

PLYMOUTH COLLEGE

SAFEGUARDING & CHILD PROTECTION POLICY

including Early Years Foundation Stage (EYFS)



Last reviewed:	August 2026
Next review date:	August 2027
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	Linsay 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/pscp@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 Help 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 Liz Best lado@plymouth.gov.uk 01752 305978
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 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 (2026)*, 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 and child protection 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 (2026)*, 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	• 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.

	The Head ensures that the DSL has adequate resources, time and training to carry out their role. The Head is involved in reviewing and responding to allegations made against staff and volunteers, and raises any cases to the LADO as necessary.
School's Management Board	• 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	• 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. • Be vigilant to signs of concern that a pupil may be experiencing or be at risk of experiencing harm. Be aware that pupils can make direct and indirect disclosures, and know how to respond to both. Report any concerns around a child's safety, mental health and wellbeing on CPOMs within 24 hours. • 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 • 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; • 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 Family Help, Prevent, local authority, Police or CAMHS. • Be familiar with Part One of Keeping Children Safe in Education (2026).
--	---

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. State what actions (if any) have already been taken and the rationale for this.

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 their 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.

If there are concerns about a child, the options to the safeguarding team are:

- Manage internally with our own pastoral support systems, including decisions on whether to inform parents of our concern
- Undertake a Family Help assessment
- Make a referral to statutory services (e.g. children's social care)

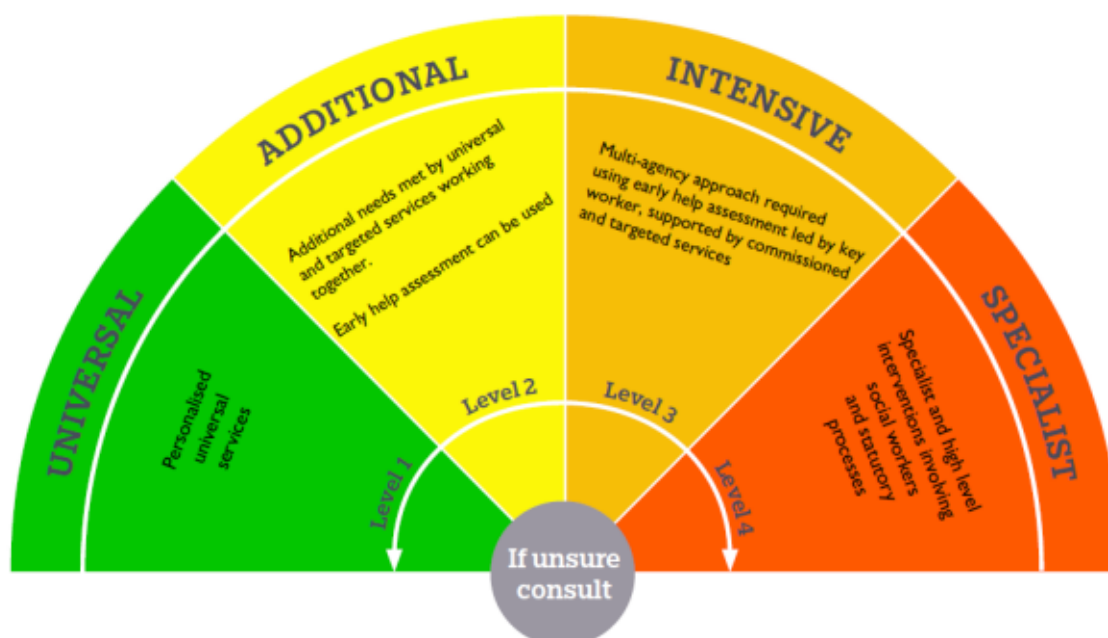
CPOMs is used by the School to record all pastoral and safeguarding concerns, incidents of bullying, harassment and discrimination, and SEND interventions. If a pupil transfers to a new school, the DSL will make arrangements to securely transfer the child protection within 5 days of them being on roll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

Local safeguarding 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.

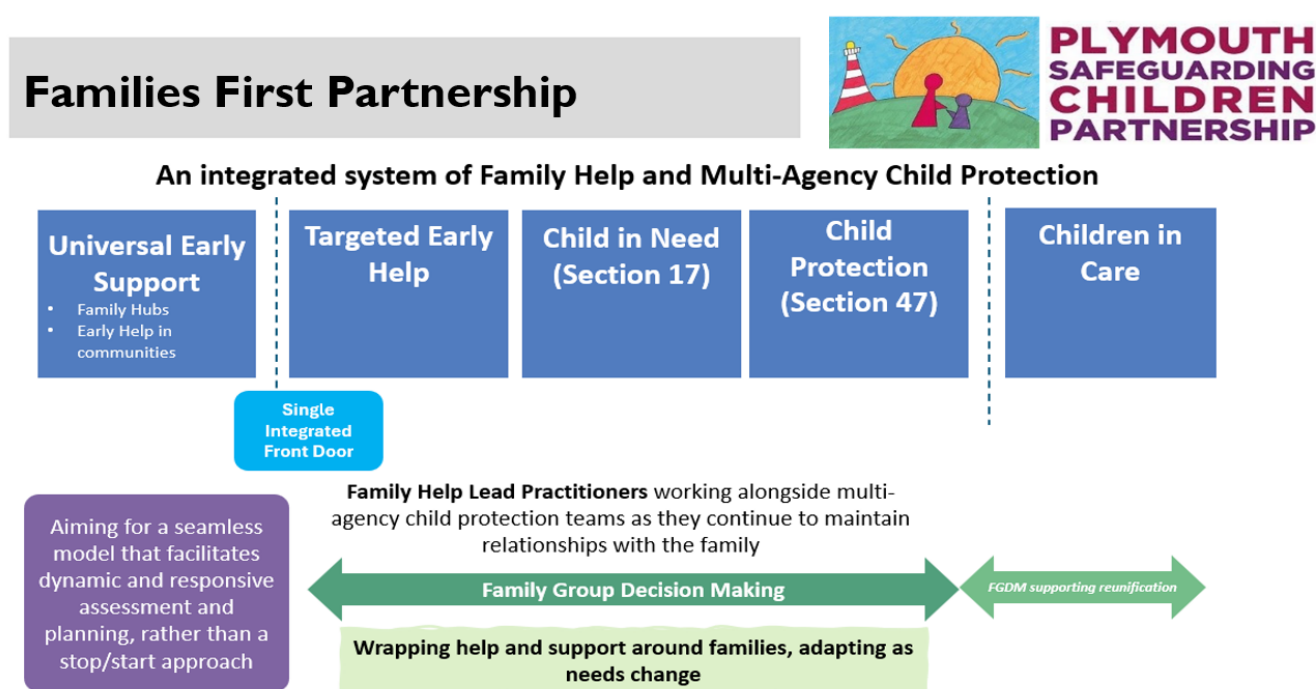
The levels of need "windscreen" model



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.

Plymouth now operates a Family Help model through local family hubs and has moved to an integrated front door through the Families First Partnership:



Family Help seeks to offer support to families in their locality when needs are identified on a voluntary and consensual basis. A family lead practitioner may be appointed to oversee the implementation and impact of multi-agency support, and they may not necessarily be a social worker.

The integrated front door is a multi-agency team of professionals who will assess whether a child is at immediate risk of harm and therefore statutory intervention is required.

More information about these local arrangements can be found on the Plymouth Safeguarding Children Partnership's [website](#), and through [Working Together to Safeguard Children 2026](#) and [The Families First Partnership Guide 2026](#).

If you have concerns that a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (01752 668000) and if appropriate the police, is made immediately.

A local authority social worker should make a decision about the next steps within one day of receiving the report, and this should be communicated to you. If it is decided that a statutory assessment is needed, the School will co-operate fully with that assessment.

Information Sharing

The timely sharing of information is vital in identifying and tackling all forms of abuse, neglect, and exploitation. All staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks, whether this is when problems are first emerging or where a child is already known to local authority children's social care.

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and safety of children.

However, care should be taken to ensure that information is only shared with the appropriate people (e.g. the designated safeguarding lead or a deputy designated safeguarding lead) and that the information shared is focused and proportionate. This may mean that some information is summarised or omitted when recording a safeguarding concern, but care should be taken not to omit something that may be relevant when assessing risk.

All safeguarding and wellbeing concerns are recorded and stored on CPOMs.

When a child moves to a new setting, their child protection file is shared with the new school by the designated safeguarding lead, who will record their safe receipt. The DSL may also consider if it is appropriate to share other information in order to ensure that appropriate support is in place for a child when they begin at their new setting, for example if a child has had a social worker or if they are a young carer.

Further guidance around information sharing can be found [here](#).

Information security

If a cyber-attack or a data breach occurs and a child's sensitive information is compromised, this should be treated as a direct risk to that child's safety and wellbeing. Should a data breach occur, it should be reported immediately to both the Data Protection Officer and the Designated Safeguarding Lead, who will take appropriate action.

An annual review of the effectiveness of the School's cyber security will be undertaken to strengthen resilience, reduce the risk of disruption, prevent data breaches and mitigate safeguarding risks.

Specific forms of abuse and contextual safeguarding

Child-on-child abuse

Children are capable of abusing other children. It can happen inside and outside of school, and online. The impact of this can be significant and long lasting.

All staff have a role to play in preventing, identifying and responding when they believe a child may be at risk of abuse from another child.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as “teenage relationship abuse”)
- physical abuse such as hitting, kicking, shaking, biting, or hair pulling (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- serious physical assault or harm, or threat with a weapon
- sexual violence or harassment (see below)
- initiating / hazing type violence and rituals

All staff must report to the designated safeguarding lead if they believe child-on-child abuse has occurred or is likely to occur through CPOMs. Should staff witness child-on-child abuse, it is vital that they challenge it. Downplaying certain behaviours as “banter” etc., can lead to a culture of unacceptable behaviour that normalises abuse.

Where child-on-child abuse has occurred, it is considered as a safeguarding issue for both the victim and the alleged perpetrator, and both shall have their needs and risks assessed. Wherever necessary, support will be offered and signposted.

The School has a zero-tolerance approach to harassment, discrimination and bullying, and sanctions will be applied in line with the school’s [Respect and Responsibility](#) policy where deemed necessary. However, all children will be supported and educated to understand their behaviour and prevent these behaviours from escalating in the future.

Any pupil at Plymouth College can report child-on-child abuse to any trusted adult either in person, by email or through the anonymous reporting form accessed through the student portal or by the QR code located across the school site.

Child-on-child sexual violence and sexual harassment

The School requires all staff to be vigilant to signs of sexual violence and harassment and harmful sexual behaviours (HSB), including misogyny and misandry, occurring between children in school, outside of school and online, and occurs both physically and verbally.

Child-on-child 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.

It is most likely to include, but may not be limited to:

- Sexual violence such as rape, assault by penetration and sexual assault
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names,
- sexual jokes or “taunting”,
- physical behaviour, such as deliberately brushing against someone, or interfering with someone’s clothes,
- displaying pictures, photos or drawings of a sexual nature,
- upskirting (this is a criminal offence),
- online sexual harassment, which may include:
 - consensual and non-consensual making or sharing of nudes or semi-nudes
 - sharing of unwanted explicit content
 - sexualised online bullying
 - unwanted sexual comments and messages
 - sexual exploitation, coercion and threats
 - coercing others into sharing images of themselves or performing acts they’re not comfortable with online

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) 2026 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.

Any concerns of child-on-child sexual violence or harassment, or harmful sexual behaviours, even if it is speculative or rumour, and whether it has happened inside or outside school, or online, must be reported to the DSL via CPOMs immediately.

When any such report is received, the safeguarding team will review and follow the procedures outlined in Part Five of KCSIE 2026. Consideration will be given to whether referral to external agencies are necessary. Parents of all parties will be informed unless it is deemed that this may put the child at additional risk. Where there may be photographic or videographic evidence, the designated safeguarding lead will follow the advice provided by [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\) - GOV.UK](#)

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. Support will be offered and signposted to them, and a needs and risk assessment carried out where necessary.

It is also important to consider that those who allegedly perpetrate harmful sexual behaviour may themselves be victims of abuse, trauma, or unmet needs. As such, safeguarding support must be provided to them as well, 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. Any needs and risk assessments for the alleged perpetrator will also be carried out. School based sanctions may be applied as a result of any investigation of child-on-child sexual violence or harassment.

The safeguarding team will also consider the wider implications for the school community and ensure ongoing support and monitoring for any parties affected by incidents of child-on-child sexual violence or harassment.

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.

Operation Encompass is an information-sharing scheme between the police and relevant education settings. There is a new statutory duty for police to notify a child’s education setting if they have reasonable grounds to believe a child may be a victim of domestic abuse. Any Operation Encompass notification received about a pupil at Plymouth College is followed up with a welfare check on the same day where possible.

Exploitation

Child Exploitation is a form of abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim wants or needs, and/or for financial advantage or increased status of the perpetrator, and/or through the threat of violence.

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.

Children can be exploited by other children, who may themselves be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim. No child can consent to being exploited.

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.

Any concern of child exploitation must be reported on CPOMs within 24 hours.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of abuse, and may face threats against their family, find themselves in debt, and be coerced into carrying weapons.

It is important that they receive immediate help through the appropriate agencies, and they may need additional support to help keep them in education.

Child Sexual Exploitation (CSE)

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.

CSE is a form of child sexual abuse. It may involve physical contact, including assault by penetration or non-penetrative acts (such as masturbation, kissing, rubbing and touching outside clothing). It may include non-contact activities, including online.

It can occur as a one-off occurrence or it might happen over time, and it may not happen with the child's immediate knowledge (e.g. if others share photos or videos of them online). Most instances of CSE are committed by someone known to the victim.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds, who can legally consent to have sex, but are still considered children and therefore are protected by child sexual abuse laws.

Victims of CSE are not always recognised and will need significant support.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal ine". The activity can happen locally but also across counties in the UK. Vulnerable children are exploited to move, store and sell drugs and money.

Children are recruited in a number of locations, including schools, and increasingly online.

Some additional indicators that a child may be involved in county lines (including those listed for other forms of exploitation) are:

- unexplained absences or missing episodes from home
- have been involved in serious violence
- are found in accommodation they have no connection with, or are found far away from home

Modern Slavery

Modern slavery encompasses exploitation, human trafficking and slavery, servitude or forced labour, forced criminality or the removal of organs.

The National Referral Mechanism is the system used within the UK to identify and support potential victims of modern slavery, and further guidance on the NRM can be found [here](#). Children referred through the NRM may also have access to an Independent Child Trafficking Guardian (ITCG).

Honour or faith-based abuse (including female genital mutilation and forced marriage)

Honour or faith-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.

Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

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.

Female genital mutilation (FGM)

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.

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 of what is meant by “to discover that an act of FGM appeared to have been carried out” 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.

The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Forced marriage

Forcing a person into marriage is a crime in England and Wales, as is forcing a child to marry before their eighteenth birthday.

If any member of staff has concerns that a pupil is being coerced or forced into marriage, they should inform the DSL who will contact the Forced Marriage Unit.

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 annually 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.

Plymouth College is now a mobile phone free school, the details of which can be found in this [policy](#).

Artificial Intelligence (AI) and safeguarding

AI is rapidly evolving, and whilst it creates exciting opportunities for our children and young people, it is not without risk.

Specifically, children are at risk from:

- Generative AI chat tools, which can foster unhealthy emotional dependence, compromise their privacy, and subject them to misinformation or inappropriate content.
- AI-generated nude and semi-nude images and deepfakes.

Our filtering and monitoring systems are assessed annually to ensure they are detecting any such use of AI. Any use of AI products in school (e.g. educational platforms) must first be assessed for its safety before use (using the [DfE's Generative AI Product Safety Standards](#) advice) and a list of approved platforms is shared with staff.

Pupils are educated on the risks of using AI through the PSHE and RSE curriculum, and are taught what to do if they become victims of online harm.

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).

Serious violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation.

Staff should report any concerns that a child is carrying or using a weapon to the DSL via CPOMs immediately. The DSL will then assess the risk to both the individual pupil and others in the community and take appropriate action, such as referral to the police and informing parents. A safety and support plan will be put in place, which may include necessary action to de-escalate peer conflict.

Use of reasonable force

There are limited circumstances in which staff may need to use “reasonable force” to safeguard children. “Reasonable” in this context means “using no more force that is necessary for the least amount of time”.

The [Restrictive Interventions](#) policy has more information about this.

If any member of staff has had to use reasonable force to safeguard children, they should report this to both the designated safeguarding lead and the Senior Deputy Head.

Children at greater risk of harm

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.

Mental health

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

Staff should be aware of the signs that a pupil is struggling with their mental health and they should signpost them to the pastoral team (form tutor, head of year, school nurse or school counsellor), as well as reporting this on CPOMs within 24 hours.

Staff should never attempt to diagnose a mental health condition in a pupil.

Having a mental health problem does not necessarily mean there is a safeguarding concern. However, for some children, poor mental health can lead to eating disorders, self harm or suicidal ideation. This should be recorded on CPOMs and if there is a significant concern that a child is in danger, 999 should be called or they should be taken to A&E by a parent or trusted adult. If urgent, but not emergency, help is needed, staff can get help from NHS 111.

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

Children with medical conditions

The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, college or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

The medical policy and the allergies policy both contain further information about supporting children with medical conditions, including allergies.

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.

Elective Home Education (EHE)

Many home educated children have a positive learning experience. However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs.

Where a parent expresses their intention to home educate their child, the School will inform the Elective Home Education team at the Local Authority, to ensure that full and proper checks can be made about the suitability of this.

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 DDSs work proactively with children's social workers, carers, and other professionals (such as the Virtual School's Head) 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.

Children who have or who have previously had a social worker are closely monitored in terms of attendance, attainment, behaviour and wellbeing.

Young carers

Schools and colleges should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

The School will try to ascertain who in the community is a young carer (both through pupil and parent engagement) and signpost them to local support networks.

Children who are lesbian, gay or bisexual

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.

Children who are questioning their gender

Plymouth College is an inclusive school, where the individual is known and celebrated. Any request (from parent or pupil) to socially transition (any action where a child can present as the opposite biological sex) will be met with careful consideration of the child's thoughts, feelings and best interests, and will be reviewed on a case-by-case basis. We recognise that children who are questioning their gender may be more vulnerable to complex mental health and psychosocial needs, and we will be proactive in signposting support. Children questioning their gender are

also more susceptible to discriminatory bullying, and we take a zero tolerance approach to this, in line with the [Anti-Bullying Policy](#).

Should a child wish to socially transition, a request should be made to the Head or the designated safeguarding lead by them or their parents. Conversations will happen around the child's wishes (with their parents present, unless in doing so they would be placed at greater risk) and decisions made about what the School is able to accommodate. The decision making process will be documented on CPOMs, and any relevant communications made to staff. Staff must not adopt any changes relating to social transition unless these have been decided by the School.

All decisions will give due regard to the school's ethos and values, safeguarding legislation and obligations under equality and human rights law, as well as the welfare and best interests of the child. Consideration will also be given to the impact of any agreed action, including on the child's peers. No decisions will be made without the involvement of the child, their parents (unless this would place them at risk of harm) and any clinical evidence and advice.

The Cass Review recommends taking a careful approach, especially for those children who wish to socially transition before puberty.

Accommodating social transition is an active intervention, and may have significant effects on the child in terms of their psychological functioning and longer term outcomes. We therefore would adopt a flexible approach with frequent opportunities for review.

Some requests we will be unable to meet in relation to social transition, such as use of toilets or changing rooms designated for the opposite biological sex. However, we have the capacity to offer self-contained toilets and changing facilities, which would be discussed with the child and their parents when reviewing any decisions made. Requests to participate in single-sex sports would also need to be considered in light of safety and fairness reasons. We have a legal requirement to record all children's biological sex on our school roll.

Wherever possible, the School wishes to work with a child and their family who make a request to socially transition. We would consider all of their wishes and how we can accommodate them, whilst also making sure we're acting in the best interests of the child and their peers.

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, meal times 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 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.

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, and contextual safeguarding information.

All staff will receive annual safeguarding and child protection update training, as well as shorter briefings and bulletins on the staff safeguarding portal from the DSL in order to provide them with relevant skills and knowledge to safeguard children effectively. Staff are expected to engage with all training materials provided as part of their ongoing CPD.

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.

Further information can be found in the [Safer Recruitment Policy](#), which includes information about the appointment of LAB members and adults volunteering with the school.

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. The SCR is overseen by the Senior Deputy Head and HR.

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 Senior Deputy Head prior to their visit, which includes a risk assessment.

Use of the School premises for non-school activities

The School frequently hires or rents out the facilities on site to external organisations and individuals and we therefore have arrangements in place to keep children safe.

The Commercial Lettings Manager will seek assurances from any provider that they have suitable safeguarding and child protection policies in place, including procuring copies of these policies. This is a condition of use and occupation of the premises and a failure to comply with this would lead to termination of the agreement.

Information about how to liaise with the School's safeguarding team are shared with the provider, and the designated safeguarding lead is available to liaise on any safeguarding matter that occurred on site regardless of whether the child is a Plymouth College pupil or not.

Raising concerns about staff, including supply staff, trainee teachers, 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 staff, trainee teachers, 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) immediately. The Head will then consult the LADO for advice.

If the concern is about the Head, the proprietor should be informed and the LADO contacted.

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 2026 (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 of 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 2026 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.

What staff should do if they have concerns about safeguarding practices within the school

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding provision and know that such concerns will be taken seriously by the senior leadership team.

The School's [whistleblowing policy](#) exists to protect people who raise legitimate concerns, and advice can also be sought from the [NSPCC Whistleblowing Advice Line](#).

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 (2026)
DBS	Disclosure and Barring Service
CCE	Child criminal exploitation
CSE	Child sexual exploitation
HBA	Honour or faith-based abuse
HSB	Harmful sexual behaviour
FGM	Female genital mutilation
NRM	National Referral Mechanism
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 2026](#)

[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](#)

[Children's Wellbeing and Schools Act 2026](#)

[Online Safety Act 2023](#)

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](#)

[DfE's Generative AI Product Safety Standards](#)

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](#)