Status:	Regulatory
Applies to:	Whole School
SLT Reviewer (initials):	BNO
Committee Monitor:	E&W
School Manual Ref:	

STOVER

Safeguarding and Child Protection Policy (Including EYFS)
Independent Day School for Girls and Boys aged 3 to 18 years
Stover School

Revised September 2026

This policy should be read alongside:

- The Anti-Bullying Policy;
- The Behaviour Policy;
- The Safer Recruitment Policy;
- The ICT Safe User Agreement;
- Supervision Policy;
- The Counselling Policy; and
- KCSiE September 2026
- Working Together to Safeguard Children 2023
- What to do if you are Worried a Child is Being Abused – Advice for Practitioners (2015)
- Sexual Violence and Sexual Harassment between children in schools and colleges (2021)

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SAFEGUARDING CONTACT INFORMATION

	Telephone Number	Email Address
Designated Safeguarding Lead – Ben Noble Overall Lead for all Safeguarding	01626 354505 07436 266200	safeguarding@stover.co.uk (bnoble@stover.co.uk)
Deputy Designated Safeguarding Lead S-J Avery	01626 354505	(safeguarding@stover.co.uk) (sjavery@stover.co.uk)
Deputy Designated Safeguarding Lead Sharron Humphries	07587777410	safeguarding@stover.co.uk (shumphries@stover.co.uk)
Deputy Designated Safeguarding Lead Ben Steer	01626 354505	safeguarding@stover.co.uk (bsteer@stover.co.uk)
Safeguarding Administrator Kirsty Gordon	01626 354505	safeguarding@stover.co.uk (kgordon@stover.co.uk)
Governor Safeguarding Responsibility – Mike Burgess	07377644413	mburgess@stover.co.uk

For additional useful contacts, please see Appendix D

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1.1 This policy applies to all pupils whilst in the care of Stover School to include provision before and after school, trips and activities. Pupils, include all children under the age of 18 and those that are on roll and are over the age of 18. Safeguarding and promoting the welfare of the children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- promoting children's welfare;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have best outcomes.

1.2 This policy has been authorised by the Governors, is addressed to all members of staff and volunteers, is available to parents on request and is published on the School website. This policy can be made available in large print or another accessible format if required. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit. It also applies to the EYFS (Early Years Foundation Stage) (Jan 2024) provision. Throughout this policy, Stover School has regard for Keeping Children Safe in Education (KCSIE Sept 2026), Working Together to Safeguard Children (July 2018, amended Dec 2023) and the Prevent Duty Guidance: for England and Wales (updated March 2024) and will follow the departmental advice What to do if you are worried a child is being abused – Advice for practitioners (March 2015), Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (May 2024), Children Missing Education (Aug 2024).

1.3 Stover Schools upholds a culture of safety and raising concerns, so that every pupil should feel safe, listened to and protected from any form of abuse, including with regard to race, culture, gender, sexual-orientation, sexual harassment and sexual violence. This also includes abuse that is on-line and that might be considered 'cyberbullying' (it is often the case that online and face-to-face abuse occur concurrently). Stover School will adopt a 'zero-tolerance' approach meaning that any abusive behaviour will be challenged, and appropriate action taken. This includes so-called 'low-level' abuse. Stover School will educate children about what actions that they can take to report, and all staff will ensure that they are able to reassure children that they will be listened to. This will take place through the school's pastoral and PSHE process. All staff understand that some pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and they may not recognise that these experiences are harmful to themselves. It is the duty of the Stover staff to use their 'professional curiosity' and inform the DSL and/or DDSL's if they have any concerns about a child.

1.4 Stover School recognises that there must be a child centred and coordinated approach to safeguarding and that they are part of the full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. The Data Protection Act 2018, Data (Use and Access) Act 2025 and GDPR do not prevent the sharing of information or 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.

The guidance "Information Sharing: Advice for practitioners" (Sept 2015, updated May 2024) providing safeguarding services to children, young people, parents and carers including the 7 golden rules will be followed regarding information sharing.

1.4.1 Rule 1: The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights laws are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

1.4.2 Rule 2: Be open and honest with the individual from the outset about why, what, who and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

1.4.3 Rule 3: Seek advice from the Bursar, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

1.4.4 Rule 4: Where possible, share the information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 practitioners may 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.

1.4.5 Rule 5: Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

1.4.6 Rule 6: Necessary, proportionate, relevant, adequate, timely and secure: ensure that all information your share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion and is shared securely.

1.4.7 Rule 7: Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Governors are obliged to ensure that the UK GDPR and Data Protection Act 2018 are followed so that personal information is fairly and lawfully processed and held safe and secure. The ICO guidance must be complied with ensuring that personal information is protected and access to official information is shared according to the ICO guidance 'For Organisations'.

1.5 The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. This means that they should consider, at all times, what is in the best interests of the child.
The School will take all reasonable measures to:

- Follow the Safer Recruitment Policy and practice safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by another organisation) who work in any regulated activity, as defined in KCSIE 2026 (which now includes volunteers, following the removal of the supervision exemption), and in accordance with the guidance given in *Safeguarding children and safer recruitment in education*, the Education (Independent School Standards) (England) Regulations 2012 (as amended), Disqualification under the Childcare Act, (August 2018), to have

completed DBS enhanced with barred list checks (including previous GTCE sanctions and restrictions), and overseas checks where applicable.

- ensure that the minimum requirements are met for the upkeep of the Single Central Register,
- ensure that all members of staff have an enhanced DBS certificate and as such will check for any prohibition, direction, sanction or restriction, including the barred list – checks will be carried out by using the Secure Access Portal via the Teacher services web page and to ensure that any Section 128 direction (barred from teaching) is checked, the school will ensure that the 'children's workforce independent schools' is specified in the parameters for the barred check list;
- ensure that at least one of the persons who conducts an interview has completed safer recruitment training;
- online searches will be completed for all shortlisted candidates and candidates will be informed as such;
- when employing a teacher the Teacher Services system will be utilised to determine and verify qualified teacher status;
- annually remind staff to disclose relevant information regarding disqualification;
- ensure that all staff have read and observed the Staff Code of Conduct as listed in this policy;
- ensure that where the School ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the Disclosure and Barring Service (**DBS**);
- ensure that the Teaching Regulation Agency is contacted to check if any proposed governor is barred as a result of being subject to a Section 128 direction using the Secure Access Portal;
- ensure that where staff from another organisation are working with our pupils on another site, the school have received written confirmation that appropriate child protection checks and procedures apply to those staff;
- follow the local inter-agency procedures of the Devon Safeguarding Children Board;
- **LISTEN t**o the child without judgement, ensuring that victims do not feel ashamed of making a report;
- reassure victims that they are being taken seriously and that they will be supported and kept safe;
- when using terms such as victim and perpetrator/alleged perpetrator staff must be mindful of using this language in front of children, as in some cases abusive behaviour may have been harmful for the perpetrator as well;
- protect each pupil from any form of abuse, whether from an adult or a peer, including consensual or non-consensual sharing of nudes and semi-nudes, gender-based issues and cyberbullying/online abuse, prejudice based and discriminatory bullying;

- be alert to child-on-child online abuse, harassment and misogynistic messages; non-consensual sharing of indecent images, abusive images and pornography;
- be alert to signs of abuse both in the School and from outside, including radicalisation and extremism;
- deal appropriately with every suspicion or complaint of abuse;
- design and operate procedures which promote this policy;
- design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- support children who have been abused in accordance with his / her agreed child protection plan;
- be alert to the medical needs of children with medical conditions;
- operate robust and sensible health & safety procedures;
- take all practicable steps to ensure that School premises are as secure as circumstances permit;
- operate clear and supportive policies on drugs, alcohol and substance misuse;
- be able to recognise early help needs by being alert to children with an additional vulnerability and therefore early help needs due to Special Educational Needs or Disability; has a mental health need; being a young carer; showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and associated with organised crime groups; is frequently missing/goes missing from care or home; is misusing drugs or alcohol; is at risk of modern slavery, trafficking or exploitation; is in a family with challenges for the child, such as adult mental health, misuse of drugs or alcohol, or domestic abuse – including where they see, hear or experience its effects; has returned home to a family from care; is showing signs of abuse and/or neglect; is at risk of modern slavery, trafficking, sexual or criminal exploitation; is at risk of being radicalised or exploited; is a privately fostered child; is persistently absent from school;
- be alert to children with extra-familial (outside of the family) harm that may expose these vulnerable children to multiple harms such as sexual exploitation; criminal exploitation; sexual abuse; serious youth violence and county lines;
- be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online concurrently with daily life;
- consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our School or in our local area;
- have regard to guidance issued by the Secretary of State for Education (**DfE**) in accordance with the Education Act 2011 and associated regulations;
- keep all child protection records confidential, allowing disclosure only to those who need the information to safeguard and promote the welfare of children. All relevant information will be shared for the purpose of child protection investigations under Section 47 of the Children Act 1989 and in accordance with the requirements of *Working*

together to safeguard children and current information sharing advice and the Local Authority have the duty to investigate;

- ensure that pupils who are absent from school are accounted for and recognise that unexplainable and or persistent absences from education can put children at a risk of harm;
- formally update the designated safeguarding lead and deputies either through a discrete update every 2 years to Level 3 Child Protection training or through on-going CPD throughout each year;
- formally update all staff and governors annually and provide on-going training throughout the year for Level 2 safeguarding;
- ensure all new staff, including temporary staff and volunteers, will be provided with an induction training that includes the safeguarding policy, the staff code of conduct including the whistleblowing procedure, the identity of the designated safeguarding lead and on-line safety;
- train senior pupils in a position of responsibility eg Prefects in safeguarding to Level 2;
- evaluate the understanding of the child protection/safeguarding by the staff through on-going questionnaires and reviews, and through questioning by senior staff of other staff in the school and to include an opportunity to request specific training during performance management reviews;
- enable staff to discuss any concerns that they may have regarding their own practice about welfare and safeguarding with their line manager or the designated safeguarding leads;
- have clear communication and involvement by the Governing body in policy creation, update and implementation;
- ensure that the pupils of the school are taught about how to stay safe, including online and e-safety, particularly social media, through the PSHE and Relationships and Sex Education, using the supporting materials created by the DfE "Teaching about relationships, sex and health" and Social, Cultural, Moral and Spiritual links and adhering to the ICT Safe User Agreement, including areas such as on-line radicalisation;
- ensure that appropriate filters and monitoring systems are in place for pupils when accessing the internet so that children are safe from potentially harmful and inappropriate material, including terrorist and extremist material, without 'overblocking'. The UK Safer Internet Centre (UKCIS) has published guidance, Appropriate Filtering and Monitoring, as to what is deemed appropriate which the school will adhere to and partakes in a risk assessment regarding internet usage that is not accessed through the school Wi-Fi. Filtering and monitoring is reviewed at least annually by the SLT lead for filtering and monitoring (The Bursar) with the DSL (see 4.15).

2 The Designated Safeguarding Lead

2.1 The School has appointed a member of the School Leadership Team, Head of Prep School, to the position of Designated Safeguarding Lead. The Designated Safeguarding Lead (and

deputies) are most likely to have a complete safeguarding picture and are the most appropriate person to advise on the response to safeguarding concerns.

2.2 Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the School, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's form teacher or the Headteacher who will notify the Designated Safeguarding Lead in accordance with these procedures.

2.3 The main responsibilities of the Designated Safeguarding Lead are:

- to be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection;
- to co-ordinate the child protection procedures in the School;
- to determine the response to the concern raised about a child, following the procedures in section 6 of this policy and the Devon Children and Families Partnership procedures where there are concerns about a child and considering the context for the child, known as contextual safeguarding;
- as part of induction to ensure that all members of staff and volunteers receive appropriate training on child protection and the safer recruitment procedure and to keep and maintain records of this training beyond induction through periodic updates;
- as part of induction to ensure that all members of staff and volunteers receive online safety training, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- to ensure that all staff are provided with regular updates for safeguarding and online safety training, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- to ensure that all senior pupils of the school with responsibility receive appropriate training on child protection;
- to support and enable staff and others in the community to feel able to raise concerns in their safeguarding role and to promote a culture of listening to children;
- to monitor the keeping, confidentiality and storage of records in relation to child protection;
- to liaise with and work alongside the, Devon County Council and Devon and Cornwall Police in order to contribute to multi-agency working in line with the statutory guidance Working Together to Safeguard Children;
- to work within the guidelines from the NPCC about when to call the police;
- With regard to Working Together to Safeguard Children the Designated Safeguarding Lead or where the Designated Safeguarding Lead cannot be reached the Deputies, will, where required, liaise with the child protection **Local Authority Designated Lead (LADO)** - **01392 384964**, the local authority children's social care services and other external agencies on behalf of the School (**MASH 0345 155 1071**); including under the **PREVENT** duty, nicola.channon@devon.gov.uk; the local Police force Tel 101 or in an emergency 999, and the DfE telephone helpline for Prevent 020 73407264 and

counter.extremism@education.gsi.gov.uk. It is important to note that the need to share information overrides the process requirement, so anyone can make a referral, if necessary;

- to keep parents informed of action to be taken under the behaviour policy and anti-bullying policy in relation to their child if child-on-child abuse is suspected, with support outlined for both the victim and the accused;
- to monitor records of pupils in the School who are subject to a child protection plan to ensure that this is maintained and updated as notification is received;
- to liaise with other professionals to ensure that children who are subject to child protection plans are monitored;
- where appropriate, to take part in child protection conferences or reviews, including the use of the Devon Assessment Framework **(DAF)** (Appendix A) and Team around the Family **(TAF)** (Appendix B) and set up Early Help Intervention with the pupil, their family and the school, and as required implement the Child Protection Pathway, with a strengths-based approach to Child Protection.
- to inform Devon County in writing when a child who is subject to a child protection plan moves to another school and to inform the new school of the child protection plan as advised by Social Services;
- request reports on attendance and safeguarding records for pupils registering;
- inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.
- inform the local authority when any pupil who is going to be removed from the admission register where the pupil:
  - has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education. At this point the school will engage with the family and the local authority to determine if Elective Home Education is in the best interests of the child;
  - has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered;
  - has been certified by the school doctor as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
  - are in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period; or,
  - have been permanently excluded.
- seek professional advice and support from Devon Educational Services regarding safeguarding and child protection, including an annual audit and review; and
- support the Head's PA and the Safeguarding Administrator in keeping and maintaining records of staff and governor training on child protection and safer recruitment training;

- support the Head's PA in the updating of the Single Central Register.

2.4 The **Designated Safeguarding Lead** is the **Head of Prep School** who may be contacted on any one of the following numbers:

- 01626 354505
- 07436 266200

The Designated Safeguarding Lead(s) will:

- advise and act upon all suspicion, belief and evidence of abuse reported;
- work collaboratively with the governor for responsibility for safeguarding arrangements, ensuring that information is shared termly, or as required, and that policy and practice is reviewed;
- keep the Head informed of all actions unless the Head is the subject of a complaint. In this situation, the Senior Designated Lead should consult with Chair of Governors or in his absence, the Vice Chairs of Governors, without notifying the Head first;
- inform the Head of issues especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns and all cases which concern a staff member;
- liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- act as a source of support, advice and expertise for staff;
- liaise with Social Services and other agencies on behalf of the School.
- refer cases to the Channel programme where there is a radicalisation concern, as required and support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or has left the school due to a significant risk posed or harm to a child, to the Disclosure and Barring Service or the Teaching Regulation Agency (TRA) as required;
- refer cases where a crime has been committed to the Police as required;
- investigate further any concerns raised regarding attendance and a child missing education and will inform Devon County Council as appropriate;
- receive updated child protection training at least every two years, including inter-agency protocols and Prevent training. Throughout the two year period the Designated Safeguarding Lead will refresh their safeguarding knowledge, via communications provided by Devon Educational Services, including e-bulletins and termly meetings and disseminate formally to the staff as required;
- use the Threshold Tool from Devon to determine early help and intervention, including support and response for mental ill health;

- ensure each member of staff has access to and understands the safeguarding policy and its procedures, especially new and part time staff and have regard for any specific requirement for accessing this information, eg hearing or visual impairment. This will include an annual minimum requirement of understanding KCSiE (2026) Part 1 and alongside the Safeguarding Policy;

- share the KCSiE (2026) updates during whole staff INSET and any other statutory related guidance;

- alert staff to the specific needs of children in need, and are aware of those with special educational needs and young carers within the school;

- recognise the additional risks that children with SEN and disabilities face on line for example online bullying, grooming and radicalisation;

- recognise and share information about children with a social worker, in order to promote educational outcomes;

- consider whether children are at risk of abuse or exploitation in situations outside their families. Recognise that extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence;

- keep detailed, accurate, secure written records of concerns and referrals;

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them;

- understand and support the school 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;

- ensure that the Safeguarding Policy is known, understood and used appropriately;

- alongside the School Bursar, will ensure that appropriate agreements are in place for leasing and hiring of the school site, that include safeguarding requirements, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement;

- where an alternative provision is utilised by a pupil of the school the school must be satisfied and that the placement meets the needs of the pupil and that safeguarding measures have been followed – many of the pupils in alternative provision will have complex needs and it is important that governors additionally recognise the additional risk of harm that the pupils may be vulnerable to in the alternative setting. There is a requirement for written confirmation of safer recruitment and half-termly placement reviews.

- ensure that the Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the governing bodies regarding this;

- ensure that the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;

- transfer the Safeguarding file of any school leaver to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit. Confirmation of receipt should be obtained and where required; information will be shared in advance of a child leaving in order to ensure the continuity of care;

- be available (or a deputy) during school hours, for staff in the school to discuss any safeguarding concerns;

- arrange adequate and appropriate cover arrangements for any out of hours/out of term activities, to include deputising and on-call arrangements;

- embed safeguarding, including mental health and well-being at Senior Leadership level;

- attend and present to the relevant Governors meetings any pastoral issues, including any safeguarding concerns;

- to provide INSET training regarding updates; handouts to support these updates, webinars where appropriate and an annual cycle of 'one-minute guides' that assess knowledge pre and post training materials;

- to provide induction training for all new members of staff and volunteers to reflect this policy;

- complete annually the Safeguarding Review for Devon County Council and meet with a safeguarding representative to review the safeguarding process and policy.

2.5 If the Designated Safeguarding Lead is unavailable their duties will be carried out by the **Deputy Designated Safeguarding Lead**, who has received appropriate training. The Deputy Designated Safeguarding Leads are:

Assistant Head Pastoral, Mrs S-J Avery who may be contacted on:

- 01626 354505

Head of Early Years: Sharron Humphries who may be contacted on

- 07587 777410

2.6 The Deputy Designated Safeguarding Leads, Safeguarding Administrator, Nominated Safeguarding Governor, Chair of Governors and the Executive Head have undertaken basic child protection training Level 3 and training in inter-agency working and will attend refresher training at a minimum of two yearly intervals, alongside continued updates provided by Devon Educational Services.

2.7 All staff, including volunteers and governors will receive Level 2 safeguarding training to include Prevent training and informal safeguarding updates as required, but at least annually.

2.8 All staff, including volunteers, will receive Level 2 safeguarding training to include whistle blowing training.

3 Indicators of abuse and neglect

3.1 All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Staff are reminded to listen and reassure any pupil that makes a disclosure about any abuse and must take them seriously. Staff will use the school pastoral hierarchy to take appropriate action and support the victim.

3.2 Abuse is 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). An adult, or adults, or another child, or children (child-on-child abuse) may abuse a child.

Possible signs of abuse include (but are not limited to):

- the pupil says s/he has been abused or asks a question which gives rise to that inference;
- there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
- the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour;
- extreme views are being voiced and some speech may seem scripted;
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- the pupil's development is delayed;
- the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing;
- the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
- the pupil may appear with unexplained gifts or new possessions;
- the pupil may associate with other young people involved in exploitation, drugs or alcohol;
- the pupils may misuse drugs or alcohol;
- the pupils may be illegally sharing nude or semi-nude images or videos (consensually or non-consensually);
- the pupil might be regularly arriving home late or go missing for periods of time;
- the pupil might have an older boyfriend or girlfriend;
- children who suffer from sexually transmitted infections or become pregnant;

- the pupil is reluctant to go home, or has been openly rejected by his/her parents or carers;
- the pupil has a change in appearance eg wearing of badges that might be deemed extreme;
- the pupil has a sudden change in friendships and a distancing from old friends and family;
- the pupil is overly confident, arrogant, or angry. Conversely the pupil is withdrawn, emotional and appears pacified; and
- the pupil may regularly miss school or education or do not take part in education.

3.3 **Physical abuse**

Physical abuse 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.

3.4 **Emotional abuse**

Emotional abuse is 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 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.

3.5 **Neglect**

Neglect is 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 because 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3.6 **Sexual abuse**

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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

3.5 **Allegations against pupils**

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policy on behaviour, discipline and sanctions will apply (see also the school's Anti-Bullying and Behaviour Policy). The School will take advice from the Local Authority Designated Lead (**LADO**) on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the LADO, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her during the investigation.

3.6 **Abuse and Children with Special Educational Needs/Disabilities**

- Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and the DSL will work alongside Devon County Council when auditing the SEN provision. Additional barriers can exist when recognising abuse and neglect with child with SEN and disabilities. Staff therefore should:
- not assume that behaviour changes, mood changes and injury relate to the special need or disability of the child and should further explore;
- be aware that children with SEN and disabilities are more prone to peer group isolation than other children;
- be aware that children with SEN and disabilities, can be disproportionally impacted by things like bullying - without outwardly showing any signs;
- be aware that communication barriers and difficulties might make disclosure more difficult to ascertain. Staff who work in a supporting role with children with SEN and disabilities will use other methods of communication such as art work, drama led activities and general play.
- Additional support can be found from the SEND Code of Practice; the Special Educational Needs and Disabilities Information and Support Services (SENDIASS), the NSPCC and MENCAP.

3.6.1 **Children who are lesbian, gay, bisexual or gender questioning**

- Staff should endeavour to reduce the additional barriers faced and create a culture so that trusted adults can be readily sought.
- The Cass Review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may have additional vulnerabilities, including complex mental health or psychological needs.
- It is recommended that families should be encouraged to seek clinical advice.
- When supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (unless this would place the child at risk of harm. Schools should refer to the guidance when deciding how to proceed.
- On 31st July, The **Supreme Court** ruled that references to "sex", "man" and "woman" in the Equality Act refer to **biological sex** (a person's **sex** at birth).

3.7 **Mental Health**

It is recognised that approximately 10% of all 5 to 16 year olds will have some mental health problem and that all of the school community, including staff should have health and well being as central to their ability to be successful. There should be an expectation that those that lead and manage staff have a proper regard for their wellbeing and a healthy balance between

work and other commitments. Pupils must be supported in becoming resilient and being mentally healthy, through direct input such as the PSHE programme, reflecting initiatives such as the Rise Above support materials, but also indirectly through the pastoral support provided by all staff.

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. Trained professionals should attempt to make a diagnosis of a mental health problem, however staff at school can provide observations about the day-to-day behaviours of the child. Where children have suffered from adverse childhood experiences this can have a lasting impact upon them through childhood, adolescence and into adulthood. Where a staff member has a mental health concern that is also a safeguarding concern then immediate should be taken and the DSL (or deputy) should be informed. Public Health England has produced resources to support secondary teachers to promote health, wellbeing, and resilience. The School Mentor provides support for mental health to both pupils and parents through the early help process in collaboration with the DSL.

- Any strategy to safeguard a pupil will take a graduated approach to inform a clear cycle of support: an assessment to establish a clear analysis of the pupil's needs; a plan to set out how the pupil will be supported; action to provide that support; and regular reviews to assess the effectiveness of the provision and lead to changes where necessary.
- Concerns regarding the mental wellbeing of the pupils must be drawn to the attention of the Designated Safeguarding Lead. If early school-based help is required the DSL, Form Tutor or School Counsellor will contact the parent of the pupil if not Gillick Competent, and permission is sought from the pupil to do so, if Gillick Competent.
- The views and wishes of the pupil and the parents will be considered and an agreed programme will be devised that might include the support of the Form Tutor, Head of Year, Designated safeguarding Lead or School Counsellor.
- Where more serious mental health problems occur the Designated Safeguarding Lead will contact the parent and recommend that they access their GP for a referral to **CAMHS.**
- Where the problem for the pupil is deemed extreme the Designated Safeguarding Lead will contact CAMHS directly seeking advice and immediate intervention. Other support mechanisms might be sought such as **MindEd www.minded.org.uk; Winston's Wish, www.winstonswish.org.uk Barnardo's www.barnardos.org.uk**; **www.shorespace.org** and other voluntary organisations.
- School Counselling is available to all pupils and the referral for accessing the School Counsellor is detailed in the Counselling Policy. **The School Counsellor** can be contacted directly - srae@stover.co.uk
- Where required, the School Counsellor will provide a programme for 1:1 support that is reviewed with the Designated Safeguarding Lead, without breaking confidentiality. Upon exit of this programme there is a clear, after-service provided by the Form Tutor or Head of Year for the pupil. The School Counsellor will provide specific advice about the nature of this support, without breaking confidentiality.
- The Designated Safeguarding Lead will work cooperatively with all external providers of intervention for mental health care including Educational Psychologist, Clinical Psychiatrists or Psychologists and the CAMHS service or Adult Service as required for Sixth Form Students.

3.8 **Private Fostering**

Private fostering is an arrangement made between the parent and the private foster carer, who then becomes responsible for caring for the child in such a way as to safeguard and promote his/her welfare.
A privately fostered child means a child under the age of 16 (18 if a disabled child) who is cared for and provided with accommodation by someone other than:

- a parent;
- a person who is not a parent but has parental responsibility;
- a close relative; or
- a Local Authority

for more than 28 days and where the care is intended to continue. **MASH (0345 1551071**) must be contacted here when we are made aware of a child or young person who may be subject to private fostering arrangements.

3.9 Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The school will ensure that appropriate staff have the information they require regarding the child's legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with the birth parents or those with parental responsibility. They will also have the information about the child's care arrangements and the level of authority delegated to the carer. The DSL will hold the details of the child's social worker. The school will appoint an appropriate member of staff to have the role of the designated teacher who will work with the child and all agencies, including the virtual school head, involved to develop and monitor a Pupil Education Plan. Staff are reminded that a previously looked after child remains vulnerable and prompt action must be taken to safeguard these children as they are a particularly vulnerable group.

3.10 Children who need a social worker (Child of Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs and this information should be shared with the DSL so that decisions should be made in the best interests of the child's safety, welfare and educational outcomes. Where a pupil has been assigned a social worker then safeguarding risks such as missing education will be responded to reflecting the specific needs of the child, similarly pastoral and education support will be further considered to ensure that the government's help, protection and education is adhered to.

4 Specific Forms of Abuse/Safeguarding Issue

4.1 Children and the Court System

Children are at times required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The school will support the pupils throughout this process and provide the age appropriate guides 'Going to court (5-11 year olds)' or 'Going to Court and being a witness (12-17 year olds)'.

Child arrangements via the family courts following a family separation can be stressful for children. The school will work alongside CAFCASS and provide appropriate support to the parents and carers in order to support the child through the process. The school may wish to point to the online child arrangements information tool written by the Ministry of Justice.

4.2 Children Missing from Education

The school adheres to the department's statutory guidance: Children Missing Education (September 2016) and acknowledges that children who go missing in education, particularly

repeatedly, can act as an indicator of safeguarding possibilities. This may include abuse and neglect, sexual abuse or child sexual exploitation and child criminal exploitation. Equally, no abuse as such may be involved, but it might indicate mental health problems or risk of substance abuse. Early intervention is necessary to help to determine and identify the existence of any underlying safeguarding issue. The school recognises that any numerous or prolonged absences will have a detrimental effect on the education of the child. Form Tutors and the teaching staff are in the best position to raise initial concerns about such absences to the Head of Year and the Designated Safeguarding Lead. Any failure to attend school without notice will be regarded as an unauthorised attendance.

The school will therefore ensure that:

- Where reasonably possible there will be more than one emergency contact number for the pupils in order to make contact with a responsible adult;
- Form Tutors maintain appropriate records of attendance as a matter of statutory duty;
- contact is made with home by the School Reception on the first day of the absence when no contact has been initiated from home and the school's am registration has been completed;
- concerns are raised with parents/carers by the Form Tutor and Head of Year when absence is either prolonged or a series of shorter, sporadic periods, to ensure that appropriate support may be made in order that reasons for such absences can be established, and appropriate support strategies put in place;
- where appropriate, concerns will be discussed with the Child Missing from Education contact Georgina Bennett Georgina.bennett@devon.gov.uk Telephone: 01392 287230
- For children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage (recognising that in February 2023 legal age of marriage changed from 16 to 18). These would include planned visits overseas during school holidays; holidays only with female companions where a celebration might be taking place. Staff must listen carefully to the pupils when listening to vacation destinations.
- Staff will ensure that form tutors or class teachers are notified where there are concerns about Children Missing Education and where necessary will complete the appropriate Child Missing Education Forms. The staff will be updated about this process through the One Minute Guides training process.
- Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the LADO, the police and/or the Executive Head before discussing details with parents.

4.3 **Children with family members in prison**

The school will support the pupils where a family member is in prison. The school recognises the significant impact that this might have upon stigma, isolation and poor mental health. The school will follow the advice from NICCO (National Information Centre on Children of Offenders) and Barnardo's 'Children Affected by the Improvement of a Family Member' (May 2013).

4.4 **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants, and/or financial

advantage and/or increased status of the perpetrator or facilitator and/or through violence of threat of violence and/or affection.

CSE and CCE can affect children, both male and female and can include children who have been moved (trafficked) for the purpose of exploitation. 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 the victim.

The abuse can be a one-off occurrence or a series of incidences 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.

Certain groups of children are more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status and access to economic or other resources. The children's society CSE has specific resources on preventing child sexual exploitation as doe the CSA centre of expertise

https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation

https://www.csacentre.org.uk/research-resources/key-messages/professionals-in-school-settings/

Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Some of the following can be indicators of CSE and CCE:

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

and the following can be further indicators of CSE:

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

In Devon the **REACH** (reducing exploitation and absence from care or home) team can be accessed through **MASH (0345 155 1071)** highlighting the child sexual exploitation concerns.

Children who have been exploited will need additional support to help them maintain their education.

4.4.1 **Child Sexual Exploitation**

CSE is a form of child sexual abuse and can affect any child, who has been coerced into engaging in sexual activities. This includes 16-17 year olds who can legally consent to have sex. Some children may not realise they are being exploited eg they believe they are in a genuine romantic relationship. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate

knowledge. It may include children being involved with 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.

4.4.2 **Child Criminal Exploitation**

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift, pickpocket, or threaten other young people. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

4.5 **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 forms of "deal line". This can happen locally and nationally. Offenders will use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults 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 schools and are increasingly being targeted and recruited online using social media.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

CSE and CCE indicators may be applicable to children involved with county lines as well the additional factors as children who:

- have repeated or prolonged absence;
- go missing and are found away from their home;
- have been a victim or perpetrator of serious violence (eg 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';
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel rooms where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation and a possible referral using the National Referral Mechanism.

4.6 **Modern Slavery**

Modern slavery occurs when individuals, including children are exploited via sexual exploitation, forced labour, slavery, servitude, forced criminality, the removal of organs and

human trafficking. Where it is suspected that a child is at risk of modern slavery then a referral will be made using the National Referral Mechanism.

4.7 **Cybercrime**

Children that are particularly skilled and interested in computing and technology may inadvertently or deliberately be involved with cyber-dependent crimes (crimes that can be only committed by using a computer). Where there are concerns about a child in this area then a referral can be made to the Cyber Choices programme, so long as the cyber-enabled crime is not related to fraud, purchasing illegal drugs on-line, child sexual abuse and exploitation, on-line bullying or general on-line safety.

4.8 **Domestic Abuse**

The cross–government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial or emotional. This may be a single incident or a pattern of incidents.

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. The Domestic Abuse Act 2021 legally recognises that exposure to domestic abuse and/or violence can have a serious impact upon children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The school recognises that it is essential to listen to and support pupils that have been exposed to such abuse.

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'.

Where domestic abuse is suspected at school the member of staff will as soon as practicable, and before the child returns home, report this to the Designated Safeguarding Lead whereupon the **Police** and **MASH** (0345 1551071) will be contacted for advice. Appropriate action will be taken where a member of staff is the alleged perpetrator or victim of domestic abuse, including contacting the Local Authority Designated Lead - **LADO** (01392 384964).

Where domestic abuse is not known to school, but to the police, as part of Operation Encompass the DSL will take a phone call from the police service before 9am, where a police visit has been made to a home of a pupil for domestic abuse reasons, even if there is no further action being taken by the police force. This ensures that the school has up to date relevant information about the child's circumstances and enables the appropriate support and help to be provided to the pupil.

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

4.9 **Serious Violence**

Children and young people are at risk of serious violence through CCE, CSE, County Lines and gang involvement. Staff should be aware of indicators that may signal that they are at risk 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 well-being, 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.

Factors that increase the risk of serious violence for children include, being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft and robbery.

4.10 **Homelessness**

Being homeless at risk of becoming homeless presents a risk to a child's welfare. The school will support the family and the child appropriately should there be a need and recognises that at times it may only be the 16 or 17 year old child that may become homeless or they may be excluded from their family home. These instances will need a different level of intervention and support from the Local Housing Authority.

4.11 **So-called 'honour-based' abuse (HBA)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes that have been committed to protect or defend the honour of the family and/or the community. HBA includes forced marriage, female genital mutilation (FGM) and practices such as breast ironing. It is important to recognise that it is likely that there is a wider network of family or community pressure and can include multiple perpetrators. Safeguarding measures must take this into consideration. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Staff must be alert to the possibility of a child at risk of HBA, or already having suffered HBA and must inform the DSL (or deputy) whereupon this will be followed up appropriately with the police and children's social care. There is a mandatory duty placed upon teachers for all FGM occurrences (see below).

4.11.1 **Female genital mutilation (FGM)**

Female genital mutilation comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is linked to honour based abuse. FGM is illegal in the UK and is a form of child abuse with long-lasting harmful consequences. It is also illegal for this to be carried out on a British citizen, even if it occurs outside the United Kingdom. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It is therefore the responsibility of all teachers to report to the police cases (999) where they discover that an act of FGM appears to have been carried out. The teacher must personally report this information but this should normally be discussed with the school's DSL, however, the need to share information overrides the process requirement, so anyone can make a referral, if necessary. The Home Office FGM Fact Sheet October 2015 provides useful advice for the school to follow.

4.11.2 **Forced marriage**

Forced marriage is a crime in England and Wales and 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 psychological

and religion or culture can be used as a way to coerce a person into marriage. It is linked to honour based abuse. The school can access the Forced Marriage Unit for further advice.

4.12 **Preventing Radicalisation and the PREVENT duty**

Children are vulnerable to extremist ideology and radicalisation.

- **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 of a person legitimising support form, or use of, terrorist violence.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use of 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.

There is no single identifying factor that makes a child more likely to be susceptible to extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through may different methods such as social media or the internet and settings such as within the home.

With regard to the Prevent Duty Guidance: for England and Wales (March 2015) and the Counter Terrorism and Security Act (the CTSA February, 2015), the school, as part of its commitment to safeguarding and promoting the welfare of all its pupils, recognises its role to have 'due regard' to the need to prevent people from being drawn into terrorism. This is known as the prevent duty and results in the school being vigilant and recognising that extremism and radicalisation can occur regardless of geographical location or population demographics.

The school will:

- provide all staff with appropriate training in respect of the Prevent duty;
- Provide all new staff with induction training to include the Prevent duty;
- include PREVENT awareness training for the Designated Safeguarding Lead;
- ensure that all staff are aware of factors which increase possible vulnerability to radicalisation;
- ensure that all staff know the correct procedures for reporting concerns about prevent;
- ensure that all visiting speakers to the school, whether invited by staff or pupils, follow the procedures for all visitors to the school, have agreed clearly the topic of the event and have been suitably checked and that they are appropriately supervised whilst talking to pupils;
- develop resilience to radicalisation through the PSHE programme, including the use of the Government's website www.educateagainsthate.com, and the wider curriculum including the teaching of fundamental British values (democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs) where opportunities arise in the wider curriculum;
- refer staff to the Home Office three e-learning modules: Prevent awareness; prevent referrals and channel awareness, as appropriate;

- ensure that information is shared in an age appropriate fashion across the whole age range (3-18 years old) and within the EYFS setting (and elsewhere) ensure that stereotypes and negative attitudes are challenged;
- provide appropriate filtering of electronic materials so that pupils are safe from terrorist and extremist materials when accessing the internet at school;
- **any referrals under PREVENT concerns should be made only through the Designated Safeguarding Lead or Deputies, whereupon they will inform the appropriate bodies.** The need to share information over rides the process requirement, so anyone can make a referral, if necessary to Channel and PREVENT by referring on to external agencies, the local police force (Tel 101) or the national prevent service to access a **Prevent officer Tel 0800 011 3764** and if required the DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors**: Tel 020 7340 7264** or by accessing **counter.extremism@education.gov.uk** and the **ACTearly** website;
- where a pupil is moving school and has been referred to the Channel programme the DSL will consider the appropriateness of sharing this information with the new setting to support the continuation of the Channel programme.

4.13 **Child-on-child abuse (child on child)**

Children can abuse other children and this is generally referred to as child-on-child abuse and can take many forms. Staff are reminded to listen, reassure and take seriously any allegations of abuse. Staff will use the pastoral hierarchy system to support them to take appropriate action and to provide support to the victim.
This is most likely to include, but not limited to:

- bullying - including cyberbullying (AI deepfakes, online gaming), 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 (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- threat of harm with a weapon
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could involve harassment, abuse or humiliation used as a way of initiating a person into a groups and may also include an online element).
- Racism, derogatory behavior and conflict.

Staff must be aware that even if there are no reports of child-on-child abuse that this does not mean that it is not happening as it may be the case that it is just not being reported. Staff should inform pupils about reporting processes through the pastoral sessions and PSHE. These include the option of reporting to any trusted adult (or older pupil), using the school's website and the

safeguarding button to report to the safeguarding team, letter boxes for any disclosures committed to paper that are placed discretely around the school.

Child-on-child abuse must never be tolerated or passed off as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up'. Stover School will operate a zero-tolerance policy with regards to any form of abuse and such behaviours will be challenged and appropriate action will be taken. Stover School recognises that if this is not followed then it can lead to 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.

Victims of peer abuse will be treated as in all other cases of abuse, by having their allegations listened to and fully investigated. Perpetrators of peer abuse will also be treated as being 'at risk' and will be supported as appropriate.

4.14 **Sexual violence and sexual harassment between children in schools**

With regards to child on child sexual violence and sexual harassment the school will follow the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. The school will follow the DfE advice for Sexual violence and sexual harassment between children in schools and college (September 2021). Staff will ensure that they do not dismiss or tolerate any such behaviours as this risks normalising them. Instead, staff will challenge inappropriate behaviours, making it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. Sexual violence and sexual harassment will not be dismissed as "banter", "just having a laugh", "boys being boys".

Staff will ensure that pupils are aware of the confidential reporting process through the school's pastoral sessions through PSHE – face to face with a trusted adult; using the safeguarding website recording system and the discretely placed postal boxes around school. Pupils are also encouraged to speak out for their friends if they are aware of any abuse between children at school, using the systems highlighted above. Whilst informing pupils about the processes for reporting, staff will reassure pupils that it is always right to speak out about abuse, they will be taken seriously and that appropriate actions will be taken.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or a group of children. Staff should be aware that girls, children with special needs and LGBT children are at greater risk and more likely that this will be perpetrated by boys. Behaviours such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts or 'upskirting' must be challenged and where necessary the behaviour policy will be actioned. Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttock to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence under the Voyeurism (Offences) Act (April 2019). Anyone of any sex can be a victim.

4.14.1 **Sexual Violence**

Sexual violence is defined as the following sexual offences under the Sexual Offence Act 2003:
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 and that person B has not consented 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 reasonable believes 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. Sexual assault covers a wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottoms/breasts/genitalia without consent, can still constitute sexual assault.

4.14.2 **Sexual harassment**

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. 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. Sexual harassment can include: sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualized names; sexual jokes or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment such as unwanted sexual comments and messages, including on social media, sexualised online bullying, consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.

Where an allegation of sexual violence or sexual harassment is made, the victim must be reassured that they are being taken seriously and that they will be supported and kept safe. No victim should be made to feel ashamed for making a report or have their experience minimised, nor made to feel that they are creating a problem by reporting sexual violence or harassment.

The DSL will immediately complete a risk and needs assessment that will consider the victim and their protection and support, the alleged perpetrator and all the other children (and, if appropriate, adult students and staff). The DSL will engage with children's social care and specialist services as required to support the pupil and the school in its review of the risk assessment and support and protection required. Where reports or rape or assault by penetration have been made the alleged perpetrator should be removed from the classroom and common areas shared with the victim, whilst the school contacts children's social care and the police. These actions are made in the best interests of the children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrators.

The DSL will advise the school regarding the actions to be taken following a report of sexual violence and or sexual harassment. Considerations will include the wishes of the victim, the nature of the incident and whether a crime may have been committed, the ages of the children involved, the developmental stages of the children involved, the power imbalance between the children, whether the alleged incident is a one-off or a sustained pattern of abuse, whether there a on-going risks to the victim, school pupils or staff, the wider context for both the victim and the perpetrator. Each case will be dealt with individually and when to inform the alleged perpetrator must be carefully considered. Where a decision has been reached to include children's social care and/or the police the school will seek advice about when best to inform the perpetrator.

The school will consider four scenarios when managing any reports of sexual violence or sexual harassment and reasons for the decisions should be recorded:

1. Manage internally for a one-off incident and by for example employing the anti-bullying or behaviour policy and providing pastoral support
2. Early help to support as soon as a problem emerges for example to address non-violent harmful sexual behaviour to prevent escalation of sexual violence
3. Referrals to children's social care will be made where a pupil has been harmed, is at risk of harm, or is in immediate danger. Normally the parents of the pupil will be informed, unless there are compelling reasons not to. Collaborative working will help to ensure that there is

a co-ordinated response of support for both the victim and the perpetrator (and any other pupils that require support), the DSL will ensure that they work alongside children's social care in order to ensure that any actions do not jeopardise a statutory investigation. If the school disagrees with the finding from the children's social care that a statutory response is not required the school is prepared to refer again. If a statutory assessment is not appropriate the DSL should consider pastoral support and or the targeted early help level of Family Help.

4. Reporting to the police – any report to the police will be in parallel with a referral to children's social care. Where a report of rape, assault by penetration or sexual assault is made this should be passed to the police, even if the perpetrator is under the age of 10. If the perpetrator is under the age of 10 then the police will take a welfare rather than criminal justice approach. The school will normally inform parents or carers, unless there is a compelling reason not to, and the school will seek advice about what to disclose to staff regarding the alleged perpetrator and their parents. The school will discuss with the police how to best support the victim and their anonymity. The DSL will ensure that they work alongside the police in order to ensure that any actions do not jeopardise a statutory investigation.

The school recognises that there is a need for an on-going response to safeguard and support the victim and the victim should feel as in control of the process as is reasonably possible and to make the victim's daily experience as normal as possible, so that the school remains safe for the victim. The school may utilise the support of the Children and Young People's Independent Sexual Violence Advisors (ChISVAs), CAMHS, Rape Crisis Centre, specialist NHS support from the Sexual Assault Referral Centre and Internet Watch Foundation to potentially remove illegal images. At all times the needs and the wishes of the victim will remain at the heart of the process for any ongoing support.

The school recognises the need to safeguard and support the alleged perpetrator, as appropriate, and implement any disciplinary sanctions, whilst maintaining access to education. The support and sanctions will be considered on a case-by-case basis. The school recognises that an alleged perpetrator may have unmet needs and advice should be taken appropriately from children's social care, specialist sexual violence services and the police. Should the alleged perpetrator move to another school the DSL will ensure that the new setting is aware of any on-going support needs and where appropriate, potential risks to other children and staff.

Should a criminal investigation into a rape or assault by penetration leads to a conviction or caution then the school will deem this as a serious breach of discipline and the perpetrator would be removed from the school roll. Where a criminal investigation into sexual assault leads to a conviction or caution, sanctions reflecting the behaviour policy will be followed, including permanent exclusion. There will be times where reports of sexual assault or sexual harassment are not reported to the police. The school will consider each case and determine which sanctions will be followed. In all of the above situations, the school's decisions will be recorded and justified.

Peer-on-peer consensual or non-consensual sharing of nudes and semi-nudes will be treated as a criminal act with the local police service being informed and where necessary guidance and advice from NCA-CEOP sought.

When investigating allegations about consensual or non-consensual sharing of nudes and semi-nudes, the school will follow the Education Act 2011 which provides that any electronic device can be examined and any data or files can be deleted where there is good reason to do so. There is no legal requirement to have parental consent. The school will follow the advice offered by the UK Council for Child Internet Safety (UKCCIS) advice for schools and colleges on responding to such incidents.

Staff will be provided with INSET training updates, including on-line webinars and with the Devon County One Minute Guides.

4.14.3 **Consent**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time sexual activity occurs. Someone specifically consents to vaginal, oral or anal penetration only if he or she agrees by choice to that penetration and has the freedom and capacity to make that choice.

Staff must understand that:

- a child under 13 can never consent to any sexual activity;
- the age of consent is 16; and
- sexual intercourse without consent is rape.

Pupils will be taught about consent through the school's PSHE and RSE programme using PHSE Association approved resources.

4.15 **Online Safety**

The use of technology has become a significant component of many safeguarding issues and schools are increasingly working online. The school must ensure that there are appropriate filters and processes for monitoring use.

Teaching Online Safety in School (June 2019) determines the importance of teaching pupils about the underpinning knowledge and behaviours that can help pupils to navigate the online world safely and confidently regardless of the device, platform or app. Children can then become better equipped to make the best use of the internet and technology in a safe, considered and respectful way, so they are able to reap the benefits of the online world.

It is recognised that schools must understand the risks that exist online, recognising factors such as child sexual exploitation; radicalisation; sexual predation that often have technology providing the platform to facilitate harm.

There are 4 areas of risk:

1. content: being exposed to illegal, inappropriate or harmful material for example pornography, misogyny, misandry, allegation, fake news, racist or radical and extreme views, misinformation, disinformation, AI deepfakes, online live gaming streaming and conspiracy theories. Staff will help pupils consider questions to ensure that they are confident in the content that they are accessing whilst considering AI algorithms and how they affect content being viewed as well as enabling pupils to develop their digital resilience;
2. contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults. Staff will help pupils to recognise the persuasive powers used for purchasing something, ways in which games and social media companies try to keep used online longer and criminal activities such as grooming. Staff will help pupils recognise the detrimental effect that AI chatbots can have;
3. conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying. Staff will teach pupils the same standard of respect, behaviour and honesty apply on and offline. Staff will support pupils in recognising unacceptable behaviours in others and their own "online reputation" and digital footprint; and
4. commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

As part of the education of the pupils at school the ICT Safe User Agreement is adhered to and this includes a clear statement on the use of mobile devices within the school. Appropriate filters and monitoring is in place, whilst not 'over blocking' so that children can be taught about online safeguarding. To support the PSHE programme the UKCIS 'Education for a connected world framework' will be reflected with both the 'thinkuknow' campaign and Teaching online safety in school. Outside agencies such as the South West Grid for Learning will annually present about online safety to the school community, including staff; parents and governors. Annex C of KCSIE provides a list of resources that can support staff and schools.

Where mobile devices are enabled to access the internet without going through the school's filtering systems the school will risk assess and follow the advice offered by the UKCIS 'Online Safety in Schools and Colleges: Questions from the Governing Board'. The school will complete a review in this area following the '360 safe website' which provides schools with an online safety self-review tool.

Staff will be provided with on-line safety training via the South West Grid for Learning and will have access to UKCIS guidance Education for a connected world and will have updates throughout the year.

Staff will additionally be provided with training on cybersecurity and on filtering and monitoring of online systems at school. Broader guidance can be found at the National Cyber Security Centre (NCSC.gov.uk).

Filtering and monitoring: Stephen Cole is the member of the Senior Leadership Team responsible for filtering and monitoring. Working with the Designated Safeguarding Lead, he will review the School's filtering and monitoring provision at least annually, and whenever a safeguarding risk is identified, working practices change or new technology is introduced, having regard to the DfE filtering and monitoring standards.

A written record will be kept of each review, including what was checked, the decisions made and any actions taken. The outcome will be reported to the Safeguarding Governor. The Designated Safeguarding Lead takes lead responsibility for acting on safeguarding concerns identified through monitoring.

AI and technology

1. Legal and Ethical Responsibilities

Schools must ensure that AI and technology use complies with existing safeguarding frameworks, including:

- Keeping Children Safe in Education (KCSIE) statutory guidance 1
- UK GDPR and Data Protection Act 2018
- Children's Online Privacy Protection

2. AI Use by Teachers

Teachers are permitted to use AI for tasks such as lesson planning, marking, and admin. However, they must verify AI-generated content and ensure it is appropriate and accurate.

Final responsibility for safeguarding and educational content always lies with the teacher and school leadership.

3. AI Use by Pupils

Schools can decide whether pupils may use AI tools, but must:

- Enforce age restrictions (many AI tools are 18+)
- Ensure close supervision
- Use tools with built-in safety and filtering features2

4. Data Security and Privacy

Schools must manage data security risks associated with AI and cloud-based tools.

The National Cyber Security Centre (NCSC) provides guidance on:

- Cloud security
- Cyber defence
- Device safeguarding (filtering and monitoring)

https://www.ncsc.gov.uk/

5. Policy and Oversight

While there is no single formal AI framework yet, the Department for Education (DfE) encourages schools to:

- Use AI ethically and cautiously
- Align AI use with existing safeguarding and data protection policies 3
- Develop internal policies for AI use, including acceptable use agreements and staff training

5 Duty of employees, Governors/Trustees and volunteers

5.1 Every employee and Governor of the School as well as every volunteer and supply/cover staff who assists the School are under a general legal duty:

- to protect children from abuse;
- to be aware of the School's child protection procedures and to follow them;
- as the school has charitable status the trustees of the school need to be aware of their duty to safeguard children as in the Charity Commission guidance;
- to know how to access and implement the School's child protection procedures, independently if necessary;
- to keep a sufficient record of any significant complaint, conversation or event in accordance with this policy;
- to report any matters of concern to the Designated Safeguarding Lead and as necessary, to directly refer to the appropriate local agency;
- to participate in training as required.

Induction training on the School's child protection procedures will be provided to all newly appointed staff, trainee teachers and volunteers and will include at a minimum the child protection policy, the staff code of conduct and Part One of KCSIE (September 2026), which all

staff are expected to read in full. Termly INSET training will update all staff on child protection and safeguarding procedures.

All staff working with children will undertake appropriate child protection training, including refresher training at two yearly intervals and all temporary and voluntary staff working with children will be made aware of the School's child protection procedures and the requirement to follow them. Key Governors will receive training at Level 2 or Level 3 as appropriate.

5.2 **Prefects**

All Prefects will receive Level 2 safeguarding training from the Designated Safeguarding Lead or Deputies.

5.3 Regulated activity

KCSIE 2026 sets out a revised definition of regulated activity in relation to children. The supervision exemption has been removed, so volunteers who carry out regulated activity are now in regulated activity whether or not they are supervised. Anyone engaging in regulated activity at the School will have an enhanced DBS check with barred list check, in line with the Safer Recruitment Policy, and the checks will be recorded on the Single Central Register.

5.4 Volunteers

All volunteers will:

(a) have checks appropriate to their role, including an enhanced DBS check with barred list check where they are in regulated activity, and a prohibition from teaching (TRA) check where appropriate;

(b) receive safeguarding induction before starting, covering this policy, Part One of KCSIE, the staff code of conduct, whistleblowing and the identity of the DSL and deputies;

(c) follow the staff code of conduct; and

(d) be covered by the arrangements for allegations and low-level concerns in section 7. Allegations about a volunteer will be referred to the LADO, and to the DBS where the referral criteria are met.

5.5 Trainee teachers

Where the School hosts trainee teachers:

(a) for salaried trainees employed by the School, the School will carry out all the pre-appointment checks required for staff;

(b) for fee-funded trainees, the School will obtain written confirmation from the initial teacher training provider that it has carried out all the necessary checks, including an enhanced DBS check with barred list check, and that the trainee has been judged suitable to work with children;

(c) trainee teachers will receive the same safeguarding induction as staff, including Part One of KCSIE, and must follow the staff code of conduct; and

(d) trainee teachers are covered by the arrangements for allegations and low-level concerns in section 7. Allegations will be referred to the LADO, and the training provider will be informed.

6 Procedures for reporting abuse and sharing concerns

Staff must maintain an attitude of 'it could happen here' where there are any safeguarding concerns and they must report these immediately to the DSL or Deputy DSL. The DSL or Deputy will then determine if the school can manage any support for the child internally through the school's own systems such as the pastoral team, well-being team or the School Counsellor; or if the school should commence an early help assessment; or make a referral to statutory services (under Section 17 or Section 47) as the child is in need or is likely to suffer harm.

Where required the DSL and Deputies will challenge other agencies if they appear to not be taking action.

6.1 Staff must:

- **RECEIVE** the information – staff must listen carefully to the child and keep an open mind. Staff should not question whether or not the abuse has taken place and be aware of your non-verbal messages;
- must not ask leading questions, that is, a question which suggests its own answer;
- don't stop a child who is freely recalling significant events;
- keep responses short, simple, quiet and gentle;
- **REASSURE** the child- staff must reassure the child and let them know that they have done the right thing by telling you, that they will be taken seriously and appropriate actions will be taken;
- **Do NOT promise confidentiality**. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead or Deputies who will ensure that the correct action is taken; and
- **RECORD** - staff must detail a verbatim record of the conversation ie using the language that the child has used. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. This record may provide important information about the context of the concern and be part of the contextual safeguarding required for the school and other agencies. The record must be kept securely and handed to the Designated Safeguarding Lead or Deputies as soon as practicable. Alternatively, and increasingly, a CPOMS record should be uploaded and the Safeguarding team notified promptly and immediately. Advice will be given by the Designated Safeguarding Lead or Deputies, as required regarding next steps.
- **REPORT** – staff would normally inform the Designated Safeguarding Lead or Deputies, however members of staff are reminded that ANY member of staff may make a referral to external agencies.
- **TAKE APPROPRIATE ACTION** – reports must be passed to the DSL or Deputies where appropriate or should be followed up using the pastoral hierarchy.

6.2 **Preserving and Recording evidence**

All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved and passed to the Designated Safeguarding Lead. Records will be placed on the appropriate school files; staff and/or pupil.

6.3 **Reporting**

All suspicion or complaints of abuse must be reported to the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads, or if the complaint involves the Designated Safeguarding Lead, to the Executive Head or Head of the Preparatory School.

6.4 **Action by the Designated Safeguarding Lead (and Deputy)**

- On being notified of a complaint or suspicion of abuse, the action to be taken will take into account the School's ability to meet the needs of the pupil through internal support and intervention or through a referral to Early Help or by other professionals already involved with the family, using the Devon Assessment Framework.
- Advice or urgent action for acute cases may be sought through **MASH 0345 155071.**
- Wherever possible the DSL will seek consent from the parents, except where a child is considered to be at risk of harm and seeking parental consent increases this risk or when there are reasonable grounds to believe that the child is at sign of harm.
- Advice will be sought from the Local Authority Designated Officer (LADO) **01392 384964**
- All telephone referrals must be followed up with a referral form within 48 hours via email address mashsecure@devon.gcsx.gov.uk.
- The DSL and Deputies will detail how the concerns were followed up, detailing actions taken and decisions made.

6.5 **School Holidays**

If a member of staff has a safeguarding concern during the school holiday then they have the duty to contact the MASH team OR contact the school office and request for the duty member of staff for safeguarding, normally the DSL, the Deputy DSL or the Executive Head to make contact for advice.

7 **Arrangements for dealing with allegations of abuse against teachers and other staff**

7.1 **Whistleblowing**

- All staff are duty bound to report abuse or suspected abuse, including about colleagues, even if they feel that speaking up would be disloyal to their colleagues or the school. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of misconduct. It is essential that all staff feel that they are able to whistle blow with respect to any concerns related to Safeguarding within the school rather than overlooking the problem.
- It is recognised that the decision to report a concern can be a difficult one to make. The School will not tolerate any harassment or victimisation (including informal pressures) placed upon an individual and will take appropriate action to protect the individual when a concern has been raised in good faith.
- Within the EYF, Whistleblowing now covers poor or unsafe practice across any aspect of the settings/provision, in all areas and you MUST report it.
- All concerns will be treated in confidence and every effort will be made not to reveal an individual's identity. At the appropriate time, however, the individual may need to come forward as a witness.
- This policy encourages the individual to put their name to the allegation whenever possible.

There are two levels of allegation/concern**:**

- Allegations that may meet the harm threshold
- Allegations/concerns that do not meet the harm threshold – known as 'Low level concerns'.

The **NSPCC Whistleblowing Helpline** can be contacted for advice Tel: **0800 028 0285 (**Mon-Fri 8am–8pm) or **help@nspcc.org.uk.**

7.2 Allegations that may meet the harm threshold

If an allegation of abuse, whereby this might indicate that a person would pose a risk of harm if they continue to work in regular or close contact with children, is made against anyone working with children (including volunteers, trainee teachers, supply staff and contractors) the allegation must be reported immediately to the Executive Head. The allegation may be with regard to a pupil or a child outside of the school. In the Executive Head's absence this must be reported directly to the Chair of Governors.

The school will utilise the 'harm test' as explained by the Disclosure and Barring Service - allegations that may meet the harms threshold where anyone working at a school, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be able to work with children. This may include behaviour outside of school, which is known as transferable risk.

The school has a duty to look after the welfare of the child and the DSL will ensure that the child is not at risk. Measures must be put in place to ensure that the child is not at risk of further harm and children's social care will be contacted.

The person subject to the allegation must be supported through the investigation and the allocated case manager of the investigation should discuss with the LADO , the nature, content and context of the allegation, and agree on a course of action.

Stover school will deal with allegations quickly, fairly and consistently, liaising with the Local Authority Designated Officer (LADO) **Tel 01392 384964,** agreeing a course of action. This may include completing an establishment of facts to determine if there is any foundation to the allegation such as determining if the alleged was in school, if the alleged had contact with the child, if there is any CCTV footage.

Where it is believed that a child is in immediate danger the Police should be contacted (999). There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened as per Working Together to Safeguard Children.

Where the case manager is concerned about other children in the community or the member of staff's family, they will inform the DSL and appropriate actions will be taken, such as a risk assessment and a referral to children's social care.

The Executive Head will inform the individual of the allegation, following the guidance from the LADO and if appropriate children's social care and the police.

Where it is clear that an investigation is not required by the police or children's social care, or the initial assessment or strategy discussion decides that this is the case, the LADO will provide advice about the next steps.

Where there is an initial discussion that leads to no further action, the case manager and the LADO will record the decision and justification for it and agree on what information should be put into writing to the individual concerned and by whom.

Where further enquiries are required the LADO and the case manager will discuss the process of the investigation. The investigation would normally be completed by a senior leader of the school. An independent investigator may be required due to the nature of the allegation or the complexity of the allegation.

The case manager is responsible for ensuring that the cases are dealt with as quickly as possible in a thorough and fair process and reviews will be conducted fortnightly. The first review should take place within four weeks of the initial assessment. The LADO will support the school in this process, ensuring that the appropriate investigation is carried out.

7.3 **Supply teachers and contracted staff**

Some staff are not directly employed by Stover School, however they remain under the supervision, direction and control of the governing body. Stover school must ensure that allegations against supply teachers are dealt with properly, liaising with the LADO. The school should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation. The agency should be fully involved and co-operate with any enquiries from the LADO. Should a supply teacher be utilised by Stover School, then Stover School will inform the agency of its process for managing allegations.

7.4 **Governors**

Where an allegation is made against a governor the school will contact the LADO for advice and follow the appropriate procedures. Where an allegation is substantiated the school will require them to be removed from office, informing all appropriate agencies.

7.5 **EYFS (Early Years Foundation Stage)**

The School will inform **OFSTED** of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the Nursery (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises and of the action taken in respect of those allegations. The School will inform OFSTED of these allegations as soon as reasonably practicable but in any event within 14 days of the allegations being made. The practitioner with responsibility for safeguarding in the Early Years setting is **The EYFS Lead** and the deputies are the Nursery Leaders.

7.6 **Disclosure of information**

- The Head will inform the accused person of the allegation as soon as possible after the LADO has been consulted and following any further advice from Children's Social Care and the Police.
- The Parents or carers of the child(ren) involved will be informed of the allegation as soon as possible if they do not already know of it, following advice from external agencies

- Where the LADO advises that a strategy discussion is needed, or the police or the local authority's social care services need to be involved, the Head should not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

- The parents or carers should be kept informed of the progress of the case, including the outcome of any disciplinary process. They will be made aware of the requirement to maintain confidentiality about any allegations made against teachers whose investigations are ongoing as set out in section 141F of the Education Act 2002.

- The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed until the point that the accused is charged with an offence.

7.7 Where the allegation is made against the Head the matter should be reported immediately to the Chair of Governors, and in his absence one of the two Vice Chairs, and must not be shared with the Head prior to reporting to the LADO.

7.8 The School recognises fully that it has a duty of care towards the staff, and will:

- keep an open mind until the investigation has been concluded;

- keep the member of staff informed of progress of the investigation;

- keep member of staff informed of developments in the workplace and a representative will be appointed to do this;

- arrange to provide appropriate support to the individual while the case is ongoing.

- ensure that the member of staff is informed of their entitlement to the support of their Trade Union;

- ensure that confidentiality and guard against unwanted publicity must be sought and wherever possible maintained in order to prevent the reporting or publishing of allegations against teachers. These restrictions apply up to the point where the accused person is charged with an offence or the DfE/Teacher Regulation Agency publish information about an investigation or decision in a disciplinary case;

- make a full and complete investigation irrespective of a compromise agreement being brokered or a member of staff resigning part way through the investigation;

- ensure that cases in which an allegation was proven false, unsubstantiated or malicious should not be included in employer references.

7.9 The following definitions will be used when determining the outcome of the allegation investigation:

- **Substantiated**: there is sufficient evidence to prove the allegation;

- **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;

- **False**: there is sufficient evidence to disprove the allegation

- **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Wherever possible, the accused should be given the opportunity to answer the allegation and make representations about it. It is important to reach and record an outcome, based upon the information available, even if the accused does not cooperate. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

7.10 **Action to be taken against the accused**

Where an investigation by the police or the local authority children's social care services is unnecessary, the LADO will discuss the steps to be taken with the Head (or the Chair of Governors where the allegation is against the Head). The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to summary dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake a further investigation to determine the appropriate action. If so, the LADO will discuss with the Head how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances it may be appropriate to appoint an independent investigator as advised by the Devon Children and Families Partnership.

7.11 **Suspension**

Suspension must not be an automatic response to an allegation and should only be considered in a case where:

- there is cause to suspect a child or other children at the School is or are at risk of significant harm; or
- the allegation is so serious that it might be grounds for summary dismissal.

Suspension will not be automatic and consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School or providing an assistant when the individual has contact with children, moving the child so that they do not come into contact with the member of staff – but only if the child and parents have been consulted and understands clearly that this is not a punishment for making an allegation. The LADO will be contacted for advice as necessary.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided.

If the case manager is concerned about the welfare of other children in the community or the teacher's family, these concerns should be reported to the DSL, children's social care or the police as required. These reasons alone would not constitute suspension.

Where the school is made aware of an interim prohibition order, in respect to an individual who works at school they must ensure that pending the Teacher Regulation Authority investigation, the individual **must not** carry out teaching work.

7.12 **Criminal proceedings**

The School will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

7.13 **Ceasing to use staff**

If the School ceases to use the services of a member of staff (or a governor or volunteer) because they are unsuitable to work with children, or if such a member of staff would have been dismissed had he/she not resigned, a settlement or compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service (DBS)/ Teacher Regulation Agency (TRA) where appropriate. Where a dismissal does not reach the threshold for DBS referral, separate consideration will be given to a TRA referral. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

Substantiated allegations will be included in future reference, based upon factual information of the investigation.

7.14 **Resignation**

If a member of staff (or a governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any investigation will still be followed up by the School. Resignation will not prevent a prompt and detailed report being made to the Disclosure and Barring Service in appropriate circumstances.

7.15 **DBS Referral**

Where Disclosure and Barring Service (DBS) referral criteria are met Stover School will promptly report this to the DBS about any person within the school community; whether employed, contracted, a volunteer (including Governors) or student whose services are no longer used for regulated activity as they have caused harm or posed a risk of harm to a child. Failure to make a report constitutes an offence and 'compromise agreements' cannot be used to prevent a referral being made to the DBS when it is legally required nor can an individual's refusal to cooperate with an investigation prevent a referral on the grounds that the case has not been concluded. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors.

7.16 **Unsubstantiated, unfounded, false or malicious allegations**

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy. The School shall also be mindful of the possibility that the allegation of abuse was an act of displacement, masking abuse that may be occurring within the child's own family and/or community and a consideration with the LADO regarding a referral to children's social care may be appropriate. The DSL will likewise consider this possibility.

Where a parent has made a deliberately invented or malicious allegation the Headteacher will consider (in accordance with the School's terms and conditions) whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

A member of staff could be left at the end of an unfounded or unsubstantiated allegation of child abuse with severely diminished self-esteem. If issues of professional competency are involved, or disciplinary issues are raised a period of re-training may be appropriate. The School may also arrange a mentoring programme and/or professional counselling outside the school community as appropriate.

Allegations that are found to be malicious will be removed from personnel records. Any allegations that are false, unsubstantiated, are unfounded or malicious will not be referred to in references.

7.17 **Return to work**

If it is decided that the person who has been suspended should return to work, the School should consider how to facilitate this, for example, a phased return may be appropriate and / or the provision of a mentor to provide assistance in the short term. The School should also consider how to manage the contact with the child(ren) who made the allegation.

7.18 **Record keeping**

Records will be kept on the file of the person accused (unless proven to be malicious or false) and will contain the following:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and the outcome categorised;
- a copy provided to the person concerned, where agreed by children's social care or the police and
- a declaration on whether the information will be referred to in any future reference.

The record will provide clarification in cases where future DBS checks reveal information about an allegation that did not result in a criminal conviction and it will help to prevent any unnecessary re-investigation.

Stover will preserve records that contain information about allegation of sexual abuse foe the Independent Inquiry into Child Sexual Abuse, for the term of the inquiry. All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

7.19 **Non recent allegations**

If an adult makes an allegation to the school about abuse as a child at the school, then they will be advised to contact the police.

If a child makes a non recent allegation to the school about abuse at the school, then this will be reported to the LADO.

7.20 Concerns that do not meet the 'harm threshold' – Low level concerns

As part of the whole school approach to safeguarding, Stover School promotes an open and transparent culture in which all concerns about adults at school are taken seriously, recorded, and responded to quickly and appropriately. Where these concerns do not meet the 'harm threshold' they will be regarded as low level concerns.

Staff are reminded to follow the Staff code of conduct listed below in order to understand what is deemed as appropriate behaviour and to be confident in distinguishing expected and appropriate behaviour, from concerning, problematic or inappropriate behaviour, in themselves and others.

Stover will ensure that staff feel empowered to create an environment where they can share any low-level safeguarding concerns will the DSL or Deputy and also to be able to self-refer, where for instance that may have found themselves in a compromising situation that may have been misinterpreted by others or falls below the staff code of conduct expected professional standards.

Where a low level concern is raised about a non-directly employed member of staff their employer will be notified of the concern.

All low-level concerns will be recorded, including the details of the concern, context in which the concern arose and the action taken. Records should be reviewed to see if there is a pattern for the individual, moving it to meeting the harm threshold or as a pattern of behaviour across the school that needs to be addressed through review or training.

Low-level concerns will not be cited in any future reference.

8 Staff code of conduct

8.1 Unacceptable Conduct

- Where the staff member engages in a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual (Section 16 of The Sexual Offences Act 2003).
- Where the member of staff engages in a staff/pupil relationship including the use of social media or does not follow The ICT Safe User Agreement. For ex-pupils the recommendation from Devon County is that social-media relationships are avoided.
- Where the member of staff accesses inappropriate images that are not in line with the ICT Safe User Agreement and/or uses school equipment to access adult pornography or brings in person equipment containing these images to the work place.
- Where staff seriously demean or undermine pupils, parents, carers or colleagues, or act towards them in a manner which is discriminatory in relation to gender, marital status, religion, belief, colour, race, ethnicity, class, sexual orientation, disability or age.
- Where a staff member swears, blasphemes or uses any sort of offensive language in front of pupils.
- Where a staff member smokes on site (including school vehicles), or appears at work under the influence of alcohol, illegal drugs or medicines. For the purposes of smoking, this includes the use of e-cigarettes or vapourisers.
- Where a member of staff makes sexual innuendos or any comments of a sexual nature (other than in the context of the curriculum).
- Where a staff member uses their position of authority to instil extreme views or political indoctrination.
- Where a staff member deliberately allows the exposure of pupils to such actions that undermine fundamental British values including promoting political or religious extremism by inviting individuals to speak in schools.
- Where a member of staff fails to disclose relevant information about themselves or those they live with that might impact upon their ability to work safely with children.
- Where a staff member fails to act upon a concern about a child's welfare (staff are reminded that they should act rather than wait to be told).

- Where they fail to take reasonable care of pupils under their supervision with the aim of ensuring their safety and welfare.
- Where a member of staff fails to comply with relevant statutory provisions, which support the well-being and development of pupils, including where these require co-operation and collaboration with a range of agencies, as well as teacher colleagues and other adults.
- Where they fail to observe confidentiality in a manner consistent with legal requirements.
- Where a member of staff fails to comply with the requirements of statutory bodies relating to the examination, assessment and evaluation of pupil achievement and attainment.

- Where they fail to maintain appropriate standards of honesty and integrity in management and administrative duties, including in the use of school property and finance;
- Where a member of staff misuses or misrepresents their professional position, qualifications or experience.
- Where a member of staff does not respect the privacy of pupils, parents and colleagues and passes information about, for example, addresses or telephone numbers to others without checking first with the person concerned.
- Where they fail to inform about any low-level safeguarding concerns.
- Where they fail to follow the whistleblowing procedure.
- Where they otherwise bring the reputation and standing of the school, or the profession of teaching, into serious disrepute.
- If a member of staff is found guilty of unacceptable conduct and is dismissed (or would have been dismissed had he/she not resigned), the School will make a referral to the Teacher Regulation Agency highlighting the misconduct and making reference in accordance with the Teacher Misconduct: the prohibition of teachers (April 2018) to a prohibition order. The reasons for an order are:

    - unacceptable professional conduct.
    - conduct that might bring the profession into disrepute; or
    - a conviction, at any time, for a relevant offence.

8.2 **Staff/Pupil contact**

- Staff should avoid unnecessary contact with pupils outside of school.
- School email addresses should be used for the purpose of electronic communication between the member of staff and the pupil and only for the purposes of school business eg. about homework assignments.
- Where a member of staff is required to convey a pupil by car then they must ensure that they have permission from a member of the SLT and wherever possible, the pupil must sit in the back of the car.
- Staff should not correspond with pupils via social networking sites e.g. Facebook.
- Staff should avoid social networking contact with ex pupils.
- They should not make arrangements to meet pupils, individually or in groups, outside school other than on school trips authorised by the Deputy Head or in his absence the Headteacher.

8.3 **One-to One Tuition and Lone Working**

- During the normal school day, staff, such as music, performing arts or sports coaches should ensure that, if they engage in one-to-one tuition, the door to the room has a glass panel or is left open. Outside of the normal school day staff should not be alone in a room with a pupil.

If a member of academic staff wishes to work beyond 8:00pm, when the school is closed and locked up then the Estates Manager, Jamie Halse must be informed. After hours the school estates team monitors access to the grounds, making regular patrols.

8.4 **Gifts, Rewards and Favouritism**

- Staff should avoid displays of affection, either personally or in writing e.g. messages in birthday cards, gifts, text messages, emails etc. Staff should avoid words or actions which are over familiar.
- Any gifts given to pupils by staff should be given openly and not be based on favouritism. Gifts may be given to a group or class of pupils as a reward. The reason for the reward must be specific and relate to a school based activity.
- Staff should take care to ensure that they do not accept a gift that may be construed as a bribe by others, or lead to the giver getting preferential treatment. There are occasions when pupils and/or parents wish to give staff tokens of their appreciation and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

8.5 **Dress and Appearance**

- Staff should dress in a professional way that is appropriate to their role, including the need for appropriate safety clothing as deemed necessary. This would normally mean that a male member of staff would wear a shirt and tie and a female member of staff would dress in a business-like and professional way.
- Staff should ensure that their appearance is smart, setting an example to the pupils and not likely to be viewed as offensive, revealing or sexually provocative.

9 Physical Contact

9.1 **Reasonable Force**

The term reasonable force covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children and must follow the guidance as described in the Use of reasonable force in schools (July 2013) and reducing the need for restraint and restrictive intervention (June 2019). The school concurs with the guidance from the department that believes that the adoption of a 'no contact' policy at Stover School could leave staff unable to fully support and protect the pupils. The decision on whether or not to use reasonable force to control or restrain a child is based upon a professional judgement of the individual circumstances.

Reasonable force means using no more force than is needed and may range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a pupil needs to be restrained to prevent violence or injury. The use of force may be passive physical contact such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

The school will endeavour to plan positive and proactive behaviour support for children with SEN, disabilities or with medical conditions in order to reduce the occurrence of challenging behaviour and the need to use reasonable force.

9.2 **Positive handling (Physical Restraint)**

- Staff may use such restraint or physical contact as is reasonable in the circumstances to prevent a pupil from doing, or continuing to do any of the following:
    - committing a criminal offence;
    - injuring themselves or others;
    - causing damage to property, including their own

- engaging in any behaviour prejudicial to good order and discipline at the school or among any of its pupils, whether that behaviour occurs in the classroom or elsewhere.

- Physical restraint **cannot** be justified to prevent a pupil from committing a trivial misdemeanour.
- Any restraint used should always be the minimum needed to achieve the desired result.
- Whether it is reasonable to use restraint and the degree of restraint that could be used may also reflect the age, gender and any SEN or disability needs.
- Before intervening physically, staff wherever practicable, should seek alternative measures, such as asking the child to stop and they should tell the pupil what will happen if they fail to cease in their behaviour
- The member of staff should continue to communicate throughout the incident and make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.
- Staff should avoid touching or holding a pupil in a way that might be considered indecent.
- Staff should not act in a way so as to cause injury.
- If a restraint has been employed then the member of staff must inform the Head immediately following the incident and a written report must be submitted within 24 hours.
- Positive handling must always reflect the school's **Behaviour Policy**.

9.3 **Action taken in self-defence or in an emergency**

The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a pupil is at risk of immediate injury or on the point of inflicting injury on someone else, any member of staff (whether authorised or not) would be entitled to intervene.

9.4 **Personal Care, including Intimate Care**

This includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability.

9.4.1 **EYFS Intimate Care and Toileting**

This policy supports the safeguarding and welfare requirements of Early Years Foundation Stage (EYFS) 2017 and the Disability Discrimination Act 2005: school will ensure that:

- No child's physical, mental or sensory impairment will have an adverse effect on their ability to take part in day-to-day activities;
- No child with a named condition that affects personal development will be discriminated against;
- No child who is delayed in achieving continence will be refused admission;
- No child will be sent home or have to wait for their parents/carer due to incontinence;
- Adjustments will be made for any child who has delayed continence.

9.4.2 **Partnership with Parents/Carers**

The child's keyworker will work in partnership with parents to provide care appropriate to the needs of the individual child and together will produce a care plan. The care plan will set out:

- what care is required;
- the number of staff needed to carry out the task (if more than one person is required, the reason will be documented);
- additional equipment required;

- the child's preferred means of communication (e.g. visual, verbal), agreeing terminology for parts of the body and bodily functions ;
- the child's level of ability i.e. what tasks they are able to do by themselves;
- how staff will acknowledge and respect any cultural or religious sensitivities, related to aspects of intimate care ; and
- how the plan will be monitored and reviewed in accordance with the child's development.

Parents are asked to supply the following to the EYFS setting:

- spare Clothes – clearly labelled;
- spare underwear – clearly labelled; and
- where required nappies and wet wipes.

9.4.3 **Best Practice**

- When intimate care is given, the member of staff explains fully each task that is carried out, and the reason for it. Staff will encourage children to do as much for themselves as they can. Lots of praise and encouragement will be given to the child throughout this process.
- All staff working in early years setting must be DBS checked and have satisfactorily submitted the annual self-assessment regarding disqualification by association. Particular staff members are identified to change a child with known needs and they plan and record their work with that child.
- If a member of staff is concerned about any physical or emotional changes, such as marks, bruises, soreness or distress they will inform the Designated Safeguarding Lead immediately.
- The EYFS staff will talk to the children about whether they are happy about whom they are being cared for and by and any concerns regarding their happiness will be discussed.
- If a child makes an allegation against a member of staff, the procedure set out in the Safeguarding Policy will be followed.

9.4.4 **Dealing with body fluids**

- Urine, faeces, blood and vomit will be cleaned up immediately and disposed of safely using the fluids kit and reporting to the site team immediately to enable effective and immediate cleaning. When dealing with body fluids, staff will wear protective clothing and wash themselves thoroughly afterwards.
- Soiled children's clothing will be bagged to go home and parents will be informed. Staff will not rinse it before it is bagged. Children will be kept away from the affected area until the incident has been completely dealt with.
- All staff maintain high standards of personal hygiene, and will take all practicable steps to prevent and control the spread of infection, including effective hand cleaning.
- If required the child will be taken to the separate shower in the Health Centre and will be supported by the School Matron in getting themselves clean.

9.4.5 **Older Years Intimate Care and Toileting**

- Should the need arise due to illness or a specific need then the advice above (9.3) will be followed. Wherever possible the member of staff will support the older years pupil in cleaning themselves and usually this will be the School Matron.

9.5 **Contact in other situations**

Some physical contact may be proper or necessary when demonstrating exercises or techniques during lessons for example Music, Drama, Sports lessons or coaching. On these occasions the member of staff will explain the intended action to the pupil and ask permission.

In such circumstances, the member of staff should first explain the intended action to the pupil. Do not proceed with the action if the pupil appears to be apprehensive or reluctant or if you have other concerns about the pupil's likely reaction.

- If working alone then ensure that 8.3 is followed.
- If a member of staff has to give first aid the Good Samaritan's Act will be assumed.
- Touching may also be appropriate where a pupil is in distress and needs appropriate comforting. Staff should use their own professional judgement when they feel a pupil is in need of this kind of support.

10 Recording Devices and Phones

For the purposes of this document recording devices can mean any piece of equipment that can capture an image, still or movie, for example cameras, drones, smart watches, tablets, mobile phones and all other pieces of equipment

10.1 **Parental consent**

- Parental consent is sought regarding the use of photographs internally and for the external promotion of the school. All aspects of the school, including the marketing department of the school, are made aware of the children whose parents have chosen not to give permission for their child to be photographed.

10.2 **Mobile Phones & other recording devices – EYFS**

- The Nursery and Pre-Prep have mobile phones provided by the school. These are kept in the settings and used for emergency school business only. The Nursery has a mobile phone which parents can call to report an absence or check in on their child

- Staff are asked to take one of these mobile phones when going on a walk in the school grounds.
- Personal mobile phones or recording devices are not to be used in the classrooms.
- All non EYFS staff that come into contact with EYFS pupils eg. other teachers, domestic staff, grounds staff and catering staff are informed of the need to keep personal phones secured and wherever practicable not to answer them when these pupils are nearby.
- Personal phones and other recording devices can be locked in the Nursery office or left in the Prep School Office.
- Staff are not permitted to use their personal mobile phones to take any photographs at school.
- Visitors to the EYFS setting are asked to switch off their personal mobile phones or other recording devices before they are in contact with the pupils.

10.3 **Recording Devices and Camera Usage in EYFS**

- The Nursery and Reception class each have a school camera that may be used to take pictures of pupils in the setting and on trips. These photographs form part of the pupils' learning record.
- The photographs are removed from the camera by the teachers, Classroom Assistants, Prep School Administrator or Art Assistant and stored on the School network from whence they can be printed for child's records or for display boards.
- Photographs may also be used for newsletters, in the school magazine, on the website and in the local press. Upon joining the School all parents are asked for their permission to use images of their children for School promotional purposes. Parents may opt out of this if they so wish as 10.1.
- Teachers are not permitted to take home the school's mobile phones or cameras.

- Relevant staff will check that the Pre-Prep and Nursery telephones and cameras are accounted for at the beginning and the end of the day.
- Images from CCTV are stored for security reasons only.

10.4 **Mobile Phones IT Policy point 6**

- Mobile phones can be used outside of the EYFS setting for the sole purpose of business related activity eg emailing parents or contacting colleagues.
- Where photographs have been taken of children on mobile phones these must be sent to the Marketing Department and stored upon the school network. The images on the phone must then be deleted.
- Images must NOT be taken home.
- Under the ICT Safe User Agreement all children must not use their mobile phones (or other equipment) to record their peers or staff members without their permission. These images must NOT be downloaded onto the internet.
- All pupils are not able to use their mobile devices between 8.30am -4.30pm and are either handed in at the Prep school, or in a Yonder pouch in the senior school.
- Signed in visitors to the school site will be asked not to take any photographs around the school site via the visitors information leaflet. They are asked not to take calls on any mobile device, unless they are in a supervised space. If a private call needs to be taken or made the school will provide a suitable space.

11 Secure School premises

11.1 **School premises**

- The School will take all practicable steps to ensure that School premises are as secure as circumstances permit and are well supervised at all times.
- The caretaker lives on site and regularly patrols the site.
- All buildings are secured by 8:00 every night.
- A number of staff are resident on the site including the Head.
- CCTV is in operation and is reviewed by the Estates Manager. Any issues will be reported immediately to the Designated Safeguarding Lead.

11.2 **Lanyards**

The school will ensure that all staff will wear a lanyard or badge if appropriate for Health & Safety reasons, stating that they are 'staff', governors will state 'governors', contractors will state 'contractors', volunteers will state 'volunteers' and visitors will state 'visitors'. These must be displayed and worn clearly at all times.

11.3 **Visitors**

- Visitors to school will wear a 'visitor' lanyard and will sign in at either Main Reception or the Preparatory Reception.
- All visitors will read the safeguarding information document given to them on arrival and will be made aware of the Safeguarding Team Members.
- All visitors will be escorted around the school site.
- All visitors will be briefed about mobile device usage.

11.4 **Supervision**

- Pupils will be, wherever practicable, supervised by the staff on duty who will follow the Supervision Policy, ensuring that children are kept safe and protected, whilst allowing for appropriate risk dependent upon age and special needs or disability.

- Staff will follow the supervision of duty rotas, fulfilling their duties.
- Prefects will support with the supervision of duty, ensuring that they have the contact number of the team leader upon them at all times.

12 Monitoring

12.1 The Governor assigned to safeguarding will meet termly with the Designated Safeguarding Lead to review practice and policy, prior to the audit submission to Devon County and prior to the Governors AGM. The Designated Safeguarding Lead will prepare a termly report for the Governors as part of the Pastoral Report for the Full Board Meeting.

12.2 Reviews and audit findings will be reported to the relevant Governos meeting throughout the year by the DSL.

12.3 A full audit is submitted to Devon County Council in the Autumn Term and practice is reviewed, when possible, in a face-to-face meeting with the Lead Adviser for Devon County in the Summer Term.

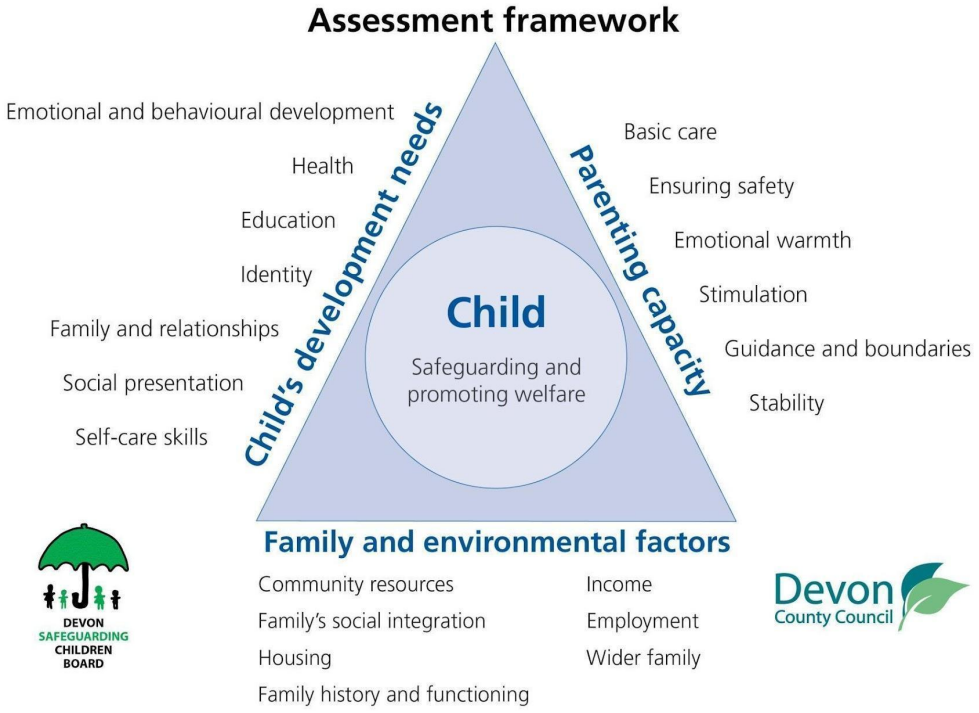
12.4 The Safeguarding Policy will be updated at least annually and to reflect Government, Local authority, ISI and other related governing bodies.

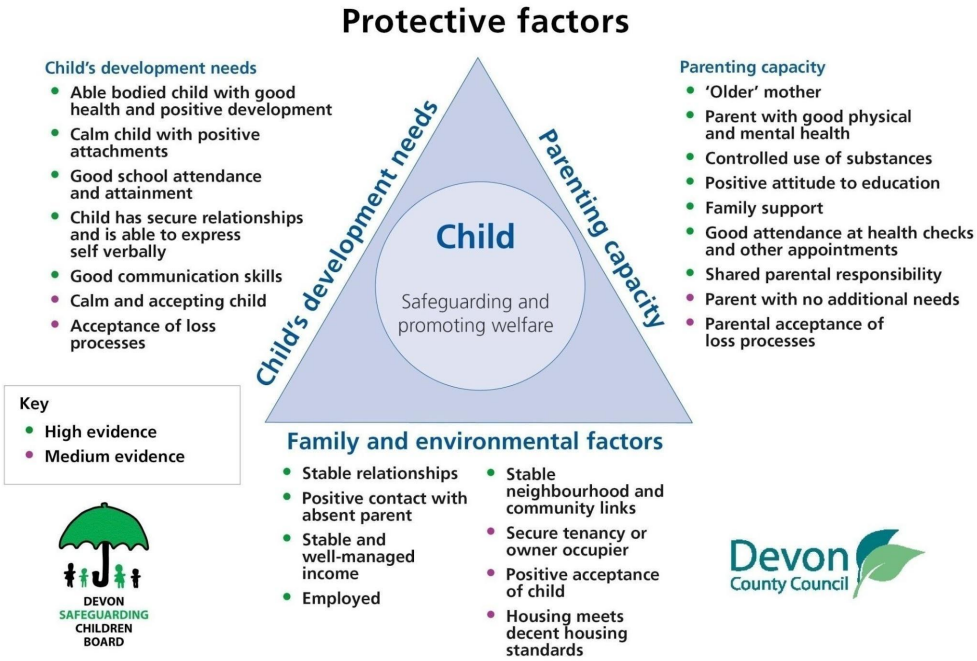
12.5 The Governors will ensure that any deficiencies or weaknesses in regard to safeguarding arrangements at any time, are remedied without delay.

Sir Ben Key — Mrs Caroline Ward

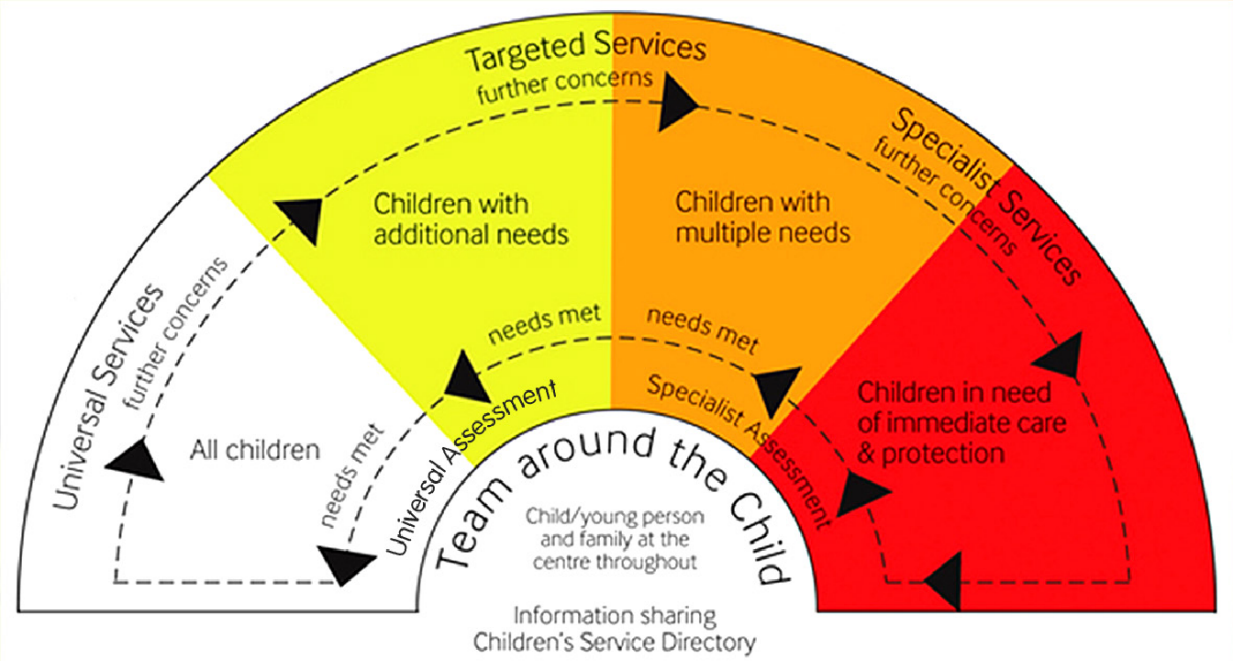
Chairman of Governors — **Executive Head Teacher**

APPENDIX A – DAF Assessment Framework and Devon Protective Factors





APPENDIX B - Team Around the Child



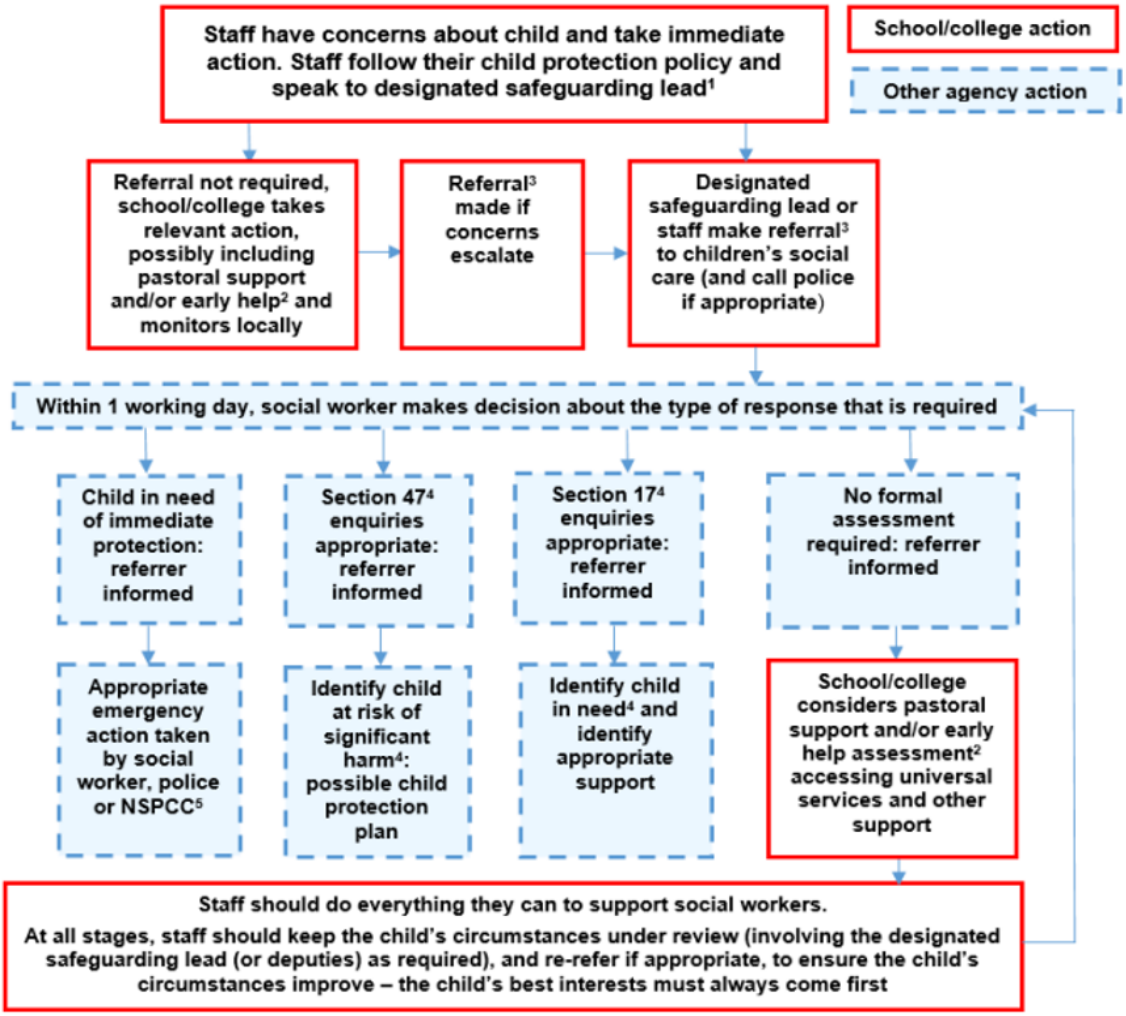
Appendix C

KCSiE 2026 flowchart

Staff should do everything they can to support social workers.

At all stages, staff should keep the child's circumstances under review (involving the designated safeguarding lead (or deputies) as required, and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interests must always come first

Figure 1: Flowchart setting out the actions taken where there are concerns about a child



Appendix D – Additional Useful Contacts

LADO – Duty Officer	01392 384964	
MASH Devon – Duty Officer LCSB Torbay – Duty Officer	0345 155 1071 Out of hours: 0845 6000 388 01803 208955 Out of hours: 0300 456 4876	mashsecure@devon.gov.uk
PREVENT Officers	0800 011 3764	prevent@devonandcornwall.pnn.police.uk.
DfE Prevent	020 73407264	counter.extremism@education.gov.uk.
Devon Safeguarding (Babcock International)	01392 287223	LDP-EducationWelfare@babcockinternational.com
Children Missing from Education – Georgina Bennett	01392 287230	georgina.bennett@babcockinternational.com
Early Help Devon North Devon Exeter Mid & East South Devon	0345 1551071	earlyhelpsecure-mailbox@devon.gov.uk earlyhelpnorthsecure-mailbox@devon.gcsx.gov earlyhelpexetersecure-mailbox@devon.gcsx.gov earlyhelpmideastsecure-mailbox@devon.gcsx.gov earlyhelpsouthsecure-mailbox@devon.gcsx.gov
Early Help Torbay	01803 208525	earlyhelp@torbay.gov.uk
EYCS Designated Child Protection Officer – Sue Bolt	01392 384926 07969684718	
Police PC Claire Hurrell PCSO Charlie Haggerty PCSO Sharon Pratt	999 or 101 07710076438 07736 087263 07813 213106	
CEOP	999	
NSPCC Whistleblowing	0800 028 0285	help@nspcc.org.uk (Mon-Fri 0800-2000)

School Counsellor - Sophie Rae	07743988908	srae@stover.co.uk
Chair of Governors - Ben Key	01626 354505	bkey@stover.co.uk
Vice Chair of Governors – Chris Hicks	01626 354505	chicks@stover.co.uk
ISI safeguarding concerns	02076000100	concerns@isi.net
OfSTED	0300 123 1231	enquiries@ofsted.gov.uk
CAMHS – Torbay	01803 655692	
CAMHS – Plymouth	01752 268011	
CAMHS – Southern Devon (Newton Abbot, Dartmouth, Tavistock and Teignmouth Area)	0330 0245321	Out of hours emergency contact 0345 600 0388
CAMHS – Eastern Devon (Exeter, Tiverton, Exmouth, Okehampton, Honiton, Sidmouth and Axminster Area)	0330 0245321	Out of hours emergency contact 0345 600 0388
GDPR/Data Protection – The Bursar	01626 354505	bursar@stover.co.uk