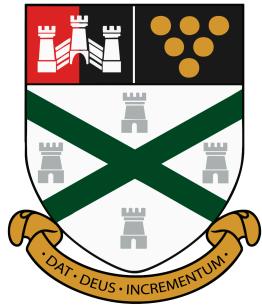


PLYMOUTH COLLEGE

SAFEGUARDING & CHILD PROTECTION

POLICY

including Early Years Foundation Stage (EYFS)



Last reviewed:	August 2025
Next review date:	August 2026
Responsibility:	Assistant Head (Pupil Welfare)

Important Contacts:

Senior safeguarding team: safeguarding@plymouthcollege.com

Prep safeguarding team: prepsafeguarding@plymouthcollege.com

Internal:

Designated safeguarding lead	Beth Field (Assistant Head, Pupil Welfare) bfield@plymouthcollege.com 01752 505139, 07854 115329
Deputy designated safeguarding leads	Fiona McWilliam (EYFS lead) fmcwilliam@plymouthcollege.com 01752 505140 Jo Newnham (Head of Prep School) jnewnham@plymouthcollege.com 01752 505101 Rebecca Moore (Head of Lower School) rmoore@plymouthcollege.com 01752 505157, 07804 164960 Naomi Taylor (Head of Middle School) ntaylor@plymouthcollege.com 01752 505157, 07905 108327 Emil Agobiani (Head of Sixth Form) eagobiani@plymouthcollege.com 01752 505168, 07521 781912
Designated person for Prevent & FGM	Beth Field
Designated teacher for looked after children	Beth Field
SENDCo	Lindsay Eckersley leckersley@plymouthcollege.com 01752 505177
School nurse	Rhian McCall schoolnurse@plymouthcollege.com 01752 505145
Safeguarding governor	Colin Quick (colin.quick@plymouthcollege.com)

External:

Plymouth Safeguarding Children Partnership	https://plymouthscb.co.uk/ pscpc@plymouth.gov.uk 01752 307535
Plymouth Families First (integrated front door)	01752 668000 mash@plymouth.gov.uk
Plymouth consultation line for professionals	01752 304339
Plymouth Early Head and SEND Advice Line	https://www.plymouth.gov.uk/plymouth-early-help-and-send-advice-line
Plymouth LADO	Sally Parma lado@plymouth.gov.uk 01752 304089 07866 149043
Plymouth EYFS safeguarding team	earlyyearssafeguarding@plymouth.gov.uk 01752 307400
Devon MASH	https://www.multiagencysafeguardinghub.com/devon-mash/ 0345 155 1071
Torbay MASH	https://www.torbaysafeguarding.org.uk/professionals/hub/ mash@torbay.gov.uk 01803 208100
Cornwall MARU	https://www.cornwall.gov.uk/health-and-social-care/childrens-services/child-protection-and-safeguarding/ multiagencyreferralunit@cornwall.gov.uk 0300 1231 116
Prevent professional's advice line	01392 225130
Police	Non urgent - 101 Urgent - 999
NSPCC whistleblowing helpline	0800 028 0285 help@nspcc.org.uk

Governance of Plymouth College

Plymouth College ("the School") is part of the Galaxy Global Education Group. The College is managed by the Schools' Management Board of the Galaxy Global Education Group (*which is responsible for Group Governance and Local Advisory Board Liaison, Co-ordinating Learning Initiatives & Setting Group KPIs, Regulatory Compliance, Safeguarding Oversight & Student Voice*). The Local Advisory Board (LAB) is an advisory sub-committee of the Galaxy Global Education Group Schools' Management Board, providing local insight, support, and challenge to the school's leadership in regards to educational standards and school improvement, safeguarding and welfare, community and stakeholder engagement, compliance and reporting. The Chair of the LAB is appointed by the Chair of the Schools' Management Board and the LAB is composed of 3-4 local members appointed by the Chair of the Schools' Management Board (with whom formal governance authority rests) and approved by the Board of Directors of the Galaxy Global Education Group.

Statement of Intent

Plymouth College is committed to safeguarding and promoting the welfare of all pupils, recognising its moral and statutory responsibilities. The School aims to create a safe, supportive, and respectful environment where children are valued and protected. A strong culture of vigilance, early detection, and immediate reporting is central to the School's safeguarding ethos. All staff, regardless of role, share equal responsibility in identifying concerns, acting promptly, and following safeguarding procedures, including those informed by our local safeguarding children partnerships. Every child, irrespective of age, ability, race, gender, religion, culture, or sexual identity, has an equal right to protection. Plymouth College also ensures that staff are trained appropriately, understand the procedures for reporting concerns, and know how to support children affected by safeguarding issues. Our policy aligns with the latest statutory guidance, including *Keeping Children Safe in Education (2025)*, and promotes a child-centred approach where the best interests of the child are always paramount. Through collaboration with external agencies when appropriate, the School aims to ensure that every pupil receives timely protection and effective support so that they may develop as expected in all areas of life.

Policy Aims

This safeguarding policy aims to:

- Ensure all staff understand their safeguarding responsibilities and know how to report concerns effectively.
- Promote a consistent, whole-school approach to safeguarding across all age groups (3–18), settings (EYFS, day and boarding), and roles.
- Safeguard children's welfare by encouraging early intervention and timely action, regardless of the perceived severity of a concern.
- Demonstrate the School's commitment to safeguarding pupils, and to working collaboratively with parents and carers, and external partners.
- Maintain compliance with statutory guidance such as including *Keeping Children Safe in Education (2025)*, EYFS statutory framework, and National Minimum Standards for

Boarding Schools.

- Ensure appropriate emotional and procedural support for children and staff involved in child protection matters.
- Ensure governors receive appropriate safeguarding training and actively monitor the effectiveness of safeguarding arrangements.
- Review the policy annually, or sooner if needed, to remain aligned with updated legislation, guidance, or incidents.

Roles and responsibilities

DSL	<ul style="list-style-type: none">• The DSL is a member of the School's senior leadership team and takes the lead responsibility for safeguarding and child protection.• Provide advice and support to other staff on child welfare, safeguarding and child protection matters• Take part in strategy discussions and inter-agency meetings• Contribute to the assessment of a child's needs• Be available during term time (24hrs a day in our context as a boarding school) for any member of staff to discuss safeguarding matters, and to ensure adequate arrangements are in place for school holidays• Manage referrals to the local authority, Channel programme, DBS and the Police appropriately• Work with others (children, parents and carers, external agencies, the Head, the LADO) to promote a positive culture of safeguarding• Ensure that child protection files are kept up to date and stored securely, and that information is shared appropriately when necessary• Transfer child protection files of pupils leaving our School within 5 days of being on roll with their new school• Raise awareness of contextual safeguarding through staff training, sharing of this policy with staff and parents, and the education of children• Remain up to date with their knowledge and skills in local and national safeguarding matters• Provide support to staff on child welfare, safeguarding and child protection matters• Reviews the safeguarding and child protection policy annually• Listen to the children in our School and understand their views, ensuring a child centred approach is taken
DDSLs	The DDSLs must be trained to the same level as the DSL and will act on behalf of the DSL if they are unavailable. They will liaise closely with the DSL on safeguarding and child protection matters to decide on appropriate courses of action.
The Head	The Head ensures the School has comprehensive safeguarding policies and procedures in place that promote a positive whole school culture of safeguarding.

	<p>The Head ensures that the DSL has adequate resources, time and training to carry out their role.</p> <p>The Head is involved in reviewing and responding to allegations made against staff and volunteers, and raises any cases to the LADO as necessary.</p>
School's Management Board	<ul style="list-style-type: none"> • Ensure compliance with statutory safeguarding duties and guidance. • Approve, monitor, and annually review the school's safeguarding policy and procedures. • Appoint a designated safeguarding governor to oversee safeguarding arrangements. • Ensure all governors receive appropriate safeguarding and child protection training. • Hold school leaders accountable for the effectiveness of safeguarding practices. • Promote a safeguarding culture across the whole school community. • Ensure concerns about staff or safeguarding failures are handled appropriately and referred when necessary.
Staff	<ul style="list-style-type: none"> • Place the safety and welfare of pupils above all other considerations – staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. It should be clear this is everyone's responsibility. • Attend training on and be aware of School policies on online Safety (E-Safety Policy) which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring • know who the DSL and Deputy DSLs are • treat all members of the School community, including pupils, parents, colleagues, trustees, governors and members of Galaxy Global with consideration and respect • adhere to the school's ethos and aims, this policy and the staff code of conduct; • demonstrate a clear understanding of and commitment to non-discriminatory practice; • understand that School staff are in a position of trust and that sexual relationships with a pupil, even over the age of 16, are a criminal offence, in accordance with the Sexual Offences Act 2003. • be alert to, and report appropriately, any behaviour that may indicate that a pupil is at risk of harm or radicalisation • never condone inappropriate behaviour by pupils or staff

	<ul style="list-style-type: none"> • take responsibility for their own continuing professional development • ensure their behaviour and actions do not place themselves or pupils at risk of harm or allegations; • value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice; • know the procedures for reporting any child protection issue and dealing with a pupil going missing; • Report any abuse involving a child of any age immediately to the DSL. Staff can also go directly to the LADO or the Police. • Know how to make referrals to relevant external agencies, such as Prevent, local authority, Police or CAMHS
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Definitions

Safeguarding

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

Child protection

This is any activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm.

Identifying children experiencing, or at risk of experiencing, harm

Safeguarding is everyone's responsibility, whatever role we carry out at Plymouth College. We all have a unique opportunity to identify the signs and indicators that a child is, or is at risk of, experiencing harm.

All staff should remain vigilant to signs that a child may be experiencing abuse or neglect. These may include:

- **Physical Abuse:** Unexplained injuries, bruising in unusual places, reluctance to explain injuries.
- **Emotional Abuse:** Excessive withdrawal, fearfulness, low self-esteem, or overly aggressive behaviour.
- **Sexual Abuse:** Sexualised behaviour or language inappropriate for age, distress when changing clothes, or unexplained gifts.
- **Neglect:** Poor hygiene, persistent hunger, inappropriate clothing, frequent lateness or absences, or failure to thrive.

Other indicators include sudden changes in behaviour, declining academic performance, unexplained or prolonged absence, self-harm, or signs of poor mental health. All concerns, no matter how small, should be reported via CPOMs within 24 hours.

If a child discloses abuse or neglect to a member of staff:

- **Stay calm** and listen carefully without expressing shock or disbelief.
- **Reassure the child** that they have done the right thing by speaking up.
- **Avoid asking leading questions**; only use open, non-suggestive prompts (e.g., “Can you tell me more?”).
- **Do not promise confidentiality**—explain that you must share the information to keep them safe.
- **Record the disclosure immediately**, using the child’s own words where possible.
- **Report the concern without delay** to the Designated Safeguarding Lead (DSL) or Deputy DSL through CPOMs.
- **Maintain confidentiality**, sharing the information only with relevant safeguarding staff.

Reporting concerns about the welfare of a child

All concerns about a child must be reported via CPOMs within 24 hours.

The report needs to be factual and professionally written; do not include opinions or inference. Describe what was seen, heard or said, using the child’s own words where possible.

Attach any relevant documents (e.g. a photo of a pupil’s work) or complete the body map if appropriate.

Select which category the report falls into, including whether the child is a boarder, SEND pupil or high performance swimmer.

If mentioning another member of staff, use their staff initials and in brackets add their job title, e.g. BFF (DSL).

If mentioning another pupil, use their first name and initial of surname, e.g. Ian B.

The appropriate members of the safeguarding team will automatically be notified and you will be able to see when they have read it. You should receive feedback from the DSL or DDSL about any subsequent action or outcomes, dependent on maintaining confidentiality.

CPOMs is used by the School to record all pastoral and safeguarding concerns, and SEND interventions. If a pupil transfers to a new school, the DSL will make arrangements to securely transfer the child protection within 5 days of them being on roll at the new school.

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

Children can be exploited (controlled or coerced into criminal or sexual behaviour through an imbalance of power) by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.

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

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

- Appear with unexplained gifts, money or new possessions
- Associate with other children involved in exploitation
- Suffer from changes in emotional well-being
- Misuse alcohol and other drugs
- Go missing for periods of time or regularly come home late, and
- Regularly miss school or education or do not take part in education.

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

- Have older boyfriends or girlfriends
- Suffer from sexually transmitted infections, display sexualised behaviours beyond expected sexual development or become pregnant.

Both CCE and CSE can be facilitated online and this is becoming an increasing means by which children are exploited.

Any concerns of CCE or CSE must be reported within 24 hours by CPOMs.

Domestic Abuse

The Domestic Abuse Act 2021 captures a range of different abusive behaviours within relationships, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected". Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse.

It is now recognised that children who see, hear or experience the effects of domestic abuse are victims in their own right. Experiencing domestic abuse (either personally or within the family) can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Any concerns about a child experiencing or witnessing domestic abuse must be reported within 24 hours by CPOMs.

So-called “honour”-based abuse (including female genital mutilation and forced marriage)

So-called “honour”-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and / or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

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

If staff have a concern regarding a child who might be at risk of HBA or who has suffered HBA, they should immediately speak to the DSL or a DDSL, who will then activate local and national safeguarding procedures.

Teachers have a **mandatory** duty to **personally** report to the police if they have discovered (either through disclosure by the victim or visually) that FGM appears to have been carried out on a girl under 18. Those failing to report may have disciplinary sanctions. It will be rare for teachers to see visual evidence, and they **should not** be examining pupils, but the same definition is used for all professionals (including health care) to whom this mandatory reporting duty applies.

If a teacher has discovered that FGM has taken place, they personally must report to the police, and also inform the DSL.

If a teacher has reason to suspect that FGM has taken place or is likely going to take place, they should inform the DSL and the mandatory reporting duty does not apply.

Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of the School’s safeguarding approach.

All staff are required to complete their annual Prevent training to ensure they are familiar with the definitions of extremism, radicalisation and terrorism, and know how to identify if a child is likely to be susceptible to radicalisation into terrorism.

Any concerns about a child being radicalised or susceptible to radicalisation should be reported within 24 hours by CPOMs. The DSL and / or DDSL will then make a Prevent referral.

Alternatively, any member of staff can make a Prevent referral themselves, but should call the Prevent professional’s helpline first for guidance (01392 225130).

Mental health

Plymouth College is committed to promoting positive health, wellbeing and resilience among children through our welfare and education provision.

If any staff member has concerns about a child’s mental health, they should signpost them to the pastoral team (form tutor, head of year, school nurse or school counsellor) and also report this on CPOMs within 24 hours. Where there is also a safeguarding concern, the DSL or a DDSL should also be informed. Services will be appropriately signposted to the child.

Based on the child's age and Gillick competency, parents may also be involved in accessing appropriate support.

Child-on-child sexual violence and sexual harassment

The School requires all staff to be vigilant to signs of sexual violence and harassment occurring between children in school, outside of school and online, and occurs both physically and verbally.

Child-on-children sexual violence and sexual harassment can occur between two or more children, or groups of children, of any age and sex, it may exist on a continuum, and it may be a one-off occurrence or something repeated over a period of time.

Whilst staff may not directly observe it occurring, they must remain vigilant to its prevalence in society and maintain an attitude of "it could happen here".

Part Five of Keeping Children Safe in Education (KCSIE) 2025 sets out the School's responsibilities in responding to child-on-child sexual violence and sexual harassment. All staff must recognise that such behaviours are never acceptable and should not be passed off as "banter", "part of growing up", or "just having a laugh". All allegations must be taken seriously, investigated appropriately, and responded to in line with statutory safeguarding duties. Failure to do so can create a culture of normalisation, so any inappropriate behaviour should be challenged appropriately.

Victims must be supported sensitively and consistently, with actions taken in their best interests. This includes listening without judgement, making timely referrals to safeguarding partners, and considering measures to protect the victim from further harm.

Importantly, KCSIE also recognises that those who perpetrate harmful sexual behaviour may themselves be victims of abuse, trauma, or unmet needs. As such, safeguarding support must be provided to both victims and perpetrators, with a focus on understanding underlying causes, reducing risk, and promoting long-term wellbeing. Staff should avoid stereotyping and make decisions based on the facts of each case, not assumptions.

Preventative education, including RSHE, clear behaviour policies, staff training, and a whole-school culture of respect and inclusion are critical. All incidents, regardless of perceived severity, must be recorded, reported, and reviewed, and all staff should know how to respond appropriately. Schools must also consider the wider implications for the school community and ensure ongoing support and monitoring for all parties involved.

Any concerns of child-on-child sexual violence or sexual harassment should be reported within 24 hours by CPOMs and to the Senior Deputy Head if it is also a disciplinary matter.

Online safety

The school recognises its statutory responsibility to safeguard pupils from online harm. Online safety is embedded throughout the curriculum, promoting safe, respectful, and responsible use of digital technology.

We maintain appropriate filtering and monitoring systems to prevent access to harmful content, including that which is illegal, inappropriate, or poses a safeguarding risk. These systems are regularly reviewed by the Head of Systems & IT and the DSL to ensure they are effective, age-appropriate, and do not unreasonably restrict learning.

Staff are trained to recognise signs of online abuse, including grooming, exploitation, radicalisation, and cyberbullying. Pupils are encouraged to speak up about online concerns, and all reports are treated seriously and responded to in accordance with our safeguarding procedures.

Any concerns of online bullying, exploitation, grooming, radicalisation or other forms of abuse should be reported within 24 hours by CPOMs.

Children missing education

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Children missing education are children of compulsory school age (31 December, 31 March or 31 August following their fifth birthday, whichever comes first, until the last Friday in June so long as you'll be 16 by the end of the summer holidays) who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Please refer to the [Children Missing Education](#) policy.

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

A child or young person being lesbian, gay, bisexual, or gender questioning is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. Plymouth College is an inclusive school and all individuals are valued equally. The [Anti-Bullying Policy](#) gives more detail on how the School responds to homophobic bullying.

If a child is questioning their gender, the school will take an individual approach to supporting that child. There may be a broad range of needs to consider, and the School will do so in partnership with the child, their parents and any clinical advice that is available. A trusted adult in school will be identified to support the child.

Looked after children

The School recognises that Looked After Children (LAC) and Previously Looked After Children (PLAC) may face additional safeguarding vulnerabilities due to past trauma, disrupted attachments, or complex care arrangements.

Where a child enters into the care of the Local Authority, the School appoints a designated teacher with responsibility for promoting the educational progress and wellbeing of all LAC and PLAC. The School works closely with carers, local authorities, and Virtual School Heads to ensure that appropriate support is in place. This includes actively contributing to and engaging with the child's Personal Education Plan (PEP), ensuring it informs planning, pastoral support, and learning provision.

Staff are made aware of the specific needs of looked after pupils and trained to respond with sensitivity and high expectations. Safeguarding arrangements are robust, ensuring that any concerns are identified early and addressed in a multi-agency context, always placing the pupil's best interests at the centre of decision-making.

If a child leaves the care of the Local Authority, the School recognises that there is potential for long-lasting impact on their well-being, mental health, socialisation, attendance and progress, and so they will continue to be monitored and supported as necessary.

Children with a social worker

The school recognises that children with a social worker may face increased safeguarding risks, including higher levels of vulnerability to neglect, abuse, exploitation, or poor mental health.

We understand that these children may require additional support to help them achieve stability, strong relationships, and improved educational outcomes. The DSL and DDSLs work proactively with children's social workers, carers, and other professionals to share relevant information, contribute to multi-agency plans, and promote the child's safety and wellbeing.

Staff are made aware, on a need-to-know basis, when a child has an allocated social worker and are trained to respond with sensitivity, consistency, and professional curiosity. We recognise that experiences of trauma can impact attendance, engagement, and behaviour, and we ensure that support is tailored accordingly, while maintaining high expectations.

Our safeguarding systems are designed to identify risk early and respond appropriately, and our pastoral care framework ensures that these children feel safe, valued, and included. The school is committed to playing a protective, stabilising role in the lives of children with social workers and to acting in their best interests at all times.

Early years and foundation stage

While this policy applies across the whole school (ages 3–18), our EYFS provision has specific safeguarding requirements that reflect the particular needs and vulnerabilities of younger children. the following provisions are in place for EYFS:

- **Deputy Designated Safeguarding Lead (DDSL):** Head of EYFS (Fiona McWilliam) has undergone EYFS-specific training, including early developmental safeguarding indicators.
- **Staff Ratios and Supervision:** EYFS settings maintain strict staff-to-child ratios and appropriate supervision at all times, including during toileting, sleep, and transitions.
- **Mobile Phones and Cameras:** The use of personal mobile phones and cameras by staff in the EYFS setting is strictly prohibited. School-owned devices are used in line with our mobile device and image use policies.
- **Intimate Care:** Where intimate care is required, procedures are followed to ensure dignity, safeguarding, and clear recording. EYFS staff are routinely trained in intimate care.
- **Welfare Requirements:** Staff meet welfare requirements around health, safety, and hygiene (including oral hygiene), including paediatric first aid, suitable premises, and safeguarding-focused risk assessments.
- **Ofsted Notification:** Any serious incidents or allegations are reported to Ofsted as required, in addition to referrals to the local authority.

These arrangements ensure that our youngest pupils are safeguarded in a manner that is age-appropriate, developmentally sensitive, and compliant with all regulatory standards.

Boarding

The School fosters a safeguarding-led culture in boarding, ensuring boarders feel safe, supported, and confident in raising concerns with trusted adults. All boarding staff, including houseparents and residential staff, receive safeguarding training relevant to their role and are aware of their responsibilities under this policy.

The Designated Safeguarding Lead (currently also resident in boarding) is available at all times, including out of hours and during weekends, to respond to safeguarding concerns in the boarding setting.

Boarding arrangements prioritise privacy and dignity while maintaining appropriate supervision. This includes practices around sleeping arrangements, showering, internal CCTV and the use of electronic devices.

Access to boarding areas is restricted, and visitors are supervised in line with safeguarding protocols. All adults (including partners of resident staff) living or working on site are subject to safer recruitment checks.

The School maintains clear communication with parents, guardians, and, where appropriate, overseas education guardians to ensure a joined-up approach to welfare and safeguarding.

Boarders are made aware of how to report concerns, including access to independent listeners and external helplines. Whistleblowing procedures are embedded and accessible to all boarding staff and pupils.

Pupils with Special Educational Needs and Disabilities

The School recognises that pupils with SEND can face additional safeguarding challenges and may be more vulnerable to abuse, neglect, exploitation, bullying, and peer-on-peer harm. We are committed to promoting the safety, dignity, and inclusion of all pupils with SEND across our EYFS, day, and boarding provision.

Staff are trained to recognise that SEND pupils may not outwardly show signs of abuse and may struggle to communicate concerns due to speech, language, or social difficulties. These pupils may also be more dependent on adults for care or be more isolated from their peers, increasing their vulnerability.

Safeguarding for SEND pupils is embedded within the school's broader inclusion and support systems. Designated safeguarding leads work closely with the Special Educational Needs Coordinator (SENDCo) and pastoral teams to ensure safeguarding concerns are identified promptly and addressed holistically. Where appropriate, support plans, risk assessments, and individualised communication strategies are put in place to safeguard vulnerable pupils.

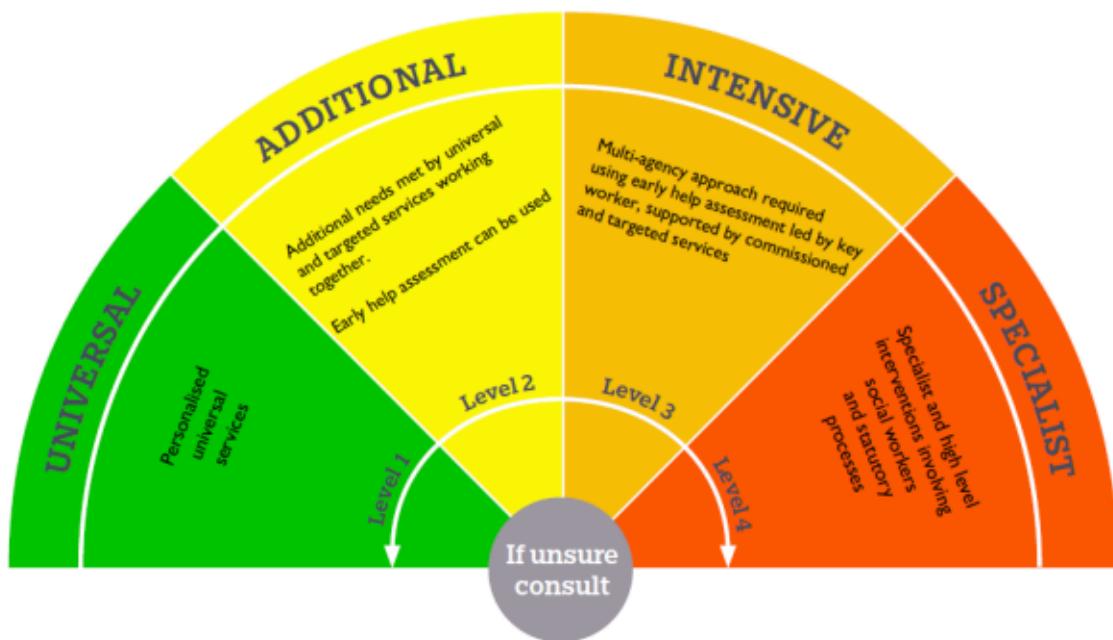
Pupils are taught about safety, consent, and healthy relationships in a developmentally appropriate way. The school ensures that all safeguarding communications and procedures are accessible to SEND pupils, including through the use of visual aids, simplified language, and trusted adults who know them well.

Local safeguarding children partnerships

The School works closely with the Plymouth Safeguarding Children Partnership (PSCP), although we also engage with safeguarding children partnerships when a pupil lives in Devon, Cornwall or Torbay, and follow their local processes.

PSCP uses a document called “Building Support” as a multi-agency framework to help understand the different levels of need families experience and how to identify the appropriate level of support needed.

The levels of need “windscreen” model



When a concern about a child is brought to the safeguarding team, this model is referred to in order to decide the appropriate course of action. Where there is uncertainty about the level of need, the professionals consultation line is utilised.

However, any member of staff can refer concerns directly to the Local Authority using the contact numbers listed above.

Staff induction and training

Before a new member of staff can commence their duties, they must receive a safeguarding briefing by the DSL or a DDSL. This will include what to report, how to report and the contact details for the safeguarding team at School and relevant external agencies, as well as both preventative and reactive safeguarding processes.

All staff will receive annual safeguarding and child protection update training, as well as shorter briefings from the DSL in order to provide them with relevant skills and knowledge to safeguard children effectively.

Safer recruitment

As part of the School's commitment to creating a culture of safeguarding, robust recruitment procedures are in place to deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities.

The recruitment pack for any advertised post includes:

- Details of the School's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding responsibilities of the post as per the job description and personal specification
- Details of whether the post is exempt from the Rehabilitation of Offenders Act 1974

If an advertised role is required to engage in regulated activities relevant to children or schools, the application form will ask the applicant to provide information on whether they are barred from this.

Applicants are required to give information about their personal details, current employment, employment history (including reasons for any gaps in employment), qualifications, referees / references, and a statement identifying why they believe they are suitable for the post and meet the person specification.

Anyone short listed for interview is asked to complete a self-declaration of their criminal record and to share any information that may make them unsuitable to work with children. Two members of staff (with at least one being trained in safer recruitment) will undertake the short listing for interview and they should consider carrying out online searches of the applicants as part of their due diligence.

Where possible, references should be obtained prior to interview, which asks the referee to state if they have any reason to believe the applicant is not suitable to work with children.

During the interview, the applicant's suitability to work with children should be assessed and any areas of potential concern should be explored.

Any offer of employment is made subject to pre-appointment vetting checks, including verification of identity, obtaining an enhanced DBS check (including children's barred list information for those who will be engaging in regulated activity with children), verification of their mental and physical fitness to carry out their work, verification of their right to work in the UK, verification of professional qualifications and if the person has lived or worked outside of the UK, further checks should be made where possible to verify this. If the position is a management position, section 128 checks must also be made.

Further information on pre-appointment vetting can be found in Part Three of KCSIE 2025.

The School maintains a Single Central Record (SCR) of pre-appointment checks for all staff (including teacher trainees, agency and third-party supply staff) and members of the proprietor body. The details of an individual must be removed from the SCR once they no longer work at the School.

Anyone visiting the school in a professional capacity (e.g. educational psychologist) must have their ID checked, provide evidence of an appropriate DBS (usually through their employer) and be issued with a visitor's badge. The "visitor's safeguarding information" booklet must be shared with them on arrival.

Under no circumstances must volunteers or visiting speakers be left unsupervised or allowed to work in regulated activity. Where appropriate, the Visiting Speakers form must be completed and submitted to the Deputy Head (co-curricular) prior to their visit, which includes a risk assessment.

Raising concerns about colleagues, volunteers and contractors

The School is committed to creating a whole school approach to safeguarding, which includes processes for raising and managing concerns about inappropriate behaviour of anyone working in or on behalf of the School in a paid or unpaid capacity, i.e. members of staff, including supply, volunteers and contractors.

There are two levels of concern when it comes to allegations of inappropriate behaviour:

1. Concerns / allegations that **may** meet the harm threshold
2. Concerns / allegations that **do not** meet the harm threshold, we the School refers to as low level concerns (please refer to the low levels concern policy)

Concerns and allegations that may meet the harm threshold

A concern or allegation may meet the harm threshold if someone working in or on behalf of the School in either a paid or unpaid capacity has:

- behaved in a way that has harmed a child, or may have harmed a child, and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point includes behaviour that may have happened outside of school and is known as a transferable risk.

Any concern or allegation that may meet the harm threshold should be reported to the Head (Peter Watts) or the DSL (Beth Field) immediately. The Head will then consult the LADO for advice.

If there are concerns that a child has been harmed, there is immediate risk of harm to a child or if the situation is an emergency, then the Police and Local Authority's social care should also be informed.

All records of allegations are kept with the DSL.

Any member of staff can report concerns and allegations that may meet the harm threshold directly to the LADO themselves.

The School will then follow guidance from the LADO and Part Four of KCSIE 2025 (managing allegations) in their response to the allegation.

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

The term “low-level concern” does not mean that it is insignificant. The School expects all staff to report these concerns, however small they may seem (potentially no more than a feeling of unease or a “nagging doubt”) in order to prevent problematic behaviour from escalating, minimise the risk of abuse and ensure that all staff act within their professional boundaries which maintain our ethos and values.

Examples of a low-level concern include, but are not limited to:

- Being over friendly with children
- having favourites
- taking photographs or children on their mobile phone, contrary to School policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

All low-level concerns should be reported to the DSL (Beth Field) who will then discuss any subsequent action with the Head (Peter Watts). All records of concerns raised are kept with the DSL.

Please see the low-level concern policy and Part Four of KCSIE 2025 for information about how these allegations are managed.

Self-disclosure

All staff are encouraged to feel confident about self-disclosure, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Self-disclosures can be made directly to the DSL.

Glossary of terms

DSL	Designated safeguarding lead
DDSL	Deputy designated safeguarding lead
EYFS	Early years and foundation stage
FGM	Female genital mutilation
SENDCo	Special educational needs and disabilities co-ordinator
LADO	Local area designated officer
MASH	Multi-agency safeguarding hub
MARU	Multi-agency referral unit
LAB	Local advisory board
KCSIE	Keeping children safe in education (2025)
DBS	Disclosure and Barring Service
CCE	Child criminal exploitation
CSE	Child sexual exploitation
HBA	“Honour”-based abuse
FGM	Female genital mutilation
LAC	Looked after children
PLAC	Previously looked after children
SEND	Special Educational Needs and Disabilities
SCR	Single central record

Legislation, statutory and non-statutory guidance, and policies

This policy is built upon legislation, statutory and non-statutory guidance, and links closely with other School policies, as detailed below

Legislation

[Keeping Children Safe in Education 2025](#)

[The Education \(School Teachers' Qualifications\) \(England\) Regulations 2003](#)

[Children Act 1989](#)

[Female Genital Mutilation Act 2003](#)

[Education Act 2002](#)

[Data Protection Act 2018](#)

[UK General Data Protection Regulation \(UK GDPR\)](#)

[Education \(Independent School Standards\) Regulations 2014](#)

[Equality Act 2010](#)

[Human Rights Act 1998](#)

[Safeguarding Vulnerable Groups Act 2006](#)

[Children and Social Work Act 2017](#)

[Sexual Offences Act 2003](#)

[Domestic Abuse Act 2021](#)

Statutory guidance

[Working together to safeguard children 2023](#)

[Working together to improve school attendance 2024](#)

[Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)

[The Prevent duty: safeguarding learners vulnerable to radicalisation](#)

[National Minimum Standards for Boarding Schools](#)

[Children Missing Education](#)

[Promoting the education of looked-after children and previously looked-after children](#)

[Special educational needs and disability code of practice: 0 to 25 years](#)

[Supporting pupils at school with medical conditions](#)

[Early years foundation stage statutory framework](#)

Non-statutory guidance

[What to do if you're worried a child is being abused: advice for practitioners](#)

[Information sharing: advice for practitioners providing safeguarding services for children, young people, parents and carers](#)

[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

[DfE's filtering and monitoring standards](#)

[Searching, Screening and Confiscation: advice for schools](#)

[Promoting the education of children with a social worker](#)

School policies

[Anti-bullying policy](#)

[Attendance and registration policy](#)

[Behaviour management policy](#)

[Children missing from education policy](#)

[Code of conduct - staff](#)

[Data protection policy](#)

[E-safety policy](#)

[ICT acceptable use policy](#)

[Low level concerns policy](#)

[Mobile phone policy](#)

[Relationships and Sex Education policy](#)

[SEND policy](#)

[Taking, storing and using images of pupils policy](#)

[Use of reasonable force policy](#)

[Whistleblowing policy](#)