



SHEBBEAR COLLEGE

SAFEGUARDING AND CHILD PROTECTION POLICY

From EYFS to Sixth Form

Reviewed and Updated: 1st

September 2022 by F Lovett

Reviewed by SLT: September 2022

Next review: September

2023

Policy Review at Shebbear College

The Governors acknowledge their responsibility to ensure that this policy is effective and follows regulatory requirements. Governors undertake a regular review (at least annually) to satisfy themselves that the implementation of this policy is effective.

Introduction

At all times the school should consider what is in the best interests of children at Shebbear College and should then take action to enable all children to have the best outcomes.

This policy applies to staff, volunteers and contractors working with pupils on school premises or away from the school on an activity, visit or other educational pursuit. The policy is in accordance with the procedures of the **Devon Children's and Families Partnership**. <https://www.dcfp.org.uk>

The safety and well-being of all pupils at Shebbear College is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment, so that every pupil can learn, and undertake educational activities in safety. Safeguarding and promoting the welfare of children includes protecting children from maltreatment, preventing impairment of children's mental and physical health or development and ensuring children are able to grow up in circumstances consistent with the provision of safe and effective care. Action will be taken to ensure all children have the best outcomes. Children include all pupils in the school.

Where there is a safeguarding concern, the SLT and the governors should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

Provision is made within the curriculum to teach the children to keep themselves safe (please see E-Safety policy and PSHE & RSE policy)

Where a child is suffering significant harm, or is likely to do so, action will be taken to protect the child. Action will also be taken to promote the welfare of a child in need of additional support (even if they are not suffering harm or are at immediate risk).

The school fully recognises its responsibilities for child protection. All staff must be aware of the professional obligation laid upon them by the 1989 Children's Act and subsequent legislation and guidance, including The Independent Schools Standards Regulations (2014), Prevent (2015), Working Together to Safeguard Children (revised 2018), and Keeping Children Safe in Education (revised 2022).

The school recognises that there is a difference between safeguarding children who have suffered from or are likely to suffer significant harm and those who are in need of additional support from one or more agencies. The former should be reported to Local Authority Children's Social Care immediately; the latter should lead to inter-agency assessment using local processes, including use of the "Common Assessment Framework (CAF)" and "Team around the Child" (TAC) approaches.

Furthermore the school recognises the value of '**Early Help**'. The school has an established pastoral system at all ages, but **all adults working or volunteering at the school** are trained to be alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs;
- has a mental health need;
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

Shebbear College recognises that children with a social worker (CiN, CiC or CP) may be more vulnerable and need additional support.

Shebbear College values its Christian ethos based on respect and mutual tolerance. Parents and guardians have an important role in supporting the work of the School. This policy and the procedures for safeguarding and child protection will be reviewed by the board of governors at least annually and a copy of the policy will be provided on the school's website.

There are **five** main elements to our policy:

- Establishing a safe environment in which pupils can learn and develop;

- Ensuring the governance of safeguarding and promotion of welfare is fully embedded within the school;
- Raising awareness of child protection issues and ensuring staff, volunteers and contractors working at the school are fully aware of presenting issues and how to act in the event of concerns being raised;
- Ensuring staff recruitment practice is safe and fully accords with the requirements of **Keeping Children Safe in Education (2022)**;
- Supporting pupils who are in need of protection or require additional help to achieve good outcomes.

‘Whistleblowing’

Shebbear College is committed to a culture of safety and of raising concerns about the wellbeing of its pupil body. The ‘**Whistleblowing policy**’ (available from the school office and also on the school website and the staff drive on the school network) outlines the procedures by which concerns will be dealt with. All concerns brought to the attention of the school in good faith will be dealt with in accordance with published procedures and there will be no negative repercussions on those who bring forward such concerns. The school guarantees to review any poor or unsafe practices or potential failures in the safeguarding regime. It further undertakes to provide for mediation and dispute resolution where necessary and to provide any further training and support that is required. All concerns will be received and handled with appropriate transparency and accountability.

As the proprietor, MIST has also published a whistleblowing policy – see [here](#)

If someone has concerns about how a child protection issue is being dealt with then they can call the NSPCC Whistleblowing helpline on 08000280285 or email help@nspcc.org.uk for confidential advice

OTHER KEY CONTACT DETAILS FOR SAFEGUARDING

Role	Name	Email & Contact number
Designated Safeguarding Lead including EYFS, Mental Health Lead and Senior Deputy Head	Mrs Fran Lovett	flovett@shebbearcollege.co.uk 01409 282000 07895 788211
Deputy Designated Safeguarding Lead including EYFS, Boarding, and Deputy Head	Miss Emma Southern	esouthern@shebbearcollege.co.uk 01409282000
Deputy Designated Safeguarding Lead for EYFS only and Head of Pre-School	Mrs Cherry Roadnight	croadnight@shebbearcollege.co.uk 01409 282000
Deputy Designated Safeguarding Lead for Prep school, Head of Prep school	Mr Matthew Foale	mfoale@shebbearcollege.co.uk
Head	Mr Charlie Jenkins	cjenkins@shebbearcollege.co.uk 01409282000 / 07857 970810

Nominated Governor	Rev Simon Leigh	Revdsimonhleigh@icloud.com 01409 282000
E-Safety Lead	Mr Craig Banyard	cbanyard@shebbearcollege.co.uk

L.A. Officers:	
Jon Galling	01392 348682
Lara Stead	01392 287216
The office of the Children's Commissioner	02077838330
Devon Safeguarding Children Board/ MASH	www.devonsafeguardingchildren.org 0345 155 1071
Children/s Social Care	01392 383000
CAMHS	03300 245321
NSPCC Helpline	0808 800 5000
Ofsted	0300 123 4666
ISI	020 760 0100
DBS	03000 200 190
TRA	020 7593 5393
Prevent – if you have a concern that someone is involved in terrorism	020 7340 7264 (non-emergency advice for staff or governors) or contact counter.extremism@education.gsi.gov.uk

TRAINING FOR ADULTS AT SHEBBEAR COLLEGE IN SAFEGUARDING AND PROMOTION OF WELFARE

Child protection training will be provided and monitored for all staff, including temporary staff, contractors and volunteers who work with children on a regular basis and in accordance with the requirements of the MAP training in terms of content and frequency. As well as annual formal training (usually in September), staff will receive informal updates by email, through briefings and online refresher courses at intervals throughout the year. As part of their training all staff are made aware of the risks presented to pupils online and for strategies that they may use in their everyday work to reduce and manage the risks these present to pupils at school.

All staff, including temporary staff, contractors, volunteers and new governors, must be provided with induction training that involves reading the appropriate documentation and then understanding:

1. The school's Safeguarding and Child Protection policy including information about the identity and role of the DSL and any deputies;
2. The staff code of conduct together with policies for the whistleblowing procedure and the acceptable use of technologies, including social media;

3. The pupil behaviour policy

4. The school's safeguarding response to children who go missing from education (children missing education policy to be provided);
5. Online safety
6. The relevant sections of KCSIE (2022).
7. The school's responsibility under the Prevent strategy – including how to identify and report young people at risk from radicalisation (see also the Preventing Extremism policy)
8. Staff / pupil relationships

As a result of such training all staff should be able to:-

- Identify the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead in the school
- Explain what they would do if they had a concern about a child
- Explain what they would do if they were worried about the behaviour of a colleague
- Explain what they would do if a child told them they were being abused or neglected

The Designated Safeguarding Lead (currently the school's Senior Deputy Head) and their Deputy (Deputy Head Academic & Senior Matron) receive appropriate inter-agency training, which is updated at least every two years. In addition, online training, newsletter updates and an annual safeguarding conference is attended.

IDENTIFYING ABUSE – WHAT IS ABUSE AND NEGLECT?

Through their day-to-day contact with pupils, school staff are well placed to observe any signs that a child may be suffering, is likely to suffer significant harm, or alternatively is in need of additional support to promote their welfare and prevent concerns from escalating. The school will therefore:

- Establish and maintain an environment where pupils feel secure, are encouraged to talk, and are listened to.
- Ensure through PSHE, RSE and the assembly programme that pupils know relevant safeguarding measures and that there are adults in the school whom they can approach if they are worried through the system of House masters/mistresses, House tutors, pastoral team, HAWC staff and independent listener.
- Include opportunities in the PSHE & RSE curriculum for pupils to develop the skills they need to keep themselves safe from harm including online. E-safety messages are delivered regularly via email or social media.

The following is taken from 'Keeping Children Safe in Education: 2022'

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be

caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: *the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.*

Sexual abuse: *involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.*

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

All Shebbear staff should have an awareness of safeguarding issues that can put children at risk of harm. Staff are aware that behaviours linked to issues such as drug taking and/or alcohol abuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

All Shebbear staff should be aware that sexual violence and sexual harassment put children in danger.

All Shebbear staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

All Shebbear College staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Child on child abuse

All Shebbear staff are aware that safeguarding issues can manifest themselves via **child on child abuse**. It

is essential that **all** staff understand the importance of challenging and reporting inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child on child abuse can happen both inside and outside of school. **All** staff should understand, that even if there are no reports in school it does not mean it is not happening, it may be the case that it is just not being reported.

Child on child abuse is most likely to include, but may not be limited to: bullying (including cyber bullying, prejudice based and discriminatory bullying), abuse in intimate personal relationships between peers, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence, such as rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent and sexual harassment. Staff are clear as to the school or college's policy and procedures with regards to child on child abuse as outlined in our behavioural management policy and the consequential harm and the need to ensure that such matters are appropriately handled in the best interests of both the victim(s) and alleged abuser(s).

The school operates a **Child on Child Abuse policy**, an **Anti-Bullying policy** and a **Behaviour policy** that outline procedures when difficulties arise in the relationships between pupils. However, the school recognises that in some cases there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'. **In such circumstances, the reporting procedure to be followed is the same as all other suspected abuse cases.** However, it is an expectation in such cases that in the event of a child telling us about child on child abuse, that all children involved, whether those that may have harmed (perpetrator) or those that may have been harmed (victim), are treated as being "at risk".

(Please see Appendix 1 for more guidance on child on child abuse).

Sexual violence and sexual harassment

Child on child sexual violence and sexual harassment can happen both inside and outside of school, as well as online. All staff need to have an "it could happen here" approach. All reports will be taken seriously and victims will be supported, kept safe and not made to feel that they are creating a problem.

Specific safeguarding issues

The school will seek advice from expert and professional organisations that are best placed to provide up to date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools on the TES website and also on its own website <http://www.nspcc.org.uk>

The school can also access broad government guidance on the issues listed below via the GOV.UK website:

- Child criminal exploitation (CCE) - **see also appendix 1**
- child sexual exploitation (CSE) - **see also appendix 1**
- bullying including cyberbullying – also refer to the Anti-Bullying Policy
- domestic abuse - **see also appendix 1**
- drugs
- fabricated or induced illness
- faith abuse
- Vulnerability of pupils with SEND – in particular with reference to anti bullying and behaviour
- female genital mutilation (FGM) – **see also appendix 1**
- forced marriage – **see also appendix 1**
- gangs and youth violence; county lines - **see also appendix 1**
- gender-based violence/violence against women and girls (VAWG)
- honour-based abuse – **see also appendix 1**
- mental health
- Children missing from Education – **see also appendix 1**

- private fostering
- radicalisation and the 'prevent' strategy – **see also appendix 1**
- sexting
- teenage relationship abuse
- trafficking
- upskirting
- the policy for the use of Cameras and Mobile Phones in EYFS – The use of personal phones and camera in the EYFS (Pre-School) by staff, parents and visitors is forbidden - **see also appendix 5**

See Appendix 2 for characteristics and symptoms of child abuse or neglect.

Remote and blended learning

In circumstances where a pupil or member of staff needs to work remotely the usual safeguarding procedures should be followed. Please refer to the remote and blended learning policy for further details.

Elective Home Education (EHE)

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the DSL and other key professionals will work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of the child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

In accordance with the Education (Pupil Registration) (England) Regulations 2006, Shebbear College will inform the local authority of all deletions from their admission register when a child is taken off roll. Safeguarding transfer forms will be completed if required.

ROLE AND RESPONSIBILITY OF GOVERNORS AT SHEBBEAR COLLEGE

The governing body have a strategic leadership responsibility for the school's safeguarding arrangements and **must** ensure that they comply with their duties under legislation. They are also responsible for ensuring that the policies are fully implemented in practice and are reviewed for their effectiveness at least annually and that any deficiencies or weaknesses in child protection arrangements are remedied without delay. The nominated member of the governing body who will liaise with the local authority on issues of child protection or in the event of an allegation being made against the Head or member of the governing body is **Rev Simon Leigh** who is suitably trained in safeguarding and promotion of welfare. The nominated governor meets regularly (at least termly) with the DSL to review implementation of the policy and procedures and review the SCR.

Key tasks of the governing body include:

- An annual review of the school's child protection policies and procedures including an update and review of procedures and their implementation, or more regularly if required. KCSIE indicates that the DSL would work with the governing body on this;
- Ensuring the school contributes to inter-agency working in line with **Working Together to Safeguard Children (2018)** through the effective implementation of the policy and procedures in practice and good cooperation with local agencies. The implementation of these policy provisions will be checked through discussion with the governing body and DSL, and by scrutiny of the relevant minutes. Minutes should therefore be sufficiently detailed to demonstrate the depth of the review;
- If there has been a substantiated allegation against a member of staff (including supply staff, contractors and volunteers), the school should work with the Local Authority Designated Officer

(LADO) to determine whether there are any improvements to be made to the school procedures or practice to help prevent similar events in the future.

- Maintaining appropriate records for staff training and safe staff recruitment and vetting processes to underpin and inform the annual review of safeguarding arrangements.
- Ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority. This includes ensuring that staff have the information they need about the child's status, contact arrangements with parents, care arrangements and delegated authority to carers, and information available to the DSL.
- Reporting to the Charity Commission any safeguarding cases defined as serious incidents as laid out in Charity Commission guidelines to trustees

INFORMATION SHARING

Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

DESIGNATED SAFEGUARDING LEAD(S)

The governing body has appointed a member of the school's leadership team to the role of Designated Safeguarding Lead (for all settings including EYFS). This person is the Senior Deputy Head, **Mrs Fran Lovett**. Working with her will be the Deputy Head (Academic), **Miss Emma Southern** who has been appointed to the role of Deputy Designated Safeguarding Lead (for all settings including EYFS). **Mr Matthew Foale** is the Deputy Designated Safeguarding Lead for the Prep School. **Mrs Cherry Roadnight** who has been appointed to the role of Deputy Designated Safeguarding Lead for EYFS.

The DSL is responsible for keeping written records of concerns, discussions, decisions and reasons for decisions. The Head has a role of oversight and operating in concert with/supporting the above as necessary. The Head should ensure that the policies and procedures, adopted by their governing bodies, (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

The role and responsibilities of the Designated Safeguarding Leads are contained in Appendix 3

REPORTING CONCERNS ABOUT A CHILD

If any member of staff or volunteer has a concern that: a child may be suffering significant harm; is likely to suffer significant harm or; is in need of additional support in order to promote their welfare, then the member of staff or volunteer must liaise without delay with the school's DSL or deputy. The designated person will decide whether to make a referral to Local Authority Children's Social Care (MASH) in accordance with local protocols including taking advice.

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan).

There are many ways to report concerns to the DSL or deputy. Ideally, spoken contact should be made, but both are available by email as well. The DSL keeps all school Child protection records.

Full procedures are available from devon.gov.uk/childprotection

The same procedures can also be followed if there is a concern that a pupil is at risk of being drawn into terrorism.

The Devon Safeguarding hub can be contacted 24 hours a day on [03451551071](tel:03451551071)

Such contacts must be made without delay where there is a risk of immediate serious harm to a child.

It should be noted that any member of staff can refer children directly to children's services if they feel that appropriate action is not being taken. Where it is suspected that a crime has been committed or will be committed then the police should be contacted immediately.

Similarly, any concerned adult should press for reassessment if they feel that a problem has re-emerged and/or is not being dealt with effectively

It will be for local authority children's social care services to determine the nature of any investigations or assessments in accordance with sections 47 and 17 of the 1989 Children Act 1989.

Local authority children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that we provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Staff must ensure that the child's wishes and feelings are taken into consideration when determining the actions to be taken and what services are required to ensure protection. Staff must never promise confidentiality to the child and must always act to ensure interests of the child are paramount. Parental consent for referrals to statutory agencies is not required.

Online safety

The curriculum network is monitored by Impero and Smoothwall with decryption and interception of HTTPS requests to prevent access to inappropriate materials. All QUIC Requests are blocked as they cannot be filtered by Smoothwall. The Curriculum network also uses Cloudflare for Teams as the upstream DNS with strict content blocking policies enabled. Smoothwall identifies users on the Curriculum network using iDex, and applies age-appropriate and time-based content filtering.

The BYOD network is monitored by Smoothwall, which utilises Layer 7 filtering, IPS and IDS to identify and prevent any attempts at bypassing the Smoothwall web filter. Smoothwall does not decrypt and inspect on the BYOD network, due to various apps and websites breaking on personal devices when an inspection policy is enabled. Certificates are instead validated by Smoothwall to prevent devices spoofing traffic using advanced HTTPS/TCP 443 VPNs. The BYOD network also utilises Pi-Hole with illegal/adult/malicious domain filters, with logging to identify users who attempt to bypass the web filter. Smoothwall identifies users on the BYOD network using 802.1x RADIUS/NPS, and applies age-appropriate and time-based content filtering.

For boarders, Smoothwall will prevent students from browsing the internet after set bedtimes, these bedtimes are also mirrored in the NPS server, which sends a RADIUS CoA request to all APs to disconnect and prevent re-connection of student devices at bedtimes until access is permitted again in the morning.

Access to 3G/4G is limited through the school policy of all phones outside of the Sixth Form being kept in bags or pockets unless permission is given by teachers for their use. Within boarding pupils in Forms Four and below, hand all electronic devices in thirty minutes before lights out to give them time to wind down without using any technology. Form Five and Sixth Form are given additional privileges in this area but their management is monitored and intervention to help them takes place if necessary. The school makes provision for teaching children to keep themselves safe through PSHE and e-safety talks (local police etc.).

For further details regarding safety online and remote learning please see the E-Safety policy.

Mental Health

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

Staff should refer to the Mental Health & Wellbeing policy.

GUIDANCE IN HANDLING CONCERNS RAISED BY CHILDREN

- Limit any questioning to the minimum necessary to seek clarification only, strictly avoiding 'leading' the pupil or adult who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened.
- Stop asking any more questions as soon as the pupil or adult has disclosed that he or she believes that something abusive has happened to the pupil or someone else.
- Tell the informing pupil or adult that the staff member will now make sure that the appropriate people are brought in to follow the problem through.
- Try to ascertain the wishes and feelings at this point if appropriate but remember that what they want to happen may not be possible.
- Refer the matter immediately, with all relevant details to the DSL as above, or the designated deputy.
- Make an accurate written record as soon as possible of what they have been told, and make a copy of this available to the DSL or Head.

Remember that you have a duty to safeguard the welfare of our pupils. Never assume that abuse is impossible in the school, or that an accusation against someone you know well is bound to be wrong. If you suspect a child is being abused physically, emotionally, sexually or is being neglected then you should raise your concerns with the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead or the Head as soon as possible.

ALLEGATIONS OF ABUSE MADE AGAINST TEACHERS AND OTHER STAFF

Where it is alleged that a member of staff (including supply staff, contractors and volunteers) 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 child or children in a way that indicates he or she may pose a risk of harm to children; or behaved or may have behaved in a way that indicates they may not be suitable to work with children the matter **must be reported immediately to the Head**. This includes any allegations against the Designated Safeguarding Lead.

The Head must then, without delay, contact the Local Authority Designated Officer (LADO) to discuss the concerns. The LADO in conjunction with children's services and/or the police will then confirm the arrangements for investigating the issues raised. The school will fully comply with these arrangements including maintaining appropriate levels of confidentiality. ***Where a child has suffered serious harm and/or a crime may have been committed or has been committed then the police must be contacted from the outset.***

If the allegations concern the Head the initial report must be made to the Chair of Governors, the nominated governor for safeguarding and / or MIST General Secretary who will then be responsible for notifying the Designated Officer. **The Head should not be informed of this. The Local Authority Designated Officer will then advise on the appropriate course of action.** If the Chair of Governors or safeguarding governor receives an allegation regarding the Head, they will contact the LADO first and then immediately inform the MIST General Secretary.

The Local Authority Designated Officer should be informed within one working day of **all** allegations including those that are made directly to the police.

Immediate contact should be made with the Local Authority Designated Officer to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. Discussions should be recorded in writing, and communication with both the individual and the parents of the child/children agreed. The school will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place.

Since 1st October 2012, there have been restrictions on the reporting or publishing of allegations against teachers and so schools must make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

The school maintains a code of conduct for staff (including supply staff and volunteers) which provides guidance to staff (including supply staff and volunteers) about their behaviour and actions so as to not place pupils and staff at risk of harm or of allegations of harm to a pupil (***refer to the Staff Code of Conduct – this can be found under the policy section on the school website and is available on request from the school office***).

Shebbear College have a duty of care to their employees. The school will ensure it provides effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. Any allegation of abuse made against a teacher or other member of staff (including supply staff, contractors and volunteers) in the school will be dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

Where a member of boarding or residential staff is suspended pending an investigation of a child protection nature alternative accommodation will be provided away from children.

If a member of staff, (including supply staff, contractors and volunteers) is removed from regulated activity (we cease to use their services) because they have harmed and/or pose a risk of significant harm, the School has a legal duty to refer the individual to the Disclosure and Barring Service (DBS) for consideration of discretionary barring.

Ceasing to use a person's services includes: dismissal; suspension, non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of

initial teacher training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. **Failure to make a report constitutes an offence.** ‘Compromise agreements’ cannot apply in this connection, or where the individual refuses to cooperate with an investigation. Shebbear College has a legal duty to respond to requests from the DBS for information they hold already, but the school does not have to find it from other sources.

Within the EYFS setting, in the event of an allegation of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere) Ofsted will be notified within 14 days.

Cases that are considered serious (e.g., because a child has been harmed, the individual has been referred to the DBS, there has been a significant loss to the School, etc) the Chair of Trustees will consult with the Head and MIST General Secretary on whether a serious incident notification should be made to the Charity Commission.

If a teacher is dismissed, (or would have been dismissed if they had not resigned), a referral will be made to the **Teacher Regulation Agency (TRA)** and a prohibition order may be appropriate. The reasons such an order would be considered are: “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Further guidance is published on the TRA website.

Where a referral has been made to the DBS, it is not necessary for a referral also to be made to TRA, as information is shared between the two bodies. Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to a TRA referral.

Low Level Concerns

The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in paragraph 355 of KCSiE 2022. 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 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

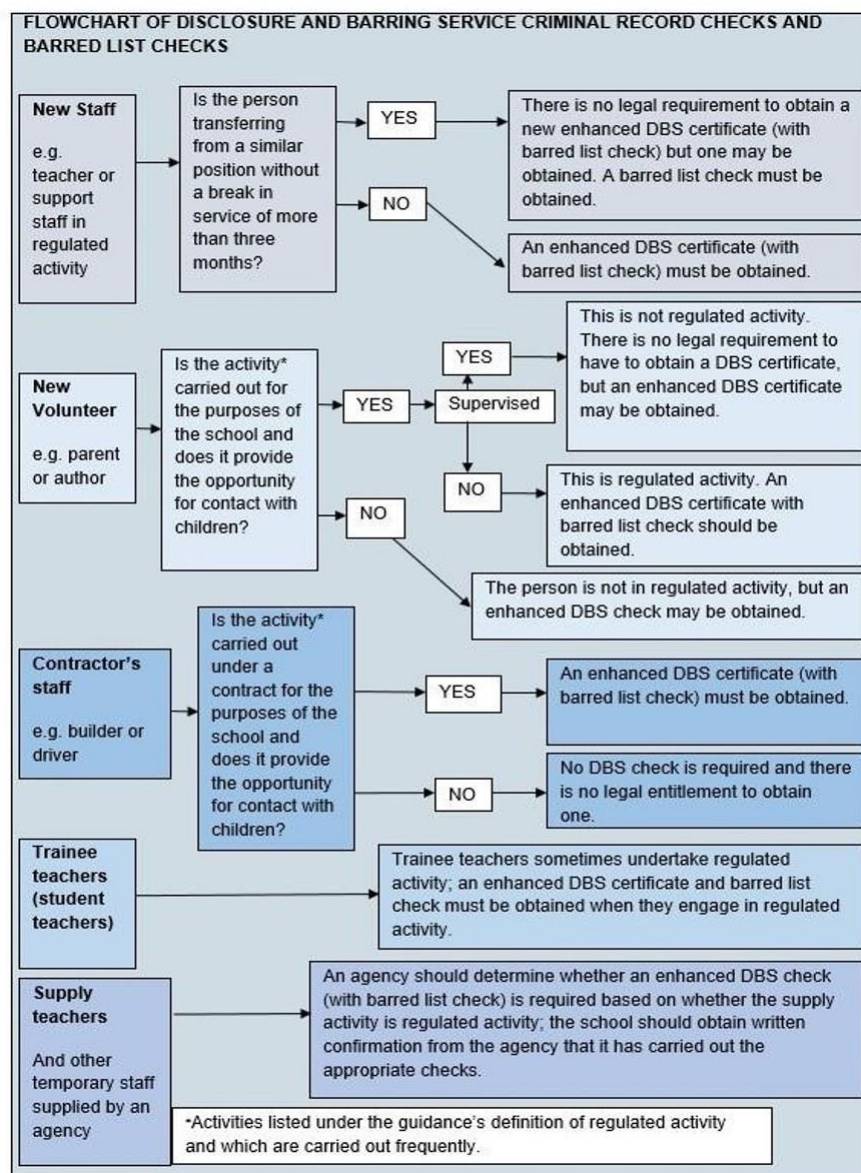
- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils

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 a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly and with the right person, and recorded and dealt with appropriately. Low level concerns should be shared with the Head and/or DSL, verbally or in writing. Ensuring low-level concerns are dealt with effectively should also protect those working in or on behalf of the school from becoming the subject of potential false low-level concerns or misunderstandings.

Flowchart of Disclosure and Barring Service criminal record checks and barred list checks



Source: Keeping Children Safe in Education, 2021, p.60

SAFER RECRUITMENT POLICY

Please refer to Appendix 4.

EYFS

Shebbear College has a duty under section 40 of the Childcare Act 2006 to comply with the welfare requirements of the Early Years Foundation Stage. Shebbear College will ensure that:

- Mrs Fran Lovett is the EYFS Lead. Miss Emma Southern, Mr Matthew Foale and Mrs Cherry Roadnight are EYFS Deputies.
- staff complete safeguarding training that enables them to recognise signs of potential abuse and neglect; and
- have a practitioner who is designated to take lead responsibility for safeguarding children within each early years setting and will liaise with local statutory children's services agencies as appropriate.
- This lead will also complete child protection training.

BOARDING

The School prides itself on its excellent boarding provision and the fact that at its heart is a thriving boarding community, which brings benefits to all its pupils. As a consequence, the school is also attuned to the specific safeguarding requirements that boarding school settings need, and always seeks to exceed them.

Shebbear College has additional factors to consider with regard to safeguarding due to having boarding students. With this in mind:

- Boarding pupils will be made aware of the school's stance on sexual relationships between children and it is important that boarders understand this. This will be explained to all boarders in a meeting held at the start of each year by the Boarding HsM who is level 3 Safeguarding trained.
- Our approach to child-on-child abuse will reflect the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation. The rules about areas they can and can't go will be explained to boarders in their induction meeting and the consequences for not following the rules will also be explained. This will include guidance on child-on-child abuse. A child friendly copy of this policy is available to all pupils. In individual circumstances, when needed, a risk assessment will take place.
- Our Boarding Houses will have clear guidance regarding how boarders' devices are managed in terms of bringing a device into the school, and harmful content that may already be downloaded on to it, and the opportunity to download harmful content via 3,4 and 5G that will bypass the school's filtering and monitoring systems. There are guidelines in place from an online safety perspective for boarders i.e. collect phones, on school Wi-Fi with filters etc.

Arrangements are made to safeguard and promote the welfare of boarders while they are accommodated at the school and such arrangements have regard to the Boarding Schools National Minimum Standards.

- All staff, and particularly those involved in the pastoral care of our boarders, are highly conscious of pupil relationships, and in particular the potential for child-on-child abuse.
- In any case where a member of the boarding staff is suspended pending a child protection related investigation, alternative accommodation away from children will be found at once.

Please see our boarders' safeguarding policy for further information.

APPENDIX 1 – FURTHER INFORMATION ON:

CHILD CRIMINAL EXPLOITATION (CCE) and CHILD SEXUAL EXPLOITATION (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

COUNTY LINES

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to

leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing.

CHILDREN MISSING FROM EDUCATION

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, ‘honour’-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school’s or college’s unauthorised absence and children missing from education procedures.

CHILDREN WITH FAMILY MEMBERS IN PRISON

Children with family members in prison Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children

CYBERCRIME

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded
- ‘Denial of Service’ (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, ‘NPCC- When to call the Police’ and National Cyber Security Centre - NCSC.GOV.UK

DOMESTIC ABUSE

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

OPERATION ENCOMPASS

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

MENTAL HEALTH

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

MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

PREVENTING RADICALISATION

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist

ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

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

Staff at Shebbear meet together at least twice a week and use this opportunity to share concerns about pupils. If a child is thought to be at risk of radicalisation then this information should be shared with the DSL and consideration will then be given about a possible referral to Channel.

Under Section 26 of the Counter-Terrorism and Security Act 2015 the school has a responsibility to prevent people from being drawn into terrorism – the Prevent duty. Under this duty, Shebbear College:-

- Risk assesses children being drawn into terror
- Pays due regard to the Devon County Prevent strategy
- Trains staff to identify children at risk and to challenge extremist ideas. The DSL and the Deputy DSL have both undertaken Prevent awareness training and have briefed staff about their findings.
- All Shebbear pupils receive E Safety training and the school network is filtered to ensure that children are safe from terrorist and extremist material.

Shebbear College is committed to working with the new 'Channel' programme and if required the College (via the DSL) will refer vulnerable pupils to the Devon 'Channel' panel.

CHILD on CHILD - SEXUAL VIOLENCE AND SEXUAL HARRASSMENT

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. Schools and colleges should be aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children 104 with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.

Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe

SEXUAL VIOLENCE

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school/college.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003¹³² as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

SEXUAL HARRASSMENT

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile,

offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos.¹³⁸ Taking and sharing nude photographs of U18s is a criminal offence. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice for schools and colleges.
 - sharing of unwanted explicit content
 - sexualised online bullying
 - unwanted sexual comments and messages, including, on social media
 - sexual exploitation; coercion and threats, and
 - coercing others into sharing images of themselves or performing acts they’re not comfortable with online.

It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence

HARMFUL SEXUAL BEHAVIOUR

Children’s sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour” (HSB). HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

SERIOUS VIOLENCE

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

SO-CALLED 'HONOUR'-BASED ABUSE (including Female Genital Mutilation and Forced Marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple

perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

FEMALE GENITAL MUTILATION (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

It is mandatory for teachers to report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss such a case with the school's DSL and involve local authority children's social care as appropriate.

To report to police phone 101 or 999

FORCED MARRIAGE

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmfu@fco.gov.uk.

APPENDIX 2 – SIGNS OF ABUSE AND NEGLECT

A child may be experiencing abuse if he or she is:

- Frequently dirty, hungry or inadequately dressed
- Left in unsafe situations, or without medical attention
- Constantly “put down,” insulted, sworn at or humiliated
- Seems afraid of parents or carers
- Severely bruised or injured
- Displays sexual behaviour which doesn’t seem appropriate for their age
- Growing up in a home where there is domestic violence
- Living with parents or carers involved in serious drug or alcohol abuse

Remember, this list does not cover every child abuse possibility. You may have seen other things in the child’s behaviour or circumstances that worry you. Abuse is always wrong and it is never the young person’s fault.

Signs and behaviours which may indicate that a child is being abused:

- repeated minor injuries
- truanting
- drug taking
- sexting
- children who are dirty, smelly, poorly clothed or who appear underfed
- children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of ‘detachment’ or ‘don’t care’ attitude
- overly compliant behaviour
- a ‘watchful attitude’
- sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child’s age), continual open masturbation, aggressive and inappropriate sex play
- a child who is reluctant to go home, or is kept away from school for no apparent reason
- does not trust adults, particularly those who are close
- ‘tummy pains’ with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self-inflicted wounds
- reverting to younger behaviour
- relationships between child and adults which are secretive and exclude others
- pregnancy

These signs are not evidence themselves, but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs.

APPENDIX 3 – THE ROLE AND RESPONSIBILITIES OF THE DESIGNATED SAFEGUARDING LEAD

The Designated Safeguarding Lead will ensure that their role is carried out according to the guidance contained in ‘Safeguarding Pupils and Safer Recruitment’ DfE (formerly DfES, then DCSF) 2007 and with KCSIE (2022). They will ensure the operation of safe recruitment procedures, including DBS checks and compliance with Independent School Standards regulations. The role of the designated person is an operational one.

The Designated Safeguarding Lead takes specific responsibility for child protection matters in the school and is responsible for:

- Holding the school’s copy of the current Devon Children’s and Families Partnership Child Protection Procedures, being fully conversant with these procedures and ensuring that SLT and members of the pastoral team are aware of them.
- Ensuring that the school follows the procedures through maintaining ready contact with local authority children’s social care.
- Holding and being conversant with the school’s copy of “Working Together: a guide to arrangements for inter-agency co-operation for the protection of children from abuse.”
- Holding and being conversant with appropriate sections of the Children Act 1989,
- Independent School Regulations 2014, Section 11 of the 2004, and KSCIE (2022)
- Making the above publications and any similar relevant documentation available to The Head and other CP staff
- Liaising with the Head to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Managing referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children’s social care as required and support staff who make referrals to local authority children’s social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead (and any deputies) should undertake Prevent awareness training.

Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children’s social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements

- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses, and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Raising Awareness

The designated safeguarding lead should

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

APPENDIX 4 – RECRUITMENT AND SELECTION POLICY AND PROCEDURES INCLUDING EYFS

Policy statement

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of the children in education.

Shebbear College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Please refer to the Safer Recruitment Policy for our current procedures

APPENDIX 5 – EYFS (KINDERGARTEN) POLICY FOR THE USE OF CAMERAS AND MOBILE PHONES

To ensure the safety and welfare of the children in our care this policy outlines the protocols for the use of personal mobile phones and cameras within the EYFS (PreSchool).

- Parents and visitors are alerted to the fact that the EYFS is a smartphone-free zone through clear signage to this effect. Visitors using a smartphone will not be allowed access to the premises until it is switched off and put away.
- Personal smartphone usage is kept to a minimum. Staff at the Pre-School must only use their personal smartphones when on a break and only when in the Staff Room or when off-site without pupils. Personal smartphones are never used by staff in any rooms occupied by pupils and staff are not permitted to use their phones to take photographs of children.
- All personal smartphones are kept securely in the Staff Room or away in staff bags in a place where they cannot be accessed by children.
- There is a Pre-School mobile that is used for campus visits and trips. It is also used as a school camera for children's observations as well as an iPad. Parents are all aware of the number.
- Members of staff ensure that the main telephone number of the School and Pre-School is known to immediate family should they need to be contacted in an emergency;
- EYFS staff use a School smartphone when taking children off-site for trips or any visits to the Shebbear College campus. In the event that staff take their own smartphones on outings for use in case of an emergency, the making or receiving of personal calls is not permitted.
- Members of staff do not use their personal smartphones to take photographs of children on outings or trips. School cameras are to be used for this purpose

Monitoring and Review

It is the responsibility of all staff to adhere to this policy. It will be reviewed at the end of each school year.