MOUNT KELLY
Boarding and Day School
Boys and Girls, Aged 3-18

Child Protection and Safeguarding Policy

(This policy applies to all pupils including those in the EYFS)

Reviewed September 2026
Next Review September 2027
Owner Deputy Head Pastoral and DSL

Date of Review	Author	Page / Para	Synopsis of Amendment
Sep 26	MAC		Updated statutory references throughout to reflect *Keeping Children Safe in Education 2026*.
Sep 26	MAC	P.2	Key contacts amended to reflect changes in staffing
Sep 26	MAC	Section 5	Updated requirement so that all staff must read Part One of KCSIE in full.
Sep 26	MAC	Section 5	Updated staff guidance to reference emerging safeguarding threats, including online harm, exploitation and technology-enabled abuse
Sep 26	MAC	Section 8	Updated mental health section to reflect stronger emphasis within KCSIE 2026 that mental health concerns may become safeguarding concerns
Sep 26	MAC	Section 8	Expanded references to misogyny, violence against women and girls (VAWG), harmful gender stereotypes and respectful relationships
Sep 26	MAC	Section 8	Updated terminology and references to Family Help and wider multi-agency safeguarding reforms where applicable.
Sep 26	MAC	Section 10	Expanded online safety section to include risks associated with artificial intelligence (AI), including deepfakes, AI-generated imagery and the potential misuse of generative AI tools
Sep 26	MAC	Section 10	Added requirement for annual review and risk assessment of online safety, filtering and monitoring arrangements
Sep 26	MAC	Section 15	Updated section concerning gender-questioning pupils in line with revised KCSIE 2026 guidance.
Sep 26	MAC	P.58	Safer Recruitment: Reviewed against KCSIE 2026 requirements relating to regulated activity, DBS checks and safeguarding checks. **No substantive amendments required.**

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Key Contact Information

Role	Name	Contact Details
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Safeguarding Officers – College (Level 3 trained)	Mrs Charlotte Bates	batesc@mountkelly.com
	Mr Greg King-Limb	kinglimbg@mountkelly.com
Chairman of the Governors	Mr Ian McQueen	chairman@mountkelly.com
Safeguarding Governor	Mrs Kerstin Lewis	cpgovernor@mountkelly.com
Deputy Safeguarding Governor	Mrs Wendy Davis	dcpgovernor@mountkelly.com
Assistant Head Personalised Learning	Mrs Maria Rogers	rogersm@mountkelly.com
Mount Kelly Enterprises Ltd - DSL	Mr Joshua Devine	devinej@mountkelly.com
Mount Kelly Enterprises Ltd – L3 Trained	Mr Andrew Thomas	thomasa@mountkelly.com
MK Swim Centre Acting DSL	Miss Liz Vernon	vernonl@mountkelly.com
HR Manager	Miss Nicola Harvey	harveyn@mountkelly.com
Independent Listener	Mrs Rachel Debenham	r.debenham@wellington-school.org.uk 07909927066
Devon Children and Young Person's Referral	Devon MASH (Multi Agency Safeguarding Hub) 0345 155 1071 / mashsecure@devon.gov.uk	
Devon Children's Services	Emergency Out of hours	0845 6000 388
Early Help	earlyhelpsouthsecure-mailbox@devon.gcsx.gov.uk	
Devon Local Authority Designated Officers	LADO	01392 384 964
Local Police	Central referral unit	101
NSPCC	Whistleblowing	0800 028 0285
	Helpline	0808 800 500
Professionals Online Safety Helpline	POSH	helpline@saferintenet.org.uk 0344 381 4772

1. Safeguarding Statement and Policy Aims

The welfare of the child is paramount

Mount Kelly School recognises our moral and statutory responsibility to safeguard and promote the welfare of all pupils and expects all staff, governors and volunteers to share this commitment. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. We listen to our pupils and take seriously what they tell us, children are aware of the adults they can talk to if they have a concern. When there are concerns for a child's welfare we may need to share information and work in partnership with other agencies. We will ensure concerns are discussed with parents/carers first unless we have reason to believe that doing so would be contrary to the child's welfare. Child protection forms part of the school's safeguarding responsibilities and we take a zero-tolerance approach to abuse. The Child Protection and Safeguarding policy underpins and guides our school's procedures and protocols to ensure its pupils and staff are safe.

All staff will adopt the view that, **'it could happen here'**

Mount Kelly operates safeguarding procedures in accordance with locally agreed inter-agency procedures as laid down by the Devon Safeguarding Children Partnership. (DSCP)

Policy Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote the welfare of children and adults at risk
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance *Keeping Children Safe in Education (2026)* and *Working Together to Safeguard Children* (2026). We comply with this guidance and the arrangements agreed and published by the Devon safeguarding partners through the local multi-agency safeguarding arrangements.

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

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- Statutory guidance on FGM
- Section 175 of the Education Act 2002
- Section 157 of the Education Act 2002
- Part 3 of the schedule to the Education (Independent Schools Standards) Regulations 2014
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- The National Minimum Standards for Boarding 2022
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006
- The Teachers' Standards 2021
- What to do if you're worried a child is being abused 2015
- Statutory guidance on the Prevent Duty
- Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers 2024
- Sexual violence and sexual harassment between children in schools and colleges 2021
- Disqualification under the Childcare Act (2006) as amended 2018
- Children Missing Education 2024
- Statutory framework for the EYFS
- Relationships Education, Relationships and Sex Education (RSE) and Health Education Statutory guidance for governing bodies, proprietors, head teachers, principals, senior leadership teams, teachers 2021
- The Children and Social Work Act 2017
- The Mental Capacity Act 2005
- The Care Act 2014
- Care and Support Statutory Guidance (updated January 2022)
- NSPCC Adults at Risk Policy and Procedures 2022
- Wavepower (2025)

- The Human Rights Act 1998
- The Equality Act 2010

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. *Appendix 1 explains the different types of abuse.*

Neglect is a form of abuse and 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.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

The DSCP (the Devon Safeguarding Children Partnership) is responsible for making sure that children and families can get the right support, in the right place at the right time. The Devon Safeguarding Children Partnership comprises Devon County Council, NHS Devon Integrated Care Board, Devon & Cornwall Police and partner agencies. This policy and School safeguarding procedures are in accordance with the procedures of the DSCP.

An **Adult at Risk** (previously known as a Vulnerable Adult) is any person who is aged 18 years or over who is or may be in need of community care services by reason of mental or other disability, age or illness **and** who is or may be unable to take care of themselves, or unable to protect themself against significant harm or exploitation.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality Statement

Some children and adults at risk have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children and adults at risk have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identity or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly in PSHE lessons, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent

- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

All staff

All staff, Governors and volunteers will read and understand Part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and confirm they have read and understood it. All staff will make a declaration that at the start of each academic year to say they have reviewed the guidance.

Staff who work directly with children are also expected to read annex B of KCSIE (about specific safeguarding issues).

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, sexual exploitation (CSE) child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- What to look for to identify children who need help or protection
- That a child and their family may be experiencing multiple needs at the same time

- New and emerging safeguarding threats, including online harm, child criminal exploitation (CCE), child sexual exploitation (CSE), radicalisation, image-based abuse, financially motivated sexual extortion ("sextortion"), the misuse of artificial intelligence (AI), and other forms of technology-enabled abuse.

The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team.

The DSL takes lead responsibility for child protection and wider safeguarding matters in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

Roles and responsibilities will include:

- Availability - being available during school hours
- Refer suspected cases, as appropriate, to the relevant body (Children's Social Care, Channel programme, Disclosure and Barring service, the Police) and support staff who make such referrals directly
- Working with others - e.g. a point of contact with safeguarding partners, a source of support and advice for staff, to promote supportive engagement with parents and/or carers and the SLT/Governing body
- Information sharing and managing the child protection files
- Raising safeguarding and child protection awareness
- Updating training, knowledge and skills required to carry out the role of DSL
- Providing support to staff
- Knowing what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Holding and sharing information
- Will complete the "Audit of Statutory Duties and Associated Responsibilities" (S175/157 audit) to be submitted annually to the Education Safeguarding Team working on behalf of Devon County Council

The DSL will also keep the Head Master informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The DSL will work alongside the Head Master, IT staff and governors to ensure that filtering and monitoring systems are effective and that safeguarding risks arising from technology are identified and managed.

The Deputy Designated Safeguarding Lead(s)

Are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL a deputy will be appointed to assume all of the functions above.

The Safeguarding Officers

Are trained to the same standard as the Designated Safeguarding Lead and work with the DSL and DDSLs to ensure the ongoing safety and protection of pupils by supporting management of the reporting system (MyConcern), providing support to staff and understanding the views of children.

The Governing Body

- Will facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Will appoint a Governor to chair the Safeguarding committee which will have oversight of safeguarding matters, meeting termly with particular responsibility for reviewing the DSL's Devon s157/175 annual Audit of Statutory Duties and Associated Responsibilities for Schools
- The Governing Body will approve this policy annually and ensure it complies with the law and hold the Head Master to account for its implementation
- The Governing Body will appoint a senior board level to monitor the effectiveness of this policy in conjunction with the full Governing Body. This is always a different person from the DSL
- The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head Master, where appropriate
- All governors will read KCSIE Parts 1 and 2, and Annexes B, C and F
- The Governing Body will receive assurance at least annually regarding the effectiveness of the School's filtering and monitoring arrangements and will satisfy itself that appropriate safeguarding and online safety risk assessments are in place and reviewed regularly.

The Head Master

The Head Master is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns
- Ensuring the relevant staffing ratios are met in our Early Years setting and making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting

6. Confidentiality

- Mount Kelly recognises that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm the school must contribute to inter-agency working in line with Working Together to Safeguard Children (2026) and share information between professionals and agencies where there are concerns
- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if 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
- All staff must be aware that they cannot promise a child confidentiality which might compromise the child's safety or wellbeing
- However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the Head Master or DSLs will only disclose information about a child to other members of staff on a need-to-know basis
- We will always undertake to share our intention to refer a child to MASH with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will contact the MASH consultation line
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - The DSL should consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)

        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health

- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. (Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL or deputy DSL").

If you have concerns that a child is AT RISK and / or is suffering or likely to suffer harm, or is in immediate danger – ACT IMMEDIATELY

- Make a referral to children's social care via the Multi-Agency Safeguarding Hub (MASH) and/or the police **immediately** if you believe a crime has been committed and / or a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral**
- A referral does not require parental consent in such circumstances
- Tell the DSL as soon as possible if you make a referral directly

If you have concerns about a child IN NEED (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

- Where possible, speak to the DSL first to agree a course of action. If agreed the concern can be logged on **MyConcern** for the record. *(See flowchart below)*
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000
- Share details of any actions you take with the DSL as soon as practically possible and log on **MyConcern**
- Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible

Family Help (previously Early Help)

- If Family Help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in a Family Help assessment, in some cases acting as the lead practitioner
- The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed
- The School recognises the evolving nature of multi-agency safeguarding arrangements and will work collaboratively with Family Help services, children's social care, health services, police and other partner agencies to identify needs, provide early intervention and safeguard children. Staff should be aware that

support may be provided through Family Help, child in need, child protection or other multi-agency arrangements, depending on the needs and circumstances of the child and family.

If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Remember that no child should be made to feel ashamed about making a disclosure
- Listen to them and reassure them that they are being taken seriously, that they will be supported and kept safe
- Under no circumstances give an impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment
- Allow them time to talk freely and do not ask leading questions. Use TED questions if required. (Tell me, explain, describe)
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation on **MyConcern** as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. If you do not have access to **MyConcern** contact the DSL and / or a DDSL.
- Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

We will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions, for example about the safety of medicines or food hygiene.

If you discover that FGM has taken place or a pupil is at risk of FGM

- The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs"

- FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'
- Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out Appendix 3
- **Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, **personally**. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it
- Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate
- **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures
- The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. **Staff should not examine pupils**
- **Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM, must speak to the DSL and follow our local safeguarding procedures

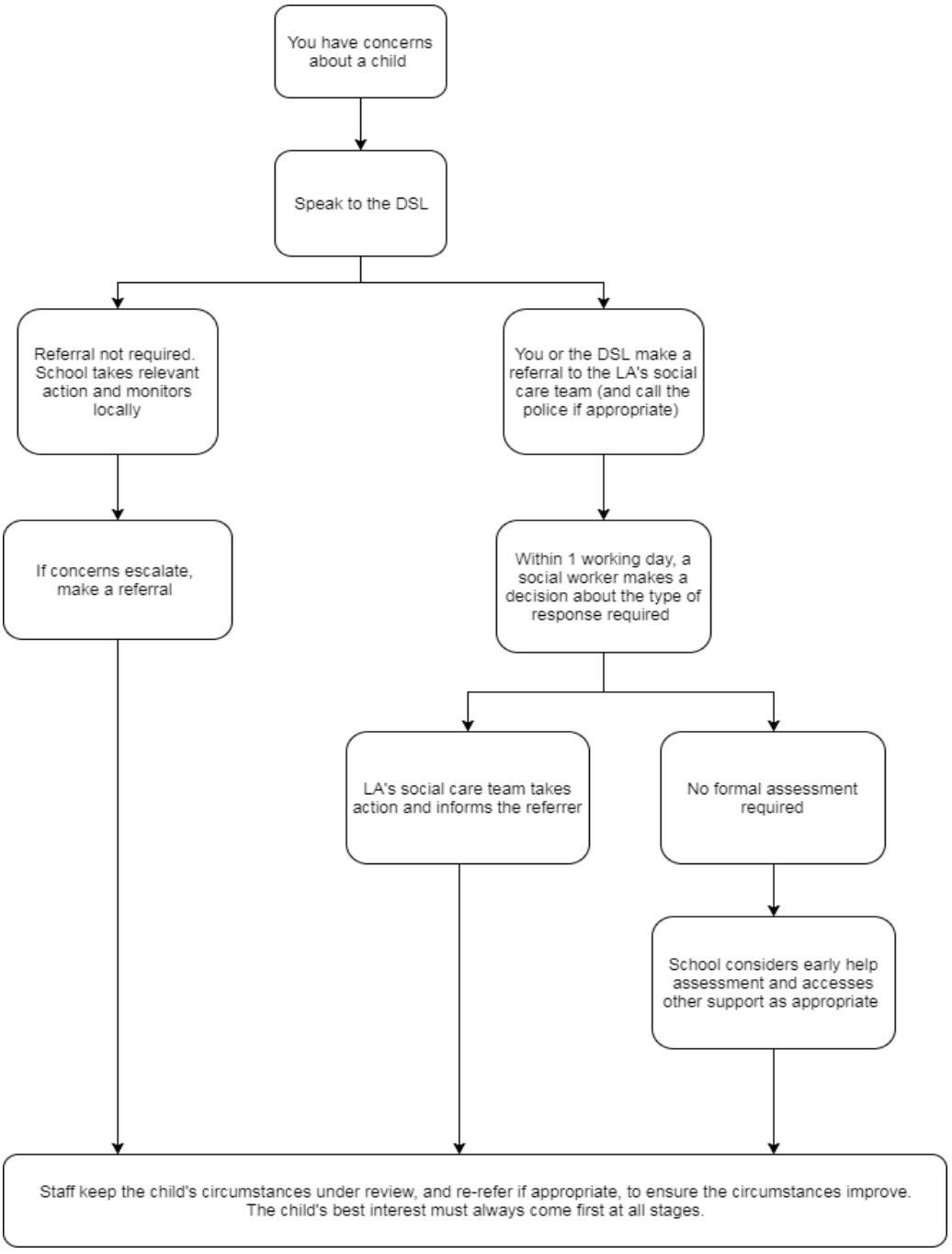
Making a Referral

- Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to Devon Children's Front Door (which incorporates their Multi Agency Safeguarding Hub) or other support is appropriate in accordance with the **Devon Safeguarding Children Partnership Levels of Need Tool**
- If a referral is needed, then the DSL should make it using the online referral form. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one has not been made they can and should consider making a referral themselves
- However, if a child is deemed to be at risk of significant harm there is an option to contact the Front Door directly on 0345 155 1071 (lines are open Monday-Thursday 9am-5pm and Friday 9am-4pm).
- If help is needed outside of these hours or at weekends or bank holidays, a call should be made to the Emergency Duty Service on 0345 6000 388. **If a child is at immediate risk the police should be contacted on 999.**
- It is DSCP procedure that the child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child
- The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome
- The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded
- If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves

- If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves

The DSCP Conflict Resolution and Case Resolution Protocol can be found here: https://www.devonscp.org.uk/training-and-resources/policies-and-procedures/case-resolution-protocol-and-escalation-procedures/

Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)



If you have concerns about extremism

- If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral
- Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include **Channel**, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team
- The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations
- In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
    - Think someone is in immediate danger
    - Think someone may be planning to travel to join an extremist group
    - See or hear something that may be terrorist-related

If you have a mental health concern

- Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, exploitation or other forms of harm.
- Staff should also recognise that concerns about a pupil's mental health may themselves become safeguarding concerns where there is reason to believe that the child is experiencing abuse, neglect, exploitation, significant harm or is otherwise at risk. In such circumstances, concerns should be managed in accordance with the School's safeguarding and child protection procedures.
- Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the usual safeguarding referral procedures
- If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action
- The DSL will work with the School Nurse where a pupil presents with mental health concerns

Concerns about a staff member, supply teacher or volunteer

- If you have concerns about a member of staff (including a supply teacher, volunteer, contractor or the DSL / DDSLs), or an allegation is made about a member of staff posing a risk of harm to children, speak to the Head Master

- If the concerns/allegations are about the Head Master, speak to the Chair of Governors, without informing the Head Master
- The Head Master / Chair of Governors will then follow the procedures set out in appendix 2, if appropriate

Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.

The School recognises that misogyny, harmful gender stereotypes and violence against women and girls (VAWG) can contribute to a culture in which abuse, harassment and discrimination are more likely to occur. Staff should be alert to behaviours, language and attitudes that may reflect these issues and should challenge them appropriately. Through our safeguarding, pastoral and RSHE programmes, we actively promote respectful relationships, equality, dignity and respect for all members of the school community.

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

We also recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Domestic abuse in intimate personal relationships
- 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)
- 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-nude 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
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, physical abuse, indecent exposure, sexual assault, initiations, upskirting or sexually inappropriate pictures or videos (including sexting)

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy.

Mount Kelly aims to reduce the likelihood of child-on-child abuse through;

- The reinforcement of the Mount Kelly Values (Compassion, courage, humility, respect, commitment, integrity)
- Training staff to be aware of, recognise, manage and report incidents of child-on-child abuse
- High expectations of behaviour
- Clear consequences for unacceptable behaviour
- Raising awareness amongst pupils by providing a developmentally appropriate PSHE curriculum which develops their understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe.
- Providing a reporting system via a QR code published in Houses and on noticeboards
- Maintaining an open-door policy for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed
- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Further information and advice is available in the guidance 'Managing incidents of sexualised behaviour – guidance for education 2023'.

Sharing of nudes and semi-nudes ('youth produced sexual imagery' or 'sexting')

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where;

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

All incidents of this nature should be treated as a safeguarding concern and in line with the 2020 guidance 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'[1] .

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

Your responsibilities when responding to an incident

If you are made aware of an incident involving sharing of nudes or semi-nudes, you must report it to the DSL immediately.

[1] Sharing nudes and semi-nudes

You must **not**:

- View, copy, download, store, share or print the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Head Master and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care

The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through Helen Head, West Devon Youth Intervention Officer.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE education. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

8. Reporting systems for our pupils

- When there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report concerns and/or allegations.
- To achieve this we will:
    - Make pupils aware of when and to whom they should report concerns through discussion in PSHE lessons and tutor sessions. Pupils will be signposted to the School's Pastoral and Safeguarding Teams
    - Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

9. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The School's filtering and monitoring arrangements are reviewed at least annually to ensure they remain effective, proportionate and appropriate to the safeguarding needs of pupils. The review takes account of the school's specific context, emerging technologies, online risks and patterns of pupil use. Outcomes of the review are reported to the governing body as part of its oversight of safeguarding and online safety.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our PSHEE curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras (see section below)
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easily accessible. Staff, pupils and parents/carers may be familiar with generative AI platforms such as ChatGPT and Google Gemini.

Mount Kelly recognises that AI has the potential to enhance teaching, learning and safeguarding practice. However, AI can also facilitate harm and present safeguarding risks, including bullying, harassment, exploitation, grooming, misinformation and exposure to inappropriate or harmful content.

Staff should be aware that emerging AI technologies may be used to create or manipulate images, audio and video content, including deepfakes and AI-generated imagery. This may include the use of 'nudification' applications and other tools that can create realistic images without a person's knowledge or consent. Such technologies may be used to humiliate, harass, exploit or abuse children.

Mount Kelly will treat any use of AI to access harmful content, create or share inappropriate material, bully, harass or exploit pupils, or otherwise place a child at risk, in line with this policy, the Promoting Positive Behaviour Policy and relevant safeguarding procedures.

Staff should remain aware of the evolving nature of AI technologies and exercise professional judgement when using them. Appropriate risk assessments will be undertaken before new AI tools are adopted by the School. The School's filtering and monitoring arrangements also apply to the use of AI technologies, in accordance with Keeping Children Safe in Education.

Staff mobile phones and cameras (including all electronic devices with imaging and sharing capabilities)

- College and Prep staff are allowed to bring their personal phones to school for their own use, but must use them with discretion
- Staff will not store pictures or recordings of pupils on their personal phones or cameras. School cameras or phones will be made available for staff to take photos for school events and activities
- We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school

EYFS staff personal mobile phones (including all electronic devices with imaging and sharing capabilities)

- EYFS Staff will not carry personal mobile phones while working
- The EYFS Manager will keep a mobile phone within the learning environment for emergencies (e.g. lockdown procedures)
- EYFS Staff may use their mobile phones during break / lunchtimes in an agreed area not used by children.
- A mobile phone will be taken on all school trips. This is in line with the statutory framework for the Early Years Foundation Stage, which states that providers should take contact telephone numbers and a mobile phone on outings

10. Notifying parents

- The School will normally seek to discuss any concerns about a pupil with their parents or carers. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure
- However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from the MASH
- Where there are concerns about forced marriage or honour-based violence parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk

11. Pupils with special educational needs, disabilities and or health issues

- We recognise that pupils with special educational needs (SEN), disabilities and certain health issues can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:
    - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
    - pupils being more prone to peer group isolation than other pupils
    - the potential for pupils with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
    - communication barriers and difficulties in managing or reporting these challenges
- We offer extra pastoral support for pupils with SEN and disabilities. This includes:
    - A personalised learning profile
    - Drop-in sessions with the Personalised Learning department

12. Pupils with a social worker

- Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health
- The DSL and all members of staff will work with and support social workers to help protect vulnerable children
- Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:
    - Responding to unauthorised absence or missing education where there are known safeguarding risks
    - The provision of pastoral and/or academic support

13. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- We have appointed an appropriately trained member of staff, to take the lead on promoting the educational achievement of looked-after and previously looked-after children. The member of staff is **Val Petch** (Health and Wellbeing Team and Safeguarding Team).
-

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

14. Pupils who are lesbian, gay, bisexual or gender questioning

- We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or questioning their gender can be targeted by other children.
- We also recognise that pupils who are lesbian, gay, or bisexual or questioning their gender are more likely to experience poor mental health. Any concerns should be reported to the DSL.
- When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.
- When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).
- The School recognises that a child who is questioning their gender may experience vulnerability, distress, bullying, peer pressure, family conflict, social isolation or risks associated with online activity. Staff should ensure that any response is child-centred, respectful and focused on the welfare, wellbeing and safety of the child. Where appropriate, the School will undertake a safeguarding risk assessment and consider any wider vulnerabilities or safeguarding concerns, working in partnership with parents/carers and external agencies where necessary.
- We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying. We will have regard to current Department for Education guidance, Keeping Children Safe in Education and any relevant statutory guidance when considering how best to support gender-questioning pupils and when making safeguarding decisions.
- Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

15. Record-keeping

- All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded using **MyConcern**. If you are in any doubt about whether to record something, discuss it with the DSL
- Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them

- Child protection files will be kept **until the pupil's 26th birthday** (7 years after they reach the school leaving age)
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. To allow the new school/college to have support in place when the child arrives, this should be within:
    - **5 days** for an in-year transfer, or within
    - **The first 5 days** of the start of a new term
- In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child

16. Training

All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

- This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.
- It will be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- It will include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas
- Staff will also receive regular informal safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training
- Volunteers will receive appropriate training, if applicable

The DSL, Deputies and Safeguarding Officers

- The DSL, Deputies and Safeguarding Officers will undertake child protection and safeguarding training at least every 2 years
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments) including inter-agency workings
- They will also undertake Prevent awareness training alongside online safety training.

Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

Recruitment

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

EYFS Staff

- All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues
- The EYFS Co-ordinator will hold an approved qualification at level 3 or above and at least half of all other staff must hold at least an approved level 2 qualification. We will make sure that children are adequately supervised, especially whilst eating, and decide how to use staff to ensure children's needs are met. We will inform parents and/or carers about how staff are organised, and, when relevant and practical, aim to involve them in these decisions. Children will usually be within both sight and hearing of staff and always within sight or hearing.

17. Whistle-blowing

- We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so
- All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the Whistleblowing Policy
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0808 800 5000– line is available from 11:00 AM to 5:00 PM, Monday to Friday and Email: help@nspcc.org.uk

18. Links with other policies and procedures

- Anti-bullying
- Attendance, Registration, Supervision and Missing Pupils
- Code of Conduct – Staff
- Complaints
- Curriculum
- Data Protection
- Equality
- First Aid
- Health and Safety
- Independent Listener
- Lettings
- Mobile Devices
- Mount Kelly Swim Centre Terms and Conditions of Hire
- Mount Kelly Swim Centre Pool Operating Safety Procedures which include arrangements for Child Admissions and Young Swimmers
- Mount Kelly Swim Centre Filming and Photography Policy
- Online Safety
- Pupil Behaviour and Discipline
- Recruitment and Selection
- School Contractors
- Teaching and Learning
- Relationship, Health and Sex Education Policy
- Substance Misuse and Drugs Policy
- Volunteers
- Whistleblowing

Appendix 1 - Types of Abuse

Types of Abuse:

- Physical abuse
- Emotional abuse (including domestic abuse)
- Sexual abuse (including child sexual exploitation)
- Neglect

Signs of Abuse in Children:

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

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

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses

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

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

Recognising Physical Abuse

The following are often regarded as indicators of concern:

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

Bruising

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

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

Bite Marks

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

Burns and Scalds

- It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:
- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

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

Fractures

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

There are grounds for concern if:

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

Scars

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

Recognising Emotional Abuse

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

The indicators of emotional abuse are often also associated with other forms of abuse

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a "loner" – difficulty relating to others

Recognising Signs of Sexual Abuse

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

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

Some behavioural indicators associated with this form of abuse are:

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

Some physical indicators associated with this form of abuse are:

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

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

Appendix 2 - Allegations of abuse made against staff

Allegations of abuse made against staff that may meet the harms threshold

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside school
- Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Head Master, or the chair of governors where the Head Master is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative part of school.

If in doubt, the case manager will seek guidance from the human resources manager and a designated officer of the Devon MASH, as well as the police and children's social care where they have been involved.

Where an allegation relates to a member of supply staff provided by an agency, the agency will be fully involved.

Definitions for outcomes of allegation investigations

- **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 (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Head Master (or Chair of Governors where the Head Master is the subject of the allegation) – the 'case manager' – will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with a Devon designated officer. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with pupils at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made
- If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency
- Where the police are involved, wherever possible the governing body will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's HR adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and HR adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching for professional misconduct.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Head Master, or other appropriate person in the case of an allegation against the Head Master, will consider whether any disciplinary action is

appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached (and justification for these, as stated above) and the outcome
- If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Non-recent allegations

- Abuse can be reported, no matter how long ago it happened.
- We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
- Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Concerns that do not meet the harm threshold (low-level concerns)

This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

- Using inappropriate sexualised, intimidating or offensive language
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the Head Master will collect evidence where necessary by speaking:

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

The Head Master will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

Review

- The Head Master will review whether there are any wider cultural issues in school that enabled the behaviour to occur and if appropriate policies could be reviewed or additional training delivered to mitigate against recurrence.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

See Part 4 of KCSIE 2026 for full guidance on managing allegations

Appendix 3 - Specific safeguarding issues

Specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school

- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

If a pupil is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol

- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

The DSL will use the Devon Safeguarding Children Partnership Adolescent Safety Framework Safer Me Assessment on all occasions when there is a concern that a child is being or is at risk of being sexually or criminally exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually or criminally exploited. The Safer Me Assessment will indicate to the DSL whether a Safer Me Early Help approach or referral to the Exploitation Hub (Reach) is required. If the DSL is in any doubt they will contact MASH consultation.

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

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

County Lines (Criminal Exploitation)

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of

'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Domestic abuse

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

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.

How does it affect children?

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

What are the signs to look out for?

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

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

- Contact: https://new.devon.gov.uk/dsva/
- If you are concerned about a child or young person in Devon please contact the Multi-Agency Safeguarding Hub (LOCAL AUTHORITY SAFEGUARDING HUB) on 0345 155 1071 or email mashsecure@devon.gov.uk
- If you are concerned about an adult (aged 16+) in Devon please complete the Risk Identification Checklist to identify the level of risk which support service to refer them too, and follow the advice on the MARAC page for all levels of risk
- If you are concerned about a vulnerable adult please contact Adult Social Care on 0845 155 1007 (9am – 5pm Monday to Thursday, Friday 9am to 4:30pm and 9am – 5pm on Saturdays) In an emergency, please contact the Emergency Duty Service 0845 6000 388
- Fear Free is a charity delivering support services to women and young people experiencing the trauma of domestic abuse and sexual violence. Telephone 0345 155 1074 or email admin.devon@fearfree.org.uk

- SAFE (Stop Abuse for Everyone) is a charity based in Exeter providing help and support to children and families who have experienced domestic abuse and violence. Telephone 030 30 30 0112 or email hello@safe-services.org.uk (Monday to Friday, 9am – 5pm)
- National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, available 24hour a day 0808 2000 247 and its website offers guidance and support for potential victims. Refuge: https://www.refuge.org.uk/
- Operation Encompass - Operation Encompass helps police and schools work together to provide emotional and practical help for children. Police will inform the 'key adult' within school if they have been called to an incident of domestic abuse, where there are children in the household before registration the next day.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

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

If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, the member of staff must report this to the Police by calling 101. The report should be made with 24 hours.

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs FGM might have taken place are:

- Having difficulty walking, standing or sitting.
- Spending longer in the bathroom or toilet.
- Appearing quiet, anxious or depressed.

- Acting differently after an absence from school or college.
- Reluctance to go to the doctors or have routine medical examinations.
- Asking for help – though they might not be explicit about the problem because they're scared or embarrassed

For more information on FGM follow this LINK to the NSPCC.

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

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

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism 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.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with the multi-agency safeguarding arrangements and safeguarding partners for Devon.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalizing them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate.

Checking the identity and suitability of visitors

- All visitors will be required to verify their identity to the satisfaction of staff
- If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification
- Visitors are expected to sign the visitors' book and wear a visitor's lanyard
- Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:
    - Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
    - The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

The School places all visiting contractors and professionals into one of three categories, as follows:

Category 1: Approved Contractors

Regular, approved contractors

- Employees of these contractors hold Enhanced DBS checks, including the Children's Barred List, and are at liberty to enter, and work unsupervised in all areas of the School
- The Register of such contractors is held and managed by HR, and the identity of Approved Contractors and their employees is checked on their arrival at the School against a list of Approved Contractors held in Reception. Having signed in, they are free to carry out the work for which they are contracted

Category 2: Occasional Contractors

Infrequent, occasional contractors – often called in at short-notice

- Employees of these contractors may not necessarily hold any form of DBS check, and are therefore the subject of a Contractor Risk-Assessment (see Appendix A), which will "determine the appropriate level of supervision depending upon the circumstances"

- Notice of the arrival of such contractors is given to Reception. On arrival they are met by the member of staff who arranged their visit and issued with a Contactors Leaflet (Appendix B). They are then accompanied to their place of work and supervised according to the Risk Assessment

Category 3: Visiting Professionals

Visiting professionals are employed by third parties, and the School either accepts a letter of assurance from the principal employer or training provider (in the case, for example, of trainee teachers) or a personal DBS, accompanied by photograph ID.

Missing pupils

- Our procedures, as detailed in our Attendance, Registration, Supervision and Missing Pupil Policy, are designed to ensure that a missing child is found and returned to effective supervision as soon as possible

Boarding

- As a boarding school Mount Kelly adheres to the National Minimum Standards for boarding. The Pastoral Boards of the College and the Prep meet weekly to discuss boarding issues and monitor the welfare of the pupils (both boarding and day) on a regular basis and advise staff of pupils who may require more support / intervention. As a member of the Boarding School's Association, Mount Kelly supports the BSA Commitment to Care Charter.

War Conflict and Trauma

Much research has been undertaken on war conflict / trauma leading to toxic stress and health problems in childhood and beyond. Trauma results from an event, series of events, or set of circumstances that is experienced by an individual as harmful or life threatening. While unique to the individual, generally the experience of trauma can cause lasting adverse effects, limiting the ability to function and achieve mental, physical, social, emotional, or spiritual well-being. Mount Kelly recognises that violent political conflict has a devastating effect on the physical and mental health of children and its staff are alert to the needs of those children who have experienced or continue to experience such conflict either directly or indirectly.

Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are place in residential schools, children's homes or hospitals are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

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

It is a legal requirement for, a parent, private foster carer or other persons involved in making a private fostering arrangement to notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this will the DSL and the DSL will notify MASH of the circumstances.

Work Experience

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with the guidance in Keeping Children Safe in Education.

Children staying with host families

The school may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the school follows the guidance in Keeping Children Safe in Education (2026) to ensure that hosting arrangements are as safe as possible.

Intimate Care

Mount Kelly has an Intimate Care Policy, which covers the procedures regarding sensitive handling of young pupils. Mount Kelly is committed to ensuring that all staff responsible for the intimate care of children will undertake their duties in a professional manner at all times. We recognise that there is a need to treat all children with respect when intimate care is given. No child should be attended to in a way that causes distress, embarrassment or pain. Definition: "Intimate care is any care which involves washing, touching or carrying out an invasive procedure (such as cleaning up after a child has soiled him/herself) to intimate personal areas. In most cases such care will involve procedures to do with personal hygiene and the cleaning of equipment associated with the process as part of a staff member's duty of care".

Anti-Bullying / Cyberbullying

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic, disability and gender-related bullying. We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that children with SEND and / or differences / perceived differences are more susceptible to being bullied / victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Head Master and the DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education.

Racist Incidents

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents and report them to the Local Authority via the BPRI reporting form.

Physical Intervention

- We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person
- Such events should be recorded and signed by a witness.
- Staff who are likely to need to use physical intervention will be appropriately trained

- We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures
- We recognise that touch is appropriate in the context or working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundary

Safer Recruitment

The School follows all statutory guidance relating to the safe recruitment of staff and all information on the checks carried out are recorded on the School's single central register (SCR) which is maintained by the Head of HR and is reviewed termly by the Chair of the Safeguarding Committee. *(See Recruitment and Selection Policy for further details).*

Safer Recruitment and EYFS

The EYFS statutory framework includes its own requirements for safer recruitment:

- References from family members will not be accepted
- Electronic references must originate from a legitimate source
- Referees will be contacted to clarify vague or insufficient information
- References for volunteers are required before they are recruited

Volunteers

We will:

- Never leave an unchecked Volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS Check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a Risk Assessment when deciding whether to seek and enhanced DBS Check without barred list information for any Volunteers not engaging in regulated activity. We will retain a record of this Risk Assessment *(see Volunteer Policy for further details)*

Appendix 4 - Swim England, MK Swim Centre & MKEL

Swim England

Mount Kelly has significant number of pupils enrolled who swim as part of the Mount Kelly Swim Team. Our club is a fully affiliated member of Swim England. In matters of safeguarding, the School safeguarding policy will be adopted. However, where there is a specific safeguarding issue relating directly to an incident involving pupils who are Swim England affiliated, the DSL will pay due regard to the Swim England's safeguarding procedures as outlined in *Wavepower 2025: Child safeguarding policy and procedures for clubs*. **Andrew Main** is the nominated Welfare Officer for the Mount Kelly Swim Club.

Non-School Safeguarding Team

Any safeguarding issues involving Mount Kelly pupils will be dealt with by the School Safeguarding Team while any safeguarding issues involving members of the public will be dealt with by the Non-School Safeguarding Team. The Non-School Safeguarding Team comprises:

- Maddy Carr (Foundation DSL)
- Laura Tabb (Foundation DDSL)
- Joshua Devine (MKEL DSL)
- Andrew Thomas (MKEL L3 trained)
- Liz Vernon (MK Swim Centre Acting DSL)

Mount Kelly Swim Centre

Key Contacts:

Liz Vernon (Deputy Pool Manager and MK Swim Centre Acting DSL)

vernonl@mountkelly.com

Office – 01822 813155

Mobile – 07708 022719

The Mount Kelly Swim Centre acknowledges the duty of care to safeguard and promote the welfare of children and adults at risk and is committed to ensuring that safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and requirements.

The Mount Kelly Swim Centre recognises that the welfare and interests of children and adults at risk are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all children and adults at risk

- have a positive and enjoyable experience of sport at the Mount Kelly Swim Centre in a safe and child-centred environment
- are protected from abuse whilst participating in aquatics or outside of the activity

The Mount Kelly Swim Centre acknowledges that some children, including disabled children and young people or those from ethnic minority communities and adults at risk, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

As part of our safeguarding policy Mount Kelly Swim Centre will

- promote and prioritise the safety and wellbeing of children, young people and adults at risk
- ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children, young people and adults at risk
- ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored on MyConcern
- prevent the employment/deployment of unsuitable individuals
- appoint a Designated Safeguarding Lead and a Deputy and ensure robust safeguarding arrangements and procedures are in operation.

The policy and procedures will be widely promoted and are mandatory for everyone involved in the Mount Kelly Swim Centre. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

Mount Kelly Swim Centre Staff Training

All Mount Kelly Swim Centre Staff will receive annual School safeguarding training including KCSIE updates. In addition, all Mount Kelly Swim Centre Staff will receive Swim England's mandatory safeguarding training in line with the requirements of their safeguarding policy – Wavepower (2025). All Mount Kelly Swim Centre staff will be made aware of Mount Kelly Swim Centre safeguarding procedures and of specific safeguarding issues they should be aware of in relation to working within a leisure pool environment.

The Mount Kelly Swim Centre DSL and DDSL

The Mount Kelly Swim Centre Designated Safeguarding Lead (DSL) takes responsibility for child protection and wider safeguarding matters in the swim centre.

Roles and responsibilities will include:

- Being available to support staff who need to report an incident
- Managing communication from the Swim Centre to the Mount Kelly School Safeguarding team regarding any incidents involving Mount Kelly pupils
- Recording incidents using MyConcern and liaising with the Non-School Safeguarding Team to manage cases
- Implementing safeguarding and child protection procedures

The Mount Kelly Swim Centre Deputy Designated Safeguarding Lead (DDSL) is trained to the same standard as the DSL and works with the DSL and other members of the Non-School Safeguarding Team to ensure the ongoing safety and protection of all users of the Mount Kelly Swim Centre.

Reporting systems for users of the Mount Kelly Swim Centre

- Where there is a safeguarding concern, the Mount Kelly Swim Centre will ensure the wishes and feelings of the user are taken into account when determining what action to take and what support to provide.
- To ensure that all users feel safe and supported there are a number of ways of making a report:
    - Mount Kelly Pupils – following School reporting procedures.
    - Mount Kelly Swim Centre users – may speak directly to the Mount Kelly Swim Centre DSL or DDSL (or email the DSL if appropriate), or speak to any Mount Kelly Swim Centre staff, including lifeguards.

Notifying parents of non-School children

- In the event of a disclosure or referral to the MASH, parents of non-Mount Kelly children will be informed of the process if the information for contacting parents is available.
- However, if the Mount Kelly Swim Centre believes that notifying parents will increase the risk to the child, advice will be sought from the MASH.

Record-keeping

- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded using MyConcern. If you are in any doubt about whether to record something, discuss it with the Mount Kelly Swim Centre DSL or a member of the Non-School Safeguarding Team.
- When recording a concern, the 'Non-School' notification group should be selected.
- The names of non-Mount Kelly children or adults at risk cannot be officially 'associated' with the concern, but names can be recorded in the concern summary. All other sections of the concern should be completed.
- Confidential Mount Kelly Swim Centre information and records will be held securely and only available to those who have a right or professional need to see them.
- Child protection files will be kept until the child's 26th birthday (7 years after they reach the school leaving age).

Capacity and consent for adults and adults at risk

It is important to be alert to issues of cognitive capacity which can increase the vulnerability of people where they have a reduced ability to make informed decision in the moment. This may be transient (e.g., due to fear, shock, injury, illness) or long term (e.g., due to learning differences, disability or mental health issues).

Whilst this is a complex issue, it should not get in the way of staff and volunteers genuinely seeking to ensure that all individuals are respectfully consulted in relation to participation in activities and/or sharing of information about them.

A young person aged 16 or older is presumed in law to have capacity to consent, unless there is evidence to the contrary. Capacity to content is not simply based on age however, particularly where learning and communication difficulties and disabilities are identified. You should also consider a person's capacity to understand the consequences of giving or withholding their consent. They should not be treated as unable to make a decision until all practicable steps to help them have been taken.

When assessing a person's understanding you should seek to explain the issues using their preferred mode of communication and language. This should be done in a way that is suitable for them, considering all you know about them from your contact with them, particularly their age, language and likely understanding.

If you are unsure whether they have the capacity to consent, then seek the advice of the Mount Kelly Swim Centre DSL or from the NSPCC Helpline 0808 800 5000.The person's friend, carer or another professional, where available, may be able to provide relevant information or advice.

The following should be considered when assessing whether a person has sufficient understanding at any time to consent, or to refuse consent to sharing of information about them or participating in specific activities;

- Can the person understand the question being asked of them?
- Are they taking an active part in the discussion?
- Can they rephrase the question in their own words?
- How would they explain it to someone else?
- Do they have a reasonable understanding of what the risks or benefits of giving their consent or saying no?
- What do they say they think would happen in they agree to the action being suggested?
- Can they appreciate and consider alternatives, weighing up one aspect against another and express a clear and consistent personal view? Encourage them to say out loud, or write down their view of pros and cons. You could recheck these views later or at a alter contact with them.

Practical Guidance

General security for public swimming sessions

Members of the public attending public swimming sessions register their details on the Mount Kelly Swim Centre computerised management information system at Reception. The system records the name of the individual, address, age and contact details**.** Members of the public must report to Reception to sign in when using the facility so that their details can be checked and their attendance in the building recorded. The Swim Centre foyer is monitored by CCTV.

Hire of facilities by external groups

Where facilities are let to external groups or events organised involving children the Mount Kelly Swim Centre requires the organisers to have public liability insurance (£5 million) and an appropriate safeguarding policy. They must also comply with any regulations as set out by their organisation's governing body.

Changing arrangements

The Changing Village in the 50m pool is a mixture of separate single sex changing areas and cubicles. Specific areas are dedicated to Mount Kelly School pupils and the members of the public when Mount Kelly School and community activities coincide. When the separate single sex changing areas are used by the members of the public only children under the age of 7 years may enter the opposite sex changing rooms and only when accompanied by an adult.

Local schools attending swimming teaching sessions use the former entrance to 25m pool building and the dedicated male and female changing rooms in that building rather than the mixed Changing Village in the 50m pool.

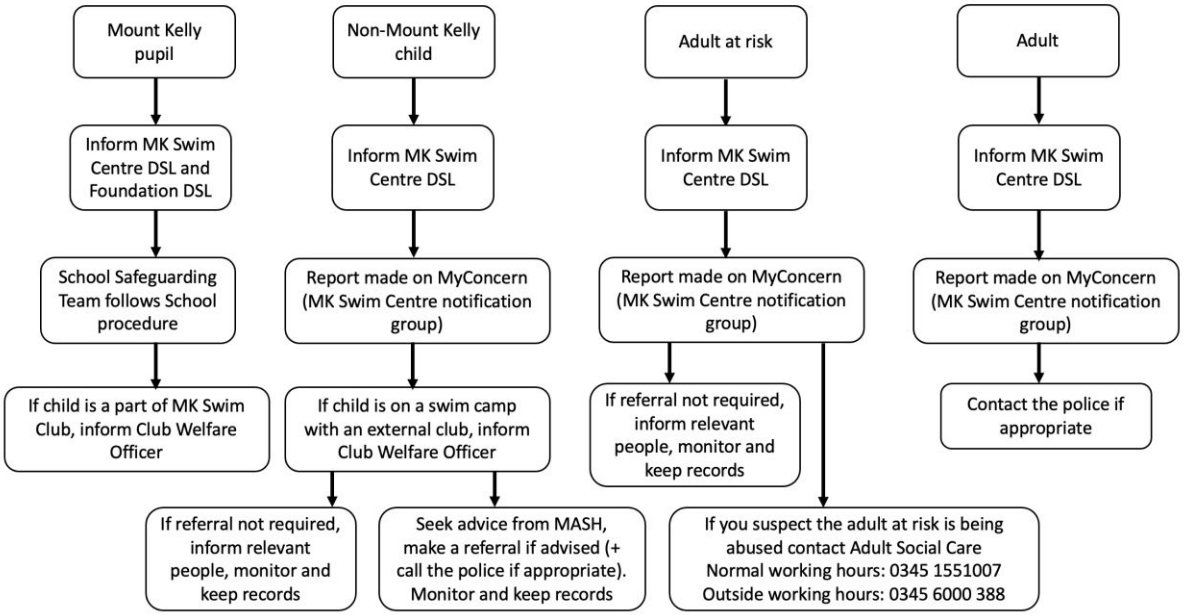
Filming and photography

Although the majority of images taken are appropriate and in good faith, images can be misused and children can be put at risk if common sense procedures are not observed. As a result, a dedicated Mount Kelly Swim Centre Filming and Photography Policy has been compiled and applies to all images and videos taken on any type of camera or recording device (including mobile phones). It applies to all general public sessions, training sessions and events in the Swim Centre.

Use of devices in changing rooms

Wavepower 2025 states that mobile phones and devices should not be used under any circumstances in a changing room area during Swim England regulated activity. This must be supported by clear signage in changing rooms confirming a zero- tolerance approach to the use of mobile phones in changing areas.

Mount Kelly Swim Centre – Safeguarding Procedure Flow Chart



Mount Kelly Enterprises Limited

The School has a Limited Company that operates throughout the year. This is known as Mount Kelly Enterprises Limited (MKEL). All operations including external lettings are carefully managed and risk assessed by the Commercial Manager of MKEL, so as not to interfere with or to compromise the safeguarding of the pupils at the School. Any safeguarding incident involving MKEL will be dealt with by the Commercial Manager in his capacity as MKEL DSL. Concerns will be recorded on MyConcern using the Non-School notification group and shared with the Non-School Safeguarding Team.

Appendix 5 - Policy Amendments

Amendments September 2024

Date of Review	Author	Page / Para	Synopsis of Amendment
04.02.24	MC	1	February 2024 amendments moved to Appendix 5
		3	Key contacts information updated to reflect changes to Safeguarding Officer roles
		4/1	'Devon Children & Families Partnership' changed to 'Devon Safeguarding Children Partnership'
		5	KCSIE changed to 2024 version, Working Together to Safeguard Children changed to the latest version (2023). Added reference to FGM legislation, Rehabilitation of Offenders Act. Links to all legislation and statutory guidance added or updated
		6	Updated definition of safeguarding and child protection added Sharing of nudes and semi-nudes – sentence added: 'This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video'. DSCP paragraph changed to reflect the name change of the organisation and a redefinition of its priorities. Definitions added: 3 local safeguarding partners, victim and alleged perpetrator(s) / perpetrator (s).
		7	Equality statement – final two bullet points added
		8	Paragraph updated – all staff to read Part 1 of KCSIE, all staff who work with children should also read Annex B
		9	'All staff will be aware of' section – final two bullet points added 'The DSL' – 2nd bullet point updated to refer to supporting staff who make referrals
		11-12	Sections of KCSIE read by governors clarified. 'The Head Master' – final bullet point added. 'Confidentiality' – reference to Working Together to Safeguard Children updated to the 2023 version Section added – from 'if a victim asks the school not to tell anyone about the sexual violence or sexual harassment'
		13	Section renamed – 'acting' changed to 'taking action' Section added – from 'All staff are expected to be able to identify and recognise all forms of abuse…' plus list of forms of abuse.
		15	'Bear in mind that some children may' section added
		16	'Making a Referral' section updated to reflect change in organisation name and procedures.
		18	Concerns about staff – 'contractor' added
		19	'Child-on-child abuse' replaced with 'allegations of abuse made against other pupils'
		20	Section updated – 'Procedures for dealing with allegations of child-on-child abuse'
		21	'Your responsibilities when responding to an incident' section – copy and store added to first bullet point
		22	Bullet point expanded: **The DSL will make an immediate referral to police and/or children's social care if:** The incident involves an adult. Where an adult

			poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
		23	'Further review by the DSL' section added (up to 'curriculum coverage'
		24-25	'Online safety and the use of mobile technology' section added. AI section moved here from Appendix 3.
		25	Staff mobile phones – amendment: Staff will not store pictures or recordings of pupils on their personal phones or cameras. School cameras or phones will be made available for staff to take photos for school events and activities' EYFS staff personal mobile phones – brackets added - (including all electronic devices with imaging and sharing capabilities)
		26- 27	Amendment to sentence: communication barriers and difficulties in managing or reporting these challenges Named member of staff for looked after children changed
		28-29	Addition of bullet point in final paragraph of 'Looked-after children' section Section on timescale for file transfer changed to specify 5 days Bullet point added: 'It will be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning'.
		30	Bullet points added in Governors section Whistle-blowing section – NSPCC phone number and available times updated
		44-45	Section added: 'Assessing adult-involved nude and semi-nude sharing incidents'
		56	BPRI reporting link added

Amendments February 2024

Date of Review	Author	Page / Para	Synopsis of Amendment
04.02.24	MC	1	October 2023 amendments moved to newly created Appendix 5
		2	Title of Appendix 4 added to contents page and page numbers corrected
		3	Key Contact info: Swim Centre DSL and DDSL added MASH email address updated
		4	Policy aims: 'adults at risk' added to the first bullet point
		5 Section 2	Added legislation and statutory guidance: Working Together to Safeguard Children 2015 (updated December 2023); The Mental Capacity Act 2005; The Care Act 2014; Care and Support Statutory Guidance (updated January 2022); NSPCC Adults at Risk Policy and Procedures 2022, Wavepower 2024
		6	Definition of an Adult at Risk added Equality statement - addition of 'adults at risk'
		P.24 Section 16	Added policies and procedures: Data Protection, Equality, Lettings, Mount Kelly Swim Centre Terms and Conditions of Hire, Mount Kelly Swim Centre Pool Operating Safety Procedures which include arrangements for Child Admissions and Young Swimmers, Mount Kelly Swim Centre Filming and Photography Policy, School Contractors

		46	'ASA Amateur Swimming' (now 'Swim England') and Mount Kelly Enterprises Ltd sections originally on page 46 moved to Appendix 4
		Appendix 4 (48)	Section on the Mount Kelly Swim Centre added, including flow chart

Amendments October 2023

Date of Review	Author	Page / Para	Synopsis of Amendment
15.08.2023	MC	4	Update of safeguarding staff / contacts.
		6 / 1	Change to 'Keeping Children Safe in Education 2023'.
		7 / 4	Use of terminology updated. 'Sexting' replaced by 'sharing of nudes and semi-nudes'. Definition changed to match language used in KCSIE 2023.
		8	In 'Roles and responsibilities section' – paragraph 2 onwards added to match recommendations from The Key Safeguarding: 'The school… unacceptable'.
		9	In the 'all staff will be aware of' section, addition of the final four bullet points (as per guidance from The Key Safeguarding.) Bullet point 3 (about 'the signs of different type of abuse') re-worded to include specific reference to county lines DSL role – paragraph 2 of this section: addition of understanding filtering and monitoring processes (KCSIE 2023 update) DSL section: addition of bullet point 8 ('knowing what local specialist support is available…')
		10	Addition of section 2 – 'The Safeguarding Officers' – brief outline of roles and responsibilities of Safeguarding Officers.
		10-11	Addition of final bullet point on page 10: 'ensure that the school has appropriate filtering and monitoring systems in place…' (in Head Master – change to Governing Body)
		11	Addition of bullet point 2: 'making decisions regarding all low-level concerns' (guidance from The Key).
		19	Terminology changed in title to 'sharing of nudes and semi-nudes' to reflect language used in KCSIE 2023. Paragraph 3 - link to updated guidance in footnote.
		19	Section renamed to reflect terminology used in KCSIE – 'sexting' replaced by 'sharing of nudes and semi-nudes'
		21	Section added – 'Reporting systems for our pupils' 'Staff mobile phones and cameras' moved to this location (following outline in They Key Safeguarding)
		24	Addition of Safeguarding Officers to section 17 – 'The DSL, Deputies and Safeguarding Officers'.
		25	Policies alphabetised. Names of policies updated to match the policies published on the school website / intranet / T-drive. Names of policies no longer on the website or

			intranet deleted: allegations against staff; parental concern; administration of medicines; physical intervention; intimate care; radicalisation and extremism.
		36	Addition of 'humiliating pupils' to the definition of low-level concerns (final bullet point in the 'examples of such behaviour' section).
		37	Year of publication changed – Keeping Children Safe in Education 2023 (final line of page).
		38	First paragraph re-worded in line with terminology used in KCSIE 2023.
		46 / 2	Name of Welfare Officer for Mount Kelly Swim Club to be added when confirmed.
		43	Change: 'they will follow our procedures set out on page 16 of this policy, including discussing their concerns with the DSL' (final lines of page).
		46	Missing pupils section: name of policy updated
		47	Need confirmation of where the Intimate Care Policy is located
		48	Addition of section on AI (following guidance in The Key Safeguarding) Change from 'Safer Recruitment Policy' to 'Recruitment and Selection Policy' (section 4)

Amendments 2022

Page	Amendment
Throughout	References to KCSIE 2022
	References to peer-on-peer replaced by child-on-child
5	Updated reference to NMS to 2022
7,8	Updated roles and responsibilities of the DSL – taken from LA model policy.
15	Minor amends / updates to section on child-on-child abuse and inclusion of a link to the South West Child Protection Procedures manual. Inclusion of pupil ability to report incidents via a QR code.
19	Addition: Child protection files will be kept **until the pupil's 26th birthday** (7 years after they reach the school leaving age)
33	Included reference to section 4 of KCSIE 2022 – Managing allegations
36,37	Comprehensive update on Domestic Abuse - taken from LA model policy.
38	Revision of information on FM