



## **Exeter Pre-Prep School**

### **Safeguarding and Child Protection Policy and Procedures**

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## Safeguarding and Child Protection Policy and Procedures

This policy applies equally to all pupils across the school, including in the Early Years Foundation Stage (EYFS).

This policy is one of a suite of policies covering the safeguarding and promoting the welfare of children. This policy is published on the school website. A printed copy is available on request from the school office.

### Policy statement

This policy applies to staff working with pupils on school premises or away from the school on an activity, visit or other educational pursuit.

At Exeter Pre-Prep School, we are committed to safeguarding children and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children to talk to us about anything that worries them. We will always act in the best interests of the child.

The safety and well-being of all our pupils at Exeter Pre-Prep School is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment, so that every pupil can learn, and undertake educational activities in safety. We expect good manners, respect and fair play to be shown by everyone so that every pupil can develop their full potential and feel positive about themselves as individuals. All pupils should care for and support each other.

Exeter Pre-Prep School fully recognises its responsibilities for child protection. All staff must be aware of the professional obligation laid upon them by the 1989 Children's Act and subsequent legislation. The school has a "duty to safeguard and promote children's welfare" (Education Act 2002 Section 157). Every complaint or suspicion of abuse from within or outside the school will be taken seriously and in all proper circumstances will be referred to an external agency such as children's social care within the local authority, the child protection unit of the police or the NSPCC, without investigation within the school.

Policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

### What is Child Abuse?

Keeping Children Safe in Education (DfE 2024) refers to the different categories of abuse (physical abuse, emotional abuse, sexual abuse, neglect and exploitation). These are set out in detail in Appendix 1 along with indicators of abuse and neglect; indicators of child exploitation are set out in Appendix 3.

### Child protection statement

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of the Devon Child and Families Partnership (DCFP).

### Policy principles

- The welfare of the child is paramount. The school is committed to act in the best interest of the child.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- Pupils and staff involved in child protection issues will receive appropriate support.
- The wider environmental factors of a child's life outside of school are considered when making safeguarding assessments (contextual safeguarding) in line with Keeping Children Safe in Education (DfE 2024).

### Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- To ensure consistent good practice.
- To demonstrate the school's commitment with regard to child protection to pupils, parents and other partners.

### Supporting and protecting children

We recognise that a child who is abused or witnesses violence 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 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. School may not only provide stability in the lives of children who have been abused or who are at risk of harm, but it plays a significant part in the prevention of harm to our children.

### Reporting of historic concerns, safeguarding failures or abuse

The school's aim is always to support our alumni and as part of this aim the school is committed to providing an open and compassionate response to any reports of historic concerns, safeguarding failures or abuse. We will take all reports seriously, listen carefully to the voice and wishes of the individual and follow current best practice guidelines in the handling of such a report and in providing support for the individual concerned. The Head and Chair of Governors will be made aware of any and all such reports. Learning from the past is important so that we can reinforce our commitment to the highest quality safeguarding in the present.

### Transparency

Exeter Pre-Prep School values its ethos based on respect and mutual tolerance. Parents/carers have an important role in supporting the work of the school. Copies of this policy, together with our other policies relating to issues of child protection and safeguarding, are on our website, and we hope that parents and carers will always feel able to take up any issues or worries that they may have with the school. Any allegation of child abuse will be referred to the statutory authorities. Open communications are essential.

## Terminology

*Safeguarding and promoting the welfare of children* refers to the process of providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

*Child protection* refers to the processes undertaken to protect children who have been identified as suffering, or likely to suffer significant harm (section 47 of The Children's Act 1989).

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

*DSL* refers to the Designated Safeguarding Lead at the school.

*Child* includes everyone under the age of 18.

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

## Safeguarding legislation and guidance

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

- Keeping Children Safe in Education DfE 2024
- The Children Act 1989 / 2004
- The United Nations Convention on the Rights of the Child (UNCRC)
- The Equality Act 2010
- Sexual violence and sexual harassment between children in schools and colleges DfE 2021
- The *Devon Children and Families Partnership* (DCFP) Babcock guidance and training and Model Child Protection and Safeguarding Policy
- ISI Independent Schools Standards Regulations 2016 and subsequent 'ISI Updates to Schools'
- Section 157 of the Education Act 2002 (Independent schools including academies and CTCs)
- The Education (Independent Schools Standards) (England) Regulations 2015 (Independent schools including academies and CTCs)
- The Teachers' Standards DfE 2013
- Working Together to Safeguard Children DfE 2023
- Information Sharing DfE 2024
- Filtering and Monitoring Standards for Schools and Colleges DfE 2024
- Working Together to Improve School Attendance 2024
- What to do if you're worried a child is being abused 2015
- Prevent Duty Guidance: for England and Wales 2024
- Channel and Prevent Multi-Agency Panel (PMAP) guidance 2021
- Relationships and Sex Education (RSE) and Health Education DfE 2021
- Teaching Online Safety in Schools DfE 2023
- Charity Commission guidance: Charity Commission updated 2019 at <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity#protecting>

## Roles and responsibilities

### Key Personnel

Role	Name	Contact details
Designated Safeguarding Lead (DSL) and Head	Mr Daniel Ayling	<a href="mailto:eppssafeguarding@exeterschool.org.uk">eppssafeguarding@exeterschool.org.uk</a> <a href="mailto:preprephead@exeterschool.org.uk">preprephead@exeterschool.org.uk</a> Tel. 01392 496122 Mobile 07549 022014
Deputy DSL (EYFS) and Head of Pastoral Care	Mrs Annabel Lawrence-Jones	<a href="mailto:eppssafeguarding@exeterschool.org.uk">eppssafeguarding@exeterschool.org.uk</a> <a href="mailto:AFL@exeterschool.org.uk">AFL@exeterschool.org.uk</a> Tel. 01392 496122*

\*Out of hours contact details will be made available to staff.

The Chair of Governors is **Gillian Hodgetts**.

The Vice Chair and nominated safeguarding governor is **Catherine Gibaud**.

Both can be contacted at [bursar@exeterschool.org.uk](mailto:bursar@exeterschool.org.uk) / Tel: 01392 307080.

### The Governing Body is responsible for:

- Reviewing the procedures for and the efficiency with which the child protection, safeguarding and wellbeing issues have been discharged.
- Ensuring that any deficiencies or weaknesses in child protection arrangements are remedied without delay.
- Approving amendments to child protection arrangements in the light of changing regulations or recommended best practice.
- Reporting termly to the Exeter School governing body on child protection, safeguarding and wellbeing issues.

### The Designated Safeguarding Lead (DSL)

- is a member of the pre-prep leadership team and has the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff
- is appropriately trained, with regular updates
- acts as a source of support and expertise to the school community
- has a working knowledge of DCFP procedures
- makes staff aware of DCFP training courses and the latest policies on safeguarding
- keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from, the pupil's general file
- refers cases of suspected abuse to Devon's Multi Agency Safeguarding Hub or police as appropriate
- ensures that when a pupil leaves the school, their child protection file is passed to their next school (as soon as possible and ensuring secure transit) and confirmation of receipt is obtained
- considers if it would be appropriate to share any information with Exeter Pre-Prep School in advance of the child leaving to facilitate a smooth handover

- attends and/or contributes to child protection conferences
- co-ordinates the school's contribution to child protection plans
- develops effective links with relevant statutory and voluntary agencies including the DCFP
- ensures that the child protection policy and procedures are reviewed and updated annually
- has responsibility for the provision of online safety (for staff and pupils) within the school
- liaises with the designated governor and Chair of Governors as appropriate
- makes the child protection policy available publicly, on the school's website or by other means

### **The Deputy Designated Safeguarding Lead (DDSL)**

Deputy DSLs are trained to the same level as the DSL and assist the DSL in the above roles. In the absence of the DSL the deputy will assume all the functions above.

The Head monitors staff absences to ensure that there is always sufficient safeguarding cover on any given school day.

### **DSL (and DDSL) Training and Reporting**

The DSL and deputy DSLs have received appropriate training in child protection and inter-agency working and undergo refresher training every two years. They attend courses with other child support agencies to ensure that they remain conversant with best practice. They maintain links with the DCFP and the DSL reports termly to the governors on child protection issues.

The DSL co-ordinates child protection procedures in the school and maintains records of children subject to child protection plans. The DSL works with the Bursar and Head of HR to maintain an ongoing programme of training for all employees.

The school's records on child protection are kept locked in the Head's Office and are separated from routine pupil records. Access is restricted to the DSL and deputies. From September 2023, new records will be held electronically on CPOMS (Child Protection Online Management System).

The DSLs will advise and act upon suspicion, belief and evidence of abuse reported to them; keep the Head informed of all actions (unless the Head is the subject of a complaint, in which case a DDSL should consult with the Chair of Governors without first notifying the Head); and liaise with Children's Services and other agencies on behalf of the school.

### **Governors**

Governors will receive appropriate safeguarding and child protection training at inductions, and then at regular intervals. Training should provide them with the knowledge required to ensure the school's safeguarding policies and procedures are effective.

### **Good practice guidelines and staff code of conduct**

Good practice includes:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them

- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's child protection and safeguarding policy, staff code of conduct, pupil behaviour management policy and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary, directly to the police or MASH (Multi Agency Safeguarding Hub)
- ensuring that the school follows Charity Commission guidance on the safeguarding of children and on the reporting of serious incidents. <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity#protecting>

All staff, including new members of staff, governors and volunteers, will find the "Code of Conduct for Staff" in the Staff Handbook.

Discussion of the procedures set out in that document is part of the induction procedures for newly appointed staff. The code of conduct provides guidance for teachers and other members of staff. It is not intended to be a substitute for proper training.

The DSL and Deputy DSLs who have received specialist training in child protection and safeguarding, must be informed if any member of staff has any concerns regarding the safeguarding of pupils. Further details of procedures for informing the DSLs of concerns are given in the document Child Protection: Procedures and Advice on Disclosure: staff guidelines.

### **Guidance for staff when working with pupils on a 1:1 basis.**

Sometimes it is necessary for a member of staff to work with a pupil on a 1:1 basis; for example, when offering academic or pastoral support, or when mentoring a pupil. Staff must ensure that they give due regard to safeguarding in such situations by meeting the pupil in a classroom or office with the door open whenever possible. If, for any reason, a member of staff meets with a pupil and is not able to follow best practice as outlined above, they should follow the self-referral process and inform the DSL.

Whilst some pupils may require greater support at times, it is expected that in most cases, 1:1 sessions would not continue for extended periods of time. Staff who see pupils regularly on a 1:1 basis should inform the Head of the arrangement. If a member of staff has any concern about the nature of a 1:1 meeting(s) between a colleague and pupil, they should inform the Head in line with the school's Low Level Concerns Policy.

### **Abuse of position of trust**

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Sexual relationships or sexual contact with any pupils, or encouraging a relationship to develop in a way which might lead to a sexual relationship, or any relationship considered inappropriate with any pupil at the school, is a grave breach of trust that will usually lead to disciplinary action and may also lead to



criminal prosecution. It is the criminal offence of an abuse of a position of trust to have any sexual relationship with any school pupil under the age of 18. It is also a breach of the staff code of conduct and considered to be gross misconduct to have a sexual relationship with any pupil of Exeter Pre-Prep School.

### **Allegations against staff**

All school staff should take care not to place themselves in a vulnerable position with a child. It is 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.

In line with Keeping Children Safe in Education part 4 guidelines, all staff must record in writing any concerns they have about the practice or behaviour of a member of staff and share it with the Head/DSL or DDSL. All such concerns to a DDSL must be communicated to the Head/DSL in a timely manner, who 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). *See also Low-Level Concern Policy.*

The Local Authority Designated Officer (LADO) will be contacted for all allegations and the relevant guidance will be followed. If the Head needs advice or guidance, they should contact the LADO. If the allegation is against the Head, the person receiving the allegation will contact the LADO or Chair of Governors directly.

Where concerns are considered to be 'low level' by the Head, they should be managed in line with part 4 of Keeping Children Safe in Education and the wider school policies and procedures. *See also Low-Level Concerns Policy.*

If the concern relates to the Head, the person receiving the information will immediately inform the Chair of Governors who will consult the LADO as above, without first notifying the Head. Where an allegation relates to a member of supply staff provided by an agency, the agency should be fully involved.

Suspension of the member of staff, excluding the Head, against whom an allegation has been made, needs careful consideration, and the Head will seek the advice of the LADO and the Head of HR in making this decision. In the event of an allegation against the Head, the decision to suspend will be made by the Chair of Governors with advice from the LADO.

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

### **What school staff should look out for (children who may be particularly vulnerable)**

Some children may have an increased risk of abuse (both online and offline). Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To provide support to meet the needs of children as soon as problems emerge. *Early help* (working with Devon services) is available. Any child may benefit from *Early help*, but all staff should be particularly alert to the potential need for *Early help* for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

This list provides examples of additionally vulnerable groups but is not exhaustive.

### **Children who are lesbian, gay, bisexual, trans or gender questioning (LGBTQ)**

The fact that a child may be LGBTQ is not in itself an inherent risk factor for them. However, children who are LGBTQ (or even perceived to be) can be targeted by other children. Risks can be compounded where children lack a trusted adult with whom they can be open. At Exeter Pre-Prep School, we endeavour to reduce additional barriers faced by ensuring there is always a safe space where children can speak openly to adult about LGBTQ issues.

### **Pupil Welfare and Wellbeing**

Exeter Pre-Prep School seeks to promote social and moral well-being through its PSHE provision, and to teach pupils to take care of and value themselves, and to think in terms of making a positive contribution to society as adults. Further details are provided in our Relationships Policy.

### **Bullying**

Bullying, harassment, victimisation and discrimination will not be tolerated. The school staff treat all our pupils and their parents fairly and with consideration, and expect them to reciprocate towards each other, the staff and the school. The school adopts a zero-tolerance approach where any kind of bullying is unacceptable. Full details of the school's position on bullying are given in the Anti-Bullying Policy.

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including online bullying and prejudice-based bullying should be reported and will be managed through our Anti-Bullying Policy. (This is further detailed in the section on child-on-child abuse).

### **Children who are absent from education**

Attendance, absence and exclusions are closely monitored. A child being absent or going missing from education, particularly repeatedly and/or for prolonged periods can act as a vital warning sign for a range of safeguarding possibilities. This may include abuse and neglect, sexual abuse or exploitation and

can also be a sign of child criminal exploitation, such as involvement in County Lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called honour-based abuse, or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority where appropriate, particularly where children go missing on repeated occasions and/or are missing for periods during the school day. The school may consider a home visit appropriate, through discussion with parents, if there is concern for a child's wellbeing or they have been absent from school, as a means for a member of school staff to meet with the child.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage (see later sections for more detail).

### **Whistleblowing if you have concerns about a colleague**

Staff who are concerned about the conduct of a colleague must remember that the welfare of the child is paramount. The school's "Whistleblowing Policy" is in the Staff Handbook and enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All allegations of abuse made against staff (including one of the designated persons with responsibility for safeguarding) should be reported immediately to the Head/DSL, who will then discuss the matter with the Local Authority Designated Officer (LADO) before further action is taken.

If the Head is absent from school, the allegation should be passed immediately to the Chair of Governors who will initiate further action. If the allegation concerns the Head (who is also the DSL), the Chair of Governors will discuss the matter with the LADO. Following due process, the school would report to the DBS/Teaching Regulation Agency as appropriate.

Staff may also report their concerns directly to MASH or the police if they believe direct reporting is necessary to secure action.

### **Allegations against staff**

When an allegation is made against a member of staff, our set procedures must be followed. The full procedures for dealing with allegations against staff can be found in Keeping Children Safe in Education (DfE 2024) and in the school's Staff Handbook.

Exeter Pre-Prep School is committed to learning lessons from all disclosures made, not just those which are concluded and found to be substantiated.

Allegations concerning staff who no longer work at the school, or historical allegations, will be reported to the police.

### **Staff training**

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern. Further detail of safeguarding and child protection training, of all categories of school staff, is documented and logged.

New staff and governors will receive a briefing during their induction, which includes the school's child protection and safeguarding, anti-bullying and behaviour management policies, Keeping Children Safe in Education 2024 (Part 1 and Annex B) and staff code of conduct, reporting and recording arrangements, and details for the DSL and Deputy DSLs. All staff will receive training appropriate to their role (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. All staff will also receive safeguarding and child protection updates on formal INSET days, via email, online training, website access and staff meetings throughout the year.

Annually staff are required to read this Safeguarding and Child Protection Policy, the school's Behaviour Management and Anti Bullying policies and the Staff Code of Conduct, and Keeping Children Safe in Education (Part 1 and Annex B). The condensed version of Keeping Children Safe in Education Part 1 (Annex A) will be provided instead of Part 1 "to those staff who do not work directly with children". Annex A gives a better basis for these staff members to safeguard children.

At least every two years, all staff complete an online assessment to prove their understanding (all new staff complete this online assessment in their first year as part of their induction).

### **Safer recruitment**

The school complies with the requirements of Keeping Children Safe in Education (DfE 2024) and the DCFP by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The school's Staff Recruitment Policy sets this out in detail "Checking Employees, Temporary Workers, Governors, Proprietors, Volunteers and Contractors."

At least one member of each recruitment panel will have attended safer recruitment training.

The school obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the school have been appropriately checked. The school will inform shortlisted candidates that online searches may be carried out as part of due diligence checks.

#### *Trainee teachers*

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained. The school maintains a single central record of recruitment checks undertaken.

#### *Volunteers*

Volunteers, including governors will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

#### *Contractors*

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

### **Site security**

Visitors to the School, including contractors, are asked to sign in and are given a badge and colour coded lanyard, which confirms they have permission to be on site. Parents who are simply delivering or

collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations. The Head will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site. Further detail is provided in the school's Visiting Speaker Policy.

### **Extended school and off-site arrangements**

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our school, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits, we will check that effective child protection arrangements are in place.

### **Staff/pupil online relationships**

The Staff Handbook provides staff with the "E-mail and internet policy" and "Social media policy" which includes their personal online activity and rules regarding online contact and electronic communication with pupils. This is also part of the Code of Conduct section of the Staff Handbook.

## **Child protection procedures: guidelines for staff**

All staff should be aware that children can abuse other children (both inside and outside school and online). They should have the view that it does happen at Exeter Pre-Prep School and an absence of reporting does not provide evidence that it is not happening.

All staff should understand the importance of challenging inappropriate behaviours between peers. Downplaying certain behaviours, for example dismissing sexual harassment as "banter", "just having a laugh" or "boys being boys", can lead to a culture of unacceptable behaviour and prevent pupils from making reports of abuse.

It is important that pupil victims seeking to make a report are listened to and taken seriously, will be supported and kept safe. It is important that a pupil does not gain the impression that they are creating a problem by reporting abuse, sexual violence or harassment, nor should a victim ever feel ashamed for making such a report.

### **Recognising abuse, neglect and exploitation**

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse, neglect, and exploitation.

Abuse, neglect, and exploitation are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone. Exploitation can be criminally and/or sexually motivated.

Abuse may be committed by adult men or women and by other children and young people. Equally, a child can be exploited by any adult or another child or young person.

If a child is subjected to harassment, violence and or abuse, this may breach the child's rights as set out in the Human Rights Act.

Alongside the categories of abuse, neglect and exploitation, there are also several specific safeguarding concerns that we recognise our pupils may experience:

- child absent from education, particularly on repeat occasions and/or for prolonged periods
- child missing from home or care
- child criminal exploitation (CCE) and/or child sexual exploitation (CSE)
- bullying, including cyberbullying
- domestic abuse
- drugs
- 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
- private fostering
- radicalisation
- youth produced sexual imagery (sexting)
- teenage relationship abuse
- trafficking
- child-on-child abuse

Staff are aware that behaviours linked to drug taking, alcohol abuse, school absence and sharing of nude/semi-nude images put children in danger and that safeguarding issues can manifest themselves via child-on-child abuse.

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. We also recognise that, whilst any report of sexual violence/harassment is to be taken very seriously, girls are more likely to be victims of such abuse and boys are more likely to be the perpetrators.

### Taking action

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**".

Key points for staff to remember for taking action are:

- in an emergency, take the action necessary to help the child – if necessary, call 999

- report your concern as soon as possible to the DSL, definitely by the end of the day (the DSL mobile number is on the reverse of staff lanyards)
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete an accurate, succinct record of concern on CPOMS
- seek support for yourself if you are distressed

*If you are concerned about a pupil's welfare:*

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are okay or if they can help in any way.

A pupil may not feel ready or know how to tell someone that they are being abused. It is through providing opportunities within School as a safe place where they can talk to emotionally available adults that a child may feel safe to share instances of abuse.

If a pupil talks to a member of staff about any risks to the safety or wellbeing of themselves or others, the staff member will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the DSL. The point at which they tell the pupil this is a matter for professional judgement. Staff should always be upfront with pupils regarding the boundaries of confidentiality.

Staff should use CPOMS (or a Safeguarding Concern Form if access to CPOMS is not available) to record any safety or wellbeing concerns and must always immediately raise concerns with the DSL or Deputy.

### **Notifying parents**

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Therefore, if the DSL believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from MASH and/or the police before parents are contacted.

### **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.

Staff should only discuss concerns with the DSL/Head, a DDSL or the chair of governors (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 a number of cases where senior leaders in school had failed to act upon concerns raised by staff, Keeping Children Safe in Education (DfE 2024) emphasises that any member of staff can contact children's social care if they are concerned about a child (see Appendix 7 for contact details).

Child protection information will be stored and handled in line with the GDPR 2018. Information sharing is guided by the principles that the information is necessary and proportionate, relevant, adequate, accurate, timely and secure.

Information sharing decisions will be recorded, whether or not the decision is taken to share. Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals, or stored securely on CPOMS. Child protection information will be stored separately from the pupil's school file. Only safeguarding team will have access to this information.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for not obtaining consent.

Child protection records are normally exempt from the disclosure provisions of the GDPR, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Head or DSL. **Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.** The GDPR does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

### **Enquiry to MASH**

The DSL will make an enquiry to MASH if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that an enquiry is being made, unless to do so would increase the risk to the child.

Any member of staff may make a direct enquiry to MASH if they genuinely believe independent action is necessary to protect a child.

### **Participation in strategy meetings**

The school may be contacted by the MASH and asked to attend a strategy meeting if there is a concern that a pupil is suffering or is at risk of suffering significant harm. In these instances, the school has a duty to share information held regarding the pupil and the family to help inform multi-agency decision making.

### **Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with the MASH team, the police or the NSPCC if:

- the situation is an emergency and the DSL/Head, deputy DSLs and the Chair of Governors are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety



- for any other reason they make a judgement that direct referral is in the best interests of the child

### **Teaching about safeguarding**

Children at Exeter Pre-Prep School are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims or abuse, and children with special educational needs or disabilities.

### **ICT Policies**

Schools have an important role to play in equipping children and young people to stay safe online both in school and outside. Internet safety is integral to the school's computing curriculum and is embedded in PSHE.

The school has robust filtering and monitoring systems to keep pupils safe. Harmful content, such as sexual, terrorist or extremist material, is blocked on school devices, as well as on any personal devices connected to the school's Wi-Fi. Pupil and staff access to the internet on school devices or personal devices connected to the school's Wi-Fi is monitored during term time. Education or guidance is given if a pupil or staff member searches for content deemed inappropriate or potentially harmful. More serious action is taken if a pupil or staff member breaches the school's ICT Acceptable Usage Policy, any other policy or the staff code of conduct. The DSL takes the lead on online safety and ensuring that all staff understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

The school has an ICT Acceptable Usage Policy to which all staff and users must sign up annually. This includes guidance on the use of personal mobile technology on 3G/4G/5G networks.

### **Use of Mobile Phones**

Exeter Pre-Prep School allows staff to bring in personal mobile telephones and devices for their own use. The school does not allow members of staff to contact parents using their personal devices – except for an emergency, e.g. emergency contact with parents is required, but malfunction of all the school phones due to power cuts / lack of mobile signal for a school mobile.

Users bringing personal devices into the school must ensure there is no inappropriate or illegal content on the device. All staff must ensure that their mobile telephones/devices are left inside their bag throughout contact time with children.

Mobile phone calls may only be taken during staff breaks or in a staff member's own time - and in the staff room. If staff have a personal emergency, they are free to use the school phone or make a personal call from their mobile in a designated staff area of the school, e.g. the staff room.

Personal devices must not be used for taking photographs. The school (via the Head/DSL) reserves the right to check the image contents of a staff member's mobile phone should there be any cause for concern over the appropriate use of it.

### **Use of Mobile Phones and Cameras in the EYFS**

Photographs may be taken for the purpose of recording a child or group of children participating in activities or celebrating their achievements; this is an effective form of recording a child's progression in the Early Years Foundation Stage. However, it is essential that photographs are taken and stored appropriately to safeguard the children in our care.

Only the designated School cameras, mobile phones and tablets may be used to take any photo within the school or on outings unless permission has been granted by the Head/DSL. Images taken on these cameras must be deemed suitable without putting the child/children in any compromising positions that could cause embarrassment or distress.

All staff are responsible for the location of the cameras, which should be stored securely when not in use. Images must be downloaded as soon as possible. Photographs should then be distributed in a printed format to members of staff to record in children's learning journey books.

If photographs need to be taken in a washroom, e.g. photographs of the children washing their hands, then authorisation from the Head must be obtained in advance and the staff member taking the photographs must be accompanied by another member of staff whilst carrying out this kind of activity. At all times the camera must be placed in a prominent place where it can be seen.

Permission is sought from parents for their child's image to be used in publications. Should the parent refuse permission then the child's name is added to the list stored in the office and staff are notified of the parental request.

### **Equal Treatment**

Exeter Pre-Prep School is committed to equal treatment for all, regardless of an individual's age, gender, ability, culture, race, language, religion, sexual identity or social background.

The school aims to create a friendly, caring and perceptive environment in which every individual is valued. We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each pupil.

We will regularly review how we are supporting pupils with protected characteristics and will take positive action, where proportionate, to deal with the disadvantages these pupils face – for example, by making reasonable adjustments for disabled children.

### **Complaints Policy**

Exeter Pre-Prep School hopes that parents and their children do not have any complaints about the school. A copy of the school's Parental Complaints Policy is available on the school's website.

### **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.

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

Exeter Pre-Prep School recognises 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 with the DSL and the DSL will notify MASH of the circumstances.

### **Looked After / Previously Looked After Children**

The most common reason for children becoming looked after is as a result of abuse and neglect. Exeter Pre-Prep School ensures that staff have the necessary skills and understanding to keep looked after/previously looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The DSL will have details of the child's social worker and the name and contact details of the Devon County Council's virtual school head for children in care.

### **Staff Awareness of Safeguarding Risks to Children**

All staff should be aware that a child presenting with problems or exhibiting unusual or changed behaviour in school, might be subject to abuse or might be vulnerable to abuse in a number of different contexts. This policy gives outlines of the following Safeguarding risks with some further details in the appendices as listed.

- Child-on-child abuse, which 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 peers
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - sexual violence (including sexual assault, rape and assault by penetration) – see also Appendix 2
  - sexual harassment, such as sexual comments, remarks, jokes which may be standalone or part of a broader pattern of abuse – see also Appendix 2
  - 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 sharing of nudes and semi-nude images or videos
  - upskirting (taking a picture under clothing without permission)
  - initiation / hazing type violence and rituals

*All of the above could have an online element to a greater or lesser extent by means of online threats and encouragement.*

- Child Criminal Exploitation (CCE) and /or Child Sexual Exploitation (CSE) – see also Appendix 3
- Mental Health

- Female Genital Mutilation (FGM) – see also Appendix 4
- Domestic Abuse – see also Appendix 5
- Radicalisation and Extremism – see also Appendix 6
- So-Called Honour-Based Abuse (SCHBA)
- Forced Marriage
- Serious Violence

In addition, Appendix 1 has further information on recognising the categories of abuse and Appendix 7 on external contacts and emergency numbers.

***Child-on-Child Sexual Violence and Sexual Harassment – see also Appendix 2***

Exeter Pre-Prep School has due regard to the guidance in Section 5, Keeping Children Safe in Education 2024 and in the guidance document ‘Sexual violence and harassment between children in schools and colleges’ (DfE Sept 2022).

Allegations of CSE, child-on-child sexual violence and/or sexual harassment will be treated the same whether the incident(s) occurred in or out of school.

Key points as detailed in Appendix 2 are:

- The immediate response in such cases is very important and the pupil/victim needs to feel reassured, protected and listened to. No victim must ever be made to feel ashamed.
- Risk assessments should be made on a case-by-case basis by the DSL or DDSL
- Report of sexual violence or sexual harassment should include the time and location of the incident and subsequent risk assessments will include any actions required to make the location safer.
- In the consideration of follow-on actions, it is important to:
  - prioritise the safety of the victim (and other children at risk) and to listen to the voice of the victim and consider their wishes
  - consider multiple other factors, including the importance of understanding intra-familial harms and any necessary support for siblings following incidents
  - record all concerns, communications, discussions, decisions and reasons for decisions that lead to either:
    - Manage internally
    - Recommend Early Help approach
    - Refer to MASH
    - Report to the police
- Whatever the action/response, it is important to emphasise that:
  - There is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated
  - Ongoing support for all involved will be required and this is likely to lead to complex judgements being made by the school, supported by other agencies as appropriate
  - It is clearly explained to pupils that the law is in place to protect rather than criminalise them.
- The internal/school sanctions issued alongside any other will be covered by the Anti-Bullying and Behaviour policies.

### ***Harmful Sexual Behaviour***

Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.

### ***Mental Health***

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

When children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, then the DSL or deputy should be informed immediately.

### ***Serious Youth Violence***

Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19, 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.

The term child-on-child abuse can refer to all of 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).

We aim 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 relationships education 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.

Any concerns, disclosures or allegations of child-on-child abuse in any form should be referred to the DSL.

The DSL will seek advice and guidance from MASH and where it is clear a crime has been committed or there is a risk of crime being committed the police will be contacted. The DSL will refer to the document “NSPCC – *When to call the police*” for further guidance as needed.

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 the victim and perpetrator will be provided with support.

***Consensual and non-consensual sharing of nudes and semi-nude images or videos (also known as ‘sexting’ and ‘youth produced sexual imagery’)***

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.

All incidents of this nature should be treated as a safeguarding concern and reported to the DSL. They will be dealt with by the DSL in line with the UKCCIS guidance ‘Sharing of nudes and semi-nudes: Advice for education settings working with children or young people’ (UKCCIS 2021).

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 youth produced sexual imagery.

***Domestic Abuse***

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological, financial or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse (See Appendix 5).

Domestic abuse can impact children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

***Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) - see also Appendix 3***

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18

into sexual or criminal activity. Children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18. Allegations of CSE will be treated the same whether the incident(s) occurred in or out of school.

In some cases, the abuse will be (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been exploited even if the activity appears consensual. Exploitation does not always involve physical contact; it can also occur through the use of technology. More information and the indicators of CSE and CCE are set out in Appendix 3.

The school includes the risks of exploitation in the PSHE curriculum. A common feature of exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of CSE and CCE. It is important to note that the experience of CCE/CSE may be very different between boys and girls and hence the indicators are also likely to be very different. All concerns are reported immediately to the DSL.

### ***So-Called Honour-Based Abuse (formerly honour-based violence)***

So-Called Honour-Based Abuse (SCHBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

SCHBA 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.

### ***Female Genital Mutilation***

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. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police.

The duty applies to all staff employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead; however, the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher 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 the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

School staff are trained to be aware of risk indicators of FGM which are set out in Appendix 4. Concerns about FGM outside of the mandatory reporting duty should be reported to the DSL. 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 a teacher or other member of staff should examine a child.

### ***Forced Marriage***

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. Since February 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a school or through a third party. The correct procedure is to inform the DSL who will make contact via MASH.

### ***Radicalisation and Extremism***

The Prevent Duty for England and Wales (2015) under section 26 of the Counter-Terrorism 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 defined as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". We also include in our definition of extremism calls for the death of members of our Armed Forces, whether in this country or overseas.



Children may be susceptible to extremist ideology and radicalisation. Exeter Pre-Prep 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, radicalisation and extremism.

Exeter Pre-Prep School seeks to protect children against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in Appendix 6. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014). 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. If the matter is urgent, then Devon & Cornwall Police must be contacted by dialling 999. In non-urgent cases where police advice is sought, then dial 101. The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Further information on Preventing Radicalisation has been included in Keeping Children Safe in Education in line with: [Prevent Duty Guidance: for England and Wales](#), published in March 2015 as part as the UK's Counter Terrorism strategy. [The Prevent Duty](#), Departmental advice for schools and childcare providers, published in June 2015. This non-statutory departmental advice is for governing bodies, Headteachers / Principals, Designated Safeguarding Leads and school staff. The document clarifies what the prevent duty means for schools and what actions are necessary to demonstrate compliance with the duty. It also provides sources of information, advice and support, including **Channel**, which provides early support for anyone who is vulnerable to being drawn into any form of terrorism or supporting terrorist organisations, regardless of age, faith, ethnicity or background.

### ***Serious Violence***

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

All staff should be aware of the associated risks and understand the measures in place to manage these. Further advice and details is available via Home Office publications and guidance [here](#) and [here](#). Staff should always contact the DSL with any concerns.

## Appendix 1

### Recognising signs of child 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-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age-inappropriate sexual behaviour
- Child Sexual Exploitation

Harm can include ill treatment that is not physical, as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

#### 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)
- Not feel ready or know how to tell someone that they are being abused

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.

### Extra-familial harms

Children can be 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), criminal exploitation, serious youth violence, county lines and radicalisation.

### **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, hand prints or a hair brush
- 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

It is noted that birth marks, especially Mongolian Blue Spots, can mimic bruising and that these are common in African, Middle Eastern, Mediterranean and Asian children.

### 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, for example:

- 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 non-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**

Children of any age 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

### **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
- A child seen to be listless, apathetic and irresponsible 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

## Appendix 2

### Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between children of any age and sex. Sexual violence and harassment exist on a continuum and may overlap; they occur online and face to face (both physically and verbally) and are never acceptable.

All staff should be aware that children abuse other children (both inside and outside school and online). They should have the view that it does happen at Exeter Pre-Prep School and an absence of reporting does not provide evidence that it is not happening.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

All staff should understand the importance of challenging inappropriate behaviours between peers. Downplaying certain behaviours, for example dismissing sexual harassment as “banter”, “just having a laugh” or “boys being boys” can lead to a culture of unacceptable behaviour and prevent pupils from making reports of abuse. Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts, genitalia, pulling down trousers, flicking bras and lifting up skirts is essential. Dismissing or tolerating such behaviours is to risk normalising them and to risk creating an unsafe culture and climate, where abuse is even less likely to be reported.

It is important that pupil victims seeking to make a report are listened to and taken seriously, will be supported and kept safe. It is important that a pupil should never gain the impression that they are creating a problem by reporting abuse, sexual violence or harassment. Nor should a victim ever feel ashamed for making such a report. Pupils should be supported to understand that the law is in place to protect rather than criminalise them.

The effort to create a safe, inclusive, respectful culture at Exeter Pre-Prep School is everyone’s responsibility. PSHE/relationships education teaching will play a specific part tackling such issues as:

- healthy and respectful relationships
- what respectful behaviour looks like
- consent
- stereotyping and equality
- body confidence and self-esteem
- prejudice
- addressing cultures of sexual harassment
- that sexual violence and harassment is always wrong

Serious cases are likely to be complex and difficult and each case will be dealt with on an individual basis. The DSL will follow this policy and the more detailed advice and guidance of specialist agencies and the published “Sexual violence and sexual harassment between children in schools and college” DfE 2021.

### *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.

#### *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. Further information and advice is available via the Devon Children and Families Partnership:

<https://www.dcfp.org.uk/>.



### Appendix 3

#### Exploitation (including Child Sex Exploitation, Child Criminal Exploitation and County Lines)

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 exploitation.

Signs include:

- going missing from home or school
- regular school absence/truancy
- 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
- 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

## Appendix 4

### 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. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, **the member of staff must report this to the police.**

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

#### *Mandatory reporting duty*

Section 5B of the 2003 Act introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report ‘known’ cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.

It is recommended that staff make a report orally by calling 101, the single non-emergency number. Where there is a risk to life or likelihood of serious immediate harm, staff should report the case immediately to the police, including dialling 999 if appropriate. In most cases, reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day.

#### *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?*

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. It is illegal in most countries including the UK.

*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 Leone, 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 there is the 'One Chance' rule. It is essential that settings schools/colleges take action without delay and make a referral to children's services.

## Appendix 5

### Domestic Abuse

*How does it affect children?*

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to mental health issues such as depression, self-harm and anxiety.

*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.

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

Contact: <https://www.devon.gov.uk/dsva/>

## Appendix 6

### Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:

*Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.*

3. Extremism is defined by the Crown Prosecution Service as:

*The demonstration of unacceptable behaviour by using any means or medium to express views which:  
Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;  
Seek to provoke others to terrorist acts;  
Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or  
Foster hatred which might lead to inter-community violence in the UK.*

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 vulnerability include:

1. *Identity Crisis:*

The student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;

2. *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;

3. *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;

4. *Unmet Aspirations*

The student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;

5. *Experiences of Criminality*

Which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;

6. *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.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of 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; and
- 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 can be accessed via this link.](#)

## Appendix 7

### MASH Contacts



#### **For Early Help, Consultation and Enquiries please contact:**

Telephone: 0345 155 1071

E-mail: [mashsecure@devon.gov.uk](mailto:mashsecure@devon.gov.uk)

Fax: 01392 448951

Enquiry Form available at: <https://www.dcfp.org.uk/training-and-resources/making-a-mash-contact/>

Post: Multi-Agency Safeguarding Hub, P.O. Box 723, Exeter EX1 9QS

Emergency Duty Team – out of hours: 0845 6000 388

Police – non-emergency number: 101

For all LADO enquiries Exeter: (01392) 384964

Or

<https://www.devon.gov.uk/educationandfamilies/child-protection/managing-allegations-against-adults-working-with-children>

#### **Early Help Contacts**

Please visit <https://www.dcfp.org.uk/early-help/>

Early Help Team: 0345 155 1071

Locality Early Help Mailbox

North: [earlyhelpnorthsecuremailbox@devon.gov.uk](mailto:earlyhelpnorthsecuremailbox@devon.gov.uk)

Mid & East: [earlyhelpmideastsecuremailbox@devon.gov.uk](mailto:earlyhelpmideastsecuremailbox@devon.gov.uk)

South & West: [earlyhelpsouthsecuremailbox@devon.gov.uk](mailto:earlyhelpsouthsecuremailbox@devon.gov.uk)

Exeter: [earlyhelpexetersecuremailbox@devon.gov.uk](mailto:earlyhelpexetersecuremailbox@devon.gov.uk)

For emergencies outside of office hours please call:

0345 600 0388 or 0845 600 0388

