no risk assessments for children and visitors in place, the home/organising school must prepare risk assessments in accordance with school specific policies.
- No trips or visits must take place under any circumstances without relevant requirements being adhered to, most specifically in relation to the Local Authority trips and visits requirements E.g. Evolve;
- Children on work experience must have school-based supervisors allocated who have completed at least raising awareness safeguarding and child protection training. This policy applies to all children on such work experience and must be shared with employers. Employers and children must be made aware of how to report concerns and who to report to. Reports should be made to the home school DSL. Welfare checks must be made at least weekly, by school-based supervisors, when children are on work experience.
- Third party organisations using or hiring Trust premises for their own activities and/or events must provide their own safeguarding policies to Headteachers of those venues that are being used. Providers must meet the expectations of the After school clubs community activities and tuition safeguarding guidance for providers and leasing agreements must reflect this expectation;
- Where allegations are received relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities for children, the school should follow its own

safeguarding policy and procedures, including informing the LADO. This responsibility falls on the school and not the out of school setting. (KCSiE)

Alternative Provision:

- A child educated off site on dual roll arrangements will be safeguarded by the DSL/DDSL's at the alternative provision / school venue and the policies of these providers will apply. However, the child remains the substantive responsibility of their original school who must assure themselves that the setting is fit for purpose and meets the pupils needs.
- Annual quality assurance of offsite/dual roll/alternative provision is the responsibility of the DSL at the original (substantive or referring) school. Regular contact and visits must be made with the alternative provider / school and the DSL of the home school.
- Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs.
- Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.
- When commissioning an alternative provision, our school will have due regard for the following guidance documents:
    - Alternative provision - GOV.UK
    - Education for children with health needs who cannot attend school - GOV.UK
    - Non-school alternative provision: voluntary national standards - GOV.UK

22. Principals and Standards for Safeguarding Supervision

Introduction

For the purposes of these standards, the following definition of supervision is used:

'Supervision is an accountable process which supports, assures and develops the knowledge, skills and values of an individual, group or team. The purpose is to improve the quality of their work to achieve agreed objectives and outcomes'.

Safeguarding supervision is complementary to, but separate from, managerial supervision, which is about monitoring and appraising the performance of staff.

Supervision can be any conversation (planned or unplanned, formal or informal) where you discuss your concerns about a child or family, talk through different ways of engaging with them and discuss different options of support comes under the scope of supervision.

Working to ensure that children are safeguarded is demanding and requires sound professional judgements to be made. It may also be distressing and stressful for the professionals involved. Working Together to Safeguard Children states: 'Effective professional supervision can play a critical role in ensuring a clear focus on a child's welfare. Supervision should support professionals to reflect critically on the impact of their decisions on the child and their family'.

Functions of safeguarding supervision

DSLs will receive formal safeguarding supervision with the Trust Safeguarding Manager at least termly.

Safeguarding supervision uses the supervisory relationship to promote positive outcomes for children and families through creating a safe contained environment where the practitioner has the capacity to think and reflect.

It enables the practitioner to take responsibility for their own practice and response to the safeguarding needs of children and families. Effective supervision should consider the wider family and social context. Safeguarding supervision will:

- Enable the individual to reduce the negative impact of human factors on their performance through the recognition of personal triggers and the personal and organisational resources they have to support them in developing and sustaining resilience in the face of challenging and complex work.
- Facilitate recognition of gaps in knowledge and skills needed for effective safeguarding practice.
- Enhance the ability of practitioners to work effectively with colleagues both within their own organisation and with external agencies.
- Contribute to organisational responsibility for competent accountable performance. Safeguarding supervision should be provided within a structured process. Good practice requires an experienced supervisor with knowledge of safeguarding appropriate to the context in which the supervisee works.

All practitioners have a responsibility to seek safeguarding supervision.

Effective supervision can help to:

- Promote and develop competence and skill in safeguarding practice.
- Maintain a focus on the child.
- Avoid the potential for 'drift'/delay.
- Provide an opportunity for exploring professional difference and challenging fixed views.
- Review the evidence-base for agreed actions and decisions.
- Address the emotional impact of the work. The more stressful aspects of case management may require debriefing processes to explore the emotional aspects outside of formal safeguarding supervision.

Types of Safeguarding Supervision

- Planned 1:1 safeguarding supervision
- Responsive safeguarding supervision - This refers to requests made from any professional to the TWT Lead for Safeguarding & Attendance or the Safeguarding Manager for advice and support on safeguarding issues when they have concerns about a child or family. This advice should be sought as and when issues arise and should not be delayed by waiting for regular planned supervision. The supervisee presenting any cases for discussion will be responsible for implementing any agreed actions.
- Group safeguarding supervision - Group supervision can be utilised with any team that has common caseloads or across teams where staff report safeguarding challenges or issues. The purpose of group supervision is to support the team in working effectively to promote a consistent and a cohesive approach. Cases are discussed constructively to improve practice. This could include learning points from internal reviews, Serious Case Reviews (SCRs) and changes in policies and protocols. Opportunities are provided for group supervision at the local network meetings.
- Unplanned face-to-face contact in the working environment: Whilst unplanned conversations can be both timely and helpful, staff should be encouraged to share information and seek advice on safeguarding issues in private settings. Some settings are not conducive to good communication and are not sufficiently private to discuss confidential or personal details of cases. It is important to ensure that agreed actions are recorded and followed up in line with organisational policy.

Safeguarding Standards

Safeguarding supervision should be provided by an appropriately experienced supervisor.

The TWT Safeguarding Manager has undertaken appropriate training in Safeguarding Supervision.

The TWT Safeguarding Manager undertakes weekly supervision from the Trust Leader for Safeguarding & Attendance. Both the Safeguarding Manager and Trust Lead undertake half termly external supervision provided by Safeguarding Network.

Decisions relating to children, young people and families should be recorded (or cross-referenced) on the child/young person's or family's safeguarding chronology. Safeguarding supervision records will be kept securely in line with policy and procedure.

An open culture of learning and development and commitment to continuous improvement in practice should be promoted.

There is a duty to escalate the following concerns should they arise within safeguarding supervision:

Child/family member may be at risk of significant harm.

- There is unsafe practice placing people at risk.
- There is illegal activity.

Other issues should not be taken outside of safeguarding supervision

Any complaints or disagreements with regards to safeguarding supervision should be discussed, agreed and recorded with the supervisee. This will usually involve an agreement to involve the supervisor's line manager in a three-way discussion to resolve any issue that the worker and supervisor cannot resolve themselves. Such discussions should take place with reference to relevant organisational policies and the safeguarding supervision protocol.

23. Additional Resources

Further advice on child protection is available from:

- NSPCC: http://www.nspcc.org.uk/
- Childline: http://www.childline.org.uk/pages/home.aspx
- Anti-Bullying Alliance: http://anti-bullyingalliance.org.uk/
- Beat Bullying: http://www.beatbullying.org/
- Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents http://www.childnet.com/
- Thinkuknow (includes resources for professionals and parents) https://www.thinkuknow.co.uk/
- Safer Internet Centre http://www.saferinternet.org.uk/
- Intercom Trust - an LGBT+ led charity, proudly working with 1000's of people each year to improve wellbeing and inclusion across the region https://www.intercomtrust.org.uk/
- Knife Crime https://www.college.police.uk/guidance/knife-crime-evidence-briefing/understanding-causes-knife-crime

- Knife Crime One Minute Guide (Devon); https://www.devon.gov.uk/support-schools-settings/safeguarding/guidance-policy-and-tools-2/safeguarding-one-minute-guides/no-69-knife-crime/

- Safeguarding One Minute Guides (Devon) Safeguarding one minute guides

- The Children's Society's page on Preventing **Child Sexual Exploitation** https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation

- Prisoners' Families Helpline offers free, confidential support and advice for families in England and Wales who are in contact with the criminal justice system.

- Modern slavery: how to identify and support victims - GOV.UK

- County Lines Toolkit For Professionals | The Children's Society

- Rise Above: Free resources on health wellbeing and resilience

- Educate Against Hate - Prevent Radicalisation & Extremism

- UKCIS Online Safety Audit Tool - GOV.UK

- Child sexual abuse material generated by artificial intelligence

- Beyond Referrals Toolkit | Contextual Safeguarding

Children's
Front Door - Devon

If you are concerned that a child is being abused, or to request Targeted Early Help (L3) support you can

call: 0345 155 1071
or
complete the Request for Support online form available at:
https://devoncountycouncil.outsystemsenterprise.com/MASH/homepage

The Devon SCP Children's Front Door **consultation line** for **professionals only:** to request number email devonscp@devon.gov.uk.
Emergency Duty Team out of hours **0345 6000 388**
Police non-emergency 101

For all LADO enquiries Exeter (01392) 384964
ladosecure-mailbox@devon.gov.uk
Further info:
Managing allegations - Devon Children and Families Partnership (dcfp.org.uk)

Early Help
Locality Early Help Mailbox
North: earlyhelpnorthsecure-mailbox@devon.gov.uk
Mid & East: earlyhelpmideastsecure-mailbox@devon.gov.uk
South & West: earlyhelpsouthsecure-mailbox@devon.gov.uk
Exeter: earlyhelpexetersecure-mailbox@devon.gov.uk

For emergencies outside of office hours please call:
0345 6000 388