

# Child Protection and Safeguarding Policy 23/24

<b>Staff reviewer:</b>	<b>Scrutinised by link Governor:</b>	<b>Date signed off at Committee:</b>	<b>Date approved at Board:</b>	<b>Next review date:</b>
<i>Yasmin Trevelyan</i>	<i>Jennie Hamilton</i>	<i>19.09.23</i>	<i>17.10.23</i>	<i>August 2024</i>

# 1. Preamble

Key Personnel

**The Designated Safeguarding Lead (DSL) is Yasmin Trevelyan**

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**The deputy DSL(s) are:**

**Kerry Burnham** - [KerryBurnham@exeterms.ac.uk](mailto:KerryBurnham@exeterms.ac.uk) - Tel: 01392 429 020

**Grace Strachan** – [gracestrachan@exeterms.ac.uk](mailto:gracestrachan@exeterms.ac.uk)

**Sam Chidley-Bedford** – [schidley-bedford@exetermathematicsschool.ac.uk](mailto:schidley-bedford@exetermathematicsschool.ac.uk)

**Joe Rowing** - [joerowing@exeterms.ac.uk](mailto:joerowing@exeterms.ac.uk)

**The designated mental health lead is Sam Chidley-Bedford –**

Contact details: [schidley-bedford@exetermathematicsschool.ac.uk](mailto:schidley-bedford@exetermathematicsschool.ac.uk)

**Designated Teacher for Looked After Children is: Yasmin Trevelyan**

**The nominated child protection governor is: Jennie Hamilton**

Contact details: The link governor can be contacted through [janelucas02@exetermathematicsschool.ac.uk](mailto:janelucas02@exetermathematicsschool.ac.uk)

**The Deputy Child Protection governor is: Lewis Day**

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**The Headteacher is: Kerry Burnham**

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**The Chair of Governors is: Tim Pauldon**

The Chair can be contacted through [janelucas02@exetermathematicsschool.ac.uk](mailto:janelucas02@exetermathematicsschool.ac.uk)

## 2. Purpose

This policy applies to all staff, trustees, Governors, volunteers, agency staff, contractors, students, visitors to, and anyone working on behalf of Exeter Mathematics School. Exeter Mathematics School believes that children and young people regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.

This policy has been developed in accordance with the principles established by the Children Act 1989 and in line with the following government publications:

- Section 175 and Section 157 of the Education Act 2002
- The Education (Independent Schools Standards) (England) Regulations 2010
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Working Together to Safeguard Children 2018 (updated Dec 20)
- Keeping Children Safe in Education 2023
- Sexual Violence and sexual Harassment between children in schools and colleges 2017 – updated 2021
- Education and Training (Welfare of Children) Act 2021
- Information Sharing 2018
- Teaching online safety in schools
- What to do if you're worried a child is being abused 2015
- Filtering and Monitoring Standards for schools and Colleges (DfE)
- South West Child Protection Procedures Multi-Agency Child Protection Procedures
- Multi Agency Practice Guidelines: Female Genital Mutilation, 2020
- Children Act, 2004
- 'Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Safeguarding Vulnerable Groups Act, 2006
- HM Government Prevent Duty Guidance for England and Wales, 2015 (revised)
- Children and Social Work Act 2017
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Female Genital Mutilation Act 2003
- Children and Adoption Act 2006
- Children and Young Persons Act 2008
- United Convention on the Rights of the Child 1991
- Voyeurism (Offences) Act 2019
- Preventing youth violence and gang involvement - Practical advice for schools and colleges
- PACE Code C 2019
- Prevent Duty 2015
- The Human Rights Act 1998
- Equality Act 2010

Exeter Mathematics School takes seriously its responsibility under section 175 of the Education Act 2002 and section 11 of the Children Act 2004, Education and Training (Welfare of Children) Act 2021 to safeguard and promote the welfare of children and to work together with other agencies to ensure adequate arrangements are in place to identify, assess and support those students who are suffering harm.

- 2.1. Students are aware of who they can talk to if they have a concern, and we listen to our students and take seriously what they tell us. Exeter Maths School recognises that Child Protection and Safeguarding is everyone's responsibility and that all staff have a full and active part to play in protecting children, young people and vulnerable adults from harm and that the child's welfare is our paramount concern. Child includes everyone under the age of 18 or 25 if a care leaver, and those within our care who are over 18 - for the purposes of this policy child/children/student/young person are interchangeable.

## The aims of this policy are:

- 2.2. To raise awareness of Safeguarding incidents and/or behaviours which can be associated with factors outside the school and can occur between children/students outside the school or college. All staff, but especially the designated safeguarding lead (including deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as **contextual safeguarding**, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.
- 2.3. To demonstrate the school's commitment with regard to safeguarding and child protection to students, parents/carers and other partners.
- 2.4. To support the young person's development in ways that will foster security, confidence and independence.
- 2.5. To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- 2.6. To raise the awareness of all teaching and non-teaching staff of the need to safeguard young people and of their responsibilities in providing a safe environment and identifying and reporting possible cases of abuse, sexual violence and harassment.
- 2.7. To provide a systematic means of monitoring student known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those students.
- 2.8. To emphasise the need for good levels of communication between all members of staff.
- 2.9. To maintain a structured procedure within the school, which will be followed by all members of the school community in cases of suspected abuse.
- 2.10. To develop and promote effective working relationships with other agencies, especially the Police and MAST teams in our area
- 2.11. To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance), and a single central record is kept for audit.

## 3. Definitions

- 3.1. Safeguarding and promoting the welfare of students refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that students grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.
- 3.2. Child Protection refers to the processes undertaken to protect students who have been identified as suffering or being at risk of suffering significant harm.
- 3.3. 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.
- 3.4. The term "Students" includes all on role at EMS. It also includes those enrolled on outreach programme.
- 3.5. Child includes everyone under the age of 18 or 25 if a care leaver, and those within our care who are over 18 - for the purposes of this policy child/children/student/young person are interchangeable.

- 3.6. Some guidance refers to “child-on-child” abuse, the language of which has been echoed here. For clarity within our setting, I would consider this to include “peer-on-peer” and interactions across the 17/18 divide.
- 3.7. Parent refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers, adoptive parents, and LA corporate parents.
- 3.8. Vulnerable Adult refers to someone aged 18 or over who is, or may be, in need of community services due to age, illness or a mental or physical disability. Who is, or may be, unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation.
- 3.9. Prevent Single Point of Contact is the person identified in the School as the point of contact for all Prevent related incidents and concerns. At EMS this is the DSL.
- 3.10. Safeguarding Team refers to the team of Level 3 Child Protection trained staff who support the DSL and DDSLs in safeguarding and child protection across the whole School and at Exeter College.

#### 4. Policy

- 4.1. Exeter Mathematics School procedures for safeguarding children, students, young people and vulnerable adults, is in line with Local Child Protection procedures and current DFE Safeguarding procedures. EMS students may be covered by any of the agencies in the four counties in the South West which the current cohort of students come from. Every effort has been made to ensure that our policies are appropriate to all of the current local safeguarding boards and multi-agency bodies and with an eye to the incoming local safeguarding partner arrangements – Please see <https://www.proceduresonline.com/swcpp/>
- 4.2. Exeter Mathematics School recognises that it is an agent of referral and not of investigation. It is not the School’s responsibility to investigate abuse.

##### **We will ensure that:**

- 4.3. The Senior Leadership Team, and Governors, understands and fulfils its safeguarding responsibilities.
- 4.4. The Designated Safeguarding Lead (DSL) and Deputies have undertaken level 3 child protection training, as has the School’s Headteacher and the Deputy Designated Safeguarding Leads and will ensure that said training is kept up to date in line with the requirements of the role and KCSIE 2023. The Designated Safeguarding Lead is also the lead teacher for Children in Care (CiC), Looked after children (LAC), and other vulnerable adults.
- 4.5. The Mental Health lead is appropriately trained.
- 4.6. We work with Exeter College’s Safeguarding team. These team members have undertaken Group 3 Child protection training.
- 4.7. All members of staff are provided with training on induction that complies with local and regional safeguarding boards, Home Office and DFE standards, in order to develop their understanding of the signs and indicators of abuse. This is refreshed every 3 years. All members of staff are trained to be able to complete and submit a Multi-agency referral. Training updates are delivered throughout the year.
- 4.8. All members of staff have been trained in how to respond to a child, young person or vulnerable adult, who discloses abuse, and the procedure to be followed in appropriately sharing a concern of possible abuse or, a disclosure of abuse. Staff are aware that in some cases, if the victim is not offered support following disclosure, that the ‘One Chance’ opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations especially if they become aware of potential forced marriage, FGM and HBV cases.

- 4.9. All staff and volunteers, read KCSiE Part 1 annually and confirm to say they have read and understood it. In addition, all governors receive appropriate safeguarding and child protection training at induction, in line with the revised KCSiE 2023 guidance.
- 4.10. We take care to address Specific Child Protection issues as they arise. The following should be referred immediately to the most relevant agency. The issues featured below are linked to guidance and local procedures which can be found on the South West Child Protection Procedures at <https://www.proceduresonline.com/swcpp/>. The list is not intended to be exhaustive:
- 4.11. **Prevent Duty.** All EMS staff are trained as part of their induction. Existing staff have also received such training. We recognise the importance of awareness to anti-radicalisation and staff are proactive in recognising the signs in students who may be vulnerable to this form of abuse. The DSL is the single point of contact for Prevent issues. For more information, please see appendix 6
- 4.12. **Domestic Abuse and Serious Violence.** Staff at the school are aware of the signs of domestic and serious violence. The School's DSL has received the 'Against Domestic Violence and Abuse' Level 1 training in domestic abuse and will act in an advisory capacity for EMS. The DSL has completed Domestic abuse training from IDAS and is the nominated Operation Encompass contact. This is to ensure that the School fulfils its statutory obligation to consider domestic abuse as a major issue in child protection cases. For more information, please see appendix 5.
- 4.13. **Child Death.** If a student dies whilst at Exeter Mathematics School the DSL will ensure that all student data is amended immediately, in order that parents/carers of the student do not receive any inappropriate information from the School. The School will also ensure that all students who are affected by the death are offered pastoral support by either School staff or Exeter College's Pastoral Support Team. The Pastoral Leader will liaise with the appropriate tutor to ensure that the parents'/carers' wishes are respected. The DSL will ensure that any serious case review documentation that may be required is completed when and if requested. Please see "Procedures on the death of a student" for further guidance.
- 4.14. **Forced Marriage and so called "honour" based abuse.** EMS recognises that forced and arranged marriages are different. All staff need to be vigilant to recognise the signs of students at risk of Forced Marriage and to inform the DSL and the authorities. The DSL has training in spotting and supporting victims of forced marriage. We are aware that 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.
- 4.15. **Ritualistic abuse & Genital Mutilation, including Female genital mutilation and circumcision.** EMS recognises that all staff need to be vigilant to recognise the signs of students at risk of this abuse and to inform the DSL and the authorities in accordance with section 5B of the FGM Act 2003. The DSL has training in spotting and supporting victims of FGM. For more information, please see appendix 4.
- 4.16. **Sexually harmful behaviour/Sexual Abuse/Child Sexual Exploitation –** ([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)) Involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. If the victim is under 18 and there is an imbalance of power the act is classed as Child Sexual Exploitation. The management of children and young people with a history of sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole School community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff should consider a child to be at potential CSE risk in the case of regular school absence/truanting and make reasonable enquiries with the child, parents and carers to assess this risk. The DSL will use the [Devon Children and Families Partnership CSE Screening Tool](#) on all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited. In

all cases if the tool identified any level of concern the DSL should contact their local MAST and email the completed CSE Screening Tool along with a MASH enquiry form. If a child is in immediate danger the police should be called on 999.

- 4.17. **Sexual violence and sexual harassment** – Exeter Mathematics school recognises the need to acknowledge and understand the scale of harassment and abuse and how downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to students accepting it as normal and not coming forward to report it. EMS has a zero-tolerance approach to sexual violence and sexual harassment, it is never acceptable, and it will not be tolerated. We work hard to promote an open culture and reduce the barrier to reporting including the provision of anonymous mechanism of referring or self-referring to the safeguarding team.
- 4.18. **Youth produced sexual imagery** - All incidents of Under 18s sharing, possessing and creating sexual images and videos of themselves or other juveniles will be treated as a safeguarding concern and in line with the guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'. In the process of referral Staff must not view, copy or print the youth produced sexual imagery. This includes offences under upskirting<sup>1</sup> legislation (Voyeurism Offences Act 2019) and other image based sexual abuse.
- 4.19. **Online safety** - Please refer to the School's Online-safety policy and appendix 7 for further details.
- 4.20. **Missing people/trafficking** - Missing children and young people. A child/young person going missing from education is a potential indicator of abuse and neglect, including modern slavery, sexual abuse and Trafficking. We will monitor absence and take appropriate action.
- 4.21. **Private fostering** – There is correlation between private fostering and increased risk of abuse. Staff should be alert for students cared for by someone other than a parent or a close relative for extended periods (28 days or more),
- 4.22. **CiC/ LAC** - The most common reason for students becoming looked after is as a result of abuse or neglect. EMS ensures that staff have the necessary skills and understanding to keep 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. The DDSL is the named contact for CiC and works closely on this issue with the DSL.
- 4.23. **Child on child abuse** - All staff should recognise that young people are capable of abusing their peers. This policy applies to all, regardless of age, gender, etc. Research indicates that young people rarely disclose abuse by peers and that if they do, it is likely to be to their friends. Therefore, EMS will also educate students in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice. For more information, please see appendix 2 and 3.
- 4.24. **Child Criminal Exploitation (CCE)** is a form of abuse similar to CSE - where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal rather than sexual activity. In our local context "County Lines" is a significant issue. A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children, young people and adults - often with mental health or addiction problems - to act as drug runners or move cash so they can stay under the radar of law enforcement.
- 4.25. **Honour based abuse (HBV)** - A collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. 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.

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<sup>1</sup> Upskirting is a term used to describe the act of taking a sexually intrusive photograph underneath a person's clothing without their permission. NB this is now a reportable criminal offense

- 4.26. **Extra-familial harms**- take a variety of different forms and children and young people can be vulnerable to multiple harms including (but not limited to) domestic abuse in their own intimate relationships (teenage relationship abuse), serious youth violence, county lines, sexual exploitation, radicalisation and/or criminal exploitation. See KCSIE (2023) paragraph 23. The DSL has attended training on Adolescent Safety Framework used within DCC to support young people at risk of Contextual Safeguarding
- 4.27. **Vulnerable groups and protected characteristics.** -To ensure that all our students receive equal protection, we will give special consideration to children, young people and vulnerable adults who are members of vulnerable groups including, but not limited to:
- 4.27.1.1. Disabled or have special educational need including students with Educational Health Care Plans.
  - 4.27.1.2. Young carers
  - 4.27.1.3. Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
  - 4.27.1.4. Students affected by their own and/or parental/carer illness, incarceration, substance misuse, domestic abuse or parental/carer mental-health needs
  - 4.27.1.5. Asylum seekers and refugees
  - 4.27.1.6. Those vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, sexuality or gender identity.
  - 4.27.1.7. Those at higher risk of female genital mutilation (FGM), forced marriage or extremism
  - 4.27.1.8. Living in temporary accommodation or at risk of being homeless.
  - 4.27.1.9. Is a privately fostered child or young person.
  - 4.27.1.10. Is misusing drugs or alcohol themselves.
  - 4.27.1.11. Is experiencing mental health, wellbeing difficulties.
  - 4.27.1.12. Vulnerable to being bullied, or engaging in bullying,
  - 4.27.1.13. Is a 'looked after' child (LAC) or a child in care or who has returned home to his/her family from care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care.
  - 4.27.1.14. Does not have English as a first language.
- 4.28. **Preferred Pronouns and Names** – EMS will always respect a student's identity and gender expression. When a student informs EMS of a change to noun/pronoun/identity we will make all required changes on our systems. To ensure no accidental outing of a student's identity we request that students make parents/carers aware of their request to the school before these changes are made. We will support students to tell parents and/or carers where necessary. N.B A request to change legal sex (as assigned at birth) needs to be accompanied by a gender recognition certificate or other relevant documentation.
- 4.29. **Other stakeholders**
- 4.29.1.1. Governors at the school receive Child Protection training on a 3, yearly basis. The Governing Body has identified a Governor and deputy who are responsible for Child Protection and Safeguarding within the School. This will be reviewed on an annual basis.
  - 4.29.1.2. All parents/carers are made aware of Exeter Mathematics School's responsibilities with regard to child protection through the publication of the Child Protection Policy, and reference to it, on the Exeter Mathematics School website. Parents/carers also receive information which includes relevant safeguarding information when their child begins their education at Exeter Mathematics School.



#### 4.30. **Safer Recruitment**

- 4.30.1.1. Selection and recruitment of staff includes all appropriate checks on staff suitability, according to Safer Recruitment guidelines and will be compliant with the requirements of the Independent Safeguarding Authority, including cursory online and social media checking.
- 4.30.1.2. Adverts should inform candidates that online searches may be done as part of due diligence checks.
- 4.30.1.3. Our policy and procedures will be updated at least annually or when we are notified of any legislative changes.
- 4.30.1.4. All staff new to Exeter Mathematics School will be shown how to access the child protection policy, the Staff Handbook (including code of conduct), Child Protection Procedure flow chart and the latest version of KCSIE part 1. These will be explained as part of their induction.
- 4.30.1.5. All new staff will undertake Child Protection and Safeguarding training as part of their induction to working at Exeter Maths School.

#### 4.31. **Responsibilities**

- 4.31.1.1. We understand that our responsibility to safeguard children, young people and vulnerable adults requires that we all appropriately share any concerns that we may have about them.
- 4.31.1.2. **The monitoring of child protection and safeguarding of students within the School.** The DSL acts as a focal point for staff to discuss concerns and liaise with other agencies and professionals.
- 4.31.1.3. **Communication with the Deputy safeguarding lead.** The DSL meets with the DDSLs informally on a daily and formally on a weekly basis.
- 4.31.1.4. **Encouraging a culture of listening to young people and taking account of their wishes and feelings.** The DSL ensures that all staff are aware of the Child Protection policy and the safeguarding guidelines and know how to recognise and refer any concerns

#### Governors

All members of The Governing Body understand and fulfil their responsibilities, namely, to ensure that there is a Child Protection and Safeguarding policy together with a Staff Behaviour policy (Code of Conduct) and a qualified DSL is in place with suitable time to fulfil the role. We ensure that all governors and trustees receive appropriate safeguarding and child protection training at induction which equips them with the knowledge to provide strategic challenge and to test and assure themselves that the safeguarding policies and procedures in place at Exeter Maths school are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly updated

#### Roles and responsibilities will include:

- Child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with the Local Authority and statutory requirements, are reviewed annually and that the Child Protection and Safeguarding policy is publicly available.
- Ensures that all staff including temporary staff and volunteers are provided with the Child Protection and Safeguarding policy and staff Code of Conduct.
- EMS operate a safer recruitment procedure that includes statutory checks on staff, disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training.
- EMS has procedures for dealing with allegations of abuse against staff (including the Headteacher), supply staff, volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned.

- A member of the Governing /Board, is nominated to liaise with the Local Authority on Child Protection issues and in the event of an allegation of abuse made against the Headteacher.
- A member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) by the Governing Body/Board who will take lead responsibility.
- On appointment, the DSL and deputies undertake appropriate Level 3 identified training offered by the Local Authority or other provider every two years.
- All other staff have safeguarding training updated as appropriate; but at least annually.
- At least one member of the governing body has completed safer recruitment training to be refreshed at least every five years.
- Appropriate online filtering and monitoring systems are in place via Exeter College.
- Enhanced DBS checks at the appropriate level are in place for all Governors.
- Any weaknesses in Child Protection are remedied immediately.

The Headteacher: The Headteacher supports the governing body, designated safeguarding lead, deputies, staff and volunteers to fulfil their roles and responsibilities

Roles and responsibilities will include:

- Ensuring the Child Protection and Safeguarding policy and procedures are implemented and followed by all staff
- Enabling sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and DDSLs to carry out their roles effectively.
- Supporting and promoting a safeguarding culture and ethos in EMS so that students' wishes and feelings are considered when determining what action to take and what services to provide.
- Ensuring systems are in place for students to express their views and give feedback.
- Following the whistleblowing policy and procedures if an allegation is made against a member of staff, supply staff or volunteer all staff, including liaising with the Local Authority Designated Officer (LADO) and referring anyone who has harmed or may pose a risk to a child to the Disclosure and Barring Service.
- Providing students with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.

The Designated Safeguarding Lead (DSL): The designated safeguarding lead has lead responsibility for safeguarding and child protection (including online safety).

Roles and responsibilities include:

- Availability – being available during school hours or ensuring a Deputy Designated Safeguarding Lead is onsite.
- Management of referrals – to e.g., Children's Social Care, Channel programme, Disclosure and Barring service, the Police Single Point of Access.
- Leading Prevent, ensuring all staff are aware of their duty under Prevent legislation.
- Working with others – e.g. a point of contact with safeguarding partners, a source of support and advice for staff,
- Being aware of the requirement for students to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- Ensuring that either they, or another safeguarding staff member, attend case conferences, core groups, or other multi-agency planning meetings and contribute to assessments.
- Ensuring that any student currently with a child protection plan who is absent from school without explanation for two days is referred to their key worker's MASH Team.
- Maintaining positive working relationships with external agencies including but not limited to; CAMHS, Early Help, Exeter College Student Support, Medical professionals, LADO, Local Authority Safeguarding Teams, Prevent/Chanel.
- Being the named contact for Operation Encompass.

- Understanding locally agreed processes for providing early help and intervention and supporting members of staff where Early Help is appropriate.
- Promoting supportive engagement with parents and/or carers and the SLT/Governing body
- Information sharing and managing the child protection files on arrival at EMS and on their departure.
- Ensuring all safeguarding records are kept up to date and securely.
- Raising Safeguarding and Child Protection Awareness
- Ensuring all new Exeter Mathematics School staff are trained in Safeguarding and Prevent as part of their induction and a level two course is completed in line with KCSIE requirements.
- Ensuring governors are appropriately trained at induction and given annual refresher training
- Ensuring each member of staff has access to the Exeter Mathematics School Child Protection policy and KCSIE pt1.
- Ensuring all staff receive regular up to date safeguarding information and training, including understanding roles and responsibilities in relation to filtering and monitoring.
- Pursuing their own CPD and attending any relevant training or refresher courses at least every 2 years; updating training, knowledge, and skills as required to carry out the role of DSL
- Providing support to all staff in relation to safeguarding concerns
- Overseeing and acting upon filtering and monitoring reports and completing checks to this system.
- Ensuring Students are taught an effective Pastoral Curriculum which supports students being able to identify and manage risks including online safety.
- Ensuring that the Statutory 175/157 safeguarding audit is completed annually.
- Monitor attendance to ensure appropriate safeguarding arrangements are in place for students whom are absent from education on repat occasions and/or for prolonged periods.

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

All Staff –

Roles and responsibilities will include:

- maintaining an attitude of 'it could happen here' where safeguarding is concerned.
- identifying concerns early, provide help for students and promote student's welfare.
- providing a safe environment in which students can learn.
- knowing what to do if a student tells them they are being abused, exploited, or neglected.
- being able to reassure victims of abuse that they are being taken seriously and that they will be supported and kept safe.
- recognising the barriers for students when wanting to make a disclosure (verbal or non-verbal)
- raising any concerns for a child following our safeguarding policies and procedures
- being aware of local authority referral processes
- adhering to Teachers' Standards 2012 - that teachers (which includes headteachers) should safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Being aware of systems within school which support safeguarding e.g. safeguarding policy, behaviour policy, code of conduct, CME, online filtering, and monitoring
- Attending regular safeguarding and child protection training including in house briefings and online training.

- Recognising that students missing, or absent education can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation.

#### 4.32. Confidentiality

- 4.32.1.1. Exeter Mathematics School recognises that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm the school must contribute to inter-agency working in line with Working Together to Safeguard Children (2018) and share information between professionals and agencies where there are concerns.
- 4.32.1.2. All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student and staff involved but also to ensure that information being released into the public domain does not compromise evidence.
- 4.32.1.3. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children, young people and vulnerable adults.
- 4.32.1.4. All staff must be aware that they cannot promise a child, young person or vulnerable adult to keep secrets which might compromise the safety of themselves, or of another.
- 4.32.1.5. Staff are made aware that they must make a record of Child Protection issues as soon as possible, within 24 hours, and that these records must be signed and dated.
- 4.32.1.6. We will always undertake to share our intention to send an enquiry to the appropriate Multi Agency team with their parents/parents unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with the Multi agency team before taking any action.
- 4.32.1.7. Every effort will be made to prevent unauthorised access, and sensitive information should not routinely be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is ever necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage. Child protection information will be stored separately from a student's other records.
- 4.32.1.8. Child protection records are normally exempt from the disclosure provisions of GDPR and the Data Protection Act, which means that children and parents and carers do not have an automatic right to see them. The Data Protection Act does not prevent college staff from sharing information with relevant agencies, where that information may help to protect a child or support a criminal investigation.
- 4.32.1.9. Staff should only discuss concerns with the DSL, headteacher/principal 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.
- 4.32.1.10. However, following a number of cases where senior leaders in school had failed to act upon concerns raised by staff, Keeping Children Safe in Education (2023) emphasises that any member of staff can contact students' social care if they are concerned about a child.
- 4.32.1.11. Child protection information will be stored and handled in line with GDPR and the Data Protection Act 2018 and HM Government Information Sharing and Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018  
Information sharing is guided by the following principles:

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

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

#### 4.33. **Supporting Staff**

4.33.1.1. We recognise that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful or upsetting.

4.33.1.2. We will support such staff by providing an opportunity to talk through their anxieties and to seek further support. This could be provided by, for example, the Exeter College's occupational health nurse, Employee Assist programme, our wellbeing support team or an external provider.

4.33.1.3. We understand that staff should have access to advice on the boundaries of appropriate behaviour. The document 'Guidance for Safe Working Practices for Adults who work with Children and Young People in Education settings' (2019) provides advice on this and the circumstances which should be avoided in order to limit complaints against staff of abuse of trust and/or allegations of physical or sexual abuse. Safeguarding in education is a part of the Staff development programme.

#### 4.34. **Allegations Against Staff**

4.34.1.1. All staff should take care not to place themselves in a vulnerable position with a child, young person or vulnerable adult.

4.34.1.2. Lone working. It is always advisable for interviews or work with individual children/young people/vulnerable adults or parents/carers to be conducted in view of other adults.

4.34.1.3. We understand that anyone may make an allegation against a member of current or historical staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the DSL. If an allegation is made against the DSL, the member of staff receiving the allegation must immediately inform the Headteacher. The full procedures for dealing with allegations against staff can be found in Keeping Children Safe in Education (DfE, 2023).

4.34.1.4. The DSL on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) service (01392 384964 or [ladosecure-mailbox@devon.qcsx.gov.uk](mailto:ladosecure-mailbox@devon.qcsx.gov.uk)).

4.34.1.5. Suspension of the member of staff against whom an allegation has been made needs careful consideration. We will take advice in consultation with Exeter College's Head of Human Resources and the LADO where appropriate.

4.34.1.6. **Low-level Concerns** - EMS recognises the need for having and maintaining a culture where all concerns about all adults working in or on behalf of the school or college

- (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Even if they do not meet the threshold for LADO intervention.
- 4.34.1.7. We will ensure staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others through the staff guidance documents and induction materials
- 4.34.1.8. We empower staff to share any low-level safeguarding concerns by making training on power-imbalance and suspicious behaviour a key part of updates and training.
- 4.34.1.9. Low level concerns can be reported to the Headteacher directly or indirectly through the safeguarding lead.
- 4.34.1.10. EMS recognises that it is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately to maintain and embed a culture of openness, trust and transparency. If there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult the LADO.
- 4.34.1.11. On receipt of a concern the Headteacher or the safeguarding lead will investigate sensitively and proportionately and take action that addresses unprofessional behaviour and supports the individual to correct it at an early stage
- 4.34.1.12. Low level concerns might include behaviour that: is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, being over friendly with students, having favourites, taking photographs of students on their mobile phone, contrary to school policy, engaging with a student on a one-to-one basis in a secluded area or behind a closed door, humiliating students.
- 4.34.1.13. For further direction on Low Level Concerns see appendix 10.

#### 4.35. **Whistle blowing**

- 4.35.1.1. We recognise that children, young people and vulnerable adults cannot be expected to raise concerns in an environment where staff fail to do so.
- 4.35.1.2. All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues. If necessary, they should speak to the DSL and/or the Headteacher. Please see our Whistleblowing policy for more information.

#### 4.36. **Behaviour and Safeguarding**

- 4.36.1.1. All students will be aware of the 'Student Code of Conduct'. The Student Code of Conduct is linked to the student disciplinary process.
- 4.36.1.2. All staff, teaching and support, should be aware of their duty to challenge inappropriate and/or extreme behaviour in the School in order to safeguard all students and staff. The staff code of conduct is discussed at induction training.

#### 4.37. **Physical Intervention**

- 4.37.1.1. Our policy is not to use physical intervention. If a situation has deteriorated to such a point as physical restraint is necessary then the police should be called. It is not realistic to intervene between adults in a safe fashion.
- 4.37.1.2. We recognise that touch can be appropriate in the context of working with students, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundary.

## 5. Recognising and Responding to Safeguarding Concerns

- 5.1. Any child, in any family, in any school, could become a victim of abuse. Staff should always maintain an attitude of “It could happen here”. We also recognise that abuse, neglect, and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.
- 5.1.1. Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children and young people may be abused in the family or in an institutional or community setting by those known to them or, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.
- 5.1.2. Abuse and Neglect may also take place outside of the home, contextual safeguarding, and this may include but is not limited to, sexual exploitation criminal exploitation, serious youth violence, radicalisation.
- 5.1.3. Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting put students in danger and that safeguarding issues can manifest themselves via child-on-child abuse.
- 5.1.4. There will be occasions when staff may suspect that a student may be at risk but have no ‘real’ evidence. The student’s behaviour may have changed; for example, they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed. EMS recognises that the signs may be due to a variety of factors, for example, a parent/carer has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. However, they may also indicate a child is being abused or needs safeguarding.
- 5.1.5. Further information about the four categories of abuse; physical, emotional, sexual and neglect, (familial and contextual) and indicators that a child may be being abused can be found in appendices 1.

### 5.2 Responding

5.2.1 If a staff member has a concern about the safeguarding of a student, they should discuss their concerns with the DSL and put them in writing using BROMCOM, the schools reporting system. Records should include:

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

All concerns however small must be recorded and shared with the DSL as this information could provide the ‘missing’ piece of the bigger picture of the lived experience for the child.

If a student discloses to a member of staff
<ul style="list-style-type: none"><li>• We recognise that it takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, guilty, or scared; their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault.</li><li>• Sometimes they may not be aware that what is happening is abuse.</li><li>• A child who makes a disclosure may have to tell their story on several subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.</li></ul>

Throughout the conversation with the student the staff member will;

- listen to what the child has to say and allow them to speak freely.
- remain calm and not overact or act shocked or disgusted – the student may stop talking if they feel they are upsetting the listener.
- reassure the child that it is not their fault and that they have done the right thing in telling someone.
- not be afraid of silences – staff must remember how difficult it is for the student and allow them time to talk.
- take what the child is disclosing seriously.
- ask open questions but avoid asking leading questions.
- avoid jumping to conclusions, speculation or making accusations.
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused.
- avoid admonishing the child for not disclosing sooner. Saying things such as ‘I do wish you had told me about it when it started’ may be the staff member’s way of being supportive but may be interpreted by the child to mean they have done something wrong.
- tell the child what will happen next, that they cannot keep secrets and that information will be shared to ensure the right level of support is given.

#### Notifying Parents/carers

Exeter Maths school will normally seek consent from the student to discuss any concerns about a student with their parents/carers. This must be handled sensitively and normally the DSL/DDSL will contact the parent in the event of a concern, suspicion, or disclosure of abuse of that the child has been harmed in some way.

However, if we believe that notifying parents/carers could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s Local Authority Safeguarding Hub e.g., familial sexual abuse.

Where a student refuses consent for parents/carers to be spoken to, the DSL/DDSL will consult with the Safeguarding Hub.

Where there are concerns about forced marriage or honour-based abuse parents/carers should not be informed a referral is being made as to do so may place the child at a significantly increased risk. In some circumstances it would be appropriate to contact the police.

If concern is raised about a student’s safety and a student has refused consent to notify parents/carers the DSL/DDSL will determine the level of risk. If the student is at risk of immediate and/or significant harm then the DSL/DDSL are able to override the student’s wishes and contact the parents/carers to ensure the safety of that student.

#### Making a referral



Concerns about a child or a disclosure should be immediately raised with the DSL who will help decide whether a referral to children's Local Authority Safeguarding Hub or other support is appropriate in accordance with The Local Authority Threshold Tool.

If safeguarding staff are uncertain about whether a concern raised should be referred to the Local Authority Safeguarding Hub, a consultation will be sought with the Local Authority to seek further support and guidance.

If a referral is needed, the DSL should make this rapidly within the working day. Anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can, and should consider making a referral themselves.

## 6. Implementation

### 6.1. Photography, Video, Images and other Media

To protect students, we will

- 6.1.1.1. seek their consent for photographs to be taken or published (for example, on our website or newspapers or publications)
- 6.1.1.2. seek parental/carer consent for under 18's
- 6.1.1.3. use only the student's first name with an image
- 6.1.1.4. ensure students are appropriately dressed
- 6.1.1.5. encourage students to tell us if they are worried about any photographs that are taken of them.

### 6.2. Building Security

- 6.2.1.1. Access to the site is controlled at all points. To the rear of the property the student's entrance is accessed only by student/staff identity keycards through a security gate.
- 6.2.1.1.1. The student access is controlled by the student/staff keycard access and monitored by CCTV. Access for students ceases out of school hours.
- 6.2.1.1.2. Access to the main school entrance at the front of the building is controlled by reception staff.

#### 6.2.2 Use of Safer Recruitment and Single Central Record

##### Overview

This guidance is provided to ensure that requirements contained within KCSIE 2023 in regards to the above groups has been disseminated to staff, that the necessary checks listed below have been carried out and that there are agreed procedures in place at reception for the management of visitors to school.

##### Legal Background

The recruitment and engagement of personnel within education is regulated by KCSIE 2023

##### Single Central Record

EMS is responsible for collating above information for agency staff, contractors and for obtaining letters of assurance from other organisations, and for providing this to the Senior People Business Partner at Exeter College who manages the SCR on behalf of school. The Senior People Business Partner will advise on maintenance of SCR to ensure completeness and compliance.

## Visitors

- 6.2.2 All visitors must sign-in at reception. Here they are issued with an ID badge and asked to read basic details for fire safety and safeguarding expectations.
  - 6.2.2.1 Lanyards are colour coded to show status of staff. Red for non-DBS visitors, Green for Governors, Volunteers or other visitors that have been through our safeguarding checks. Blue is for members of staff.
  - 6.2.2.2 Students are asked to report any guests without badges to a member of staff immediately. Staff are expected to reinforce the above in the case of non-adherence or contact a member of SLT.
  - 6.2.2.3 Unexpected or unknown visitors are refused entry until they are cleared by SLT/appropriate member of staff.

## 6.3. Contractors:

- 6.3.1 To ensure that as far as possible only bona fide personnel are afforded access; all contractors can only attend the school by arranged appointment, agreed by a member of the Senior Leadership Team.
- 6.3.2 All contractors shall need to provide a suitable means of identification on arrival.
- 6.3.3 If a contractor fails to adhere to either of these points; they shall be refused entry to the site.
- 6.3.4 On arrival, all approved contractors shall be issued with a school ID badge and these shall be worn and be visible at all times when the contractor is on site.
- 6.3.5 A contractor's code of conduct will be used to inform all contractors what might be considered inappropriate behaviour at the school. This will enable the school to identify any inappropriate behaviour from all concerned and then effectively challenge it.
- 6.3.6 Code of conduct for contractors. When on site, contractors should:
  - 6.3.7 Work safely and responsibly and be aware of responsibility for own actions and behaviour.
  - 6.3.8 Avoid any conduct which would lead any reasonable person to question their motivation and intentions. Remember that actions, no matter how well intentioned, could be misinterpreted.
  - 6.3.9 Never give their personal or professional contact details to students, visiting children or other young people, including any telephone number, address or form of social media. Any and all contact should be monitored/mediated by an EMS representative.
  - 6.3.10 Work and be seen to work, in an open and transparent way.
  - 6.3.11 Stay within the agreed work area and access routes.
  - 6.3.12 Obtain permission, if need arises, to go outside the agreed work area or access routes.
  - 6.3.13 Keep staff informed of where they are and what they are doing.
  - 6.3.14 Dress and act professionally – No profane or inappropriate language.
  - 6.3.15 Be mindful of the need to avoid placing themselves in vulnerable situations.
  - 6.3.16 Wear allocated School ID badge at all times on site.
  - 6.3.17 Failure to adhere to the contractors' code of conduct will entitle the school to exclude such individuals from the site, and notify a senior representative of their organisation. More serious breaches of safeguarding protocol will automatically be reported to the appropriate agency immediately. Appropriate agencies may include Police and Counter terrorism services.

EMS recognise that we must ensure that requirements contained within KCSIE 2023 in regards to the above groups has been disseminated to staff, that the necessary checks listed below have been carried out and that there are agreed procedures in place at reception for the management of visitors to school. Please see Appendix 9 for further details

## 6.4. OUTDOOR LEARNING and Residential Accommodation Supplementary guidance/procedures.

### Residential Centres if used on a residential trip

- 6.4.1 When young people are changing, and showering staff need to ensure that they do not allow themselves to be compromised.
- 6.4.2 Staff must ensure that they do not enter a bedroom when to do so would mean they would be alone with a young person with the door closed.
- 6.4.3 The relaxed social atmosphere often found in residential centres could lead to a young person making a disclosure to staff regarded as a trusted adult. The young person should be listened to and Exeter Mathematics School safeguarding policy should then be followed.

### Boarding Accommodation

- 6.4.4 Specific advice and staff code of conduct are provided to all residential workers
- 6.4.5 Staff must follow the policies and procedures as outlined in the residential staff handbook.
- 6.4.6 All staff supervising students in EMS accommodation are trained in child protection and safeguarding.

### Homestay Hosts

- 6.4.7 The school does not current use homestay accommodation.

### Outdoor Learning Activities

- 6.4.8 Many activities encourage and necessitate physical contact. Staff need to be aware of anyone taking advantage of these activities *or* anyone being overtly uncomfortable with what they are being asked to participate in.
- 6.4.9 Some activities can be emotionally or mentally challenging. Staff need to be aware of the varying boundaries and capacity to manage these demands of individual young people.
- 6.4.10 There will be times when staff need to make physical contact with young people, e.g. when supporting during climbing or caving, making adjustments to specialist equipment. Staff need to ensure that they do not allow themselves to be compromised. Refer to the DFE Policy on Physical Contact between Staff and Students.
- 6.4.11 The relationship between staff and young people during outdoor learning activities is often an informal one; staff must always ensure that they maintain their professional distance.
- 6.4.12 The relaxed and informal atmosphere often found during outdoor learning activities could lead to a young person making a disclosure to staff regarded as a trusted adult. Exeter Mathematics School policy should be followed.

## 7. Associated Documentation

- 7.1 Anti-Bullying Policy
- 7.2 Online safety Policy
- 7.3 Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings
- 7.4 Lone-working Policy
- 7.5 Residential Privacy and Access Policy
- 7.6 Student Code of Conduct
- 7.7 Staff Code of Conduct
- 7.8 Substance misuse policy
- 7.9 Health and Safety Policy
- 7.10 Equality & Diversity Policy
- 7.11 Educational Visits Policy

- 7.12 Safer Recruitment Policy
- 7.13 Pastoral & Accommodation Officer Handbook
- 7.14 Prevent Risk Assessment
- 7.15 Procedures on the death of a student
- 7.16 Electronic Communications code of practice
- 7.17 Student behaviour management policy
- 7.18 ICT acceptable use agreement
- 7.19 Whistleblowing policy

## **8. Monitoring, Review and Evaluation**

- 8.1. The DSL and Governors of Exeter Mathematics are responsible for ensuring the regular review of this policy.

## 9. Equality analysis

The following equality analysis section should be completed by the policy holder as part of every policy review and carries the same date as the main policy. EAs are particularly helpful in revealing any unintended, indirect discrimination.

Under the Equality Act (2010) we have a duty to;

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

We need to consider each protected characteristic individually and in combination. The interaction of different layers of characteristics is called intersectionality. This recognises that the barriers for each group are not homogenous, and instead are a combination of layers of identity interacting. For further detail or to support the completion of the following, please see our equality and diversity policy.

<p>1. <b>Evidence considered</b> <i>What data or other information have you used to evaluate if this proposal is likely to have a positive or an adverse impact upon protected groups when implemented? Where were information gaps, and what steps can you take to remedy these gaps? Can the RM intelligence Dashboard (student counts) provide any insight into which protected characteristics are likely to be affected by the changes?</i></p> <p>Awareness of the legislative and regulatory demands on safeguarding are the primary drivers of policy and implementation. The policy has, at heart, the protection of those vulnerable and protected groups.</p>					
<p>2. <b>Consultation.</b> <i>How have you consulted staff and student communities and representatives including those from protected groups? What were their views? Who else has been consulted in this proposal?</i></p> <p>Staff and governors are consulted in the writing of this.</p>					
<p>3. <b>Promoting equality.</b> <i>Does this policy have a positive impact on equality? What evidence is there to support this? Could it do more?</i></p> <p>This policy is aimed at resolving the impact of inequality and thereby underpins the other policies taking a proactive approach to equality across the school.</p>					
<p>4. <b>Identifying the impact of policies</b>            Identify any issues in the document which could have an adverse impact on any people who are protected by the Equality Act 2010. The protected characteristics are:</p> <ol style="list-style-type: none"> <li>1. Age</li> <li>2. Disability</li> <li>3. Gender reassignment</li> <li>4. Marriage and civil partnership</li> <li>5. Pregnancy and maternity</li> <li>6. Race</li> <li>7. Religion or beliefs</li> <li>8. Sex</li> <li>9. Sexual orientation</li> </ol>					
Issue Assessed <i>E.g. policy section or practice.</i>	Protected Group	Impact and Evidence <i>What are the possible impacts on people from the protected groups above, and</i>	Justification <i>Can the issue be justified for academic</i>	Proposed Action/Timeline <i>If this has a negative impact, what will you do</i>	Person responsible for action(s)

		explain how you have made that assessment. Are these impacts positive or negative?	business reasons? Please explain.	to reduce, minimise or eliminate negative impact? If this has a positive impact, how will you promote, develop or utilise this opportunity?	
5.	<b>Monitoring</b>	How will you monitor the actual impact that your proposal has had following its implementation? When will you do this?			
		This policy is reviewed at least annually			
6.	<b>Summary</b>	Summarise the outcome of this Equality Assessment, and state any actions you will be taking as a result. No Actions			

*For further information regarding any child protection procedure, please consult*

*<https://www.proceduresonline.com/swcpp/>*

**Other useful Contacts:**

Devon Early Years and Childcare Service [www.devon.gov.uk/eycs](http://www.devon.gov.uk/eycs)

Child Exploitation and Online Protection Agency [www.ceop.org.uk](http://www.ceop.org.uk)

NSPCC Safe (Safe Activities for Everyone) Network [www.safenetwork.org.uk](http://www.safenetwork.org.uk)

Local Authority Designated Officer (LADO) - [ladosecure-mailbox@devon.gcsx.gov.uk](mailto:ladosecure-mailbox@devon.gcsx.gov.uk)

01392 384964

**Multi-agency Safeguarding Hub (MASH) 0345 155 1071**

email: [mashsecure@devon.gcsx.gov.uk](mailto:mashsecure@devon.gcsx.gov.uk)

**MASH Consultation Line** 0345 155 1071 (ask for Consultation Line)

**Early Help co-ordination centre** 0345 155 1071 (ask for Early Help)

**Out of hours for CYPS (Social Care):**

5pm -9am and at weekends and public holidays, please contact:

Emergency Duty Service 0845 6000 388 (low-rate call)

**Police Central Referral Unit:** 0845 605 116

**Early help Consultation Service:**

If you have concerns about a child but are unsure whether to make a Social Care referral. The numbers are available here: <https://www.dcfp.org.uk/document/early-help-locality-contact-information/>

**DCFP**

Head of Safeguarding: 01392 386091

DCFP Office: 01392 383000

Child Protection Chairs and Local Authority Designated Officers for managing allegations against staff:

Allegations against staff Referral Co-ordinator 01392 384964

**Devon's Domestic Abuse Helpline**

0345 155 1074

*The above list is not exhaustive and as new policy guidance and legislation develops within the remit of Safeguarding we will review and update our policies and procedures as appropriate and in line with the Devon Safeguarding Children Board and Local Authority.*

Further information on Appendix 8

## Appendix 1

### Recognising signs of child abuse

#### Categories of Abuse:

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

#### Signs of Abuse in Children:

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

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age-inappropriate sexual behaviour
- Child Sexual Exploitation.

#### 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 or carers
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

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



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/carers are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

### Bruising

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

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

### Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

### Burns and Scalds

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

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

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

### Fractures

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

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type

- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

## Scars

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

## Recognising Emotional Abuse

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

The following may be indicators of emotional abuse:

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

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

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

Some behavioural indicators associated with this form of abuse are:

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

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

## 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 unresponsive 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 Abuse & Sexual Harassment.

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children. Staff should be vigilant to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual abuse and sexual harassment
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type abuse and rituals

This abuse may be perpetrated and suffered by students of all ages and we are wary to child on child cases.

Developmental Sexual Activity Encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

#### Inappropriate Sexual Behaviour

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

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

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

Consent – agreement including all the following:

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

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

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice is available in the Devon multi-agency protocol “Working with Sexually Active Young People” available at [www.devon.gov.uk/safeguarding](http://www.devon.gov.uk/safeguarding) by choosing Safeguarding Children – Protocols and Guidance for Professionals.

## Appendix 3

### Exploitation (incl Child Sex Exploitation, Child Criminal Exploitation & County Lines)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance could be due to age, gender, sexual identity, cognitive ability, physical strength, status, and /or access to economic or other resources. The abuse could be linked to an exchange for something the victim perceives that they need or want and/or will be to the financial benefit or other advantage (such as increase status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and adults or children (who themselves may be experiencing exploitation). The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when the activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. The experience of girls who are criminally exploited can be very different from boys, the indicators may not be the same and both boys and girls that are being criminally exploited may be at higher risk of sexual exploitation.

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

The DSL will use the appropriate Local Authority Assessment tool e.g. the Exploitation Toolkit, the Devon Children and Families Partnership Adolescent Safety Framework Safer Me Assessment<sup>2</sup> on all occasions when there is a concern that a child is being or is at risk of being sexually or criminally exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually or criminally exploited. These assessments will indicate to the DSL whether e.g. a Safer Me Early Help approach or referral to the Exploitation Hub/Local Authority Safeguarding Hub is required. If the DSL is in any doubt, they will contact the Safeguarding Hub consultation.

In all cases if the assessment identified any level of concern the DSL should contact their local MACE<sup>3</sup> (Missing and Child Exploitation) and email the completed (e.g. Safer Me) assessment along with a Safeguarding Hub enquiry form. If a child is in immediate danger the police should be called on 999.

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

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

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

Signs include:

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

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

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

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

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

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

## **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 abuse 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.

'Known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act 2003 .

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 Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

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

The 'One Chance' rule

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

**For further information see:** <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>



## Appendix 5

### Domestic Abuse and Violence (incl Operation Encompass)

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological 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, and 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.

How does it affect children?

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases children may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are at risk of significant harm.

What are the signs to look out for?

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

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

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

### Operation Encompass

Operation Encompass helps police and schools work together to provide emotional and practical help for children. Police will inform the 'key adult' within school if they have been called to an incident of domestic abuse, where there are children in the household before registration the next day.

## Appendix 6

### INDICATORS OF VULNERABILITY TO RADICALISATION

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

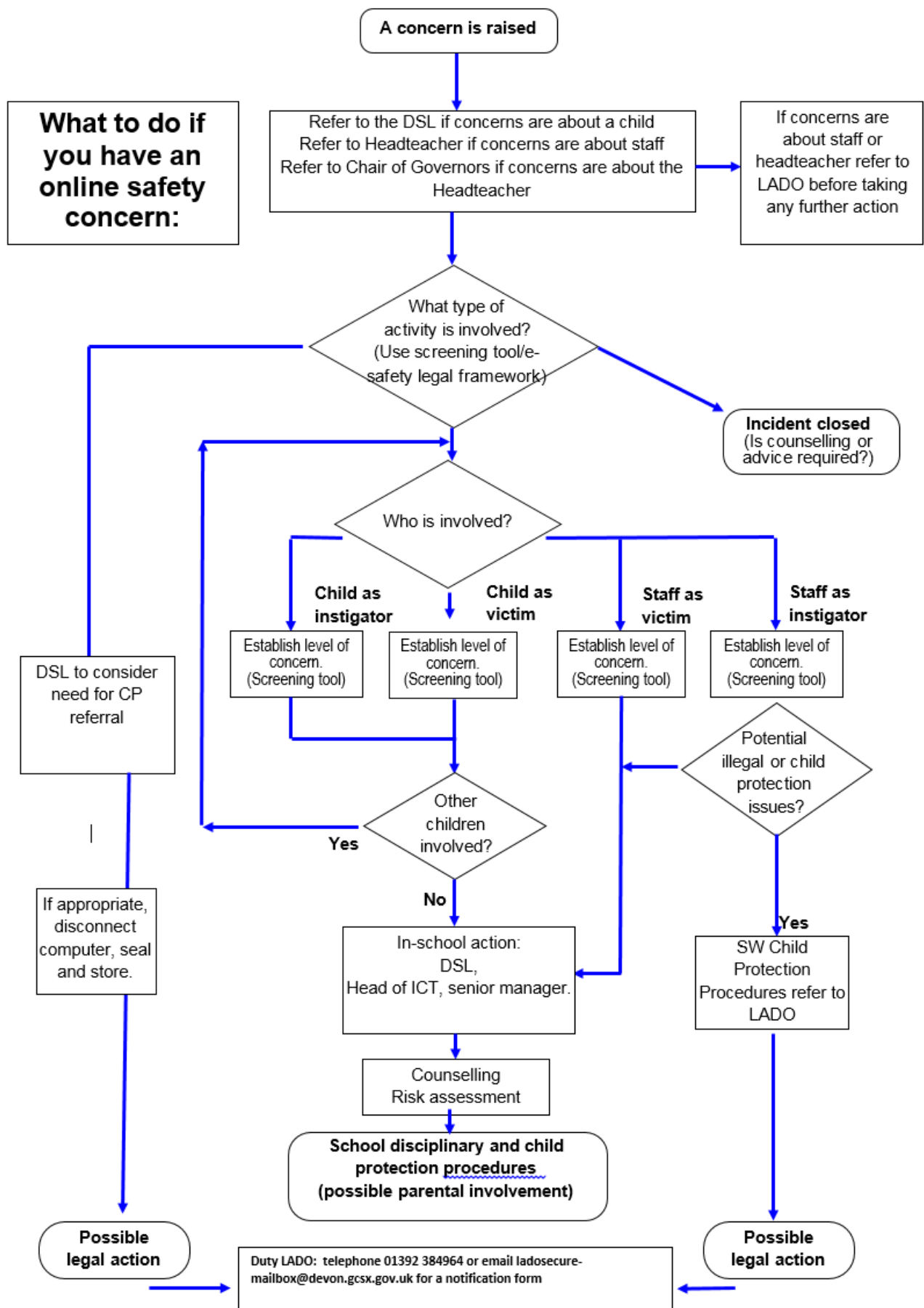
*Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country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

The demonstration of unacceptable behaviour by using any means or medium to express views which:

  - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - Seek to provoke others to terrorist acts;
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - Foster hatred which might lead to inter-community abuse in the UK.
4. 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.
5. Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
  - Identity Crisis – the student / student is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
  - Personal Crisis – the student / student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
  - Personal Circumstances – migration; local community tensions; and events affecting the student / student’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
  - Unmet Aspirations – the student / student 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 / students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. 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.
8. 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 abuse 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 8

Further advice on child protection is available from:

NSPCC: <http://www.nspcc.org.uk/>

Childline: <http://www.childline.org.uk/pages/home.aspx>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Beat Bullying: <http://www.beatbullying.org/>

Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents/carers <http://www.childnet.com/>

Thinkuknow (includes resources for professionals and parents/carers) <https://www.thinkuknow.co.uk/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Transgender <http://www.mermaidsuk.org.uk/>

[Schools transgender toolkit](#)

[Intercom trust transgender guidance](#)

**Devon - MASH**

Telephone: **0345 155 1071**

Email: [mashsecure@devon.gcsx.gov.uk](mailto:mashsecure@devon.gcsx.gov.uk)

Enquiry Form available at:

<https://www.dcfp.org.uk/training-and-resources/multi-agency-safeguarding-hub-in-devon/>

**Emergency Duty Team** out of hours **0845 6000 388**

**Police** non-emergency 101

**For all LADO enquiries**

Exeter (01392) 384964

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

**Early Help**

Locality Early Help Mailbox

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

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

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

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

For emergencies outside of office hours please call:

0345 600 0388 or 0845 600 0388

**Cornwall MARU**

Telephone - **0300 123 1116**

Email : [multiagencyreferralunit@cornwall.gov.uk](mailto:multiagencyreferralunit@cornwall.gov.uk)

Enquiry Form available at:

[www.cornwall.gov.uk/health-and-social-care/childrens-services/child-protection-and-safeguarding/](http://www.cornwall.gov.uk/health-and-social-care/childrens-services/child-protection-and-safeguarding/)

**Early Help**

Email: [earlyhelphub@cornwall.gov.uk](mailto:earlyhelphub@cornwall.gov.uk)

Telephone: **01872 322277**

[www.cornwall.gov.uk/earlyhelphub](http://www.cornwall.gov.uk/earlyhelphub)

**Somerset Social Care**

Telephone: **0300 123 2224**

Email : [childrens@somerset.gov.uk](mailto:childrens@somerset.gov.uk)

Emergency Out of Hours : **0300 123 23 27**

Enquiry Form available at : [www.professionalchoices.org.uk](http://www.professionalchoices.org.uk)

**Early Help**

**Telephone:** 01823 355803

**Dorset County Council**

**Childrens Advice and Duty Service (ChAD)**

Telephone: **01305228558**

For the most up to date contact details please contact - [South West Child Protection Procedures \(proceduresonline.com\)](http://proceduresonline.com)

## Appendix 9

### SAFER RECRUITMENT GUIDANCE for

- i) **Recruitment of Agency Staff**
- ii) **Contractors**
- iii) **Other visitors to school eg social workers, other professionals**
- iv) **Procedures – visitors to reception**

#### Overview

This guidance is provided to ensure that requirements contained within KCSIE 2023 in regards to the above groups has been disseminated to staff, that the necessary checks listed below have been carried out and that there are agreed procedures in place at reception for the management of visitors to school.

#### Legal Background

The recruitment and engagement of personnel within education is regulated by KCSIE 2023

##### i) **Engagement of Agency Staff**

KCSIE requires that school must obtain written notification from the supplying organisation that they have carried out the checks on the individual who will be working at school that we would otherwise have obtained. These checks are confirmed by the supplying organisation in a letter of assurance which states:

- For regulated work that an enhanced DBS with children's barring information has been obtained.
- For other work where there is the opportunity for contact with children that an enhanced DBS has been obtained
- School is also required to check that the person arriving for work, is the same person upon whom the checks have been made.
- In practice, this requirement can be met by having a list of agency staff expected for the day and checking this list against photo ID for each arrival.

Further, the supplying organisation may forward a copy of its safeguarding policy to confirm that the following recruitment checks have been carried out:

- ID
- right to work in the UK
- employment history has been reviewed and checked for completeness
- teacher qualifications (where relevant)
- that two satisfactory references have been taken up
- that the Teacher Regulation Agency website has additionally been accessed to make prohibition, direction or restriction checks
- 

##### ii) **Engagement of Contractors**

A contractor or any employee of the contractor coming onto site will have the opportunity to come into contact with children and therefore an enhanced DBS is required.

The contractor will be required to provide:

- A letter of assurance detailing names of employees and DBS details (disclosure number, date of issue and level of check) of individuals coming onto site,
- Copy of their safeguarding policy to include relevant recruitment checks as listed above,

##### iii) **Visitors from other organisations eg social workers, other professionals**

For visitors who are coming to school in a professional capacity, school can rely on a letter of assurance from the organisation that all its staff have been recruited in line with safer recruitment including enhanced DBS checks. Visitors will need to prove their identity using photo ID issued by the organisation.

#### **iv) Procedures - Visitors to reception**

The list of approved contractors, agency workers and other organisations to be used by reception is held on teams admin/reception/single central record and is updated from the single central record held centrally.

Generally, most visitors reporting to reception will either be visitors who have an appointment with a member of staff or contractors coming on site for maintenance or repair to equipment. Other visitors will include parents/carers, agency workers, Exeter College staff, governors and unscheduled visitors.

The following procedures should be followed in all instances:

1. All visitors to sign in and out, this to include name, organisation, who visiting, time in and time out.
2. a) Agency staff to be checked against the list of recognised companies and their identity checked against photo ID or by confirmation from a member of staff.  
b) Building contractors to be checked against the names of approved employees held for that contractor on the list and their identity checked against photo ID or by confirmation from a member of staff  
c) Invigilators and mentors and other workers will also be on the list and need to be checked as in 2(b)  
d) Other visitors coming to school to have the organisation that they work for checked to the list and their identity checked to the photo ID issued by their organisation.
3. A green lanyard can be given to all visitors who satisfy checks in item 2 above.
4. Governors will also be on the SCR list and to be issued with a green Governor lanyard.
5. A red lanyard is to be issued to all other visitors to school and to visitors who fail checks listed in item 2.
6. All visitors issued with a red badge must remain in reception until collected by a member of staff who will supervise them until they leave school.

In respect of item 2, these visitors will be notified to reception either through the school calendar or by a list provided to reception in advance of the visit.

#### **Single Central Record**

EMS is responsible for collating above information for agency staff, contractors and for obtaining letters of assurance from other organisations, and for providing this to the Senior People Business Partner at Exeter College who manages the SCR on behalf of school. The Senior People Business Partner will advise on maintenance of SCR to ensure completeness and compliance. This is a confidential document.



## Appendix 10

### Low-level Concerns

This appendix is in relation to any concerns or allegations against staff which do not meet the harm threshold to refer to LADO (Local Authority Designated Officer), referred to as 'low-level' concerns.

Exeter Maths School promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately. In this appendix the term staff will include EMS employees, supply staff, volunteers, and contractors.

Any concerns about a member of staff will be reported responsibly and with the right person, recorded and dealt with appropriately, this will enable Exeter Maths School to be able to

- identify inappropriate, problematic, or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

What is a Low-Level Concern?

The term 'low-level' concern does not mean that the concern is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door,
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from several sources. For example: suspicion; complaint; or disclosure made by a child, parent and or carer, or other adult within or outside of the organisation; or because of vetting checks undertaken.

Allegation: Any adult linked to our school who has:

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

Low Level Concern: Any adult linked to our school who has behaved in a way that:

- is inconsistent with the staff code of conduct and ethos of Exeter Mathematics School including inappropriate conduct outside of work
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Appropriate:

- Behaviour which is entirely consistent with our school's Code of Conduct, and the Law.

### Reporting of Low-Level Concerns

Any member of staff who has a concern about the action/s of another member of staff, volunteer, or contractor, or who on reflection, recognises that their own actions could have been viewed as concerning should inform Headteacher or Designated Safeguarding Lead as soon as possible. If the concern is about the Headteacher then it must be reported to the Chair of Governors. Any Low-Level concerns that are reported directly to the DSL must be shared with the Headteacher within one working day or sooner if the matter is urgent.

We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it.

### Recording Low-Level Concerns

Any low-level concerns will be recorded in writing which is only by Headteacher and DSL. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

At Exeter Maths School the records are stored within a secure TEAMS platform which is kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). The records are reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Headteacher and DSL will decide on a course of action, either through disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO.

All Low-Level concerns will be retained during an individual's employment at Exeter Maths school plus 2 years after end of employment or 5 years, whichever is longest.

### Responding to low-level concerns

If the concern has been raised via a third party, the headteacher or DSL should collect as much information as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously,
- to the individual involved and any witnesses.

All information collected will be recorded in writing along with the rationale for their decisions and action taken.

The member of staff identified in the concern will be spoken to by either the Headteacher or the Designated Safeguarding Lead. The potential outcomes of these conversations may include finding positive strategies, access to training courses, identifying lessons learnt. A reflection of the conversation and outcomes will be recorded in the Low-Level Concern file.

### Organisations or Individuals using school premises.

Exeter Maths School may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

### Information Sharing

Low-level concerns which are shared about supply staff and contractors will be shared with their employers, so that any potential patterns of inappropriate behaviour can be identified.

If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.