



**Exeter School**

**SAFEGUARDING AND CHILD PROTECTION  
POLICY AND PROCEDURES**

<b>Status:</b>	Approved
<b>Approver:</b>	Governors
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## Safeguarding and Child Protection Policy and Procedures

This policy is one of a suite of policies covering the safeguarding and promoting the welfare of children. A printed copy of this policy is available to parents on request from the Head's PA and is also published on the school's website.

### 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.

The safety and wellbeing of all our pupils at Exeter School is our highest priority. Our business is to know everyone as an individual and to provide a safe and caring environment, in which every pupil can flourish.

Exeter School fully recognises its responsibilities for child protection. All staff must be aware of the professional obligation laid upon them by the Children's Act 1989 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 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.

The School understands that successful outcomes for children depend on strong multi-agency partnership working across the whole system of help, support and protection including effective work from all agencies with parents, carers, and families.

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 Safeguarding Children Partnership.

### 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 best practice.
- To demonstrate the school's commitment regarding child protection to pupils, parents, and other partners.

### Supporting and protecting children

We recognise that a child who is abused or who 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.

### Historic reporting of historic concerns, safeguarding failures, or abuse

The school's aim is to 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 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 School values its ethos based on respect and mutual tolerance. Parents/guardians have a significant 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 guardians 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, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

*Child protection* refers to the processes undertaken to protect children who have been identified as suffering, or likely to suffer significant harm (s.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 at Exeter School (although we recognise the legal differences of those who are over 18 years old).

*Pupil* includes all children (and young people, if over the age of 18) on roll at the school.

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

### **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

**The designated safeguarding lead (DSL) for child protection is Miss Ali Dunning.**

[ad@exeterschool.org.uk](mailto:ad@exeterschool.org.uk) 01392 307080 07814 394701

**The head of safeguarding is Mrs Jess Doku.**

[jld@exeterschool.org.uk](mailto:jld@exeterschool.org.uk) 01392 307080

**The deputy designated safeguarding leads are Mr John Wood (deputy head of the Junior School), Mrs Jess Doku, Mr Luigi Chu (Sixth Form), Mr Mike Glanville (Middle School) and Mrs Julia Daybell (Lower School).**

John Wood	<a href="mailto:jsw@exeterschool.org.uk">jsw@exeterschool.org.uk</a>	01392 307080
Luigi Chu	<a href="mailto:lc@exeterschool.org.uk">lc@exeterschool.org.uk</a>	01392 307080
Mike Glanville	<a href="mailto:mfcg@exeterschool.org.uk">mfcg@exeterschool.org.uk</a>	01392 307080
Julia Daybell	<a href="mailto:jhd@exeterschool.org.uk">jhd@exeterschool.org.uk</a>	01392 307080

Day-to-day issues are delegated to the DSL (whole school), the deputy head of the Junior School, or the Head of Safeguarding. Urgent or serious matters must be referred to the DSL immediately.

**The designated safeguarding governor and chair of the Welfare and Safeguarding Committee of governors is Ms Catherine Gibaud.** [bursar@exeterschool.org.uk](mailto:bursar@exeterschool.org.uk) 01392 307080

The designated safeguarding governor is responsible to the governing body for overseeing all safeguarding matters. The Welfare & Safeguarding Committee meets termly to consider child protection, safeguarding and wellbeing issues and reports to the governing body, which formally approves child protection policies once a year.

The governing body is responsible for:

- Reviewing the procedures for and the efficiency with which the child protection duties 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.

**The Head is Ms Louise Simpson.** [head@exeterschool.org.uk](mailto:head@exeterschool.org.uk) 01392 307080

**The Headmistress of the Junior School is Mrs Saskia Van Schalkwyk.**

[juniorhead@exeterschool.org.uk](mailto:juniorhead@exeterschool.org.uk) 01392 307080

**The designated safeguarding lead (DSL)**

- Is a member of SLT 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 members
- Takes the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- Is the Key Adult within Operation Encompass.

- Is the school's Attendance Champion
- Ensures that all staff have access to and understands the school's safeguarding and child protection policy and procedures, especially new and part-time staff
- Ensures the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, working with governors
- Ensures the child protection policy is available publicly and that parents know that referrals about suspected abuse or neglect may be made, and the role of the school in this
- Maintains links with the safeguarding partner agencies to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- Promotes educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker
- Works closely with the head of safeguarding who coordinates much of the day-to-day casework
- Refers cases of suspected abuse to Devon's Multi Agency Safeguarding Hub or police as appropriate
- Liaises with the designated safeguarding governor / chair of governors / Head as appropriate.

### **The head of safeguarding**

- Reports to the DSL.
- Co-ordinates much of the day-to-day casework across the school, providing targeted and general support to pupils and to staff dealing with these pupils.
- Works closely with the DSL and safeguarding team, taking a significant role in this team and with the administration (including CPOMS) and supports processes associated with child protection and safeguarding in the school, e.g., keeping records, monitoring progress, and working with staff, families, and external agencies.
- Ensures that the DSL is aware of all serious safeguarding / child protection issues.
- Meets regularly with the DDSLs and heads of year to discuss actions, highlight the most serious cases, and to ensure comprehensive use of CPOMS.
- Works with the attendance officer, safeguarding team, and heads of year to ensure regular, formal follow up of attendance issues at the end of each half term period
- Has line management responsibility of the pastoral assistant, working with them to ensure high-quality pastoral provision in room 3 (the dedicated wellbeing room in the senior school).
- Liaises with the DSL on the strategic development of safeguarding and pastoral care systems within the school, in terms of structural change, policy review and strategic development.
- Liaises with the DSL on ongoing safeguarding training for staff throughout the year; updates safeguarding noticeboards for staff and pupils.

### **The deputy designated safeguarding leads (DDSLs)**

- Are trained to the same level as the DSL; assist them in their role and deputise in their absence.

### **Training and reporting**

The DSL and DDSLs receive specialist training in child protection and inter-agency working and undergo refresher training every two years. They attend courses with other child support agencies as required to ensure that they remain conversant with best practice. They maintain links with the Devon Safeguarding Children Partnership (DSCP). The DSL reports termly to the Welfare & Safeguarding Committee 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 head of human resources to maintain an ongoing programme of training for all employees.

Child protection records are stored electronically on CPOMS, separate from routine pupil records.

The DSL must be informed if any member of staff has any concerns regarding the safeguarding of pupils. The DSL 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 the DSL should consult with the chair of governors without notifying the Head, first); and liaise with children's services and other agencies on behalf of the school.

### **Governors**

Governors receive appropriate safeguarding and child protection training at induction, and then at regular intervals. Training provides governors with the knowledge required to ensure the school's safeguarding policies and procedures are effective.

The deputy head (academic) has responsibility for staff absence and cover and monitors absences to ensure that there is always sufficient safeguarding cover on any given school day.

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

Good practice includes:

- reading and understanding the school's child protection and safeguarding policy, staff code of conduct, behaviour management policy, and guidance on wider safeguarding issues
- 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 and showing professional curiosity
- 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
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- recognising that adverse childhood experiences can impact negatively on a pupil's wellbeing and behaviour, and collaborating with colleagues to offer additional support for the pupil
- giving due regard to safeguarding in situations where it is necessary to work with or meet a pupil 1:1 (see 'Guidance for staff when working with pupils on a 1:1 basis', below)
- 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, will find the Code of Conduct for Staff in the staff handbook. A paper copy is made available for any volunteers without access to the intranet. 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.

All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults. Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction. If for any reason a member of staff is not able to follow best practice, they must use the self-referral process, referring any incident to the DSL who will log the incident and follow-up with the member of staff as appropriate.

### **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, e.g., when offering academic or pastoral support, or when mentoring a pupil. Staff must ensure that they give due regard to safeguarding in such situations and meeting the pupil in a classroom or office with the door open whenever possible. The member of staff should record any 1:1 meeting (e.g., in their OneNote planner or Outlook diary), including the date, time, and reason for the meeting. 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 DSL or the head of safeguarding 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 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 pupil, or encouraging a relationship to develop in a way which might lead to a sexual relationship, or any relationship just 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, and whilst not a criminal offence, it is a breach of this Code and considered to be gross misconduct to have a sexual relationship with any pupil of this School, even if over the age of 18.

### **Whistle blowing 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 Employment Handbook and enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

In line with KCSIE part 4 guidelines, all employees and volunteers must record any concerns they have about the practice or behaviour of a member of staff and share it with the Head as soon as possible (or DSL or Chair of Governors in the Head's absence). The Head 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), seeking advice from the LADO if required. See also Low-Level Concern policy. Where concerns are considered low-level by the Head, they should be managed in line with part 4 of KCSIE.

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

The Local Authority Designated Officer (LADO) will be contacted for all allegations and relevant guidance followed. This also applies if an allegation is received relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (e.g., sports associations). 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 notifying the Head first. The DSL will be informed if this is necessary.

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.

Following due process, the school would report to the DBS/Teaching Regulation Agency as appropriate.

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 Employment Handbook.

Exeter 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, 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 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.

### **Raising Awareness with Pupils**

Exeter School values its culture of open communication between staff and pupils, and its effective pastoral support structure. We prepare all our pupils to make reasoned, informed choices, judgements, and decisions. Aspects of safeguarding and child protection issues are covered through our PSHE (including relationships and sex education) programmes delivered through assemblies, lessons, form time activities and visiting speaker workshops.

The school pastoral support systems, including opportunities to seek advice, report abuse (child-on-child or otherwise), or express concerns are widely promoted, and we offer multiple access points to ensure all pupils feel as comfortable as possible in entering discussion and conversation about such matters.

All pupils know that there are adults to whom they can turn if they are worried, including their form tutor, head of year, pastoral assistant, chaplain, and the school nurse but that any adult will listen and seek to reassure and provide help (referring to the safeguarding team as appropriate).

Senior school pupils also have access to anonymous online reporting via the SWGfL app “Whisper” which is installed on pupil iPads and linked on the pupil intranet. Pupils are advised that this is a place where they can have an anonymous conversation if they do not feel able to communicate directly with a member of the pastoral team but wish to express a concern.

In the senior school, poster boards on the back of some toilet doors include information and signposting covering a variety of safeguarding issues.

In particular:

The school first aid room, staffed by a full-time paediatric nurse, has advice on where pupils can seek help. All pupils have access to telephone helplines publicised by the school enabling them to call for advice and support in private.

The senior school also has a trained pastoral assistant based in our pastoral room (room 3) which is a safe place for pupils who might need time and space away from lessons or the busy school day. In the junior school, the pupil hub is available to pupils who need space and support.

We provide leadership training to our senior prefects and house captains in the senior school. Pupils appointed as buddies in the Junior School receive training appropriate to their age in the importance of offering support and assistance to younger pupils.

The school has several pupil forums including school councils, a diversity and equalities forum, an LGBTQ+ group and an IAMME wellbeing group so that pupil voice can be heard, and opinions sought.

### **Pupil Welfare and Wellbeing**

Exeter 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 policies on Spiritual, Moral, Social and Cultural education (SMSC) and PSHE and RSE.

### **Bullying**

Bullying, harassment, victimisation, and discrimination will not be tolerated. Staff treat pupils and their parents fairly and with consideration, and expect them to reciprocate towards each other, the staff, and the school. The school takes a robust approach to bullying, with any kind of bullying considered 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 serious issue that can cause anxiety and distress. All incidences of bullying, including online bullying and prejudice-based bullying such as misogyny 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 if this is persistent or unexplainable, can act as a vital warning sign for a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including 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, who is the school's Attendance Champion, will monitor unauthorised absence and take appropriate action including notifying the local authority where appropriate. See also the school's attendance policy.

The school has a home visiting policy in place and 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.

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).

### **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 is documented in the safeguarding training policy and all training, of all categories of school staff, is logged.

New staff will receive a briefing during their induction, which includes the school's child protection and safeguarding, anti-bullying and behaviour management policies, KCSIE 2024 (Part 1 and Annex B) and staff code of conduct, reporting and recording arrangements, and details for the DSL and DDSs. 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, the staff intranet, online training, website access and staff meetings throughout the year.

Annually staff are required to read this Safeguarding and Child Protection Policy, the Staff Code of Conduct, and KCSIE (Part 1 and Annex B).

The condensed version of KCSIE Part 1 (Annex A of KCSIE) 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.

Annually all staff are required to complete an online assessment to prove their understanding.

Teaching staff also read the school’s Behaviour Management and Anti Bullying policies.

### **Safer recruitment**

The school complies with the requirements of Keeping Children Safe in Education (DfE 2024) and the Devon Safeguarding Children Partnership 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 done 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’s PA 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 Visitor 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 and work-related activities, we will check that effective child protection arrangements are in place.

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

The staff handbook provides staff with the *IT policy* and *Social Media policy* which include 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 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 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
- teenage relationship abuse
- trafficking
- child-on-child abuse

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

We 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, and 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 on CPOMS
- seek support for yourself if you are distressed.

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 with the opportunity to 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 their safety or wellbeing or the wellbeing of others, the staff member will, at the appropriate time, let the pupil know that 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 to record any safety or wellbeing concerns and must always immediately raise concerns with the DSL or DDSL.

### **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 contact 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. Exeter School is an Operation Encompass school, working closely with the police to support pupils who have experienced domestic abuse.

### **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, deputy DSL, the Head or 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 several cases where senior leaders in schools 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.

Child protection information will be stored and handled in line with the GDPR 2018. Information sharing is guided by the following principles.

The information is:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure.

Information sharing decisions is recorded (whether the decision is taken to share) and stored securely on CPOMS. Access to pupil information on CPOMS is restricted and monitored by the head of safeguarding.

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.

The school provides notes on the GDPR in Schedule 1 of the Parental Contract.

### **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 MASH, police or the NSPCC if:

- the situation is an emergency and the designated safeguarding lead, their deputy, the Head 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 judge that direct referral is in the best interests of the child.

### **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 ICT curriculum and is embedded in PSHE.

The school has robust filtering and monitoring systems to keep pupils safe. Harmful content, e.g., 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 daily 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 Acceptable Use 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 Acceptable Use 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.

### **Equal Treatment**

Exeter 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 certain protected characteristics and will take positive action, where proportionate, to deal with the disadvantages these pupils face. For example, ensuring we make reasonable adjustments for disabled children and supporting girls if there is evidence that they are being disproportionately subjected to sexual violence or harassment.

### **Complaints Policy**

Exeter School hopes that parents and their children do not have any complaints about the school. A copy of the school's Complaints Procedure-Statement for Parents and Guardians is available on the School's website.

### **Work Experience**

Pupils make their own arrangements for work experience and the School's *Work experience and professional contacts* policy outlines the responsibilities of parents and pupils when organising a placement. The policy also outlines the School's safeguarding procedures when facilitating meetings between pupils and alumni.

### **Children staying with host families**

The School may arrange for pupils to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the School follows the guidance in Annex E of Keeping Children Safe in Education (DfE 2024) to ensure that hosting arrangements are as safe as possible.

### **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. Some overseas pupils may reside with host families during school terms, and we will work with the local authority to check that such arrangements are safe and suitable, these pupils would be classified as privately fostered if staying with host families for a period of 28 days or more

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

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this 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 because of abuse and neglect. Exeter 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 several different contexts. This policy gives outlines of the following safeguarding risks with some further details in the appendices as listed.

**Child-on-child abuse** is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice based and discriminatory bullying)
- abuse in intimate personal relationships between 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
- Domestic Abuse. See also Appendix 5
- Radicalisation and Extremism. See Also Appendix 6
- So-called 'honour'-based violence
- Abuse such as Female Genital Mutilation (FGM, see Appendix 4) and forced marriage.

- Serious Violence

In addition, Appendix 1 has further information on Recognising the Four 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 School has due regard to the guidance in Section 5, KCSiE 2024 and in the guidance document ‘Sexual violence and harassment between children in schools and colleges’ (DfE Sept 2022).

Allegations of CSE peer of peer sexual violence and/or sexual harassment will be treated the same whether the incident(s) occurred in school or outside of school.

Key points as detail in appendix 2 are:

- The immediate response in such cases is particularly important and the pupil/victim needs to feel reassured, protected and listened to. No victim must ever be made to feel ashamed.
- Risk and needs assessment should be made on a case-by-case basis by DSL or DDSL
- 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 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.
  - That 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**

This is 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. 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 are available via Home Office publications and guidance [here](#) and [here](#).

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

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

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 an appropriate PSHE & RSE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe;
- systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed;
- robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.

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 wellbeing 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.

Exeter School is an Operation Encompass school. Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL or a deputy DSL) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

### **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 school or outside 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 does not recognise the coercive nature of the relationship and does not 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 (HBA) 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 so-called 'honour'. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

So-called 'honour'-based abuse might be committed against people who:

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

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

### **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. 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 different from 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 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 (2023) under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism. Extremism is defined as "*the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: 1) negate or destroy the fundamental rights and freedoms of others; or 2) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or 3) intentionally create a permissive environment for others to achieve the results in (1) or (2)*". 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 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 School seeks to protect children and young people against the messages of all violent extremism.

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 of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

## Appendix 1

### Recognising signs of child abuse and neglect

#### *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.

#### *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.

### *Recognising Physical Abuse*

The following are often regarded as indicators of concern:

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

### *Bruising*

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

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

NB 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 e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)

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

### *Fractures*

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

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

### *Scars*

Many scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

### *Recognising Emotional Abuse*

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

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g., anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated 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 & 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 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 School is everyone’s responsibility. PSHE / RSE 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 determine the nature of the incident the following factors more fully 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://new.devon.gov.uk/devonsafeguarding/> <https://www.dcfp.org.uk/>.

### Appendix 3

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

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 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.

Section 5B of the 2003 Act<sup>1</sup> 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.

#### *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 staff act without delay and make a referral to children's services.

## Appendix 5

### Domestic Abuse

The School is an Operation Encompass school, working closely with the police to support pupils who have experienced 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

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as *the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:*

- 1. negate or destroy the fundamental rights and freedoms of others; or*
- 2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic right; or*
- 3. intentionally create a permissive environment for others to achieve the results in (1) or (2).*

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. We are aware locally of the 2021 case of ‘incel’ violence in Plymouth. This exemplifies the need to be aware that radicalisation can come from a wide variety of sources.

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 can recognise those vulnerabilities.

Indicators of vulnerability include:

#### Identity Crisis

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

#### Personal Crisis

The young person may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;

#### Personal Circumstances

Migration; local community tensions; and events affecting the young person's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;

### Unmet Aspirations

The young person may have perceptions of injustice; a feeling of failure; rejection of civic life;

### *Experiences of Criminality*

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

### *Special Educational Need*

Students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

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)

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](tel:03451551071).

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

