



Blundell's

PREPARATORY SCHOOL

SAFEGUARDING POLICY (INCLUDING EYFS)

- Author: DSL
- Date Written: September 2018
- Reviewed: 25th September 2026
- Next Review Due: September 2027 (earlier if appropriate)

Policy Review Amendments

Date of Amendment	Amendment
May 2019	No Amendments
July 2019	Change of Governor's emails
September 2019	<ul style="list-style-type: none"> • Front page - Dates updated front cover. • Page 3 – Reference to 'Working Together to Safeguard Children' updated to state that policy reflects February 2019 update. o Page 3 – 'Reference to Keeping Children Safe in Education' updated to state that this policy reflects the September 2019 update. • 2.1.8 – Reference to KCSIE updated to refer to 2019 document. o 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'". • 8.3.5 - Reference to KCSIE updated to refer to 2019 document. • 9.11 – new clause added to specifically include upskirting as a form of abuse, in line with KCSIE 2019 update. o 9.12 – new clause added to refer specifically to Serious Violence, in line with KCSIE September 2019 update. • 11.6 & 11.11 - Reference to KCSIE updated to refer to 2019 document. o 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. • 22 – Reference to Staff and Parents use of mobile phones in EYFS o 23 – MASH email address updated following change by Devon County Council. • 23 – References inserted to the newly-formed Devon Children and Families Partnership.
Oct 2019	
May 11th 2020	
May 26th 2020	<ul style="list-style-type: none"> • KCSIE changed to reflect October update • Appendix A added • Appendix B added
September 2020	<ul style="list-style-type: none"> • The document has been updated in various sections in line with KCSIE 2020 • Page 6 - Reference to KCSIE updated to refer to 2020 document. • Page 7 (1.7.3) – New bullet point added. • Page 8 (2.1.8) – Reference to KCSIE updated to refer to 2020 document. • Page 8 (2.4.1 & 2.4.2) – Added to give further detail on this area • Page 8 (3.1 & 3.2) - Reference to KCSIE updated to refer to 2020 document. • Page 9 (3.2.1 (f)) – Reference added to NPCC 'when to call police' document.

September
2021

- Page 9 (3.2.1 (f)) – Explicit reference added to three local safeguarding partners, in line with updated KCSIE 2020 guidance.
 - Page 10 (3.4.1) - Reference to KCSIE updated to refer to 2020 document.
 - Page 11 (4.4) - Updated to reflect additional detail in KCSIE 2020 on Children in Need
 - Page 13 (6.1) - Bullet points added to give further clarification to GDPR regulations
 - Page 14 (8.3.2) – Detail added to content of Code of Conduct.
 - Page 14 (9.1) – Additional paragraph added to reflect extra-familial risk, as outlined in KCSIE 2020
 - Page 15 (9.1.3) – Updated to reflect new detail in KCSIE 2020 CSE
 - Page 16 (9.3) – Now referred to as ‘Honour -based abuse’ (was violence) as per KCSIE 2020 change.
 - Page 16 (9.3) – Updated to reflect that witnessing domestic abuse can also be harmful to children.
 - Page 17 (9.7) – Updated to reflect new detail in KCSIE 2020 CCE
 - Page 18 (9.13) – New paragraph added.
 - Page 20 (11.6) – Added specific reference to supply teachers
 - Page 20 (11.11) – Added specific reference to supply teachers
 - Page 25 (19.2) – Phrase ‘including when they are at home’ added
 - Page 25 (19.2) additional information regarding Daily IT report monitored by the IT department.
 - Page 25 (19.2) – Specific reference to 3G, 4G and 5G added.
 - Page 26 (21) – New section added referring to the Covid-19 pandemic.
 - Page 27 (22) – Phrase ‘and links’ added to title to reflect additional links within section.
 - Page 29 (22) – Added link to NPCC document and Government mental health advice.
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- Changed Name for new Chair of Governors front page
 - Removal of Appendix A&B (Covid19)
 - References throughout to KCSIE 2021 updated to KCSIE 2021
 - Removed DDSL for Non-Academic Staff
 - Page 6 (1.6) – Updated KCSIE Annex A to Annex B
 - Page 7 (1.7.4) – updated content to include more detail
 - Page 8 (2.4) – as for 1.6
 - Page 8 (3.1) – Removal Becci Lamacraft
 - Page 9 (3.2) - updated Annex B to Annex C
 - Page 9 (3.2.2) (a) – Replaced Child’s Protection Policy with Safeguarding Policy
 - Page 10 (3.2.3) (a, b & d)) – as for 3.2.2 (a)
 - Page 10 (3.4.3) – as for 1.6 plus addition of Annex A for Staff not directly working with children.
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- Page 11 (4.2) – expands on discussions within whole curriculum
 - Page 12 (4.10.2) – Inclusion school calendar
 - Page 12 (4.10.4) – Inclusion of word Safeguarding
 - Page 12 (4.10.8) – Changed ‘social care’ to ‘appropriate external agencies
 - Page 12 (4.10.10) – added

	<ul style="list-style-type: none"> • Page 12 (5) – Point added on honour-based abuse and Devon Safeguarding Children’s Board replaced with MASH. • Page 14 (8.3.5) – as for 1.6 • Page 15 (9.1.3) – CSE final sentence added. Plus previous section 9.7(CCE) moved to final section 9.1.3 • Page 17 (9.4) – inserted ‘child sexual exploitation’ • Page 18 & 19 (9.8 to 9.13) – renumbered 9.7 to 9.12 due to removing previous Section 9.7 • Page 20 (10.2.8) – Changed children’s social care to MASH • Page 20 (10.3) – as for 10.2.8 • Page 20 (11.7) – removed reference to Ofsted • Page 23 (16) – Inserted introductory sentence • Page 25 (16.11-16.13) – New • Page 28 (21) – Covid -19 removed • Page 28 & 29 (21-23) – New information added • Page 30 (Old 22-26) – Renumbered 24 - 27
November 2021	<ul style="list-style-type: none"> • November 2021 – update from Governors Expanded 8.3.5 to include reference to Annex A
September 2022	<ul style="list-style-type: none"> • Updated all references to KCSIE 2021 to 2022 • Updated all references to peer-on-peer to child-on-child • Update to named DDSL and appointed governors • Page 7 Inserted extra clause 1.6.1 • Page 9 Added personnel info to 3.1 • Page 15 Added intro to Section 9 • Page 18 Added two sentences to final para Section 10.1 • Page 33 Added Low Level Concerns Policy to Section 27
October 2023	<ul style="list-style-type: none"> • Updated all references to KCSIE 2022 to 2023 • Page 6 Change to Nominated Governor for Child Protection and the Deputy Governor • Page 8 changed Chair of Governors to Governing Body 2.1.2 • Page 11 3.2.3 replaced Babcock’s with DCC’s Safeguarding Services • Page 16 added third paragraph to 9.1 • Page 20 Addition of international pupils Para 1 Of 10.1 • Page 26 addition of word ‘psychological’ in bullet points 16.11 • Page 28 19.2 - addition of DfE filtering and monitoring systems into Para 2 • Page 29 19.2- addition of final sentence • Page 30 – addition of ‘child frequently absent’ into first sentence
October 2024	<ul style="list-style-type: none"> • Updated all references to KCSIE 2023 to 2024 • P6 Updated name and details of new DDSL (Dan Morris) • P14 (5) added additions bullet points to reflect changes to KCSIE 2024 • P30 (20) added reference to new government guidance released in 2024
September 2025	<ul style="list-style-type: none"> • Updated all references to KCSIE 2024 to 2025

	<ul style="list-style-type: none"> • Added new DDSL's info to front Cover: Lisa Baily & Emma Thornton • Page 6 1.1 added reference re link from KCSIE 2025 to new RSHE Guidance – from September 2026 • Page 7 1.1 – Working together to improve school attendance – added now statutory guidance • Page 7 1.3 Updated to refer to Devon Front Door formally known as MASH • Page 9 2.1.3 added new number of deputies DDSL's • Page 9 2.1.4 Devon Safeguarding Children's Board (DSCB) now Devon Safeguarding Children's Partnership) Devon SCP)- updated all references to this in rest of document • Page 10 2.4 added Allegations of Abuse Against Staff Policy and Low-Level Concern Policy • Page 11 3.2.2 (c) added in accordance with Devon guidance • Page 13 4.2 KCSIE 2025 notes that the RSHE guidance is revised for September 2026 introduction • Page 14 4.9.4 KCSIE 2025 expands 'Content' to include misinformation, disinformation, conspiracy theories, and fake news. • Page 16 8.3.3 Added Allegations of Abuse against staff and Low-Level Concern Policy • Page 22 10.3 Threshold changed to 'Levels of Needs Tool' • Page 26 16.6 Devon Children and Families Partnership changed to Devon Safeguarding Children Partnership and updated all references to this. • Page 29 19.2 Added from September 2025, these requirements also cover generative AI tools and compliance with DfE Security Standards • P34 26 Changed Devon Children and families Partnership to Devon SCP Business Team • P34 26 Added or ladosecure-mailbox@devon.gov.uk • P35 27 Added Allegations of Abuse Against Staff and Low-level Concerns Policy • P35 27 Added further use safeguarding links and contact numbers
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<p>September 2026</p>	<ul style="list-style-type: none"> • Comprehensive annual review to reflect Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026, updated Devon safeguarding arrangements and other current Department for Education guidance. • Updated the role, responsibilities and availability arrangements for the DSL and DDSs, including safeguarding cover for boarding, out-of-hours and school activities. • Updated Early Help provisions and added reference to Family Help and current Devon Levels of Need arrangements. • Strengthened procedures for the secure transfer of safeguarding files, including the five-day transfer requirements and consideration of advance information sharing with receiving schools or colleges. • Updated safeguarding content relating to child-on-child abuse, prejudice-based and discriminatory harm, serious violence, mental health and children questioning their gender. • Strengthened online safety provisions, including the four areas of online risk, filtering and monitoring responsibilities, generative AI, digitally altered content and deepfakes. • Updated guidance on the sharing of nude and semi-nude images and/or videos in line with current UKCIS guidance, including AI-generated material. • Added/updated provisions relating to children in temporary accommodation, attendance and children missing education, alternative provision and Operation Encompass. • Updated provisions relating to allegations against adults, reasonable force and restrictive intervention, safer recruitment and the use of school premises for non-school activities. • Updated statutory guidance references, terminology, external agency details and contact information throughout. • Policy reviewed against the ISBA/HCR model Child Protection and Safeguarding Policy.
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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.

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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 (August 2018)
- Prevent duty guidance: Guidance for specified authorities in England and Wales (December 2023)
- The use of social media for online radicalisation (July 2015)
- Working Together to Safeguard Children (March 2026)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (July 2025)
- Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026)
- Children Missing Education (September 2025)
- Digital and technology standards (September 2026)
- Mobile phones in schools (June 2026)
- After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)
- National Minimum Standards for Boarding Schools (May 2026)

This policy reflects Keeping Children Safe in Education September 2026 ("KCSIE"). Unless otherwise stated, any reference in this policy to Keeping Children Safe in Education or KCSIE means the September 2026 version of the guidance.

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 Front Door formerly known as 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.

1.6.1 We recognise the difficulties children and young people may have in telling someone they have been abused and aim to foster a culture in which trusted relationships can develop and thereby foster and facilitate communication.

The aims of this policy are:

1.7 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.

1.7.1 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.

1.7.2 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.

1.7.3 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 (child-on-child) and can be associated with factors both in and out of school.

- 1.7.4 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.
- 1.7.5 To emphasise the need for good levels of communication between all members of staff.
- 1.7.6 To develop a structured procedure within the school, this will be followed by all members of the school community in cases of suspected abuse.
- 1.7.7 To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- 1.7.8 To provide good lines of communication with trusted adults, supported friends and an ethos of protection.
- 1.7.9 To recognise and protect our children who may be vulnerable to radicalisation or exposed to extremist views.
- 1.7.10 To promote an inclusive and anti-discriminatory safeguarding culture in which prejudice-based harm, including racism, faith-based prejudice and other forms of discriminatory behaviour, is recognised, challenged and addressed where it may affect a child's welfare, wellbeing or sense of safety.

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 Governing Body will sign off this policy on an annual basis.
- 2.1.3 We have a Designated Safeguarding Lead (DSL) and four Deputy Designated Safeguarding Leads (DDSLs), all of whom have undertaken appropriate multi-agency safeguarding training in accordance with Devon Safeguarding Children Partnership arrangements and undertake refresher training at least every two years, together with regular safeguarding updates.
- 2.1.4 The Head and all other staff and governors, have safeguarding and child protection awareness training, to be arranged by the DSL on a regular basis, in line with the advice of the Devon Safeguarding Children Partnership ("Devon SCP"), 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 Devon SCP, 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 All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the schools Safeguarding Policy, and reference to it in our Parents' Handbook.
- 2.1.7 We will seek to ensure that in line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2026), 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, ensuring that appropriate DBS and barred list checks are undertaken for volunteers in accordance with KCSIE 2026 and the requirements relating to regulated activity. 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.
- 2.1.8 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.
- 2.1.9 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.
- 2.1.10 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 deputy 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, as part of their induction, be given access to the School's Safeguarding Policy, Code of Conduct, Allegations of Abuse Against Staff Policy, Low-Level Concerns Policy and Whistleblowing Policy, Behaviour Management Policy and IT Acceptable Use Policy together with Part One of the latest version of Keeping Children Safe in Education and, where applicable to their role, Annex A. 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 2026) the Governors have appointed Nicky Klinkenberg as DSL to take responsibility for child protection. As Deputy Head (Pastoral) and 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. The DSL also has a significant timetable reduction to ensure they have sufficient time to carry out their responsibilities. Tammy Winsley, Director of Inclusion, is the Senior Deputy DSL, with responsibility for Years 9–11. Two further Deputy DSLs have responsibility for Years 7–8 and Years 12–13 respectively. The School also has an additional Deputy DSL who provides further safeguarding and operational support.

During term time, the DSL or a Deputy DSL will always be available during school hours for staff to discuss safeguarding concerns. Appropriate safeguarding cover arrangements are maintained for boarding, out-of-hours and other school activities when the DSL is not immediately available. Appropriate arrangements are also in place for any school activities taking place outside term time.

3.2 **The DSL is responsible for:**

The DSL's responsibilities are in line with those set out in Annex C of KCSIE 2025 (September 1) and include:

3.2.1 Managing referrals

(a) Referring a child if there are concerns about possible abuse, to the Devon Front Door 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 attend 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 The Devon Front Door), the Devon Children and Families Partnership, and the Police. 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', includes inter-agency working, information sharing, the Prevent duty and the responsibilities of the DSL set out in KCSIE.

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 transferred securely to the child's next school or college in accordance with the guidance from Devon SCP.
 - 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 (through Devon County Council Safeguarding Services) 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 DDSL is appropriately trained and, in the absence of the DSL, carries 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 DDSL will assume all of the functions above. The DSL, or DDSL, 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 2025).

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 DDSLs 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 On-line 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 staff play a vital role in ensuring that pupils feel safe, respected

and able to seek help. The school promotes an inclusive, antidiscriminatory culture in which racism, faith-based prejudice and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities. All staff, including non-teaching staff, have an important role in promoting the standards of behaviour set out in our Behaviour Management Policy and Anti-Bullying Policy.

Time is allocated in the curriculum, including PSHE and Relationships and Sex Education (RSE), to help pupils understand appropriate behaviour, healthy relationships, consent, respect, prejudice and discrimination, child-on-child abuse, sexual harassment and sexual violence, and how to seek help. Teaching is age-appropriate and reflects the statutory Relationships Education, Relationships and Sex Education and Health Education guidance. Opportunities across the curriculum, assemblies and other aspects of school life are used to promote tolerance, mutual respect and understanding.

- 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 child-on child abuse, sexual harassment and violence, and consent. KCSIE 2025 notes that the RSHE guidance is revised for September 2026 introduction.
- 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 office 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 A child in need is a child who is unlikely to achieve or maintain a satisfactory level of health or development, whose health or development is likely to be significantly impaired without the provision of services, or who is disabled, as defined by section 17 of the Children Act 1989. Children may need a social worker because of abuse, neglect, exploitation or complex family circumstances. Where the Local Authority informs the school that a child has a social worker, the DSL will hold and use this information when making decisions about the child's safety, welfare and educational outcomes, including attendance, learning, behaviour and mental health. The school will work with Children's Social Care and other relevant services to support the child.
- 4.5 Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer significant harm, a referral will be made immediately to Devon Children's Social Care through the Children's Front Door, in accordance with local procedures. If a child is in immediate danger, the Police will be contacted as appropriate. Anyone can make a referral, and staff should not assume that somebody else will take action.
- 4.6 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.
- 4.7 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.
- 4.8 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.

4.9 Blundell's will support all pupils by:

- 4.9.1 Providing access to a telephone helpline enabling them to call for support in private.
- 4.9.2 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.
- 4.9.3 Displaying advice around school and form rooms on where pupils can seek help.
- 4.9.4 Providing regular, age-appropriate education about online safety, including the four areas of online risk: content, contact, conduct and commerce. Pupils are taught about misinformation and disinformation, online exploitation, the risks associated with generative artificial intelligence (AI), and the creation or sharing of digitally altered or AI-generated nude or semi-nude images (including deepfakes). Pupils are expected to follow the School's Pupil ICT Acceptable Use Policy. Further information about cyber-bullying is contained in the Anti-Bullying Policy.
- 4.9.5 Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- 4.9.6 Promoting a caring, safe and positive environment within the school.
- 4.9.7 Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- 4.9.8 Notifying external agencies as soon as there is a significant concern.
- 4.9.9 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.
- 4.9.10 Reassuring victims that they are being taken seriously and that they will be supported and kept safe.

5 EARLY HELP

Early help means support available to children and families through universal and community-based services, including schools, health services and other local provision. Its purpose is to improve resilience and outcomes and to reduce the chance of problems escalating.

Any pupil may benefit from early help. Staff should be particularly alert to a pupil who

- is disabled or has certain health conditions or additional needs;
- has special educational needs;
- has a mental health need;
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gangs, organised crime or county lines;
- is frequently missing from education, home or care;
- has experienced multiple suspensions,
- is at risk of permanent exclusion,

- is in alternative provision or is on a part-time timetable;
- is misusing drugs or alcohol;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is affected by challenging family circumstances including substance misuse, adult mental health problems or domestic abuse;
- has a parent or carer in custody or is affected by parental offending;
- is at risk of radicalisation or exploitation; is privately fostered; or is at risk of honour- or faith-based abuse, including FGM or forced marriage.

Where a child's needs go beyond what universal and community-based early help can address - for example, where there are multiple or complex needs or circumstances that increase vulnerability - the child may require targeted support through Family Help. Working Together to Safeguard Children 2026 describes Family Help as bringing together targeted early help and statutory support under section 17 of the Children Act 1989 into a more seamless offer, with assessment and planning coordinated through multi-disciplinary working.

Staff who consider that a pupil may benefit from early help or Family Help should discuss this with the DSL. The DSL will consider the appropriate response using Devon's current Levels of Need guidance and local safeguarding arrangements. Where needs can be met through universal or community based early help, the school will coordinate its response and liaise with relevant services. Where more targeted or multi-disciplinary support may be required, the DSL will make or support a Request for Support through Devon Children's Front Door in accordance with current local procedures. Early help and Family Help arrangements will be kept under review. If a pupil's situation does not improve, needs escalate, or there is concern that the child is suffering or is likely to suffer significant harm, the DSL will consider and, where appropriate, make an immediate referral to Devon Children's Social Care. Anyone can make a referral, and staff should not assume that somebody else will take action.

6 CONFIDENTIALITY

6.1 We recognise that safeguarding information is confidential and must be handled appropriately. However, information must be shared when this is necessary to safeguard and promote the welfare of children. Data protection legislation does not prevent the sharing of information for safeguarding purposes. Relevant staff should understand that 'safeguarding children and individuals at risk' is a processing condition which allows, where appropriate, special category personal data to be shared without consent. Information sharing should be necessary, proportionate, relevant, accurate, timely and secure, and decisions to share or not share information should be recorded.

Safeguarding information may be shared within the Safeguarding Team, the Welfare Committee and with other staff or agencies on a need-to-know basis where this is necessary to safeguard or promote a child's welfare.

Consent is not required where there is a lawful basis for sharing information for safeguarding purposes. Staff should seek advice from the DSL if they are unsure whether information should be shared.

Pupils' personal data should not be disclosed in response to a subject access request where the 'serious harm' test under data protection legislation is 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 Devon Front Door 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, Allegations of Abuse against Staff and Low Level Concerns Policies
 - 8.3.4 The identity of the DSL and DDSLs
 - 8.3.5 Updates to Part 1 and Annex B of the Keeping Children Safe in Education guidelines or Annex A, if the DSL has decided this is more appropriate in line with Clause 3.4.3
 - 8.3.6 Staff ICT Acceptable Use Policy

8.3.7 Behaviour Management Policy

8.3.8 Pupil Behaviour Policy

8.3.9 CME Policy & Procedures

8.3.10 On-line Safety Policy

8.4 Staff training will include the risks of radicalisation and The Prevent Duty, including how to identify children who may be susceptible to radicalisation and how to raise concerns. Training and safeguarding updates will also address relevant online safety risks, including artificial intelligence and AI-generated content, as appropriate to staff roles. Safeguarding and child protection updates will be provided regularly and at least annually, with more frequent updates where required. Prevent training will be refreshed in line with current guidance and local arrangements.

9 SIGNS AND TYPES OF ABUSE

The school recognise that pupils can experience abuse as a result of both extra-familial harm and intra-familial harm, and recognise the impact, too, of witnessing ill treatment of others. The information that follows in section 9 should be read in this context.

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.

Staff should also be aware that domestic abuse can impact children by seeing, hearing, or experiencing its effects, and that domestic abuse can be psychological, physical, social, financial or emotional.

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; 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 care⁴; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

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 abused 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 **Child-on-Child Abuse**

Child-on-child abuse can take place inside or outside school and online. It can include bullying (including cyberbullying); prejudice-based and discriminatory bullying and behaviour, including racism, faith-targeted and other prejudice-related incidents; physical abuse; abuse in intimate personal relationships; harmful sexual behaviour; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos, including digitally altered or AI-generated images such as deepfakes; upskirting; and initiation or hazing-type violence and rituals. All staff should recognise the impact that child-on-child abuse can have on children and should never minimise it as banter, part of growing up or harmless behaviour. The treatment of allegations of child-on-child abuse is dealt with in Section 16 of this policy.

9.11 **Serious Violence**

All staff should be aware of indicators which may signal that children are at risk from, or involved with, serious violent crime. These may include persistent absence from education, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant changes in wellbeing, unexplained injuries, unexplained gifts or new possessions, weapons, peer conflict, bullying and criminal exploitation. Disrupted education, including suspension, exclusion or alternative provision, may increase vulnerability. Where concerns arise, the DSL should consider an appropriate risk assessment and safety or behaviour support plan, liaison with relevant external agencies, and any heightened risks outside school hours.

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.

- 9.13 The School recognises that children who are questioning their gender may require sensitive and thoughtful support and may have additional pastoral or safeguarding needs. Any safeguarding concerns, including concerns relating to mental health, bullying, discrimination, family difficulties or other vulnerabilities, will be considered in the usual way.

Where a child or their parents raise a request relating to social transition, including a request concerning names, pronouns or uniform, the School will consider the individual circumstances of the child carefully, with their best interests, safety and wellbeing at the centre of decision-making. The DSL will be involved at an early stage where there are safeguarding considerations, and appropriate clinical advice will be considered where available.

Parents or carers will normally be involved in decisions affecting their child unless there is a safeguarding reason why doing so may place the child at risk of harm. The child's wishes and feelings will be heard and considered, alongside the wider circumstances and potential impact of any decision.

Decisions and agreed arrangements will be recorded and kept under review.

In considering any request or arrangements, the School will have regard to KCSIE 2026, its safeguarding duties and its obligations under the Equality Act 2010 and Human Rights Act 1998. The School will also comply with the requirements relating to single-sex toilets, changing facilities, sport and boarding or overnight accommodation.

10 **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 and international pupils staying with guardians and on homestay.

All staff should be alert to signs and symptoms of possible abuse whether that abuse has happened on or off site. 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 Child-on-Child 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 pupils 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 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. Staff are well placed to observe children and identify changes in behaviour, attendance, presentation or educational progress that may suggest a mental health concern. Only appropriately trained professionals should attempt to diagnose a mental health condition. Where a mental health concern is also a safeguarding concern, staff must follow the school's child protection procedures and report the concern to the DSL or a deputy without delay. Staff should also be aware that abuse, neglect and other traumatic childhood experiences can have a lasting impact on mental health, behaviour and educational outcomes.

For the avoidance of doubt, staff should report any concern about a pupil, however small it may initially appear. Low-level concerns, as defined in KCSIE, relate specifically to the conduct of adults working in or on behalf of the school and are dealt with under the School's Low-Level Concerns Policy. A low-level concern about an adult is any concern, no matter how small, that the adult may have acted in a way that is inconsistent with the Staff Code of Conduct but does not meet the harm threshold. Such concerns will be recorded and monitored by the Second Master. Where the concern relates to agency staff or contractors, the school will liaise with their agency or employer.

Further information on this can be found in the school's Low Level Concerns Policy.

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 more widely than is necessary. They must report the disclosure directly and immediately to the DSL or a deputy so that appropriate safeguarding action can be considered without delay.
- 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.

Any member of staff may make a referral directly to Devon Children's Social Care through the Children's Front Door and/or to the police in an emergency, particularly where there is immediate danger, serious harm, or concern that appropriate action has not been taken. Parental consent is not required where seeking consent may place a child at increased risk, prejudice an investigation or compromise the safeguarding response. Anyone can make a referral. Staff should follow up and challenge where they remain concerned that appropriate action has not been taken.

10.3 **Concluding notes**

Referrals will be made to Devon Front Door once a case has crossed the threshold for referrals. Devon Front Door provide a 'Levels of Needs 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 Devon Front Door 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 working practice, which will be provided 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
- 11.5 The school will follow Part Four of Keeping Children Safe in Education 2026 when managing safeguarding concerns or allegations about adults working in or on behalf of the School, including staff, supply staff,

trainee teachers, volunteers and contractors. The harm threshold is met where an adult has behaved in a way that has harmed a child, or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child or children in a way that indicates they may pose a risk of harm; or behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

- 11.6 Any concern or allegation that may meet the harm threshold must be reported immediately to the Head. Where the concern or allegation is about the Head, it must be reported to the Chair of Governors without first notifying the Head. Where there is a conflict of interest in reporting to the Head, the concern should be reported directly to the Local Authority Designated Officer (LADO). The DSL will ensure that the child's immediate safeguarding needs are addressed.
- 11.7 The case manager will discuss the allegation with the LADO within one working day. The LADO should be informed within one working day of allegations that appear to meet the harm threshold. The case manager will agree the appropriate course of action with the LADO, including any involvement of the police or Children's Social Care. Where there is an immediate risk to a child, a suspected crime requiring urgent action or another emergency, the relevant agency must be contacted immediately. The school should not investigate an allegation before discussion with the LADO where the harm threshold may be met.
- 11.8 If the allegation concerns the Head, the person receiving the allegation will immediately inform the Chair of Governors, who will act as case manager and consult the LADO without first notifying the Head.
- 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 Four of Keeping Children Safe in Education 2026 and current Devon procedures for managing allegations against adults who work with children. Where the person is supplied by an agency or is a contractor, the school will work with the agency or employer and the LADO. Suspension is not an automatic response and reasonable alternatives should be considered where appropriate.
- 11.11 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.
- 11.12 The adult who is the subject of an allegation should be informed as soon as appropriate, following consultation with the LADO and, where relevant, the police and Children's Social Care. A named person should be identified to keep the adult informed of progress and provide appropriate support. Allegations of child-on-child abuse are managed separately under Section 16.
- 11.13 In the case of staff, the matter will be dealt with in accordance with the Disciplinary Procedure.
- 11.14 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.
- 11.15 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.
- 11.16 The reasons and justification for suspension will be recorded and the staff member informed of them.

- 11.17 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.
- 11.18 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.
- 11.19 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.
- 11.20 Child-on-child safeguarding concerns are not referred to the LADO unless there is a separate concern about the conduct of an adult working with children. Child-on-child concerns will be managed under Section 16 and referred to Children's Social Care and/or the police where appropriate.
- 11.21 The outcome of an allegation should be recorded using the categories set out in KCSIE: substantiated, unsubstantiated, unfounded, false or malicious. A comprehensive written record should include the allegation, follow-up, how it was resolved, action taken, decisions reached and the reasons for those decisions. Allegations found to be false or malicious should be removed from personnel records unless the individual gives consent for them to be retained.
- 11.22 Records of allegations should be retained at least until the person has reached normal pension age or for a period of 10 years from the date of the allegation, whichever is longer. At the conclusion of a case, the record should be reviewed. Allegations that are false, unfounded, unsubstantiated or malicious should not be included in employer references, in accordance with KCSIE.

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 Prep 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, nonrenewal 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.
- 13.1 In line with KCSIE (2025), 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 The school's arrangements for the use of reasonable force and restrictive interventions are set out in the relevant School policies and staff guidance. Restrictive interventions should be used only when necessary and proportionate, for the least amount of time necessary, and using no more force than is reasonably required in the circumstances.
- 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 The school has regard to the Department for Education guidance 'Restrictive interventions, including the use of reasonable force, in schools' (effective from 1 April 2026), including the particular needs of pupils with SEND, disabilities, medical conditions or other vulnerabilities. Where a pupil is known to be at greater risk of restrictive intervention, individual risk assessment and planning should be considered. <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

16 ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ALLEGATIONS

The DSL, Governors and Head will have due regard to Part Five of KCSIE 2026 when responding to child-on-child sexual violence and sexual harassment and will apply the same safeguarding principles to all forms of child-on-child abuse.

- 16.1 Child-On-Child 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 Child-On-Child 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 Child-On-child 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 The School recognises that children with special educational needs and disabilities can be more prone to peer-on-peer group isolation than other children. 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.
- 16.4 The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for Child-On-Child abuse. There are many adults to whom pupils can turn when they need help or support, and notices to this effect are displayed prominently around school.
- 16.5 Our policy on bullying and Child-On-Child 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 the Devon Front Door service and/or the Devon Safeguarding Children 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 Partnership, 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 Partnership 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 Child-On-Child 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 psychological, 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 Child-On-Child 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 Child-On-Child 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 Child-On-Child 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 Child-On-Child abuse may be taking place, even if there are no reported cases.

17 RACIST INCIDENTS

The school recognises that racism, faith-based prejudice and other discriminatory behaviour can constitute safeguarding harm, including child-on-child abuse. Repeated incidents, or a single serious incident, may require action under safeguarding procedures in addition to the School's Behaviour, AntiBullying and Equality-related policies. The school will record, review and respond to such incidents in order to identify patterns, support affected pupils and address any wider cultural or safeguarding concerns.

18 HEALTH & SAFETY

The School's Health & Safety Policy, set out in a separate document, reflects the consideration given to protecting pupils physically within the school environment, when using technology and online services, and when away from school on trips and visits. Safeguarding considerations form part of relevant risk assessments and arrangements for educational visits, premises, activities and the use of school facilities.

Use of School Premises for Non-School Activities

Where services or activities on School premises are provided under the direct supervision or management of School staff, this Safeguarding Policy will apply. Where an activity is provided by an external organisation and is not under the school's direct supervision or management, the school will seek appropriate assurance that the organisation has suitable safeguarding and child protection

arrangements in place and that there are arrangements for liaison with the school where safeguarding concerns arise.

Safeguarding requirements will form part of relevant hire, lease or use agreements. The school will have regard to the Department for Education's 'After school clubs, community activities, and tuition: safeguarding guidance for providers' (February 2026).

19 PREVENT

19.1 Radicalisation and Extremism

Children may be susceptible to radicalisation into terrorism. Protecting children from this risk forms part of the school's wider safeguarding approach. The school has due regard to the Prevent Duty Guidance for England and Wales (2023), which came into force on 31 December 2023.

There is no single way of identifying whether a child is likely to be susceptible to radicalisation. Staff should be alerted to changes in behaviour and other indicators that a child may need help or protection, use their professional judgement and report concerns to the DSL or a DDSL.

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.

The DSL will consider the level of risk and the most appropriate response. This may include support within school, consultation with relevant agencies, a Prevent referral, Channel support and/or a referral to Devon Children's Social Care where there are wider safeguarding concerns. Prevent concerns should be managed in the same way as other safeguarding concerns.

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 SMSC (spiritual, moral, social and cultural education) in Schools (2014).

- 19.1.1 Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
- 19.1.2 Extremism, for the purposes of KCSIE, is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.
- 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 Online 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 recognises that online safety is an integral part of safeguarding. The school's approach considers the four areas of online risk: content, contact, conduct and commerce. Filtering and monitoring arrangements are maintained in accordance with the Department for Education's filtering and monitoring standards and are reviewed regularly for effectiveness. The school also considers emerging online risks, including generative artificial intelligence (AI), AI-generated or digitally altered content, deepfakes, misinformation and disinformation. Staff receive appropriate online safety training, and pupils are taught how to stay safe online through the curriculum, including PSHE/RSE, and are expected to comply with the School's ICT Acceptable Use Policies. The DSL takes lead safeguarding responsibility for online safety and for understanding the filtering and monitoring systems and processes in place. The Director of IT oversees the technical filtering and monitoring arrangements, with safeguarding concerns escalated through the school's safeguarding procedures.

The Governing Body will regularly review the effectiveness of the school's filtering and monitoring systems and ensure that the DSL and relevant staff understand their respective roles and responsibilities in relation to online safety.

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. 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.

Operation Encompass

The school recognises Operation Encompass, under which the Police have a statutory duty to notify a child's education setting where they have attended a domestic abuse incident in that child's household. Notifications may relate to any child connected to the household, whether or not the child was present. Information received will be handled by the DSL or an appropriately trained deputy and used to support the child and inform safeguarding action where required. An Operation Encompass notification does not replace any necessary referral to Children's Social Care or other safeguarding action.

20 CHILDREN MISSING FROM EDUCATION

Blundell's recognises that children who are absent from education, particularly where absence is repeated or prolonged, can be at increased risk of abuse, neglect, exploitation, criminal exploitation, radicalisation and other safeguarding harm. The school will monitor attendance and absence closely, respond promptly to unexplained or concerning patterns of absence, and share information or make referrals where safeguarding concerns arise. Further details are set out in the School's Attendance Policy and Missing Child Policy. Please also see the Missing Child Policy, which includes procedures setting out what to do when a child is not collected on time.

The School's Attendance Policy has regard to the statutory guidance 'Working together to improve school attendance' (July 2026) and to current 'Children missing education' guidance (September 2025). The school will make the required notifications to the Local Authority when pupils are added to or removed from the admission register and will work with the Local Authority where a pupil's absence or whereabouts gives cause for concern.

Where the School commissions alternative provision for a pupil, Blundell's remains responsible for the safeguarding of that pupil. The School will satisfy itself that the provider is suitable and has appropriate safeguarding arrangements in place, will share relevant safeguarding information with the provider, and will maintain appropriate oversight of the pupil's attendance, welfare and educational progress. Any safeguarding concerns arising while a pupil is attending alternative provision will be responded to in accordance with this policy.

21. HONOUR-BASED ABUSE

Honour or faith-based abuse encompasses incidents or crimes committed to protect or defend the perceived honour, beliefs or expectations of a family and/or community. It can include female genital mutilation (FGM), forced marriage and other harmful practices. Such abuse may involve a wider network of family or community pressure and multiple perpetrators. All forms of honour or faith-based abuse are abuse, regardless of the motivation, and must be handled and escalated as safeguarding concerns.

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 The Devon Front Door of the circumstances.

23. YOUTH PRODUCED SEXUAL IMAGERY (SEXTING)

The School follows current UK Council for Internet Safety (UKCIS) guidance on responding to incidents involving the sharing of nude and semi-nude images and/or videos, alongside KCSIE 2026. This includes images or videos which have been digitally altered or generated using artificial intelligence (AI), including deepfakes.

Nude and semi-nude images and/or videos may be created, sent, posted or shared by children and can include images, videos or live streams. Incidents may involve consensual or non-consensual sharing, coercion or exploitation, and may include digitally manipulated or AI-generated material such as deepfakes.

Any member of staff who becomes aware of an incident involving nude and semi-nude images and/or videos must report it to the DSL or a DDSL as soon as possible. Staff must not view, copy, print, forward, save or share the imagery, nor ask a child to send or show it to them. The DSL will undertake an initial review and risk assessment, speak with the children involved where appropriate, record the incident and determine the appropriate safeguarding response.

The DSL will consider whether a referral to Devon Children's Social Care and/or the Police is required. Referral will be made where there is concern that a child has been harmed or is at risk of harm, where an adult is involved, where there is coercion, grooming, blackmail or exploitation, where the imagery depicts sexual acts or violence, where a child is particularly vulnerable, or where there are other aggravating safeguarding factors. Not every child-on-child incident will require referral to statutory agencies; decisions will be proportionate, based on the circumstances and recorded with reasons.

Parents or carers will normally be informed at an early stage and involved in the process unless doing so would place a child at increased risk, prejudice an investigation or otherwise compromise safeguarding action. The wishes and feelings of the child will be taken into account, while recognising that the school may need to act contrary to those wishes in order to safeguard the child or others. Education about nude and semi-nude images and/or videos, consent, online sexual harassment, AI-generated imagery and how to seek help forms part of the School's preventative safeguarding education.

24 MONITORING AND EVALUATION

The school monitors and evaluates its Safeguarding Policy and safeguarding arrangements on an ongoing basis and through the annual safeguarding review. This includes consideration of whether the policy is implemented effectively in practice and whether any deficiencies or weaknesses are remedied without delay. Monitoring includes 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 USE OF MOBILE PHONES, PHOTOGRAPHY AND DVDS

Staff are not permitted to use their mobile phones or any device with cameras whilst teaching in the classroom or outdoors, on playground duty or when supervising children at any time. When not on

duty, members of staff are free to use their personal mobile phones in the staff room or empty classroom.

Staff **and parents** in the EYFS are not permitted to, and all other staff are strongly advised, not use their personally owned mobile phone or any device with cameras for school purposes. Staff must use school owned cameras and adhere to the School's policy on photography which outlines where parental permission is required. If a personal phone or any device with a camera is used inadvertently by staff members outside of the EYFS, or as a last resort such as during a sports fixture, any images must be uploaded to the School network at the earliest opportunity and deleted from the phone with no copies having been kept or transmitted elsewhere. Under no circumstances should a member of staff enter changing rooms carrying a mobile phone or camera.

Many school activities involve recording images. These may be undertaken as part of the curriculum, extra school activities, for publicity or to celebrate achievement. All members of staff and parents need to be aware of the potential for these aspects of teaching to be misused for pornographic or "grooming purposes". Careful consideration should be given as to how these activities are organised and undertaken. Staff should remain sensitive to any children who appear uncomfortable and should recognise the potential for misinterpretation.

Using images of children for publicity purposes will require the age-appropriate consent of the individual concerned and their legal guardians. Images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the School have access.

It is recommended that when using a photograph the following guidance should have been followed:

- If the photograph is used, avoid naming the pupil
- If the pupil is named avoid using their photograph
- Schools should establish whether their image will be retained for further use
- Images should be securely stored and used only by those authorised to do so

Parents

Parents are permitted to take photographs of siblings at school events for example Christmas/Nativity plays, Drama Productions, Sports Day, School Sports Fixtures, Music Concerts and Assemblies. The photos taken at these events (of children and/or staff) are for parents' personal use only. They must not be published on any internet website. This includes Facebook, Twitter, Instagram, YouTube and all other social media sites. It is not permitted to take photos in classrooms or elsewhere in the school.

26 IMPORTANT CONTACT DETAILS AND LINKS

Safeguarding concerns should normally be raised immediately with the School's DSL or a DDSL. However, anyone can make a referral directly to Children's Social Care where necessary and staff should not assume that somebody else will take action. Where a child is in immediate danger or there is an immediate risk of serious harm, contact the Police on 999 and/or Devon Children's Social Care without delay.

Devon Children's Social Care – Children's Front Door: if you are worried about the safety or wellbeing of a child or young person, complete the Devon Request for Support online form or contact the Children's Front Door on 0345 155 1071.

Outside normal office hours, at weekends and on public holidays, contact Devon's Emergency Duty Service on 0345 600 0388.

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

The Devon SCP 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. or ladosecure-mailbox@devon.gov.uk

OFSTED Safeguarding Children:

0300 123 3155

Whistleblowing@ofsted.gov.uk

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

Devon Children's Front Door / Request for Support – Tel: 0345 155 1071; use the current Devon online Request for Support form.

Extremism:

Department for Education dedicated helpline for staff and governors: 020 7340 7264 and counter.extremism@education.gov.uk

Other useful contacts

Disclosure and Barring Service (DBS) – general enquiries:
03000 200 190

Teaching Regulation Agency

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

Independent Schools

Inspectorate 0207 6000100

concerns@isi.net

NPCC 'When to Call Police' document

[When to Call Police](#)

Mental Health and Behaviour in Schools

[Official Government Guidance](#)

LINKS TO OTHER RELATED POLICIES

Anti-Bullying

Safer Working Practice / Code of Conduct

Whistleblowing

Allegations of Abuse Against Staff and LowLevel
Concerns
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
Low Level Concerns Policy