

exeter college



Child Protection and Safeguarding Policy

SAFEGUARDING ALL STUDENTS INCLUDING CHILDREN AND VULNERABLE ADULTS

Written by: The Designated Safeguarding Lead

CLT Sponsor: Kristyn Woodward

Consulted with: Exeter College Senior Leadership Team & Safeguarding Group

Next Review Date: September 2025

Version: September 2024

Contents

Page

Purpose	3-7
Definitions	7-8
Policy	8-10
Roles and Responsibilities including:	10-16
<i>Role of the Designated Safeguarding Lead</i>	
<i>Role of the Deputy Designated Safeguarding Lead</i>	
<i>Role of the Governing Body</i>	
<i>Role of the Principal</i>	
<i>Role of all College Staff</i>	
Allegations Against Members of Staff	16-17
Staff Training	17
Abuse of Positions of Trust	17-18
Safer Recruitment	18-19
Site Security	19
Photography and Images	19
Off Site Activities	19
Residential Offsite Settings	19-20
College Residential Accommodation Settings	20-21
Child Protection Procedures	21-23
<i>Recognising Abuse</i>	
Bullying	24
Sexual Harassment and Sexual Violence	24
Children with Sexually Harmful Behaviour	24
Sexual Exploitation	25
Female Genital Mutilation	25-26
Forced Marriage	26
Honour Based Violence	26
Radicalisation and Extremism	26-27
Death of a Young Person	27-28
Indicators of Abuse	28-29
The Impact of Abuse; Taking Action; Information Sharing	29-30
Information Sharing	31-33
Looked After Children; Care Leavers	33-34
Private Fostering	

College Students on Trips Staying with Host Families	34
Young People, V. Adults who may be Particularly Vulnerable to Abuse	34-35
Work Experience	35
Digital Safety	35-37
<i>Youth produced sexual imagery (sexting)</i>	
Up skirting	37
Building resilience and promoting positive behaviour	37-38
Support for those Involved in a Child Protection Issue	38
Reporting Directly to Child Protection Agencies	39
Monitoring, Review, Evaluation of CP and Safeguarding Policy and Procedures	39
Related Safeguarding Portfolio Policies and Procedures	39
Appendices (Appendix 1-3)	40-43

1. Purpose

1.1 The purpose of this policy is to make a statement of intent and commitment to action on the part of the College in relation to the child protection and safeguarding aspects of its duty to safeguard and promote the welfare of all students including children, young people and vulnerable adults. To this end, it is intended to:

- Ensure action that will contribute to the safeguarding of all students.
- Raise awareness of the need to safeguard and protect all students including children, young people and vulnerable adults and that everyone has a responsibility for safeguarding.
- Indicate what action is to be taken in circumstances.

1.2 This policy is one of a series in the College's integrated safeguarding portfolio and must be read in conjunction with the portfolio for fuller guidance and explanations. This policy supersedes all existing safeguarding and child protection policies. This policy is available on the Exeter College website and is available to all staff via the Policies pages on the Portal.

1.3 Safeguarding is not just about protecting students from deliberate harm, it relates to all forms of abuse including: (this is not a definitive list)

- Neglect
- Physical Abuse
- Sexual Abuse (including Sexual Exploitation)
- Emotional Abuse
- Sexual Violence and Sexual Harassment
- Child on Child Abuse
- Female Genital Mutilation (FGM)
- Bullying (including all forms of Digital and Online Bullying)
- Domestic Violence and Abuse including witnessing harm
- Radicalisation/Violent Extremism
- Honour Based Violence
- Forced Marriage
- Racist / Homophobic or Transphobic Abuse
- Child abduction and community safety incidents
- Criminal Exploitation (including cybercrime)
- Trafficking and Modern-Day Slavery (including the National Referral Mechanism)

- Substance Misuse

1.4 The College also recognises its responsibility under wider safeguarding to ensure that all students benefit from 'Early Help Assessment'. All College staff must be particularly alert to the potential need for early help for anyone who:

- is disabled and has specific additional needs
- has unexplainable and/or persistent absences from college
- has experienced multiple suspensions, is at risk of permanent exclusion from college
- has special educational needs (whether, or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is at risk of so called 'honour' based abuse such as Female Genital Mutilation or forced marriage
- has a family member in prison or is affected by parental offending
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised criminal groups (contextualised safeguarding)
- is frequently missing/goes missing from care, home
- is at risk of modern slavery, trafficking or criminal exploitation
- is at risk of being radicalised and drawn into violent extremism or terrorism
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care.
- is a privately fostered child

1.5 The College takes seriously its responsibility to safeguard and protect the welfare of all students in its care. It has a moral duty and statutory obligation under Section 175 of the Education Act 2002 to all children and young people under 18 years of age and vulnerable adults (under the safeguarding vulnerable groups act 2006) who attend Exeter College or are on the site (legitimately) for other reasons.

1.6 For the purpose of Safeguarding and Child Protection, this policy covers:

- All children and young people under 18 of age enrolled on full and part-time courses.
- 14-16 School link students on part time programmes
- Adult students including Vulnerable Adults enrolled at the college.
- Visitors to the College (under 18)

- Employees, apprentices, work experience students or volunteers who are under 18 years of age.

1.7 For the purpose of Safeguarding Vulnerable Adults, the following are included:

- All students classed as vulnerable adults over the age of 18 years (An adult at risk is defined by the Department of Health in the No Secrets Guidance (2000), as 'a person aged 18 years or over, who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation'.

1.8 Exeter College also works with other agencies to protect children under the Children Act 2004 and Working Together to Safeguard Children 2018. This duty is to:

- Safeguard and promote the welfare of children, young people and vulnerable adults.
- Work to provide an environment in which children, young people and vulnerable adults feel safe, secure, valued and respected, and feel confident that any complaint, allegation or suspicion of abuse will be taken seriously.
- Ensure that there are adequate procedures and arrangements within the college to identify, assess, make referrals and support children, young people and vulnerable adults who are suffering from harm.
- Work in partnership with parents and other agencies (e.g., Schools, Police, Social Care) to meet these obligations.
- Maintain a safe college environment for all.

1.9 The statutory guidance Working Together to Safeguarding Children 2018 covers the legislative requirements and expectations on individual services (including colleges) to safeguard and promote the welfare of children and young people. It also provides the framework for DSCBs to monitor the effectiveness of local services, including safeguarding arrangements in colleges.

1.10 This policy has been developed in accordance with the principles established by the Children Act 1989 and in line with the following government publications:

- 'Working Together to Safeguard Children' 2018
- Education Act, 2002
- 'What to Do If You Are Worried a Child Is Being Abused', 2015
- Keeping Children Safe in Education, 2024
- Devon Safeguarding Children Partnership Child Protection Procedure
- Information Sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers, 2018.

Information Sharing Advice for Safeguarding Practitioners

- Multi Agency Practice Guidelines: Female Genital Mutilation, 2016
- Section 11 Children Act, 2004
- Safeguarding Vulnerable Groups Act, 2006
- Devon Safeguarding Adults Statutory Guidance
- HM Government Prevent Duty Guidance for Further Education England and Wales, 2023
- Prevent Duty Guidance for England and Wales

1.11 The procedures contained in this policy apply to all staff and governors and are consistent with those of the Devon Safeguarding Children Partnership (DSCP)

1.12 Safeguarding Statement

1.12.1 Safeguarding is not just about protecting children, young people and vulnerable adults from deliberate harm. It includes issues for FE Colleges such as student health and safety; bullying; racist or homophobic abuse; or any form of harassment including sexual harassment or violence and discrimination; meeting the needs of students with medical conditions; providing first aid; drug and substance misuse; educational and off site visits; intimate care; internet safety; issues which may be specific to a local area or population, for example gang activity, cybercrime, serious violence, modern day slavery, Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), radicalisation for violent extremism and college security, safer recruitment and employment practices.

1.12.2 Exeter College recognises the moral and statutory responsibility to safeguard and promote the welfare of all students including children, young people and vulnerable adults. We work hard to provide a safe and welcoming environment where young people and adults are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that all students receive effective support, protection and justice. The college recognises that all staff have a full and active part to play in protecting children, young people and adults including vulnerable adults, from harm and that student welfare is our paramount concern.

1.12.3 Exeter College takes seriously its responsibility under section 175 of the Education Act 2002 and section 11 of the Children Act 2004, to safeguard and promote the welfare of children and young people and to work together with other agencies to ensure adequate arrangements are in place to identify, assess and support those children who are suffering harm.

2. Definitions

- **Safeguarding and promoting welfare** refers to the process of protecting all students from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all students to have the best outcomes.
- **Child Protection** refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.
- **Staff** refers to all those working for or on behalf of the College, full time or part time, temporary or permanent, in either a paid or voluntary capacity.
- **Child** includes everyone under the age of 18.
- **Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- **Vulnerable Adult** refers to someone aged 18 or over: who is, or may be, in need of community services due to age, illness or a mental or physical disability. Who is, or may be, unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation.
- **Designated Safeguarding Lead (DSL)** is the first point of contact for any member of the college staff who has a concern about the safety and wellbeing of a child, young person or vulnerable adult.
- **Deputy Designated Safeguarding Lead (DDSL)** the deputy is the first point of contact in the absence of the DSL to avoid any unnecessary delays in responding to a child/young person's/vulnerable adult's needs.
- **Prevent** refers to the Government's strategy to prevent young people and adults including vulnerable adults becoming radicalised.
- **Prevent Single Point of Contact** is the person identified in the college as the point of contact for all prevent related incidents and concerns.
- **Safeguarding Team** refers to the team of Level 3 Child Protection trained staff who support the DSL and DDSL in safeguarding and child protection across the whole college.
- **LAC Designated Person** is the person who has responsibility for Looked After Young People
- **Abuse:** refers to a form of maltreatment of a student whether that is within or outside the home, including online. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Students may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Adults and children may be abused by an adult or adults or by another child or children.

3 Policy

3.1 Exeter College's policy and procedures for safeguarding children, young people and adults including vulnerable adults will be in line with Devon Safeguarding Children Partnership Child Protection procedures and the Southwest Child Protection procedures:

[Devon Safeguarding Children Partnership](#)

[Keeping children safe in education 2024 \(publishing.service.gov.uk\)](#)

[Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](#)

3.2 The College will ensure that the Governors and Senior Leadership Team understands and fulfils its safeguarding responsibilities and recognises that it plays an important part of the wider safeguarding system for adults, children and young people, as described in the statutory guidance Working Together to Safeguard Children 2018.

3.3 Under Section 175 of the Education Act 2002 the Governors of the College make arrangement to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of all students.

3.4 There is a Designated Safeguarding Lead (DSL) supported by two Deputy Designated Safeguarding Leads (DDSL) who have undertaken level 3 Child Protection training and who update their training every two years as required by this position. Governing bodies and proprietors have ensured that the DSL is an appropriate senior member of staff, from the college leadership team. The designated safeguarding lead takes lead responsibility for safeguarding and child protection in the College.

3.5 There is a wider team of safeguarding specialists who support the Safeguarding Leads and have designated responsibility for given areas of the College. These team members will have all undertaken Level 3 Child Protection training. This team will meet on a two weekly basis to ensure the safeguarding of young people and vulnerable adults is constantly monitored and for group supervision.

3.6 Policy Principals

- The welfare of the child, young person, vulnerable adult is paramount.
- Safeguarding is everyone's responsibility.
- All children, young people and vulnerable adults, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion, concern or disclosure that may suggest a child is at risk of harm.
- Students and staff involved in child protection issues will receive appropriate support.

- All staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- When concerned about the welfare of a young person or vulnerable adult, staff members should always act in the interests of the child, young person/vulnerable adult.

3.7 Policy Aims

This Policy aims to:

- Provide all staff with the necessary information to enable them to meet their child protection and safeguarding responsibilities; remembering that "Safeguarding is everyone's responsibility".
- Create a culture of vigilance.
- To ensure consistent good practice.
- To demonstrate the College's commitment regarding child protection to student, parents and other partners.
- To support young people's development in ways that will foster security, confidence and independence.
- Raise awareness in all staff of the need to safeguard children, young people, and vulnerable adults, and of their responsibilities in identifying and reporting possible cases of abuse and vulnerability.
- To promote an environment in which all students feel safe, secure, valued and respected, and feel confident to, and know how to approach staff if they are in difficulty, believing they will be effectively listened to.
- To ensure that all staff working within our college who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance in KCSiE) and a single central record is kept for audit purposes.

3.8

The College recognises that it is an agent of referral and not of investigation. It is not the College's responsibility to investigate abuse. Staff should not extend an offer of confidentiality but should clearly inform the person that if information about abuse is disclosed there is a duty on staff to follow Safeguarding reporting procedures.

4 Roles and Responsibilities

4.1 We understand that our responsibility to safeguard children, young people and adults including vulnerable adults requires that we appropriately share any concerns that we may have about them

with our multi agency partners, in line with the statutory guidance in ‘Working Together 2023’, KCSIE 2024 and ‘Information Sharing 2018’

4.2 The College has a DSL and two DDSLs supported by a wider team of safeguarding specialists who are responsible for the monitoring of child protection and safeguarding of students within the college. They act as a focal point for staff to discuss concerns and liaise with other agencies and professionals.

4.3 Key Staff

Key Staff	
The Designated person for Safeguarding & Child Protection (DSL) is:	Kristyn Woodward
Email: kristynwoodward@exe-coll.c.uk	
The Deputy Designated Persons (DDSL) are:	Jo Spicer & Michael Bissett
Email: jospicer@exe-coll.ac.uk	
Email: michaelbissett@exe-coll.ac.uk	
The Single Point of Contact (SPOC) for Prevent is:	Kristyn Woodward
Designated Person for Care Experienced young people is:	Hannah Robson
Email: hannahrobson@exe-coll.ac.uk	
Designated person for Domestic Violence and Abuse	Kristyn Woodward
The Designated person for young people in college accommodation is	Jo Spicer
The nominated Governor for Child Protection and Safeguarding is:	Sue Clarke
Email: sueclarke@exe-coll.ac.uk	
The nominated Deputy Governor for Safeguarding & Prevent is:	Bindu Arjoon
Email: binduarjoon@exe-coll.ac.uk	
The Principal & Chief Executive of Exeter College is	John Laramy
Email: johnlaramy@exe-coll.ac.uk	
The nominated Senior Leadership team member is:	Gemma Noble
Email: gemmanoble@exe-coll.ac.uk	

4.4 The Role of the Designated Safeguarding Lead

The DSL will be appropriately trained, and this training will be regularly updated in line with statutory

guidance, to carry out those functions necessary to ensure the ongoing safety and protection of young people and adults including vulnerable adults. In the event of the long-term absence of the designated safeguarding lead, the deputy will assume all the functions above.

The Designated Safeguarding Lead:

- holds ultimate responsibility for safeguarding and child protection in the College.
- acts as a source of support and expertise in carrying out safeguarding duties for the whole college community.
- encourages a culture of listening to all students and taking account of their wishes and feelings, operating with the best interests of the student at heart.
- is appropriately trained and has regular updates to their training and will refresh their knowledge and skills at regular intervals but at least annually.
- will refer a child/young person/adult/vulnerable adult if there are concerns about possible abuse, to the Multi Agency Safeguarding Hub or Devon Safeguarding Adults Partnership for adult safeguarding.
- will refer cases where a crime may have been committed to the Police as required.
- will refer cases in collaboration with the Director of People where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
- as required, and with the support of the Director of people liaise with the “case manager” and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.
- will keep detailed, secure records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children’s social care or the prevent programme etc.
- will liaise with the Principal & Chief Executive to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- liaise with relevant staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- act as a source of support, advice and expertise for all staff.
- will with the support of the College’s DPO ensure that all Child Protection records are kept confidential, stored securely and are separate from student records, until the student’s 25th birthday or for 7 years after they complete their education at the College, in line with statutory guidance.
- will ensure that when a student leaves the College early to join a different college/6th form, their child protection file is passed to the new provider (ensuring secure transit) and that confirmation of receipt is obtained.
- will also consider if it would be appropriate to share any information with the new education provider in advance of a young person leaving. For example, information that would allow the

new school or college to continue supporting victims of abuse and have that support in place for when the student arrives.

- will have a working knowledge of Devon Safeguarding Children Partnership (DSCP) Child Protection procedures.
- will ensure that either they, or another staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide reports and supporting documents where required.
- will ensure that any student currently with a Child Protection Plan who is absent in the educational setting without explanation for two days is referred to their social worker.
- will ensure that all staff sign to say they have read, understood and agree to work within the College's Safeguarding & Child protection Policy, Staff Code of Conduct, and Keeping Children Safe in Education Part 1, and ensure that the policies are applied appropriately.
- will understand and support the college with regards to the requirements of the Prevent Duty and provide advice and support to staff on protecting children from the risk of radicalisation.
- will refer cases to the Channel programme where there is a radicalisation concern as required.
- will co-ordinate and regularly update Safeguarding & Child Protection training, provide regular updates for staff (minimum annually), and keep staff records of attendance addressing any absences with the Director of People.
- will contribute to and provide, with the Principal and Chair of Governors, the "Audit of Statutory Duties and Associated Responsibilities" to be submitted annually to the Education Safeguarding Team at Devon County Council.
- Will have sound knowledge of locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate.
- will ensure that the names of the Designated Safeguarding Leads and deputy, are clearly promoted in the College.
- will ensure the college's Safeguarding & Child protection Policy is reviewed annually (as a minimum) and the associated procedures are updated and reviewed regularly.
- ensure the Safeguarding & Child Protection Policy is available publicly.

For further detail see 'Keeping Children Safe in Education 2024' Annex C page 170 - Role of designated safeguarding lead

4.6 The Deputy Designated Safeguarding Lead

The DDSLs are trained to the same level as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the Deputy Head of Student Services and DDSL will assume all the functions above.

4.7 The Role of the Governing Body

4.7.1 The Governing body ensures that:

- the College appoints a DSL for Safeguarding and Child Protection who is a member of the College Leadership Team and who has undertaken training in inter-agency working, in addition to basic child protection training.
- the College has strategic leadership responsibility for the college safeguarding arrangements.
- the DSL role is explicit in the role holder's job description.
- the College has a Safeguarding and Child Protection policy and relevant supporting procedures in place, including a staff code of conduct, that is consistent with statutory requirements, reviewed annually and made available publicly on the College's website or by other means.
- the College has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Principal and Chief Executive, Chair of Governors, or other board members.
- the college follows safer recruitment procedures that include statutory checks on staff suitability to work with children and disqualification by association regulations.
- there is a training strategy that ensures all staff, including the Principal & Chief Executive, receive information about the College's safeguarding arrangements, staff code of conduct and the role of the DSL on induction, and appropriate safeguarding and child protection training, which is regularly updated in line with any statutory requirements.
- the DSL receives refresher training at two-yearly intervals.
- the college ensures that all staff, including temporary staff and volunteers are provided with access to the College Safeguarding & Child Protection Policy and staff code of conduct and KCSiE Part 1
- the college contributes to Early Help arrangements and multi-agency working.
- the college provides a coordinated offer of early help when additional needs of children are identified.
- the college considers how students may be taught about safeguarding, including radicalisation and digital safety as part of a broad and balanced curriculum.

4.7.2 The governing body will nominate a member (normally the chair) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Principal & Chief Executive.

4.7.3 It is the responsibility of the governing body to ensure that the College's safeguarding, recruitment and managing allegations procedures take into account the procedures and practice of the local authority and national guidance.

4.8 The Role of the Principal

The Teacher Standards 2012 state that teachers, including Head teachers and Principals should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. To this end the Principal will:

- ensure that the Safeguarding and Child Protection policy and procedures are implemented and followed by all staff.
- allocate sufficient time, training, support and resources, including cover arrangements, when necessary, to enable the DSL and Deputy to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings.
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures.
- ensure that students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- liaise with the designated safeguarding lead and the head of HR where an allegation is made against a member of staff.
- ensure that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.

4.9 The Role of all College staff

4.9.1 Safeguarding is everyone's responsibility Everyone who comes into contact with students, including vulnerable adults, children, young people and their families has a role to play in safeguarding. College staff are particularly important as they can identify concerns early and provide help for all students, preventing concerns from escalating. College staff must safeguard children, young people and adults including vulnerable adult's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

4.9.2 All Exeter College staff should identify children that may benefit from early help assessment. Early help means providing support as soon as a problem emerges at any point in a child's/young person's life. In the first instance staff should discuss early help requirements with a member of the Safeguarding Team. Staff may be required to support other agencies and professionals in an early help assessment.

4.9.3. Anyone who has a concern about a child/young person's welfare should ensure a referral is made to the Multi Agency Safeguarding Hub (MASH) or Devon Safeguarding Adults Partnership. In the first instance staff should discuss any potential referral with the Safeguarding Leads, who in most instances would make any referral. Staff may be required to liaise with the Safeguarding Team in supporting social workers and other agencies following any referral.

4.9.4 The College's 'Staff Code of Conduct'. All staff will be made aware of the College's Staff Code of Conduct at induction, and all are required to sign this.

4.9.5 Best Practice - To meet and maintain our responsibilities towards children, young people and adults including vulnerable adults, we have a Code of Conduct for all staff. The Code of Conduct and Safeguarding training informs staff of what is best practice – this includes:

- treating all students with respect
- setting a good example by conducting themselves appropriately
- involving learners in decisions that affect them.
- encouraging positive, respectful and safe behaviour among all students
- being a good listener
- being alert to changes in student behaviour and to signs of abuse, neglect and exploitation as students may not be ready or able to disclose abuse.
- recognising that challenging behaviour may be an indicator of abuse.
- reading and understanding the College's Safeguarding and Child Protection policy, staff code of conduct and guidance documents on wider safeguarding issues (Part 1 and Annexe A of 'Keeping Children Safe in Education' 2023)
- maintaining appropriate boundaries with learners including online activity and contact. Reading and understanding the College's social media Policy.
- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse.
- referring all concerns about a student's safety and welfare to the DSL, or if necessary, directly to police or children's social care

4.9.6 Staff are expected to familiarise themselves with the College's Whistle blowing policy and know what to do where there are concerns about the behaviour of member of staff.

4.9.7 Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the student is paramount. The College's whistleblowing policy [Whistleblowing- Policy.pdf \(exe-coll.ac.uk\)](#) supports staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

4.9.10 All concerns of poor practice or possible abuse by colleagues should be reported to the DSL or Director of People. Complaints about the Principal should be reported to the Chair of Governors.

4.10 Allegations against staff

4.10.1 When an allegation is made against a member of staff, our set procedures must be followed. The full procedures for dealing with allegations against staff can be found in 'Keeping Children Safe in Education 2024' Page 92

4.10.2 Allegations concerning staff who no longer work at the college, or historical allegations will be reported as appropriate to the LADO and/or police. We understand that a student may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the DSL or DDSL in their absence, who will inform the Director of People (HR).

4.10.3 The Director of People (HR) on all such occasions will discuss the content of the allegation with the DSL and if necessary, the Local Authority Designated Officer for Child Protection, in line with Statutory guidance in 'Keeping Children Safe in Education 2024'

4.10.4 Procedures to ensure the safety of the student and the member of staff will always be followed. We will take advice on what action to take in any individual case, in consultation with HR, the Senior Leadership Team and the LADO where appropriate.

4.10.5 A young person may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to students, and we must act on every allegation.

4.10.6 Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that young people are protected. In the event of suspension, the college will provide support and a named contact for the member of staff.

4.10.7 Staff, parents/guardians and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

4.10.8 Allegations concerning staff who no longer work at the college, or historical allegations will be reported using the appropriate procedures.

4.10.9 Our complaints procedure will be followed where a student or parent/guardian raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a student or attempting to humiliate them, bullying or belittling a student, or discriminating against them in some way. Complaints are managed by senior staff, the principal and governors. An explanation of the complaints procedure is included on the college website, It is also highlighted during a student's induction to college.

4.10.10 Complaints which escalate into a child protection concern will automatically be managed under the College's child protection procedures.

4.11 Staff training

4.11.1 It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern. This training should then be updated regularly, and all staff should receive updates every two years.

4.11.2 New staff and Governors will receive Safeguarding training as part of their induction, which includes being sent a link to 'Keeping Children Safe in Education' Part 1, the 'Safeguarding and Child Protection policy' and 'Staff Code of Conduct'. All staff, including the DSL, Principal and Governors will receive training that is regularly updated. All staff will also receive Safeguarding and Child Protection updates via email, e-bulletins, and website access and staff meetings throughout the year.

4.12 Abuse of Positions of Trust

4.12 .1 All college staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach. This is emphasised in the Safeguarding training received by all staff and in the 'Staff Code of Conduct'.

4.12.2 In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the College staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

4.12.3 The College provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation. Staff are asked to follow the guidelines set out in 'Guidance for safer working practice for those working with children and young people in education settings. Feb 2022', which can be found on the Staff Hub.

4.12.4 The College provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

4.12.5 The College's Staff Code of Conduct sets out our expectations of staff and is signed by all staff members.

4.12.6 We understand that staff should have access to advice on the boundaries of appropriate behaviour. The document 'Guidance for safer working practices for those working with children and young people in education settings, Feb 2022)' provides advice on this and the circumstances which should be avoided to limit complaints against staff of abuse of trust and/or allegations of physical or sexual abuse. Safeguarding in education is a part of the Staff development programme.

5 Safer Recruitment

5.1 Our College complies with the requirements of Keeping Children Safe in Education 2024 and the DSCP Child Protection procedures by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The College's Staff Recruitment procedures set out the process in full. At least one member of each recruitment panel will have attended safer recruitment training.

5.2 The College obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the College have been appropriately checked. The College maintains a single central record of recruitment checks undertaken.

5.3 Volunteers, including governors will undergo checks commensurate with their work in the College, their contact with students and the supervision provided to them. Under no circumstances must a volunteer who has not been appropriately checked be left unsupervised.

5.4 Contractors. The College checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance.

6 Site Security

6.1 All visitors to the College, including contractors, are asked to use our electronic signing in system and are given a visitors badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their young person from reception or college car parks do not need to sign in, unless they are going into buildings.

6.2 All visitors are expected to observe the College's safeguarding and health and safety regulations and will be made aware of the College's safeguarding statement and information on arrival. Copies are in all receptions.

7 Photography and images

7.1 The clear majority of people who take or view photographs or videos of students including children and young people do so for entirely innocent and legitimate reasons. Sadly, some people abuse children through taking or distributing images, so we must ensure that we have some safeguards in place.

7.2 To protect students we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications).
- seek parental consent.
- use only the student's first name with an image.
- ensure students are appropriately dressed.
- encourage students to tell us if they are worried about any photographs that are taken of them.

8 Off Site Activities

8.1 All extended and off-site activities must be subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended activities are provided by and managed by the College, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our college, we will check that they have appropriate procedures in place, including safer recruitment procedures.

8.2 When our students attend off-site activities, including day and residential visits and work-related activities, we will check that effective safeguarding arrangements are in place in line with our policy.

8.3 Residential Offsite Settings

Many courses may involve an element of offsite residential activity in their programme. Where an offsite residential activity takes place, staff must observe the following safeguarding guidance as a minimum:

- Staff must always ask for permission to enter the bedrooms of students and only with good reason.
- Conversations should be conducted from the open doorway and where possible include both male and female members of staff.

- Staff must ensure that they do not enter a bedroom when to do so would mean they would be alone with a student.
- The relaxed social atmosphere often found in residential centres could lead to a student making a disclosure to staff regarded as a trusted adult. The student should be listened to and Exeter College policy and safeguarding procedures should then be followed. The DSL should be contacted when staff are concerned about a student or if a disclosure has been made.
- There should always be male and female members of staff present on any residential or offsite activity which involves overnight stays and mixed gender groups.
- When young people are changing and showering, staff must not enter bathrooms or changing areas. If there is an immediate safeguarding or health and safety concern about a student, then it should be a member of the appropriate sex who attends.

8.4 College Residential Accommodation Settings

The College has both Residential and Host family Accommodation and this is regulated under the Further education accommodation: national minimum standards 2018 [Annex B FE Residential Accommodation National Minimum Standards Final Text 20.02.2018 \(publishing.service.gov.uk\)](#) and the Social Care Common Inspection Framework 2024 [Social care common inspection framework \(SCCIF\): children's homes - GOV.UK \(www.gov.uk\)](#).

8.5 We recognise that there are additional safeguarding and wellbeing measures that need to be considered with residential settings, as young people are living away from home and are therefore more vulnerable. These are considered in the College's Residential Accommodation Standards.

All documentation relating to Residential Accommodation is located on the College staff hub and securely on CPOMS.

8.6 Child Protection and Safeguarding procedures for learners in Residential Accommodation follow the College's main Safeguarding and Child Protection policy and procedures. However, there is additional guidance for staff working in residential accommodation about safeguarding and wellbeing of learners living in accommodation; including procedures for out of hours safeguarding concerns and student/parent and staff handbooks: these can be found on the College's Residential SharePoint Pages.

9. Safeguarding and Child Protection

Recognising Abuse

9.1. Due to their day-to-day contact with students, college staff are uniquely placed to observe changes in student behaviour and the outward signs of abuse. Students may also turn to a trusted adult in college when they are in distress or at risk. It is vital that all college staff are alert to the signs

of abuse and understand the procedures for reporting their concerns. The College will always act on identified concerns.

It is also imperative that staff understand that a student may not be able or ready to disclose abuse and are confident in recognising the possible signs and symptoms of abuse, reporting all concerns.

9.2 All staff have a duty to read the summary - Part One and Annex A, of the Keeping Children Safe in Education 2024 statutory guidance. Staff will be sent this summary prior to them attending Safeguarding training and they must sign to say they have read and understood this guidance. Copies can be found on the safeguarding SharePoint page and the college website.

9.3 'What to do if you're worried a child is being abused 2015' [What to do if you're worried a child is being abused](#) - Advice for Practitioners, is non statutory advice which helps practitioners (everyone who works with children and young people) to identify abuse and neglect and take appropriate action. College staff can find copies of this on the safeguarding SharePoint page and will also be sent an electronic copy by HR on commencing their employment and prior to receiving Child Protection and Safeguarding training.

9.4 To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a student by inflicting harm, for example by hitting them, or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people. Harm can also include witnessing harm of another person.

9.5 Types of abuse and neglect. All Exeter College staff should be aware abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

9.6 Abuse: a form of maltreatment of a student. Somebody may abuse or neglect a student by inflicting harm or by failing to act to prevent harm. Students may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults or another child or children.

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

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

9.9 Sexual abuse: including Child Sexual Exploitation – redefined as a form of Sexual Abuse (February 2017 [Child Sexual Exploitation guide](#) : involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

9.10 Child Sexual Exploitation (CSE): occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

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

9.12 Domestic violence and abuse: 2021 definition. The cross-government definition of Domestic Violence and Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial, digital or online and emotional. The Domestic Abuse Act 2021 recognises children as victims/survivors in their own right, rather than just witnesses.

9.13 Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

9.14 Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. This is not a legal definition. Definitions taken from Keeping Children Safe in Education 2024 and Guidance on Domestic Abuse Act 2021 [Domestic Abuse Fact Sheet](#)

10 Bullying

10.1 While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress and sometimes can lead to self-harming behaviours. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people.

10.2 All incidences of bullying, including cyber-bullying should be reported and will be managed through our tackling-bullying procedures. All students are made aware of the procedures on joining the college and the subject of bullying is addressed at regular intervals in PSHE education. If the bullying is particularly serious, the DSL will consider implementing child protection procedures. Please see the link to the College's 'Anti-Bullying policy' <https://adexcollacuk.sharepoint.com/sites/LeadershipHub/SitePages/Policy-Register.aspx>

10.3 Sexual Harassment and Sexual Violence between children and young people in schools and colleges

The College will take a zero-tolerance approach to any incident or allegation of sexual harassment or sexual violence between students that is brought to our attention. All staff will have a working assumption that sexual harassment and sexual violence is happening in our setting, even if there is not a report and challenge all behaviour or language that could be indicative of this. We will follow the guidance as set out in Keeping Children Safe In Education 2024, Pg 111

11 Child on Child abuse

11.1 This form of abuse occurs when there is any kind of physical, sexual, emotional or financial abuse or coercive control exercised between children or young people. It includes bullying, cyberbullying, sexual violence, harassment and sharing of indecent images.

It should be recognised that the behaviour in question is harmful to both the perpetrator (who is a child) and the victim. This abuse can be in intimate personal relationships between peers.

11.2 The management of children and young people with sexually harmful behaviour is complex and the College will work with other relevant agencies to maintain the safety of the whole College community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff, who become concerned about a student's sexual behaviour, including any known online sexual behaviour, should speak to the DSL/DDSL as soon as possible.

12 Sexual Exploitation

12.1 Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of adults, children or young people, and victims can be boys or girls. Adults, children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a person's physical and emotional health. It may also be linked to human trafficking.

12.2 A common feature of sexual exploitation is that the student often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The student may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

12.3 All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the Safeguarding Team.

12.4 The College will engage with and make referrals to the MACE and the LINKS Team when and where appropriate and make an enquiry to MASH for any child that goes missing, where there are significant concerns and if they are not known to Children's Services.

13 Female Genital Mutilation

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

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

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

13.4 There is a mandatory reporting duty for teachers for FGM. Whilst all staff should speak to the designated safeguarding lead (or deputy) about any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

If a teacher, during their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

14 Forced Marriage

14.1 A forced marriage is a marriage in which someone does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

14.2 A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

14.3 Children may be married at a very young age and well below the age of consent in England. College staff receive training and should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not be allowed to return to England.

14.4 Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. [Forced Marriage](#)

15 Honour-Based Abuse

15.1 ‘Honour-based’ abuse encompasses 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.

16 Radicalisation and Extremism

16.1 The Prevent Duty -The DSL is the designated Single Point of Contact (SPOC) for the College in matters relating to Prevent. The DSL will ensure that the College is compliant with its specified duty, as laid down in the Government’s Counter Terrorism and Security Act 2015 and the HM Government Prevent Guidance for England and Wales 2023. The Safeguarding team all receive training from on our duties under Prevent and on how to recognise, refer and support students who are at risk from, or who are being radicalised.

16.2 The College recognises that it has a responsibility in the exercise of its functions, to refer on any concerns it may have relating to potential or actual radicalisation and extremism to the Local authority partners, who are leading on Prevent: The Police, The Local Children’s Safeguarding Board and the Local Authority Channel panel.

16.3 The Government defines extremism as vocal or active opposition to fundamental British Values, including: Democracy, The Rule of Law, Individual liberty and Mutual Respect and Tolerance of Different Faiths and Beliefs.

16.4 Some students are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and colleges should also remain alert to the risk of radicalisation into white supremacy extremism.

16.5 All College staff receive training to help to identify signs of extremism. Extremism is the promotion or advancement of an ideology based on violence, hatred, or intolerance. Opportunities are provided in the Personal Development Programme and general curriculum to enable students to discuss issues of religion, ethnicity and culture.

16.6 Further information on Preventing Radicalisation' has been included in Keeping Children Safe in Education 2024) in line with: [Prevent Duty Guidance for England and Wales](#) , as part as the UK's Counter Terrorism strategy.

16.7 [The Prevent Duty](#) Departmental advice for colleges and childcare providers, published in June 2015. This non-statutory departmental advice is for governing bodies, Head teachers / Principals, Designated Safeguarding Leads and college staff. The document clarifies what the prevent duty means for colleges and what actions are necessary to demonstrate compliance with the duty. It also provides sources of information, advice and support.

17 Death of a learner

17.1 Specific guidance for dealing with the death of a learner [Guidance for dealing with the death of a student](#) is available for staff to ensure that the situation is handled as sensitively and efficiently as possible to cause least possible distress to all concerned.

17.2 The safeguarding and wellbeing team will ensure that all students who are affected by the death are offered pastoral support. The safeguarding and wellbeing team will liaise with the appropriate tutor and faculty to ensure that the parents'/guardians' wishes are respected. The DSL and/or the DDSL will ensure that any serious case review documentation that may be required is complete and available when and if requested.

18 Indicators of abuse

18.1 Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. The identification of physical signs is complicated, as children may go to great lengths to hide injuries or may not be ready or able to disclose abuse, often because they are ashamed or embarrassed, they may not have the words or there may be language barriers, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead. It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a student has been abused.

18.2 A student who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries, show signs of pain or discomfort.
- keep arms and legs covered, even in warm weather.
- be concerned about changing for PE or swimming.
- look unkempt and uncared for.

- change their eating habits.
- have difficulty in making or sustaining friendships.
- appear fearful.
- be reckless regarding their own or other's safety.
- self-harm
- frequently miss college, arrive late or leave the college for part of the day.
- show signs of not wanting to go home.
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn.
- challenge authority.
- become disinterested in their college work.
- be constantly tired or preoccupied.
- be wary of physical contact.
- be involved in, or particularly knowledgeable about drugs or alcohol.
- display sexual knowledge or behaviour beyond that normally expected for their age.
- acquire gifts such as money or a mobile phone from new 'friends' ... (this is not an exhaustive list)

18.3 Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. The Safeguarding team will use the Devon's Threshold Tool, when making an assessment as to whether to refer a concern to the MASH or Devon Safeguarding Adults Partnership. It is very important that staff report their concerns – they do not need 'absolute proof' that the student is at risk.

19 The Impact of Abuse; Taking Action; Information Sharing

19.1 The impact of abuse should not be underestimated. Many students do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

"Any student, in any family in any school or college could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".

19.2 Taking Action: Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the student, if necessary, call 999
- report your concern as soon as possible to the safeguarding team, by the end of the day

- do not start your own investigation.
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.
- Record all concerns on CPOMS.
- seek support for yourself if you are distressed.

19.3 There will be occasions when staff may suspect that a student may be at risk but have no ‘real’ evidence. The student’s behaviour may have changed, their artwork could be bizarre; they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. It is fine for staff to ask the student if they are OK or if they can help in any way.

19.4 It takes a lot of courage for someone to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

19.5 If a student talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the student know that they must pass the information on – staff are not allowed to keep secrets. The point at which they tell the student this is a matter for professional judgement. If they jump in immediately the student may think that they do not want to listen, if left until the very end of the conversation, the student may feel that they have been misled into revealing more than they would have otherwise.

19.6 Managing a Disclosure

It takes a lot of courage for someone to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

During a disclosure, staff should:

- allow the learner to speak freely.
- remain calm and not overreact – the individual may stop talking if they feel they are upsetting their listener; be reassuring.
- allow silences –be aware of how hard this must be for the individual.
- under no circumstances ask investigative questions – what, who, where... Can ask TED questions: ‘Tell me.... Explain..... Describe’...

- at an appropriate time tell the student that to help them, you must pass the information on to the Safeguarding leads.
- not offer any physical touch as comfort. It may be anything but comforting to a person who has been abused.
- avoid admonishing the individual for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong.
- tell the student what will happen next.
- report verbally asap to one of the safeguarding leads even if the child has promised to do it by themselves.
- make a CPOMS incident log as soon as possible; include all detailed notes made.
- seek support for yourself if needed.

19.7 Staff should complete an incident log via their CPOMS. If they do not have access to the internet, staff should contact the Safeguarding Leads via Greystone House on 01392 400449. If the student does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the student, if the member of staff remains concerned, they should discuss their concerns with the safeguarding leads. All sensitive information and the chronology will be recorded on the CPOMS system.

Concerns which do not meet the threshold for child protection intervention will be managed through the Early Help process.

19.8 The College will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively. A member of Safeguarding Team will contact the parent in the event of a concern, suspicion or disclosure.

However, if the College believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from MASH.

19.9 A member of Safeguarding Team will make an enquiry to the MASH if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that an enquiry is being made, unless to do so would increase the risk to the child. College procedure must be followed always, and all concerns and actions will be recorded on the CPOMS system.

19.10 Information Sharing Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case

reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, we recognise the importance of information sharing between practitioners and local agencies.

Statutory guidance

[Information Sharing Advice for Safeguarding Practitioners](#) states that college staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

It is important that we are all are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and GDPR do not prevent, or limit, 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 promote the welfare and protect the safety of children.

19.11 All staff will understand that safeguarding and child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

19.12 Staff should only discuss concerns with the safeguarding leads, Principal or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis in line with statutory guidance given in Information Sharing 2018 and Keeping Children Safe in Education 2023

19.13 Child Protection information will be stored and handled in line with the Data Protection Act 2018, Information Sharing 2018 and Keeping Children Safe in Education Statutory guidance 2024 and is guided by the following principles. The information is:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure

19.14 Information sharing decisions will be recorded and following consultation with the DPO, whether the decision is taken to share.

19.15 All safeguarding information, including learners' chronologies, will be held securely on CPOMS.

19.16 Every effort will be made to prevent unauthorised access, and sensitive information should not routinely be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage. Safeguarding information will be stored separately from a student's college file.

19.17 The DSL will normally obtain consent from the student and/or parents to share sensitive information within the college or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

19.18 Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them.

19.19 If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the DSL, who will consult with the College's Data Protection Manager.

19.20 The Data Protection Act does not prevent college staff from sharing information with relevant agencies, where that information may help to protect a child or support a criminal investigation.

20 Care Experienced Young People

20.1 The most common reason for children becoming looked after is because of abuse or neglect.

The College ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

20.2 The designated Looked After Young Persons Lead has overarching responsibility for LAC; Care Leavers and young people who live independently from their parental home supported by the DSL. The Welfare Lead will have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care. The designated lead for looked after children works with the virtual school head to discuss how Guaranteed Bursary funding can be best used to support the progress of looked after children in the College and meet the needs in the young person's, personal education plan.

21 Private Fostering

21.1 A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child has a disability. Children looked after by the local authority or who are placed in a residential college, children's home or hospital are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

21.2 Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases, so it is important that colleges are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

21.3 By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

<https://www.gov.uk/government/publications/children-act-1989-private-fostering>

22 Young People staying with host families whilst on a College trip

22.1 The College may decide for students to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the college follows the guidance in Keeping Children Safe in Education 2024, Annex D to ensure that hosting arrangements are as safe as possible.

22.2 Students may reside with host families during college terms and we follow the FE Residential Accommodation Minimum Standards to ensure that we are compliant with the standards.

23 Children, young people, adults who may be particularly vulnerable to abuse

23.1 Some children and young people may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures that fail to acknowledge children's/young person's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

23.2 Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all our students receive equal protection, we will give special consideration to children, young people and vulnerable adults who are:

- disabled or have special educational needs.
- young carers.

- living in a domestic abuse situation.
- have a parent in prison.
- have a parent with mental health issues.
- at risk of 'honour' based violence.
- affected by parental substance misuse, domestic violence or parental mental-health needs.
- asylum seekers.
- living away from home.
- vulnerable to being bullied or engaging in bullying.
- living in temporary accommodation.
- living a transient lifestyle.
- living in chaotic and unsupportive home situations.
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, gender or sexuality.
- at risk of sexual exploitation.
- do not have English as a first language.
- at risk of female genital mutilation (FGM)
- at risk of forced marriage.
- at risk of being drawn into extremism.

23.3 This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for students with communication needs.

23.4 Missing children and young people. A child/young person going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The College will monitor absence and take appropriate action, particularly where young people go missing on repeated occasions and/or are missing for periods during the College Day.

23.5 Children attending the College under the 14-16 programme who miss college sessions should always be reported as not attending college to the school they are on roll at. This is the responsibility of the tutor/lecturer who has the child in their class.

24 Work Experience The College has procedures to safeguard students undertaking work experience and /or voluntary work; including arrangements for checking people who provide placements and supervise students on work experience and in volunteering programmes which are in accordance with statutory guidance in Keeping Children Safe in Education 2024.

25 Digital and Online Safety The College takes its responsibility to ensure that students are safe online and receive appropriate information on keeping themselves safe, as part of their induction to the College and throughout the academic year. Information on 'Online' safety is regularly reviewed.

Please refer to the College's Digital Safety policy for further details

<https://portal.exe-coll.ac.uk/sites/leadership/Pages/PolicyRegistry.aspx>

26 Youth produced sexual imagery (sexting)

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

26.2 Youth produced sexual imagery refers to both images and videos where.

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

26.3 All incidents of this nature should be treated as a safeguarding concern and in line with the guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'

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

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

26.6 A member of the Safeguarding team should hold an initial review meeting with appropriate staff and subsequent interviews with the young people involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the young person at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to MASH or the Police as appropriate. An Immediate referral at the initial review stage should be made to MASH/Police if;

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

26.7 If none of the above apply, then the DSL will use their professional judgement to assess the risk to those involved and may decide to respond to the incident without escalation to MASH or the police.

26.8 In applying judgement, the DSL will consider if.

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

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

26.10 Up skirting Up skirting involves the taking of images or videos of a person under their clothes without them knowing for personal sexual gratification, it is now a criminal offence and will be dealt with accordingly.

27 Building resilience and promoting positive behaviour

27.1 Helping students to keep themselves safe is a vital part of protecting them from harm. Students will be taught to understand and manage risk through our tutorial programme and through all aspects of college life. Our approach is designed to help young people to think about risks they may encounter

and to build personal resilience and with the support of staff work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all young people and promote sensible behaviour rather than fear or anxiety.

27.2 Behaviour is intrinsically linked to safeguarding and at the College students are taught how to conduct themselves and how to behave in a responsible manner. Students are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The College continually promotes the values of Mutual Respect and Tolerance. All students are encouraged to speak to a member of staff about any worries they may have.

27.3 All students will be made aware of and asked to sign the Student Code of Conduct as part of their induction to the College. The Student Code of Conduct includes an agreement to abide by the rules of the 'Safe use of IT' and is linked to the student Agreement and Code of Conduct and the College's Conduct and Support process.

27.4 All teaching and support staff should be aware of their duty to challenge inappropriate behaviour in the College to safeguard all students and staff.

28 Support for those involved with a safeguarding concern

28.1 Any form of abuse is devastating for the student and can also result in distress and anxiety for their family and friends and for college staff who become involved.

28.2 The College will support students and their families by:

- taking all suspicions and disclosures seriously.
- nominating a link person (usually from the safeguarding team) who will keep all parties informed and be the central point of contact.
- Where a member of staff is the subject of an allegation made by a student, separate link people will be nominated to avoid any conflict of interest.
- responding sympathetically to any request from students or staff for time out to deal with distress or anxiety.
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- storing records securely.
- offering details of helplines, counselling or other avenues of external support.
- following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures.
- co-operating fully with relevant statutory agencies.

- listening to the child/young person.

28.3 We recognize that staff who have become involved with a student who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful or upsetting.

28.4 We will support such staff by providing an opportunity to talk through their anxieties and to seek further support. This could be provided by, for example, the occupational health nurse and/or the College Safeguarding Team.

29. Reporting directly to Child Protection Agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with MASH, Devon Safeguarding Adults Partnership, Police or the NSPCC if:

- the situation is an emergency and the Designated Safeguarding Lead, their deputy, the Principal are all unavailable.
- they are convinced that a direct report is the only way to ensure the student's safety.
- for any other reason they make a judgement that direct referral is in the best interests of the student.

30. Monitoring, Review and Evaluation of the Child Protection and Safeguarding policy and procedures

The Senior Leadership Team and Governors of Exeter College are responsible for ensuring the regular review of this policy. It will be reviewed on an annual basis in September of each academic year.

31. Related safeguarding portfolio policies and procedures

Anti-Bullying Policy

Data Protection Policy

Support and Conduct Procedures

Educational Visits Policy

Digital Safety Policy

Health and Safety Policy

Intimate Care policy

Learner Medical Disclosure and Administration of Medication Policy

Substance Misuse Policy

Visiting Speakers and Organisations Procedure and Letting of Premises Policy

Whistle Blowing Policy

Appendix 1. MASH Referral Details

Making a MASH enquiry (for professionals)

An enquiry should be made to the MASH when you have safeguarding concerns that may require children's social care involvement.

Before making an enquiry

Before making a MASH enquiry you need to consider if the child or young person's needs can be met by services from within your own agency, or by other professionals already involved with the family. You can contact Early Help for support and guidance about an Early Help Assessment.

We know that it is sometimes difficult to decide the appropriate point of intervention. To help you to determine levels of need when making your own assessment we have developed some [multi-agency threshold descriptors](#).

If you are a professional, before making the enquiry you should always inform the parent of your concerns and that you will be making a MASH enquiry and whenever possible seek their consent, except where a child is at risk of harm, and you believe that seeking parental consent may increase this risk. If you are unsure about thresholds or seeking consent, please seek advice from your line manager.

When to make an enquiry

Enquiries should be made when your assessment has identified needs which can only be met through specialist services at Level 3 – acute. In some cases, multiple identified needs under Level 2 – complex (using the threshold matrices) will need specialist services.

You can talk about this with social care practice managers based in the MASH and any decision reached should be clearly recorded by the agencies involved.

How to make an enquiry

Complete the [Early Help & MASH Request for Support](#) in as much detail as possible. The information you provide will support threshold decisions and contribute to a single assessment or an Early Help assessment if this has not been done already.

Urgent enquiries

If you believe that urgent action is needed because, for example, a child is in immediate danger or needs accommodation, phone the MASH on 0345 155 1071 and give as much information as you can. Your information will be passed immediately to a manager who will decide the action needed and will normally respond to you within one hour. You must follow up your telephone call by sending a completed referral form to the MASH within 48 hours. Email the form to mashsecure@devon.gov.uk or post it to:

Multi-Agency Safeguarding Hub

PO Box 723

Exeter

EX1 9QS

For Adult Safeguarding concerns please report to:

<https://www.devonsafeguardingadultspartnership.org.uk/reporting-a-concern/>

If an adult is in immediate danger call 999

Appendix 2. Safeguarding Referral Using CPOMS information

All safeguarding incidents and concerns must be reported as soon as possible using the College's online reporting system CPOMS (Child protection Online Management System)

How to make a Safeguarding referral using CPOMS

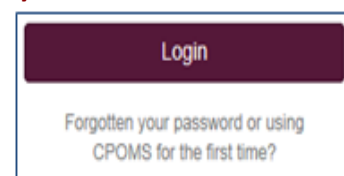


CPOMS is a market leading software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Every member of staff across the college has an obligation to report any concerns which they may have. CPOMS allows them to record your concerns and information in a central repository and have relevant people alerted immediately. CPOMS can be accessed from wherever you have an internet connection.

How to make an electronic safeguarding referral using the Colleges online system CPOMS

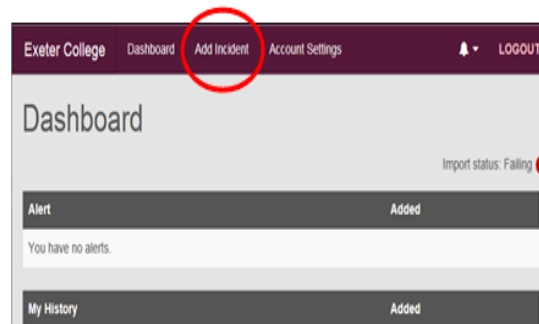
for the first time:

1. On the portal click onto the Student Experience icon
Once on the main page click onto the CPOMS button on the right-hand side.
3. Click on 'Forgotten your password or using CPOMS for the first time.'
4. Type in your College email address and click 'Reset Password'.
5. This will then send you a link to your email address where you can create your CPOMS password.



Following setting up a CPOMS Account

1. Once you have Logged in
2. You will see this screen (right), click on 'Add Incident' to make a safeguarding referral.
3. Type the students name and double check their student number in the brackets to ensure you are making the referral for the right student.
4. Detail the incident.
5. Choose the category (or more than one) which you feel best represents the incident (do not worry if you are not sure, the Safeguarding Team will change it if applicable)
6. Add any linked students who have also been involved in the incident and double check their student number in the brackets to ensure you are making the referral for the right student ***By linking a student this will copy the incident to all students selected.**
7. Alert your Safeguarding Team member by clicking on their Name (for most students the Safeguarding team member will be automatically alerted)
8. Upload any relevant documents/files/images.
9. Click add incident – your referral will then be made and will be picked up by the Safeguarding Team



Following submitting your referral You will be able to see your referral history showing when you have made a referral and for which students within the last 7 days
 You may be sent an 'alert' through your College email from a member of the Safeguarding Team letting you know the outcome of the referral or if any actions need to be followed up If you have been sent an 'alert' please click on the word 'Incident' to view the alert Once you have read the 'alert' please click 'mark as read' and include an action by clicking 'add action' if applicable

Appendix 3. Glossary

Word	Definition
CSE	Child Sexual Exploitation
CCE	Child Criminal Exploitation
DBS	Disclosure and Barring Service
DSCP	Devon Safeguarding Children Partnership
DDSL	Deputy Designated Safeguarding Lead
DfE	Department for Education
DSL	Designated Safeguarding Lead
Early Help	Multi-Agency support for families and children
EY	Early Years
FE	Further Education
FGM	Female Genital Mutilation
ICPC	Initial Child Protection Conference
KCSiE	Keeping Children Safe in Education
KS	Key Stage

LADO	Local Authority Designated Officer
LSCB	Local Safeguarding Children’s Board
MACE	Missing and Child Exploitation
MASH	Multi-Agency Safeguarding Hub
PSHE	Personal, Social, Health Education
REACH	Reducing Exploitation and Absence from Care or Home
SEN	Special Educational Needs
SLT	Senior Leadership Team
SMCS	Spiritual, Moral, Social and Cultural Education
SRE	Sex and Relationship Education

Equality Analysis

How have you involved people from minority groups who may be affected by this policy?

The policy aims to keep all minority groups safe and follows guidance from Keeping Children Safe in Education 2023 and Working Together to Safeguard Children 2015 about minority groups. We consult with student via our student surveys and Learner Voice process.

Is your policy equality relevant?

If yes, please list which groups will be affected by this policy.

All members of Exeter College. The policy raises awareness of Child Protection and Safeguarding signs, symptoms and procedures with all staff.

What evidence have you considered?

Evidence from Safeguarding Data collected over 2023/24

Relevant legal requirements as set out in the associated documentation listed above.

Evidence and advice from the LCSB

Feedback from Learner Voice and Student Surveys