

# SAFEGUARDING POLICY



Blundell's

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FOUNDED 1604



## **BLUNDELL'S SAFEGUARDING POLICY**

**Blundell's is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.**

The Designated Safeguarding Lead (DSL) for Child Protection

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Nominated Governor for Child Protection

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Deputy Nominated Governor for Child Protection

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The DSL and the Governor for Child Protection are also responsible for the implementation of the 'Prevent Duty'.

# 1 INTRODUCTION

1.1 This policy is written in accordance with Devon County Council inter-agency procedures. It has been developed in accordance with the principles established by the following:

- Children Acts 1989 and 2004;
- Education Act 2002, and in line with government publications:
- “Framework for the Assessment of Children in Need and their Families” 2000,
- “What to do if you are worried a Child is Being Abused” 2015.

It also references:

- Disqualification under the Childcare Act 2006 (Feb 2015)
- Prevent Duty Guidance for England and Wales (March 2015)
- The Prevent Duty. Departmental Advice for Schools and Childminders
- The use of social media for online radicalisation (July 2015)
- “Working Together to Safeguard Children” (July 2018)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education guidance for schools

The guidance reflects “Keeping Children Safe in Education” September 2021 (“KCSIE”).

1.2 This policy is applicable to the whole school community.

1.3 The Governing body takes seriously its responsibility under section 157 and 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm or who are likely to suffer harm, and those who are in need of additional support from one or more agencies. Blundell’s works closely with the Devon Multi-Agency Safeguarding Hub (“MASH”) to ensure that the welfare and safety of pupils at the School is given appropriate priority.

1.4 We recognise that all adults, including temporary staff \*, volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that the child’s welfare is our paramount concern.

*\*Wherever the word “staff” is used, it covers ALL staff, including ancillary, supply and self-employed staff, contractors, volunteers working with children etc.*

1.5 All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

1.6 All members of staff have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy. This includes a duty both to children in need and to children at risk of harm. All staff should read and understand at least Part 1 and Annex B of KCSIE, whenever a new version is published. All school staff should be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

1.7 **The aims of this policy are:**

1.7.1 To support the child’s development in ways that will foster security, confidence and independence. The policy endeavours to keep the child’s best interest at the forefront of all practice.

- 1.7.2 To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- 1.7.3 To protect children from maltreatment, to prevent impairment of children's mental and physical health or development, to ensure children can grow up in circumstances consistent with the provision of safe and effective care, and to take action where necessary to enable all children to have the best outcomes.
- 1.7.4 To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse. To raise the awareness of all staff that Safeguarding incidents and/or behaviours can be both adult/s to children and child/ren to child/ren ('peer-on-peer'), and can be associated with factors both in and out of school.
- 1.7.5 To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children. The policy and its procedures aim to highlight the value and importance of early intervention wherever possible.
- 1.7.6 To emphasise the need for good levels of communication between all members of staff.
- 1.7.7 To develop a structured procedure within the school, this will be followed by all members of the school community in cases of suspected abuse.
- 1.7.8 To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- 1.7.9 To provide good lines of communication with trusted adults, supported friends and an ethos of protection.
- 1.7.10 To recognise and protect our children who may be vulnerable to radicalisation or exposed to extremist views.

## **2 SAFE SCHOOL, SAFE STAFF**

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

- 2.1.1 All members of the governing body understand and fulfil their responsibilities. There is a designated Governor responsible for overseeing safeguarding. The governing body annually review the school's policies and procedures and the efficiency with which the related duties have been discharged.
- 2.1.2 The Chairman of Governors will sign off this policy on an annual basis.
- 2.1.3 We have a Designated Safeguarding Lead (DSL) and two deputies (DDSL), all of whom have undertaken the DSCB Two Day Group 3 Multi-Agency Safeguarding Children Training and who undertake to update their training at least every 2 years, as well as undertake informal updates where appropriate.
- 2.1.4 The Head and all other staff and governors, have child protection awareness training, to be arranged by the DSL on a regular basis, in line with the advice of the Devon Safeguarding Children Board ("DSCB"), to maintain their understanding of safeguarding issues, including the signs and indicators of abuse.
- 2.1.5 All members of staff, volunteers, and governors are provided with child protection awareness training at induction, including training managing a report of child-on-child sexual violence and sexual harassment. They will also receive regular updates in line with the advice of DCSB, as well as informal updates where appropriate. They know how to respond to a pupil who discloses abuse and who to discuss a concern with. They should not assume that somebody else will take action and share information that might be critical in keeping children safe. This is everyone's responsibility.
- 2.1.6 Senior pupils in positions of responsibility also receive child protection awareness training on the appropriate action to take should they receive any allegations of abuse.
- 2.1.7 All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the school's Safeguarding Policy.

- 2.1.8 We will seek to ensure that in line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2021), all staff working within our school have been checked as to their suitability to work with children by adhering to statutory responsibilities to undertake checks on all staff, including verification of their identity, qualifications, a satisfactory Enhanced DBS check and Barred List check (where appropriate), as well as taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Those undertaking management posts will be subject to prohibition from management of independent schools checks.
- 2.1.9 A single central record of appointments is kept for audit. We operate safe recruitment procedures in compliance with Independent School Standards Regulations and this is reflected in the School's Recruitment Policy.
- 2.1.10 We will seek assurance that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils on another site.
- 2.1.11 We will ensure that all child protection concerns or allegations against adults working in school are referred to the LADO (Local Authority Designated Officer) for advice.
- 2.2 Our procedures will be annually reviewed and updated. Any deficiencies or weaknesses in the procedures will be remedied without delay.
- 2.3 The name of the Designated Safeguarding Lead and their deputies will be clearly publicised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- 2.4 All new members of staff will be given a copy of our Safeguarding and Child Protection awareness training pack which includes the Safeguarding Policy, the Code of Conduct, the Whistleblowing Policy and Part 1 and Annex B of the latest version of Keeping Children Safe in Education. It also has the DSL's and DDSL's names clearly displayed, as part of their induction into the school. In relation to this it should be noted that:
- 2.4.1 The Code of Conduct includes guidance in relation to Whistleblowing, acceptable use of IT, staff/pupil relationships, and communication, including the use of social media.
- 2.4.2 The Safeguarding induction given to all new members of staff will cover the school's response to children who go missing in education (which is covered in full in section 20 of this Policy)
- 2.5 This policy is available publicly on the school's website. It is also made available to parents in the Parents' Handbook and to staff in the Staff Handbook.

### **3 RESPONSIBILITIES**

- 3.1 According to statutory guidance (KCSIE, September 2021) the Governors have appointed Nicky Klinkenberg as DSL to take responsibility for child protection. As a member of the Senior Leadership Team she has the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. Matthew Radley (Second Master), and Tammy Winsley (Head of Drama) are the DSL's deputies. Both the DSL and DDSLs' have a job description for their safeguarding roles and key activities.

## 3.2 **The DSL is responsible for:**

The DSL's responsibilities are in line with those set out in Annex C of KCSIE (September 1) and include:

### 3.2.1 **Managing referrals**

- (a) Referring a child if there are concerns about possible abuse, to the MASH and acting as a focal point for staff to discuss concerns. Referrals should be made in writing, following a telephone call within 24 hours of a disclosure or suspicion of abuse.
- (b) Liaising with other agencies as may be required. For example,
  - Police (cases where a crime may have been committed or in the case of serious harm)
  - Disclosure and Barring Service (cases where a person is dismissed or has left due to risk/harm to a child)
- (c) Keep the Head and Governors informed of any ongoing enquiries
- (d) Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- (e) Ensuring that either they or the Houseparent or Tutor attends case conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report, which has been shared with the parents.
- (f) The DSL will liaise with the school's local safeguarding partners and other appropriate agencies, in line with Working Together to Safeguard Children 2019, and will attend any strategy meetings. The three main safeguarding partners are the Local Authority (through MASH), the Devon Children and Families Partnership, and the Police. The DSL will work with partner agencies to seek advice, support and guidance, drawing on multi-agency expertise, knowledge and experience to support pupils at risk of harm including emotional and intellectual harm via social media and use of the internet. The NPCC 'When to Call the Police' document (linked at the end of this policy) should aid the DSL in this regard.

### 3.2.2 **Training**

The DSL and DDSs are fully trained for the demands of this role in child protection and inter-agency working and should regularly attend courses with child support agencies to ensure that they remain conversant with best practice, and receive appropriate refresher training carried out at least every two years. This training meets the requirements of the DfE's 'Keeping Children Safe in Education' (KCSIE), and should include reference to inter-agency working and to Prevent

In addition, the DSL should:

- (a) Ensure each member of staff has access to and understands the School's Safeguarding Policy and procedures, especially new and part time staff. The DSL is responsible for organising and delivering child protection induction, and for regularly updating all school staff on Safeguarding developments, for example, through staff meetings and notices. In this context 'regularly' should mean at least annually.
- (b) Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- (c) Be able to keep detailed, accurate, secure written records of concerns and referrals.

- Keeping written records of concerns about a child even if there is no need to make an immediate referral. CPOMS is our chosen method of recording safeguarding and welfare concerns.
  - Ensuring that all such records are kept confidentially and securely, separate from pupil records and are copied on to the child's next school or college.
  - Ensuring that an indication of further record-keeping is marked on the pupil records.
- (d) Obtain access to resources and attend any relevant or refresher training courses.
- (e) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.

### 3.2.3 Raising Awareness

The DSL should ensure the School's policies are known and used appropriately.

- (a) Ensure the School's Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governors regarding this.
- (b) Ensure the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- (c) Link with the Devon Children and Family Partnership (Devon County Council through Babcock's) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- (d) Where children leave the School, ensure their Safeguarding file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.
- (e) Providing, with the Head and the Safeguarding Governor, an annual report for the governing body, detailing any changes to the policy and procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and number of children with child protection plans (anonymised).

3.3 The DDSLs are appropriately trained and, in the absence of the DSL, carry out those functions necessary to ensure the on-going safety and protection of pupils. In the event of the long-term absence of the DSL, the DDSLs will assume all of the functions above. The DSL, or DDSLs, should always be available to discuss safeguarding concerns.

### 3.4 **The Governors must ensure that:**

- 3.4.1 The School has appointed a DSL with the necessary status, authority and time to fulfil the role effectively and that the Job Description of the DSL meets the requirements as set out in Keeping Children Safe in Education (September 2021).
- 3.4.2 The School has an effective Safeguarding Policy and procedures that meet statutory requirements and which are reviewed annually. This policy is made available to parents on the school's website. As part of their annual review, the Governing body will monitor the procedures for and the efficiency with which the safeguarding duties have been discharged, ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay and will approve amendments to safeguarding arrangements in the light of changing Regulations or recommended best practice.
- 3.4.3 All staff are given a copy of the latest version of Part 1 and Annex B of Keeping Children Safe in Education, or Annex A for staff not working directly with children if the DSL believes it will provide a better basis for those staff to safeguard children. Staff are asked to sign to

confirm they have read and understood it. Further copies are provided to staff as and when it is updated.

- 3.4.4 Upon receiving the annual report on safeguarding, the minutes of the review are sufficiently detailed in order to demonstrate the breadth and depth of the review.
- 3.4.5 The School has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head.
- 3.4.6 The School implements the Recruitment Policy which includes statutory checks on staff suitability to work with children.
- 3.4.7 The Safeguarding Policy is known and implemented in practice. The Governor responsible for Safeguarding will visit the school on a termly basis and will enquire of staff how they understand the policy and how and to who they would pass on their safeguarding concerns.
- 3.4.8 The DSL, or another designated member of staff, has the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority. This would include ensuring that a designated member of staff has responsibility for their welfare and progress and has up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents.

3.5 **The Head must ensure that:**

- 3.5.1 The Safeguarding Policy and procedures are implemented and followed by all staff.
- 3.5.2 Sufficient time is allocated to the DSL and the DDSs to carry out their roles effectively.
- 3.5.3 All staff are able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing Policy.
- 3.5.4 Pupils' safety (including e-safety) and welfare are addressed through the curriculum.

## 4 **SUPPORTING CHILDREN**

- 4.1 The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the school. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our Behaviour Management Policy and in enforcing our Anti-Bullying Policy.
- 4.2 Time is allocated in the Curriculum, including in PSHE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding. Safe practices in relation to reducing risky behaviour, including online behaviour, are embedded in the PSHE and Sex & Relationships Education, in line with the government statutory guidance document 'Relationships Education, Relationships and Sex Education (RSE) and Health Education'. Opportunities will be included for children to discuss issues such as peer-on-peer abuse, sexual harassment and violence, and consent.
- 4.3 All pupils know that there are adults to whom they can turn if they are worried, including the school counsellor, the chaplain and the medical staff. If the school has concerns about a child there is always a recognised requirement for sensitive communication and all staff members are aware of the need to avoid asking leading questions.
- 4.4 Our Monitors system is regularly supervised by boarding staff. They have been trained to ensure that they are suitable for their duties and do not abuse their roles, which are specified clearly in



writing. In particular, prefects are given induction on appointment which includes how to contribute to the school's anti-bullying practice, how to respond to allegations of serious bullying or abuse and how to act if they hear allegations of abuse.

- 4.5 A Child in Need refers to a pupil whose circumstances may require them to have extra support in order for them to live a life which does not compromise their ability to fulfil their potential. It is the duty of the Local Authority to inform the school if a child has a social worker, and the DSL should hold this information to ensure the best outcomes for the child. Social workers should share decisions about safeguarding and promoting the welfare of the child with the school. The School will refer to external agencies such as CAMHS (Child and Adolescent Mental Health Service) or Devon County Council's Children's Social Services for additional advice and support, where appropriate.
- 4.6 A Child at Risk is a pupil who is in immediate risk of harm and such cases will be referred to the MASH as a matter of urgency.
- 4.7 We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- 4.8 We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- 4.9 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 4.10 **Blundell's will support all pupils by:**
- 4.10.1 Providing access to a telephone helpline enabling them to call for support in private.
  - 4.10.2 Providing every child with a homework diary or school calendar, both of which contain guidance on where to turn for advice, including confidential help lines and web addresses for external specialists such as ChildLine, Kidscape, Get Connected and the Samaritans.
  - 4.10.3 Displaying advice in the Medical Centre and Boarding Houses on where pupils can seek help.
  - 4.10.4 Providing leadership training to our Monitors and senior pupils, which specifically covers safeguarding and child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.
  - 4.10.5 Providing regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the school's guidelines in this area (which are set out specifically in the school's Pupil ICT Acceptable Use policy). This includes guidance on educating pupils to stay safe including e-safety and online protection. PSHE lessons focus, among other areas, on the risk areas of 'content, contact, conduct and commerce'. For more details on cyber-bullying, please refer to the school's anti-bullying policy.
  - 4.10.6 Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
  - 4.10.7 Promoting a caring, safe and positive environment within the school.
  - 4.10.8 Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
  - 4.10.9 Notifying the appropriate external agencies as soon as there is a significant concern.
  - 4.10.10 Providing continuing support to a pupil about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to

the pupil's new school or FE College and ensuring the school medical records are forwarded as a matter of priority.

4.10.11 Reassuring victims that they are being taken seriously and that they will be supported and kept safe.

## **5 EARLY HELP**

Any pupil may benefit from early help but all staff should be particularly alert to the potential need for early help for a pupil who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child.
- Is at risk of 'honour' based abuse such as FGM or 'forced marriage'

Early help means providing support as soon as a problem emerges at any point in a pupil's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the school's DSL. The DSL will consider the appropriate action to take in accordance with the MASH referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving. Any referral to children's social care should be initiated by contacting MASH, through the procedures outlined elsewhere in this Policy.

## **6 CONFIDENTIALITY**

6.1 We recognise that all matters relating to safeguarding are confidential, however, all staff should share information that might be critical in keeping children safe. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children. In particular, staff should be aware of the following:

- Certain sensitive and personal information may be retained and shared for Safeguarding purposes. This will normally be done either (i) within the Safeguarding Team, or (ii) in the Welfare Committee, which is chaired by the Second Master. Such information is categorised as 'special category personal data'.
- 'Safeguarding of children and individuals at risk', as outlined in KCSIE 2021, allows for the sharing of 'special category personal data', and also allows for this to be done without consent, should the gaining of consent place the child at risk, or at further risk.

- Schools are able to refuse to share data, should they consider that the sharing of such data would place a child at risk. In such instances, the 'serious harm test' should be met.

- 6.2 The Head or DSL will disclose any information about a pupil to other members of staff on a need to know basis only.
- 6.3 The guidance, "Information sharing: advice for practitioners providing safeguarding services" (2018), supports staff who have to make decisions about sharing information.
- 6.4 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 6.5 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- 6.6 We will always undertake to share our intention to refer a child to Social Care 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 consult with the MASH on this point.

## **7 SUPPORTING STAFF**

- 7.1 We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 7.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

## **8 STAFF TRAINING**

- 8.1 It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.
- 8.2 Safeguarding is the responsibility of all members of staff and all staff should know what to do to raise a concern.
- 8.3 New staff (including temporary staff), volunteers and governors will receive training during their induction. Induction training will include:
- 8.3.1 Familiarisation with this policy (Safeguarding Policy)
  - 8.3.2 Staff Code of Conduct (which guidance in relation to Whistleblowing, acceptable use of IT, staff/pupil relationships, and communication, including the use of social media).
  - 8.3.3 Whistleblowing Policy
  - 8.3.4 The identity of the DSL and DDSLs
  - 8.3.5 Updates to Part I and Annex A of the Keeping Children Safe in Education guidelines
  - 8.3.6 Staff ICT Acceptable Use Policy
  - 8.3.7 Behaviour Management Policy
- 8.4 Staff training will also include alerting staff to the risks of radicalisation as set out in the Prevent Duty. Training in the Prevent Duty will include knowing how to identify children and young people at risk. This training will be updated on a regular basis in line with recommendations from the DSCB.

## 9 SIGNS AND TYPES OF ABUSE

### 9.1 Recognising Abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside school, and/or can occur between children outside these environments. The school's Safeguarding Team will consider whether children are at risk of abuse or exploitation in situations outside their families: such extra-familial harm can take different forms, including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

There are four categories of abuse:

#### 9.1.1 Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Some of the following signs may be indicators of physical abuse:**

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained:
  - bruises or cuts;
  - burns or scalds; or
  - bite marks.

#### 9.1.2 Emotional Abuse

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

**Some of the following signs may be indicators of emotional abuse:**

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

9.1.3 **Sexual Abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, and it is also recognised that children can sexually abuse other children.

**Child Sexual Exploitation ("CSE")** is a form of sexual abuse where children are sexually exploited for money, power or status. It involves an individual or a group using a power imbalance to coerce, manipulate or deceive a child into sexual activity. Age may be the most obvious factor, but this power imbalance can also be due to other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. CSE can be a one-off occurrence, or it can be a series of incidents over time, and can range from opportunistic to complex organised abuse. CSE can involve violent, humiliating and degrading sexual assaults, and victims can be exploited even when the activity appears consensual. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child Sexual Exploitation doesn't always involve physical contact and can happen online. Abuse may be perpetrated by individuals or groups, males or females, and adults or children (who themselves may be experiencing exploitation).

**Some of the following signs may be indicators of sexual abuse:**

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

**Some of the following signs may be indicators of sexual exploitation:**

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;

- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or don't take part in education.

### **Child Criminal Exploitation (“CCE”)**

Child Criminal Exploitation is a form of abuse where children are exploited for money, power or status. It involves an individual or a group using a power imbalance to coerce, manipulate or deceive a child into criminal activity. Age may be the most obvious factor, but this power imbalance can also be due to other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. CCE can be a one-off occurrence, or it can be a series of incidents over time, and can range from opportunistic to complex organised abuse. Victims of CCE can be exploited even when the activity appears consensual. Consent cannot be given, even where a child may believe they are voluntarily engaging in activity with the person who is exploiting them. CCE doesn't always involve physical contact and can happen online. Abuse may be perpetrated by individuals or groups, males or females, and adults or children (who themselves may be experiencing exploitation).

CCE is also sometimes referred to as ‘County Lines’, this being is a geographically widespread form of harm that is a typical feature of criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.
- The experience of girls who are criminally exploited, can be very different from boys, and the indicators may not be the same.

#### **9.1.4 Neglect**

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

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

**Some of the following signs may be indicators of neglect:**

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care;
- Parents who fail to seek medical treatment when their children are ill or are injured;
- Children who are left at home unsupervised for long stretches of time.

9.2 It is recognised that abuse can take place wholly online, or that online techniques may be used to facilitate offline abuse.

9.3 Other forms of abuse can include domestic abuse (whether a pupil is abuse themselves or witnesses such abuse), involvement in, or coercion into gangs, so-called honour-based abuse and forced marriage.

9.4 Safeguarding issues can also be linked to, for example, children and the court system, children with family members in prison, child sexual exploitation, child criminal exploitation: county lines, and homelessness. Further information in relation to these issues is provided (below).

**9.5 Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

**9.6 Children with family members in prison**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

**9.7 Homelessness**

Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as

appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

#### **9.8 Signs and Symptoms of Abuse**

The warning signs and symptoms of child abuse and neglect can vary from child to child. Children develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child. By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

Signs and symptoms are listed under 9.1.

#### **9.9 Contextual Safeguarding**

All staff, but especially the DSL and deputies, should consider the context in which safeguarding incidents and behaviour occur and how they can be associated with factors outside the school. The school will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The school will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

#### **9.10 Peer-on-Peer Abuse**

Peer-on-peer abuse is abuse carried out by one (or more) child on another, and can take many forms, including physical, sexual and emotional abuse, as well as more specific actions such as hazing, predatory sexting, and upskirting. The treatment of allegations of peer-on-peer abuse is dealt with in Section 16 of this policy.

#### **9.11 Serious Violence**

All staff should be aware of the indicators that children might be at risk from, or involved with serious violent crime. These might include increased absence from school, a change in friendships, relationships with older individuals or groups, a significant decline in performance, signs of assault or unexplained injuries, or unexplained gifts or new possessions. Any concerns should be passed on in line with this policy.

#### **9.12 Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. Schools have an active role to play in supporting the mental health and wellbeing of pupils. While only appropriately trained professionals should attempt a diagnosis of mental health problems, staff who have concerns about the mental state of a pupil should pass these concerns on in line with the protocols set out in this document. Staff should also be aware that children who have suffered abuse, neglect, or other traumatic childhood experiences, may experience a long-lasting impact on their mental health. A link to official Government guidance to support pupils in this way can be found in Section 22 of this Policy.

## **10 SAFEGUARDING AND CHILD PROTECTION PROCEDURES**

### **10.1 Procedures for staff about reporting a concern**

The school treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. All our school staff are made aware of their duty to safeguard and promote the welfare of children in the



school's care. They should not assume that somebody else will take action and share information that might be critical in keeping children safe. This is everyone's responsibility. Staff members are alerted to the particular potential vulnerabilities of looked after children.

All staff should be alert to signs and symptoms of possible abuse. Every member of staff, including part-timers, temporary, visiting, contract and volunteer staff working in school is required to report instances of actual or suspected child abuse or neglect to the DSL. This includes alleged abuse by one or more pupils against another pupil (see below section on Arrangement for Dealing with Peer-on-Peer Allegations).

If a member of staff observes something that gives cause for them to consider whether a pupil is being abused they should:

- 10.1.1 Record the incident in detail including the names of the pupil concerned as well as any pupils involved. They should also record accurately the date, time and place of the incident.
- 10.1.2 Immediately pass the information on to the DSL or to the Head or the DDSL in the absence of the DSL.
- 10.1.3 Reference will be made within 24 hours to an external agency if there is risk of significant harm, or if the incident involves a Child at Risk.

For the avoidance of doubt, staff should feel equally comfortable reporting, or passing on concerns that may be considered 'low level'; in other words, that do not meet the threshold for immediate harm, but are nonetheless concerning. Any such concerns should be reported and passed on in the same way as outlined for other concerns in this Policy. As with all concerns and reports, the school will keep a record of all low level concerns, to ensure that any inappropriate, concerning or problematic behaviour can be identified and addressed appropriately.

## 10.2 **Procedures for staff about dealing with a disclosure**

Occasionally a pupil may make a disclosure to a member of staff. When a pupil makes a disclosure the following needs to be borne in mind:

- 10.2.1 The member of staff may not promise confidentiality. If the matter places the pupil or another pupil in potential harm, then the information must be passed on to the DSL. This must be made clear to the pupil.
- 10.2.2 The member of staff should record the disclosure as accurately as possible using the pupil's language and words. The member of staff should not attach their own meaning to the disclosure or attempt to interpret implications of the disclosure.
- 10.2.3 The member of staff should not prompt or ask leading questions. The member of staff should not allow their own emotions to compromise their ability to listen and offer support.
- 10.2.4 The member of staff should explain to the pupil what they will do next and encourage them to speak directly to the DSL (offer to accompany the pupil to see the DSL). Give the pupil a time frame regarding what will happen next.
- 10.2.5 The member of staff should not discuss the matter with anyone else. Report directly and immediately to the DSL to enable them to notify appropriate agencies within 24 hours.
- 10.2.6 If staff members are unsure they should always speak to the DSL.
- 10.2.7 The member of staff should not investigate the matter.
- 10.2.8 In exceptional circumstances such as in an emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to MASH and/or the police. Parental consent is not needed for referrals. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up as appropriate.

### 10.3 Concluding notes

Referrals will be made to Devon MASH once a case has crossed the threshold for referrals. Devon MASH provide a 'Threshold Tool' which is used to assess whether or not a case should be referred.

Before proceeding any further, the DSL always has the option of having an informal discussion with the LADO without naming the individual concerned. These discussions can be helpful in determining when borderline cases need to be pursued further.

In borderline cases the LADO can advise whether the School may pursue its own investigation or whether the investigation is to be conducted by the LADO.

The DSL will report safeguarding concerns to the Head. Where there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm, a referral to Devon Children's Social Care will be made immediately. For children in need of additional support from one or more agencies, the school will contact other relevant external agencies. Blundell's points of contact are set out at the end of this Policy.

In the case of serious harm, or if a crime has been committed, the police will be informed from the outset.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to MASH immediately. **Anybody can make a referral.**

## 11 ALLEGATIONS OR DISCLOSURES OF ABUSE

- 11.1 All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- 11.2 All Staff should be aware of the school's Behaviour Management Policies.
- 11.3 All Staff should be aware of the School's Guidance about conduct and safe practice will be given at induction.
- 11.4 The IRSC nationally agreed document "*Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings*" is available at [www.saferrecruitmentconsortium.org](http://www.saferrecruitmentconsortium.org)
- 11.5 We understand that a pupil may make an allegation against a member of staff (including supply staff), a volunteer, a governor, a pupil, parent or other person connected to the School. Allegations of abuse against teachers and other staff relating to their behaviour towards a pupil or pupils in a way that indicates that he or she may pose a risk of harm to pupils will be dealt with according to the statutory guidance set out in part four of KCSIE 2021.
- 11.6 If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the DSL, the Head, or the Chair of Governors in the absence of the Head.
- 11.7 The Head or the DSL on all such occasions will discuss the content of the allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering with the Duty LADO within the working day. In the case of the allegation being made out of hours, the Head will contact the MASH's Emergency Duty Team. If a crime has been committed, the police will be informed.

- 11.8 If the allegation made to a member of staff concerns the Head, the person receiving the allegation will immediately inform the Chair of Governors who will consult as in 11.7 above, without notifying the Head first.
- 11.9 If the allegation made concerns a School Governor, the Head must be informed immediately and the process will follow the same steps as set out in 11.7.
- 11.10 The school will follow Part 4 of Keeping Children Safe in Education (2021) and the Devon County Council procedures for managing allegations against staff. Particular attention will be paid to guidance in Part 4 if the allegation concerns a Supply Teacher. Under no circumstances will we send a child home, pending such an investigation, unless this advice is given exceptionally, as a result of an Allegations/Senior Strategy Meeting:
- The term Allegations or Senior Strategy Meeting covers any urgent formal strategy discussion which may take place by telephone between the police, social care, and education managers, requiring action prior to the first meeting*
- 11.11 If the allegation concerns a member of staff, a volunteer or another pupil he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however. The school will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case.
- 11.12 In the case of staff, the matter will be dealt with in accordance with the Disciplinary Procedure.
- 11.13 Suspension of the member of staff against whom an allegation has been made, needs careful consideration, and the Head will seek the advice of the LADO in making this decision.
- 11.14 In the event of an allegation against the Head, the decision to suspend will be made by the Chair of Governors with advice from the LADO as above.
- 11.15 The reasons and justification for suspension will be recorded and the staff member informed of them.
- 11.16 Members of staff who are suspended pending an investigation of a child protection nature and who are housed in school will be required to remain off-site for the duration of their suspension.
- 11.17 We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.
- 11.18 During the course of the investigation, the school in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in Keeping Children Safe in Education relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.
- 11.19 In the case of peer-on-peer abuse which the school has reported to the LADO and which the LADO or statutory child protection authority decides to investigate further, the matter will be dealt with under the School Behaviour Management Policy after discussion with the LADO.
- 11.20 The outcome of investigation of an allegation will record whether it is substantiated (sufficient evidence either to prove or disprove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it)

and that there has been a deliberate act to deceive) and unfounded (no evidence or proper basis which supports it). If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice.

- 11.21 Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with guidelines of the Independent Inquiry into Child Sexual Abuse (IICSA). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

## **12 EXTERNAL REPORTING**

- 12.1 We follow Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to involvement of the LADO, schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) at the school, or would have been removed had they not left.
- 12.2 Blundell's School will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.
- 12.3 Further if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the school will consider making a referral to the Teaching Regulation Agency ("TRA") and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
- 12.4 Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's Designated Safeguarding Lead and involve children's social care as appropriate.

## **13 PARENTS**

- 13.1 In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Head who will decide on the appropriate response. In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the LADO or Social Services.
- 13.2 In line with KCSIE (2021), parental consent is not required for referral to statutory agencies.

## **14 WHISTLE-BLOWING**

- 14.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 14.2 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. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO.
- 14.3 The School will aim to provide immunity from retribution and no disciplinary action will be taken against staff for 'whistleblowing' in the public interest.

## **15 PHYSICAL INTERVENTION**

- 15.1 Our policy on physical intervention by staff is set out separately, and acknowledges 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.
- 15.2 Such events should be recorded and signed by a witness.
- 15.3 Staff who are likely to need to use physical intervention will be appropriately trained.
- 15.4 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.
- 15.5 We recognise that touch is appropriate in the context of working with children and all staff have been given "Safe Practice" guidance to ensure they are clear about their professional boundary.
- 15.6 We have due regard to the "Use of Reasonable Force in Schools" guidance:  
<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

## **16 ARRANGEMENTS FOR DEALING WITH PEER-ON-PEER ALLEGATIONS**

The DSL, Governors and Head will take due regard to Part 5 of KCSIE 2021

- 16.1 Peer-on-peer abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include bullying (including cyber bullying), physical abuse, initiation/hazing violence and rituals, sexting, sexual assault, upskirting, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment. Blundell's believes that all bullying and peer-on-peer abuse is unacceptable and must be dealt with in this context. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours be dismissed as the same or "just having a laugh" or "boys being boys". This is referred to in the Anti-Bullying Policy under Sections 2 and 3. Pupils will be educated on the harm of "banter" as part of the PSHE lessons. The school recognises that boys are more likely to be perpetrators and girls victims, but that all peer-on-peer abuse is unacceptable and will be taken seriously.
- 16.2 The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

- 16.3 Staff should report any peer-on-peer abuse concerns to the DSL, or the Deputy DSL. All staff have a responsibility to challenge abusive behaviours between peers.
- 16.4 The School recognises that children with special educational needs and disabilities can be more prone to peer-on-peer group isolation than other children, and also that such pupils can be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs. The School further recognises that pupils with special educational needs can have communication difficulties and barriers in reporting these challenges. The school's safeguarding records will make notes of pupils' Special Educational Needs, if applicable, to allow the school to monitor concerns relating to such pupils and consider additional pastoral support for those pupils.
- 16.5 The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for peer-on-peer abuse. There are many adults to whom pupils can turn when they need help or support, and notices to this effect are displayed prominently in boarding houses.
- 16.5 Our policy on bullying and peer-on-peer abuse is set out in a separate document called The Anti-Bullying Policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies.
- 16.6 A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from MASH and/or the Devon Children and Families Partnership on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the Devon Safeguarding Children Board, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the Devon Safeguarding Children Board and/ or the Police as appropriate.
- 16.7 Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the Police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. Sexting is referred to in the Anti-Bullying Policy under Section 7. It is the school's policy to ensure that both the perpetrator and the victim receive support and counselling.
- 16.8 In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by a senior member of staff and advice will be sought from appropriate agencies as to the best form of support to offer both victim and perpetrator.
- 16.9 When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:
- the victim;
  - the alleged perpetrator; and
  - the other children (and, if appropriate, staff) at the School.

16.10 Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

16.11 In most instances, the conduct of pupils towards each other will be covered by the school's behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. We recognise that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'. The forms of peer-on-peer abuse are outlined below.

- domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality;
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- child sexual exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18;
- harmful sexual behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others (For more information, please see Appendix 2);
- upskirting – which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- serious youth violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19' i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences. All staff will receive training so that they are aware of indicators which may signal that children are at risk from, or involved with serious violence and crime;
- 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); and
- consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery).

16.12 The term peer-on-peer abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences. There are also different gender issues that can be prevalent when dealing with peer-on-peer abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).

We aim to reduce the likelihood of peer-on-peer abuse through;

- the established ethos of respect, friendship, courtesy and kindness;
- high expectations of behaviour;
- clear consequences for unacceptable behaviour;
- providing a developmentally appropriate PSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe;
- systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed;

- robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.

16.13 Research indicates that young people rarely disclose peer on peer abuse and that if they do, it is likely to be to their friends. Therefore, we will also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice. The school recognises that peer-on-peer abuse may be taking place, even if there are no reported cases.

## 17 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.

## 18 HEALTH & SAFETY

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the school environment, and for example in relation to internet use, and when away from the school when undertaking school trips and visits.

## 19 PREVENT

### 19.1 Radicalisation and Extremism

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

Staff acknowledge the need for a culture of vigilance to be present in the school to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation.

Staff will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care. Contact details for support and advice on the Prevent Duty can be found below.

School staff receive training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools (2014)

19.1.1 **Radicalisation** is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

19.1.2 **Extremism** is defined as the holding of extreme political or religious views.

19.1.3 Blundell's has a **zero-tolerance** approach to extremist behaviour for all school community members. We rely on our strong values to steer our work and ensure the pastoral care of our pupils protects them from exposure to negative influences.



19.1.4 Blundell's is fully committed to safeguarding and promoting the welfare of all its children. As a school we recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. All staff are expected to uphold and promote the fundamental principles of British values, including **democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.**

## 19.2 **IT Policies and e-Safety**

Schools have an important role to play in equipping children and young people to stay safe online both in school and outside, including when they are at home. Internet safety is integral to the school's ICT curriculum and is embedded in PSHE. External speakers are also regularly engaged to address pupils and staff on this topic. The school ensures that when accessing the internet, terrorist and extremist material is filtered out to keep children safe.

Blundell's is also highly aware of the importance of monitoring and managing pupil's usage of mobile devices in the context of safeguarding. Pupils receive education on staying safe online through the PSHE programme, and 'Acceptable ICT Usage' policies are in place for staff and pupils, which clearly set out rules and expectations in relation to all ICT usage (and which explicitly includes pupils' own mobile devices). Pupils are issued and taken through the 'Acceptable Usage Policy' the first time they access the school network. Access to the school network is very closely monitored (led by the Director of IT), and sophisticated software is used to both block access to inappropriate sites, and monitor internet usage that is of concern. A daily report to this effect is emailed to the Second Master.

It is recognised that pupils can also use data networks (3G, 4G & 5G) to access the internet. Clear and consistent education on appropriate usage is seen as a key component in protecting pupils online in this respect, as is the provision of a fast, reliable Wi-Fi connection, which pupils therefore prefer to use instead of their data network (and which is closely monitored, as outlined above).

## 19.3 **Female Genital Mutilation (FGM)**

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupil about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

Any teacher who discovers that FGM appears to have been carried out on a girl under the age of 18 (either through disclosure by the victim or visual evidence) is under a statutory duty to report it to the Police.

If staff have concerns that FGM has taken place, as well as reporting this to the police, they should also activate local safeguarding procedures using existing and national and local protocols. Unless

the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve children's social care as appropriate.

#### 19.4 **Visiting Speakers**

On occasions, visiting speakers will come into the School to address pupils. Blundell's welcomes different insights and perspectives from visitors to the School. Visiting speakers will however be briefed with regards to our expectations of what is suitable. Speakers will be reminded not to encourage any form of extremism or radicalisation. Speakers will be reminded that pupils are impressionable and that the speakers need to be respectful of the School's support of British values. Where appropriate, the School will request that visiting speakers provide copies of materials they will use to the School in advance of the visit.

#### 19.5 **What to do if you have a concern**

The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

## 20 **CHILDREN MISSING FROM EDUCATION**

Blundell's recognises that a child going missing from education is a potential indicator of neglect or abuse, and that such children are at risk of being victims of harm, exploitation or radicalisation. The school will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. For further details, please see the Missing Child Policy which include procedures as to what to do when a child is not collected on time.

## 21. **HONOUR-BASED ABUSE**

Honour based abuse (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who;

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage;
- wear clothes or take part in activities that might not be considered traditional within a particular culture.
- It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

## 22. **PRIVATE FOSTERING ARRANGEMENTS**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local

authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

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

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

## **23. YOUTH PRODUCED SEXUAL IMAGERY (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 UKCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'<sup>1</sup>, and 'Sharing nudes and semi-nudes: how to respond to an incident.'<sup>2</sup>

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.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

In the first instance a referral to MASH will always be made, and the school will always act in accordance with any advice, recommendation or guidance received from them.

In the event that MASH recommend that the school investigate further, the DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a further referral should be made to MASH or the Police as appropriate.

Immediate referral subsequent to the initial review stage should be made to MASH/Police if;

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<sup>1</sup> [Sexting in schools and colleges](#)

<sup>2</sup> [Sharing nudes and semi-nudes: how to respond to an incident \(UCKIS\)](#)

- The incident involves an adult;
- There is good 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 education needs);
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
- The imagery involves sexual acts;
- The imagery involves anyone aged 12 or under;
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Headteacher, to respond to the incident without further escalation to MASH or the police. Such decisions will be recorded.

In applying judgement, the DSL will consider if;

- there is a significant age difference between the sender/receiver;
- there is any coercion or encouragement beyond the sender/receiver;
- the imagery was shared and received with the knowledge of the child in the imagery;
- the child is more vulnerable than usual i.e. at risk;
- there is a significant impact on the children involved;
- the image is of a severe or extreme nature;
- the child involved understands consent;
- the situation is isolated or if the image been more widely distributed;
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances;
- the children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our Safeguarding procedures, including reporting to the police or MASH. Otherwise, the situation will be managed within the school.

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.

## **24 MONITORING AND EVALUATION**

The school monitors and evaluates its Safeguarding Policy and procedures through the following activities:

- Pupil surveys and questionnaires
- PSHE discussions
- Governing Body monitoring
- Safeguarding records on CPOMS
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments

- Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the school
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by the Senior Leadership Team and the governing body
- Regular review of parental concerns and parental questionnaires
- Regular review of the use of pupil-specific leisure rooms and clubs at lunchtime and after school

## 25 IMPORTANT CONTACT DETAILS AND LINKS

In the first instance concerns should be raised with the School's DSL. Only in exceptional circumstances, such as an emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to children's social care.

Blundell's works together with the Devon **Multi-Agency Safeguarding Hub (MASH)**, and the **Devon Children and Families Partnership (DCFP)**. To make an enquiry with MASH, or to ask for advice, the telephone number to use is 0345 155 1071. Alternatively, you can contact MASH staff on the e-mail address: [mashsecure@devon.gov.uk](mailto:mashsecure@devon.gov.uk)

In case of needing to raise a concern outside of normal office hours the Emergency Duty Team can be contacted on 0845 6000 388.

For non-emergencies the Police can be contacted on 101. In emergencies the Police can be contacted on 999.

The Devon Children and Families Partnership Business Team can be contacted on 01392 386 067.

The Devon LADO (Local Authority Designated Officer) can also be contacted to report concerns or to ask for advice. The telephone number to use when contacting the LADO is 01392 384964.

### **OFSTED Safeguarding Children:**

08456 404046 (Monday to Friday from 8am to 6pm)

[Whistleblowing@ofsted.gov.uk](mailto:Whistleblowing@ofsted.gov.uk)

The school's points of contact for children who are in need of help are as follows:

MASH/Early Help – Tel No: 0345 155 1071; email: [mashsecure@devon.gov.uk](mailto:mashsecure@devon.gov.uk)

### **Extremism:**

Department for Education dedicated helpline for staff and governors: 020 7340 7264 and

[counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

### *Other useful contacts*

#### **Disclosure and Barring Service**

PO Box 181, Darlington, DL1 9FA

Tel: 01325 953795

#### **Teaching Regulation Agency**

Tel: 020 7593 5393 ('Teacher Misconduct' line)

**Independent Schools Inspectorate**

0207 6000100

[concerns@isi.net](mailto:concerns@isi.net)

**NPCC 'When to Call Police' document**

[When to Call Police](#)

**Mental Health and Behaviour in Schools**

[Official Government Guidance](#)

**26 LINKS TO OTHER RELATED POLICIES**

Anti-Bullying  
Safer Working Practice / Code of Conduct  
Whistleblowing  
Health and Safety  
Policy on Physical Restraint  
Missing Child  
ICT Policy  
Recruitment Policy  
Health and Safety Policy  
Rewards and Sanctions  
Behaviour Management  
Complaints  
Relationships and Sex Education Policy

Author:	Second Master
Date Written:	September 2018
Reviewed:	September 2021 (New policy for KCSIE 2021)
Next Review Due:	September 2022 (or earlier if appropriate)

## **Reviews and updates:**

### **June 2019**

- 19/06/19: Inclusion of Deputy Nominated Governor for Child Protection (p2), and correction to MASH/Early help contact details (p24)

### **September 2019**

- Front page - Dates updated on front cover.
- Page 2 - Tammy Winsley added as DDSL, along with relevant contact details. Governor emails addresses amended
- Page 3 – Reference to ‘Working Together to Safeguard Children’ updated to state that policy reflects February 2019 update.
- Page 3 – ‘Reference to Keeping Children Safe in Education’ updated to state that this policy reflects the September 2020 update.
- 2.1.8 – Reference to KCSIE updated to refer to 2019 document.
- 3.1 & 3.2 - Reference to KCSIE updated to refer to 2019 document.
- 3.2.1 (f) – Reference to ‘Working Together’ updated to refer to 2019 document.
- 3.4.1 & 3.4.3 - Reference to KCSIE updated to refer to 2019 document.
- 4.2 – The following sentence added, to refer to new statutory guidance: “Safe practices in relation to reducing risky behaviour, including online behaviour, are embedded in the PSHE and Sex & Relationships Education, in line with the government statutory guidance document ‘Relationships Education, Relationships and Sex Education (RSE) and Health Education’”.
- 9.11 – new clause added to specifically include upskirting as a form of abuse, in line with KCSIE 2020 update.
- 9.12 – new clause added to refer specifically to Serious Violence, in line with KCSIE September 2020 update.
- 11.6 & 11.11 - Reference to KCSIE updated to refer to 2019 document.
- 13.1 - Reference to KCSIE updated to refer to 2019 document.
- 16.1 – reference to upskirting added as a specific form of peer-on-peer abuse.
- 19.5 – email address for referrals for extremism updated.
- 22 – MASH email address updated following change by Devon County Council
- 22 – References inserted to the newly-formed Devon Children and Families Partnership.

### **May 2020**

- Appendix A added

### **September 2020**

- References throughout to KCSIE 2019 updated to KCSIE 2020
- 1.7.3 – new bullet point added
- 2.4.1 – added to give further detail on this area
- 2.4.2 – added to give further detail on this area
- 3.2.1 (f) – reference added to NPCC ‘When to Call Police’ document
- 3.2.1 (f) – explicit reference added to three local safeguarding partners, in line with updated KCSIE 2020 guidance
- 4.5 – updated to reflect additional detail in KCSIE 2020 on Children in Need
- 6.1 – bullet points added to give further clarification to GDPR regulations
- 8.3.2 – detail added to content of Code of Conduct
- 9.1 – additional paragraph added to reflect extra-familial risk, as outlined in KCSIE 2020
- 9.1.3 – updated to reflect new detail in KCSIE 2020 on CSE
- 9.3 – Now referred to as ‘Honour-based abuse’ (was ‘violence’) as per KCSIE 2020 change
- 9.3 – Updated to reflect that witnessing domestic abuse can also harmful to children
- 9.7 – updated to reflect new detail in KCSIE 2020 on CCE
- 9.13 – new paragraph added
- 11.6 – added specific reference to supply teachers
- 11.11 – added specific reference to supply teachers
- 19.2 – phrase “including when they are at home” added

- 19.2 – Specific reference to 3G, 4G and 5G added
- 21 – New section added referring to the Covid-19 pandemic
- 23 – phrase ‘and links’ added to title to reflect additional links within section
- 23 – added link to NPCC document and government mental health advice

#### January 2021

Addition of Appendix A -Covid-19 School Closure Arrangements for Safeguarding at Blundell’s

#### September 2021

- Removal of Appendix A (Covid 19)
- References throughout to KCSIE 2021 updated to KCSIE 2021
- Removed DDSL for Non-Academic Staff
- 1.6 – updated KCSIE Annex A to Annex B
- 1.7.4 – updated content to include more detail
- 2.1.7 – removal Parents Handbook
- 2.4 – as for 1.6
- 3.1 - removal Becci Lamacraft
- 3.2 – updated Annex B to Annex C
- 3.2.2 (a) - Replaced Child’s Protection Policy with Safeguarding Policy
- 3.2.3 (a,b&d) - as for 3.2.2 (a)
- 3.4.3 - as for 1.6 plus addition of Annex A for staff not directly working with children
- 4.2 – expands on discussions within whole curriculum
- 4.10.2 – inclusion school calendar
- 4.10.4 – inclusion of the word Safeguarding
- 4.10.9 – changed ‘social care’ to ‘appropriate external agencies
- 4.10.11 – added
- 5 – point added on honour based abuse and Devon Safeguarding Children’s Board replaced with

#### **MASH**

- 8.3.5 - as for 1.6
- 9.1.3 – CSE final sentence added. Plus previous Section 9.7 (CCE) moved to final section of 9.1.3
- 9.4 - inserted ‘child sexual exploitation’
- 9.8 to 9.13 - renumbered 9.7 to 9.12 due to removing previous Section 9.7
- 10.2.8 - changed children’s social care to MASH
- 10.3 – as for 10.2.8
- 11.7 – removed reference to Ofsted
- 11.8 and 11.9 – corrected 11.8 to 11.7
- 16 - inserted introductory sentence
- 16.11-16.13 – new
- 21 – Covid 19 removed
- New 21-23 – added
- Old 22-24 – renumbered 24-26



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